



Edition 2025

CODE of ETHICS

Effective January 15, 2025



Broad Technologies Company LLC

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Code of Ethics

Our Company

Broad Technologies Company LLC, (hereinafter referred to as "BroadTC", "the Company" or "the Company") is a company consistent with its values and principles. Thanks to these, our customers prefer us in the countries where we operate.

Our Mission & Vision

Mission

Our Clients

We mainly orient our actions to know, satisfy and, if possible, exceed your expectations, ensuring quality and service with efficiency and effectiveness.

Our Business Partners

Establish long-term relationships based on common objectives, supported by ethical, fair and collaborative conduct, achieving the proposed objectives and complying with the agreements reached

Vision

To consolidate ourselves as a benchmark when it comes to preferring a supplier of products of the highest quality.

Our Strategy

Represent leading international brands in the market, offering technical support and personalized assistance.

Values & Principles

Our values and principles of business ethics are the qualities that distinguish and guide us. We put them into practice on a daily basis as a fundamental axis of our culture of excellence, productivity and leadership. These pillars of our culture are:

- Customer Experience: We are committed to strengthening the relationship with our customers, who are the core of our business, promoting, listening and understanding their needs to provide the best products that help achieve their goals and their full satisfaction.
- Innovation: Since our inception we have been committed to flexibility to change, we encourage continuous dialogue and the collective construction of new ideas and solutions that allow us to be better, taking risks consciously and considering mistakes as an opportunity to learn.
- People / Human Development: We develop the potential and honor the dignity of people in a learning environment, where respect, collaboration, good performance, diversity, equity, and inclusion are fundamental. We promote people's growth through challenge, training, guidance and empowerment in decision-making.
- Sustainability: Our commitment is to be an agent of change that promotes inclusion, economic development and well-being, always seeking a balance between the economic, social and environmental spheres of our operations. Therefore, we are committed to improving in all aspects to benefit our employees, customers, suppliers and other stakeholders.
- Integrity: We fully comply with the laws, regulations and ethical principles that govern our activities. We are convinced that transparency and honesty build security and trust, and we also value the consistency between what we say and what we do.
- Efficiency: Maintain austerity in times of prosperity, to maintain solidity in times of crisis. We also take care of our company's assets as if they were our own. We optimize our processes by controlling our costs and expenses, adhering to the highest quality standards in the industry.
- Collaboration: We encourage everyone's participation to actively contribute to the realization of our goals, providing perspectives, as well as listening to and valuing the ideas of others. We combine our talent, experience and skills to achieve better results.

Our Code of Ethics

Our Code of Ethics, together with applicable laws, agreements and international best practices, forms the cornerstone of our Integrity and Compliance Program

at BroadTC and represents the values of our Company and is therefore generally applicable to all our employees, directors, directors and related third parties.

The Code of Ethics defines the behavior that we must have and receive among collaborators and representatives of BroadTC as well as third parties linked to our Company. In addition, the Code of Ethics sets out the standard of conduct of each of us with the Company, with customers and with society in general.

Although we know that it is impossible to anticipate all the situations that may arise in our daily work, this Code of Ethics serves as a guide to make the best ethical decisions in our work and to know who to turn to in case of doubts.

It is essential that our shareholders, suppliers, distributors, business partners or any person linked to the Company, know, assume and endorse the principles and values contained in this Code and put them into practice in their daily activities.

This Code sets out the responsibility as an employee or partner of BroadTC to comply with applicable laws, act with integrity and honesty in all respects, and be responsible for our actions.

The success and the way of transcendence of our Company depends to a large extent on compliance with the guidelines indicated here.

The entire Company as a whole and individually must understand the Code and comply with it. Therefore, we ask you to do the following:

- Read the Code carefully. Understand its scope and what is expected of us.
- Comply with the principles of this Code at work and in all activities. Making them our own is the basis of our philosophy and business culture.
- Always conduct yourself in an ethical manner and be proud of your conduct and actions. Be responsible for compliance with all principles and conduct set forth herein.
- Always reflect on your actions and if in doubt ask for advice.
- Remember that management levels are more committed, so they are responsible for leading by example and conducting themselves with ethical leadership in deed and appearance.
- If you know, detect or suspect that any employee, supplier, contractor or third party who relates to the Company is behaving in an illegal, unethical manner or in violation of the principles established in this Code, we request that you file a complaint with the Company's Management.

