

# INVAP

## CODE OF ETHICS FOR SUPPLIERS

April 2021



INVAP

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# INTRODUCTION

INVAP is firmly committed to promote ethical conduct inside and outside the company in order to preserve human rights, comply with labor regulations, fight against corruption, protect the environment and exercise its corporate social responsibility. With these aims in view, it established a Code of Ethics and designed an Integrity Program, among other actions.

In line with this commitment assumed by INVAP and as a result of these documents, it laid down this Code of Ethics for companies, organizations, institutions and people that provide goods and/or services to the company. It is aimed at regulating some minimal standards of conduct regarding ethics and integrity in the relations between INVAP and its supply chain. This Code is not intended to cover all possible situations that may arise in daily activity, but to be a guide for a correct ethical behavior.

We invite the company's suppliers to inform us of all situations that are or may be contrary to the guidelines set forth in this Code, as well as of any other conduct that may be considered unethical.

In case of any doubt about the application or interpretation of this Code of Ethics, you may contact the person in charge of INVAP's Integrity Program by sending an email to: [integridad@invap.com.ar](mailto:integridad@invap.com.ar)



# SCOPE

This Code of Ethics is addressed to all companies, entities, institutions, agencies, organizations and people that provide goods and/or paid services to INVAP (hereinafter “the suppliers” or “the parties that provide goods and/or services”.) This includes their staff and any other person related in any way to the services or goods provided by the suppliers (for instance, but not limited to, representatives, agents, intermediaries, members of the Board of Directors, management staff, legal representatives, partners, shareholders, subcontractors, etc.), who should behave according to the guidelines laid down in this Code or superior ones.

It is the responsibility of the suppliers to inform and enforce the provisions set forth in this document, as well as to report non-compliance or suspected non-compliance.

# INVAP'S RESPONSIBILITY TOWARDS THE SUPPLIERS

From its beginnings, INVAP has had a strong commitment to carry out relations and operations with ethics, transparency and integrity, complying with the regulations of the countries where it operates, the agreements it adheres to and the good practices.

INVAP has a Code of Ethics through which it clearly states the ruling principles that should guide the behavior of its members, the commitments it has assumed and the way it carries out its activities. This Code works as a compass that provides criteria to make decisions according to the principles of the company, in the context in which those decisions must be taken.

We invite suppliers to learn about our Code of Ethics on <https://www.invap.com.ar/en/the-company/integrity/ethics-and-integrity/>

# RULES OF CONDUCT EXPECTED FROM THE SUPPLIERS

## COMPLIANCE WITH LAWS

- The suppliers must always comply with the applicable laws of the countries in which they operate, avoiding any conduct that even without violating the law, may damage INVAP's reputation and cause adverse effects on the company or its environment. If the suppliers face conflicting demands, they should look for alternatives in order to behave with integrity.
- If local laws are stricter than what is stipulated in this Code, the suppliers are expected to comply, at the very least, with such laws.
- The parties that provide goods and/or services to INVAP should inform the company in case their operations and/or activities are disqualified and/or suspended and/or limited locally or internationally, so that INVAP may evaluate the steps to be taken in accordance with the regulations.



## ANTI-CORRUPTION

- In all business relations, the suppliers should behave so as to establish them in a legitimate and productive way. They should act with honesty and integrity when developing contacts and business relations with public, private or mixed entities in any country or place where they operate.
- The parties that provide goods and/or services to INVAP should set forth mechanisms to fight against all forms of bribery or corruption when conducting business, both in the public and the private sector.

## CORPORATE BENEFITS AND GIFTS

- INVAP does not encourage or promote the exchange of presents, benefits or corporate gifts. This does not prevent the suppliers from offering them as long as they are of symbolic or economically insignificant. Presents, benefits and gifts should never be in domestic currency or its equivalent and cannot be frequent. In case of doubt, INVAP has in-house mechanisms to determine whether the offer is acceptable or not, in which case the present may be kindly rejected or accepted under certain conditions only. If the suppliers have any doubt in relation to the gift or benefit to be offered, they may send their query to: [integridad@invap.com.ar](mailto:integridad@invap.com.ar)
- Giving a present, benefit or gift to INVAP's staff that does not comply with the provisions stated above could compromise the suppliers, since it may be considered contrary to the company's Code of Ethics.

## POLITICAL ACTIVITIES

- INVAP prohibits the suppliers from making political contributions to organizations or parties, non-governmental organizations and foundations, in the name or on behalf of the company, without INVAP's prior consent.

## CORPORATE IMAGE AND REPUTATION

- In any situation in which INVAP is represented or involved, actions should be carried with utmost diligence and the reputation and image of the company must be preserved. INVAP has never had any kind of reputational conflict, either in the country or abroad for more than 40 years.

## CONFLICT OF INTERESTS

- The staff of both parties should not have private relationships that could affect the objectivity of the business relation.

In the event that a conflict of interest arises or is identified, it should be immediately reported to [integridad@invap.com.ar](mailto:integridad@invap.com.ar) in order to decide the course of action to be taken.

- INVAP has in-house mechanisms to detect and deal with conflicts of interest.



## RESPECT AND DIVERSITY

- All people must be treated with dignity and respect, refraining from any offensive conduct or any kind of discrimination based on gender, sexual orientation, race, religious, political or trade union ideas, nationality, language, marital status, age, disability or any other reason.
- It should be guaranteed that no individual takes advantage of another through manipulation, concealment, misuse of confidential information or mistreatment practices.
- The parties that provide goods and/or services to INVAP should be committed to respect labor rights throughout its value chain.

## SAFETY AND OCCUPATIONAL HEALTH

- The suppliers shall ensure that the working conditions and environment under their control are in accordance with the applicable labor regulations and that they foster the physical, mental and social wellbeing of their personnel.
- The parties that provide goods and/or services to the company shall comply with the labor regulations on health and safety. Likewise, if needed, the suppliers should prove to INVAP that they comply with the legal requirements applicable to the activity carried out.
- When the suppliers operate at INVAP's facilities, the labor regulations on health and safety established by our company and applicable to their activities should be informed to the staff and subcontractors and be enforced.