Remember that it is everyone's obligation to protect our Company from behavior that is illegal or unethical and that may put us at risk.

In this sense, by not reporting activities contrary to the Laws or this Code in time, we can contribute to the generation of patrimonial or criminal damage to the Company, and you may even involuntarily become an accomplice by covering up illegal or unethical activities.

Remember that by filing a complaint you generate a virtuous circle of protection, because by protecting yourself, in a correct and institutional way, you protect the Company and by protecting the Company you protect yourself.

If you deem it necessary, you can file anonymous reports. We assure you that BroadTC has taken all reasonable and justified measures to protect the confidentiality of the report and the whistleblower. We guarantee you at all times that you will not be retaliated against for reporting.

Thank you very much for your cooperation and for making these basic principles of professionalism and responsibility your own. We are confident that this Code will help us all grow both personally and professionally.

Why do we need to comply with this Code?

Failure to comply with this Code affects the image and reputation of BroadTC and all of us who work in our Company.

As part of a business community, we must all look after the image of our Company, which can be seriously affected in its reputation if we do not comply with these basic rules of ethics and conduct. This affects the perception we have towards the outside world and the trust that a large number of people place in us.

In addition, failure to comply with the principles contemplated herein could constitute violations of applicable laws and consequently be subject to administrative, civil or criminal sanctions.

Who is responsible for monitoring compliance with the Code of Ethics?

BroadTC's Board of Directors is responsible for monitoring compliance with the Code of Ethics, and additionally reviewing compliance with the Code of Ethics, as well as the laws, regulations and policies that establish integrity standards throughout the organization.

If you have any questions, please contact the BroadTC Board of Directors.

BroadTC Ethics Committee

BroadTC's Ethics Committee will be performed by the Company's partner directors, who will be responsible for overseeing the management of complaints received and breaches of our Code of Ethics identified in the Company's operations, as well as establishing disciplinary sanctions for unethical conduct committed by our employees or third parties.

Transparency and Publicity of Your Interests

BroadTC will develop an Integrity and Compliance Program to publicize and implement mechanisms to provide transparency in its operations.

Respect for Human Rights and Non-Discrimination

At BroadTC we treat every person with respect and dignity and we are committed to Protect and Respect Human Rights in general and in particular, to observe the Guiding Principles on Business and Human Rights published by the Office of the High Commissioner of the United Nations and, where appropriate, to remedy or repair any deviation from their compliance.

We operate in a globalized world where there are different cultures and customs. We believe that these differences enrich us and we fully respect them. We are also convinced that different forms of thought, beliefs, or preferences allow us to have a broader perspective and be more creative in solving problems.

We promote diversity and inclusion, therefore, at BroadTC:

- We treat every person with dignity and professionalism and speak out against labor exploitation.
- We do not tolerate any type of discrimination and we promote a culture of healthy coexistence at work, based on respect, teamwork and solidarity.
- We promote respect and inclusion in the workplace without discrimination on the basis of disability, ethnicity, religion, gender, marital status, pregnancy status, nationality, sexual orientation, economic ability, age or political opinion; among others.
- We do not allow any type of harassment, intimidation, mockery, threats, accusations or other attitudes of physical or psychological violence, which threaten the dignity of workers, make them uncomfortable or cause them to feel harassed in any way.
- We prohibit the display by any means, of images or objects of sexual content in the workplace or that promote hatred, discrimination or the promotion of stereotypes.
- We promote equal opportunities between men and women and do not allow gender-based violence or sexual or workplace harassment.
- Hiring, promotions, and any other job benefits are tied to the job performance of those involved.
- We speak out against the exploitation of children and take preventive measures, including verifying compliance with the minimum age requirements set out in the applicable national legislation.

We consider that child exploitation is any activity of children or adolescents, paid or unpaid, that is carried out outside the law in dangerous or unhealthy conditions, that violates their rights, or that can produce negative effects, immediate or future, for their physical, mental, psychological, or social development or affect their education.

In the event that a minor is hired, we ensure that their rights and guarantees are taken care of through and jointly with their parents, guardians or those responsible for their guardianship and custody.

- We do not interfere with our employees exercising their freedom of association and collective bargaining.
- We make efforts to ensure that our value chain is aware of the principles that govern us under this Code and we are committed to taking action so that our suppliers, distributors and other business partners assume the behavioral commitments established in this Code in their relationship with their employees, including respect for Human Rights.
- We promote a culture of responsible, clear and honest advertising. In this way, we ensure that our customers receive the information truthfully.
- We implement dissemination campaigns to raise awareness of the importance of respect for human rights, labor inclusion, diversity and gender equality.

These are the basic principles of our Human Rights and Work Environment policy. If you become aware of misconduct that is inconsistent with these principles, please file a complaint with the BroadTC Board of Directors

Occupational Safety

Safety is one of our priorities. All employees, suppliers and subcontractors must respect the Company's personal safety standards, as the safety and integrity of employees or third parties may be at risk.

In this sense, BroadTC complies with the highest applicable standards in occupational safety issues. One of our goals as a company is to have the lowest number of workplace incidents.

Therefore, at BroadTC we are committed to:

- Offer a safe work environment, with training, equipment and tools necessary to maintain health and safety, as well as adopt the necessary measures to avoid or reduce occupational risks in our operation.
 - Promote a healthy and safe environment for our employees.
- In this sense, it is strictly forbidden to consume drugs or alcoholic beverages at work or to be at work under the influence of alcohol or any other substance, as well as to possess, market or transport these during working hours or using Company goods.
- It is forbidden to carry any type of weapon in the workplace, in corporate vehicles, or when representing the Company, except those authorized to our security personnel if applicable, to protect the Company's employees and property.
 - Comply with all civil safety regulations and train your employees on the measures to be taken in case of contingencies.

It is everyone's responsibility to take care of themselves and their colleagues to avoid risks at work. If any situation is detected that poses a risk to our safety or

that constitutes a breach of occupational safety regulations, a report must be filed immediately with the BroadTC Board of Directors.

Customer Service

We owe our existence to our customers. In order to continue to count on their preference and achieve our mission, it is essential to treat them with the utmost respect, attention and kindness. This involves, among other things:

- Provide fair treatment and respect for Human Rights. No person entering our administrative or commercial facilities shall be subjected to any discriminatory treatment on the basis of, but not limited to, gender, age, social status, disability, sexual preference, religion, or political affiliation.
- Offer services and products that meet your needs in an effective and timely manner; and be transparent about the terms and conditions of contracts and services.
- Provide adequate, clear, reliable and timely information regarding the products and services we offer and those that each of them has contracted.
- Solve your general, administrative, and technical questions and problems with a highly trained and customer service-oriented staff.
- To provide the highest possible quality to our customers, in accordance with our processes and operating standards.

This series of factors that have an important impact on the preference of our customers can be translated into a single word: Quality.

Our success depends on our ability to develop and deliver innovative, high-quality products and services. Our customers are the judges of this, so we should never deceive, provide false information or condition a sale.

The rights of our customers are protected in the countries where we operate by consumer protection laws, which ensure fairness and legal certainty in the relationship between customers and suppliers.

Failure to comply with our standards of service and customer care or engaging in improper business practices may, among other things, damage our reputation, lead to intervention by authorities, and cause us harm.

BroadTC does not tolerate any deviation from our standards of conduct and care for our clients.

If you become aware of any situation that constitutes a breach of our customer service standards, you should immediately file a complaint with the BroadTC Board of Directors.

Personal data

At BroadTC we safeguard and protect our customers' personal information with the same care with which we protect our own. We use this information only for the purposes for which we collect it.

To maintain the integrity and confidentiality of personal data, we have the most advanced systems for storing and processing data, as well as various technical, physical and administrative processes, controls and security measures.

Access to personal information is limited to those employees who have a need to know it in order to perform their job duties.

We are committed to protecting and maintaining the integrity of the personal data entrusted to us by our clients and other stakeholders, by complying with the laws of the countries where we operate and internally training on the following principles:

- Integrity: We preserve the integrity of the personal data we receive against alteration, loss, theft, hacking, intervention or destruction, whether accidental or fraudulent.
- Availability: We have procedures in place to ensure that our users' information is available to them at all times.
- Confidentiality: Personal data is only used by authorized personnel and with justification to do so.

We adhere to the applicable laws on personal data privacy and telecommunications in the countries where we operate and provide service.

If there are any doubts, they should be immediately communicated to the BroadTC Board of Directors for advice and assistance.

If you become aware of any violation of our Privacy Policy, you should immediately file a complaint with the BroadTC Board of Directors

Confidential Information

At BroadTC we are committed to not disclosing Confidential Information.

In general, we understand this type of information to mean all those that develop, generate and operate with sensitive information, which means a competitive advantage for our Company.

In the same way, we understand Confidential Information, among others:

- Financial and legal information;
- Information regarding our products and services, including our current and future plans;
- General business information, including information regarding our current and future plans, programs, and expectations.

Anyone who handles confidential information shall ensure that, at a minimum, the following safeguards are adopted:

- Be sure to keep it in a safe place;
- Do not leave photocopies or printouts of it in common areas;
- Do not discuss such information with co-workers who do not need to know it;
- Do not leave the computer screen open with confidential information;
- Never discuss this information with family or friends;
- Do not make calls or have conversations that reference confidential information in public places;
- Do not share or discuss it with people (internal or external to the Company) with whom you are not sure they have formal authorization to know it.

Disclosing Confidential Information could give undue business advantages to third parties, cause harm to our Company, and jeopardize the privacy of our customers' and business partners' communications, and may even subject you to liability in particular.

Therefore, we must observe the following rules:

- Access to internal information is limited to those who need to know it. We must refrain from discussing any Confidential Information, including with our co-workers, unless they require it to perform their duties and with prior authorization from your superior.
- It is forbidden to disclose Confidential Information to third parties. In justified cases, Confidential Information may be provided to third parties with the prior authorization of the person or area designated for such purpose by the Company, subject in any case to the conclusion of confidentiality agreements or other protection measures, as well as those of the applicable legislation.
- In the event that any governmental authority requests or orders the disclosure or delivery of any information, this circumstance must be brought to the attention of our Legal Department so that it can take the necessary measures for its protection and ensure compliance with all applicable requirements.
- If, as a result of our work, we obtain confidential information from another person, including any competitor, customer, supplier or government authority, and whose recipient is not the Company, we must respect and protect such confidentiality in terms of the above criteria and where possible, this information must be returned to the issuer without reading the content.
- Employees must refrain from holding confidential conversations of any kind in public places, as well as avoid improper disclosures through means such as the internet, social networks or mobile phones; always complying with the provisions of the applicable provisions.
- It is strictly forbidden to share Confidential or Privileged Information, in order to obtain, directly or indirectly, a profit or personal benefit. Be careful when sending emails, making sure you are transmitting information only to those who are authorized to receive it.
- When your employment relationship with the Company ends for any reason, you must hand over to your hierarchical superior all the documents and/or work tools that you were entrusted with and that contain Confidential Information.

The obligation to maintain confidentiality with respect to the Company's information subsists after the termination of the contractual relationships of its employees or contractors.

If you detect or suspect any breach related to the handling of Confidential Information, you should immediately file a complaint with the BroadTC Board of Directors

Records & Records

All accounting records, books and records must be prepared with the utmost care and must be correct, complete and reliable in all respects.

The fulfilment of our Company's financial, legal and administrative obligations depends on these records and therefore they cannot be misleading or confusing.

All of the Company's files and records must be kept up-to-date and at a sufficiently reasonable level of detail so as to accurately reflect the origin and destination of all transactions and operations, including the disposition of assets.

It is our responsibility that accounting and financial records and records are accurate and complete. Maintaining accurate information reflects the Company's good reputation and credibility and we ensure compliance with our legal and regulatory obligations.

To this end, we are committed to:

- Never forge a document.
- Do not distort the true nature of a transaction.
- Not to engage in or support another person in evading taxes or breaking the law.
- No account should be kept off the books to facilitate or conceal improper payments.
- All employees are required to maintain books, documents and records to comply with applicable laws and the policies and procedures established by the Company for such purpose.

If you detect or suspect any non-compliance with the rules for handling records and records, you must immediately file a complaint with the BroadTC Board of Directors

Computer Systems and Computer Security

Computer systems are essential to BroadTC's day-to-day operation. The Company is the only one authorized to install programs and software on your systems and devices. It is forbidden to copy, appropriate or misuse the corporate software, as well as to install any program external to the company.

It is forbidden to use personal mail or any other platform external to those of the Company for the management of the Company's information or related to its functions within it, since such information may be at risk due to not having the appropriate security measures for its protection and safeguarding.

If you detect or suspect any breach of the principles of Computer Systems and Computer Security, you must immediately file a complaint with the BroadTC Board of Directors.

Effective Control of Corruption

BroadTC is committed to controlling corruption by complying with the provisions of the Foreign Corrupt Practices Act ("FCPA"; local and international anti-corruption laws and international treaties on the subject.

Violation of the Code of Ethics, internal policies, or applicable anti-corruption legislation, regardless of the country where it is carried out, can result in civil and criminal sanctions, ranging from fines to imprisonment and are applicable both at the personal level and at the company level.

In the public sphere, corruption is the abuse of power for one's own benefit or that of the company. When interacting with Public Servants or Government Entities and it is known as Public Corruption. In the field of individuals, that is, when actions or omissions are carried out aimed at obtaining some undue benefit for the Company, personal or for a Third Party and it is known as Private Corruption.

BroadTC prohibits giving or receiving, directly or indirectly, bribes, offering or soliciting a bribe, or aiding or abetting or authorizing the payment or receipt of a bribe. Bribes can include paying to gain an undue advantage or influencing a decision (such as obtaining a lower tax rate than the law provides).

Bribes can be in money, securities, real or personal property, donations, jobs, gifts, access to entertainment and hospitality, travel, loans, installment payments, vacations, job offers, personal services, or anything else of value.

Gifts, Entertainment & Hospitality Expenses

Giving or receiving gifts, meals, or access to entertainment or hospitality may be acceptable as long as there is no expectation that the person who received the benefit will reciprocate something in return for that care and that it fulfills specific lawful business purposes.

Gifts, access or expenses to entertainment that are intended to influence decision-making or that may affect BroadTC's business relationships should not be accepted.

Every gift must be given and received in an honest and transparent manner. It is forbidden to give or receive gifts, access to entertainment or hospitality from public servants directly or through intermediaries such as distributors, suppliers, consultants, third parties or travel agencies.

A good criterion to know if you should give or accept a gift or give or receive attention is to ask yourself how it would look in the eyes of someone outside the Company or on the front page of a newspaper.

It is important to note that gifts, meals, entertainment, or other payments from or to public servants carry a higher risk and may be prohibited or limited under local laws. For the purposes of this Code of Ethics, employees of government companies are considered public servants.

Similarly, if you detect or suspect any violation of BroadTC's Gifts, Entertainment and Hospitality Policy, you should immediately file a complaint with the BroadTC Board of Directors.

Interaction with Public Servants

Due to the nature of our business, we are sometimes required to interact with public servants. Transactions with government are regulated by specific laws and are not the same as business with private individuals.

It is strictly forbidden to offer a public servant, either directly or indirectly, anything or service in exchange for favourable treatment.

Obtaining any type of licenses, permits or procedures before government agencies for the operation of the Company must be processed in accordance with the provisions of BroadTC's Anti-Corruption Policy.

The Company will refrain from participating directly or indirectly in any contest or tender in which there are indications of corruption, responding in a timely and transparent manner to the information requests and observations of the authorities.

BroadTC also prohibits, on its behalf or on its behalf:

- Enter into contracts with distributors, representatives, consultants, business partners, agents, intermediaries, customers, contractors, managers, lobbyists, consultants or suppliers that could pose a risk of bribery or corruption. In other words, we should not negotiate or make payments to third parties if there is any indication that those people may engage in some kind of bribery or act of corruption.
- Make payments for gifts, access to entertainment or hospitality to public servants or their families.
- Making "facilitation payments," which are minor payments or fees to obtain a government service to which we are entitled, such as the issuance of a visa.

- Make donations or make payments to causes or political parties, with Company resources or in the name of BroadTC. You may make donations in your personal capacity and in accordance with applicable local laws.

BroadTC also prohibits any unethical conduct such as fraud, deception, extortion, collusion, use of false information, illicit enrichment or money laundering, financing of terrorism, among others. These actions constitute crimes, regardless of whether public servants are involved.

Finally, BroadTC prohibits any attempt to assist or conceal acts of corruption regardless of the benefit obtained for you, the Company, or Third Parties.

In order to combat corruption, BroadTC is committed to:

- Abide by the anti-corruption laws of all countries in which we operate or that are applicable to us.
- Comply with all laws and financial reporting standards applicable to the Company.
- Conduct all negotiations, purchases, and financial transactions in accordance with our internal procedures and keep all records of such transactions for review in the event of an audit.
- Ensure that payments made by us or on our behalf are solely payment for goods or services actually rendered to our company.
- Adopt internal controls and report, if necessary, to the corresponding authorities those cases in which an employee or third party incurs in an act of corruption.
- Promote practices to effectively control corruption throughout the value chain, train staff on preventive measures, and conduct outreach campaigns.

If you detect or suspect any violation of our Anti-Corruption Policy, you should immediately file a complaint with the BroadTC Board of Directors.

Conflicts of Interest

These types of conflicts arise when the interests of an employee or a third party are inconsistent or interfere with the interests of the Company.

Conflicts of interest are a form of corruption that consists of an action that may be unduly influenced by a personal, family or third party interest.

A conflict of interest exists when an employee or a third party guides their decisions or acts for their own benefit, which is often of an economic or personal nature, opposing the responsibility to act for the benefit of the Company when they are representing it. A good criterion that we can use to know whether or not you have a conflict of interest is to imagine explaining your actions to a friend, colleague or the press, would you feel comfortable?

When acting on behalf of BroadTC, we must always put the interest of our Company above our personal interest. This means that we do not let our own

interest, that of our family or any other relationship, influence the decisions we make on behalf of our Company.

Conflicts of interest may affect our judgment, affect BroadTC's reputation and image, and expose BroadTC to potential risks, therefore we must avoid actual or construed conflicts of interest in matters relating to hiring, promotion, or any other dealings with the Company or our dealings with other business interests outside the Company.

In addition, we must not accept gifts, favors, or access to entertainment or hospitality that may influence our decisions or affect the Company's business relationships.

Many employees have family members or people with a close relationship who are employees, customers, or vendors. Family, personal and/or friendship ties should not be considered in the assignment of jobs or in the selection of a supplier, this may lead to actual or potential favoritism, as well as a lack of objectivity in such assignments, for this reason assignments of this type within the Company are prohibited. It's important to remember that job decisions should be based on qualifications, performance, skills, efficiency, and experience.

The Company does not encourage the secondary employment of its employees or any other activity or action external to the business, such as the opening of a new business where the owner is the owner, director, consultant, officer or director of any other business of its own or of third parties.

It is forbidden for the employee by his nature to interfere with the interests or reputation of the company or to have a negative impact in terms of competition. You may not be employed by, or otherwise provide services for, or receive payment from, any customer, supplier or competitor of the Company. Any conflict of interest must be declared by the stakeholder(s) to the Compliance Officer using the conflict of interest declaration form found in BroadTC's Conflict of Interest Policy.

If you detect or suspect any breach of our Conflict of Interest Policy, you should immediately file a complaint with the BroadTC Board of Directors.

Dealing with Our Suppliers

As noted in the previous section, the personal relationship, if any, with our suppliers and business partners must not create conflicts of interest, affect your objectivity or give the appearance of improper conduct, so in such cases you should refrain from making decisions that may be influenced by that relationship.

These risks arise particularly when doing business on behalf of BroadTC with family, friends or third parties or when we receive or give a gift, food or other payment from or to a supplier, especially when the supplier is from a government company.

Any conflict of interest must be declared using the Conflict of Interest Declaration form found in the Conflict of Interest Policy.

We must maintain a professional relationship with our suppliers and business partners to ensure that we adhere to the values and principles set forth in this Code of Ethics and make every effort to have our suppliers promote and adhere to these principles.

We must select our suppliers based on the merits, costs, and efficiency of their products and services; communicate to current or potential suppliers, in a clear and precise manner, the needs of the Company; and ensure that we receive adequate value for the price paid.

All interactions with our suppliers must be conducted in accordance with established procedures, including legal and registration obligations.

For the purposes of selecting and contracting suppliers and any third party that provides goods or services to the Company, the guidelines established in this document must be followed.

If you detect or suspect any breach of any of these points, you must immediately file a complaint with the BroadTC Board of Directors.

Due Diligence for Employees and Third Parties

BroadTC's Board of Directors is responsible for establishing policies, procedures and protocols to prevent the incorporation of individuals who may generate a risk of Corruption and affect the integrity of the Company.

BroadTC will articulate the means necessary to efficiently accomplish this task.

Anti-Money Laundering

At BroadTC we adhere to laws that prohibit money laundering or terrorist financing. Employees must be aware of and comply with these provisions in order to prevent the services offered by the Company from being used to hide or simulate the origin of resources of illicit origin.

In view of the vulnerable activities to which the Company is subject, employees must always remain alert to situations that may represent the incorporation of resources of illicit origin.

If you detect or suspect any non-compliance with this point, you should immediately file a complaint with the BroadTC Board of Directors

Use of Company Assets

We must take care of and make efficient use of all the tangible and intangible assets of our Company, as they are necessary inputs to carry out its activities and operations. Among others, we can mention the following:

- Real estate and movable property;
- Tools, supplies, vehicles, inventories, consumables, devices and telephone exchanges;
- Telecommunications networks and equipment and their components;
- Computer equipment and applications such as e-mail and voicemail systems;
- Software developed in-house or third-party licenses;
- Financial resources, investments;
- Concessions and other authorizations to operate telecommunications networks;
- Industrial and intellectual property rights,
- Information about products and services and financial and business information.

We must reasonably use the Company's assets for the performance of our work and not for personal gain or for an unauthorized purpose.

In addition, we must protect the Company's resources, comply with all procedures relating to the operation and security of such assets to prevent them from being damaged, lost, stolen or wasted.

Financial Resources

Any person who has control over the Company's financial resources, including cash, cash equivalents, securities, securities or credit cards, is personally responsible for their custody, management and use in the operation of BroadTC.

We must also ensure that all of the Company's income and expenses are properly documented, in accordance with applicable law.

Political Activities

BroadTC has no ideological, political or partisan affiliation, but respects the right of its employees to collaborate civically in non-profit professional associations and citizen organizations that promote the legal and responsible exercise of political rights.

All employees enjoy the absolute freedom to exercise their political rights without being pressured, directly or indirectly, to do so in favour of a specific party or person.

However, in order to allow the Company to comply with the legal provisions that are applicable to it, the participation of our employees in political and/or electoral processes must be strictly in a personal capacity, outside of working hours and

without any express or implicit reference to BroadTC and may not involve under any circumstances the use of financial resources or other assets of the Company.

In addition, some laws that govern us contain provisions that prohibit BroadTC and its employees from making donations, contributions, or other payments, whether in cash or in kind, to political parties, employees of political parties, and candidates for elected office, including those in other countries.

Therefore, the financial resources of our Company cannot be used to support any candidacy for political office.

If you detect or suspect any non-compliance with the above principles, you should immediately file a complaint with the BroadTC Board of Directors

Sustainability

Sustainability for BroadTC means ensuring a balance between economic, social and environmental aspects, so that the company can continuously generate a positive impact on the communities in which it operates and its environment, thus reaffirming our commitment to be an agent of change that promotes inclusion, economic growth and well-being.

In this sense, our Smart Sustainability Strategy is aimed at making the Company a catalyst for development and improvement of people's quality of life, through digital connectivity, road awareness, environmental preservation and care actions, among others.

We also work continuously to keep our operations aligned with the best national and international standards, including the Ten Principles of the Global Compact, the Women's Empowerment Principles and the Sustainable Development Goals established by the United Nations.

Any act that may jeopardize the sustainability of BroadTC must be reported immediately to the BroadTC Board of Directors.

Everyone's Responsibility

Our Code of Ethics reaffirms BroadTC's commitment to achieving the highest standards of labor conduct and business practices. Ultimately, however, each person is responsible for their actions.

No Code of Ethics can provide for all situations or cover all the rules applicable to each specific case. Therefore, the content of the Code of Ethics should be considered in conjunction with the laws, regulations, rules, policies, guidelines, practices, instructions and procedures applicable both to BroadTC and at the local level in each of our countries.

As a global company, BroadTC must comply with the laws of all countries in which it operates, and to the extent of our responsibilities, we are all responsible for knowing and complying with such laws, regulations and other applicable laws.

We must also act in a way that supports the spirit and intent of every law to which we are subject. In this regard, where this Code of Ethics or any other BroadTC guideline differs from local laws or regulations, we must always apply the highest standard of conduct.

If you believe that any provision contained herein is in conflict with local law or regulation, you should immediately file a complaint with the BroadTC Board of Directors.

Failure to comply with our Code of Ethics

Failure to comply with the Code of Ethics affects the image and reputation of BroadTC and all of us who work in our Company.

Any violation of the Code of Ethics or BroadTC's internal guidelines may result in disciplinary measures depending on the severity of the violation, or even administrative, civil or criminal sanctions.

Our Duty to File Complaints

Each of us must report directly to the BroadTC Board of Directors any conduct that violates this Code of Ethics or any applicable law, regulation, policy or internal procedure and in general, any unethical conduct.

We must cooperate with any internal or external investigation and maintain the confidentiality of the same. Employees who make a false or fraudulent report may be subject to disciplinary sanctions.

Remember that failure to report an ethical offense can have disciplinary consequences for you, as you could be covering up an unethical act or a crime. Anonymous complaints may be submitted if the complainant so wishes. In this case, it is recommended to leave a contact for the follow-up of the investigation.

BroadTC will take all reasonable and justified steps to protect whistleblowers and will not retaliate against you for reporting. To the extent possible, the Company will maintain the confidentiality of whistleblowers.

Nothing in this Code of Ethics shall be construed as an obstacle for persons who feel affected or witness any illegal conduct to directly file complaints with the competent authorities. In such cases, it is recommended to notify our Management, so that, if necessary, it can cooperate with the corresponding authorities.

All complaints received will be managed, addressed, and investigated by the BroadTC Board of Directors.



Help us improve this Code

This Code of Ethics sets out the minimum standards to which our Company is committed.

We are aware that not all possible situations can be foreseen or regulated, so we thank you in advance for any suggestions or comments to supplement and improve this Code.

At BroadTC we know that participation in compliance with this Code of Ethics is essential to the development and success of our Company. We appreciate you reading it carefully and understanding it and invite you to put it into practice in your daily work.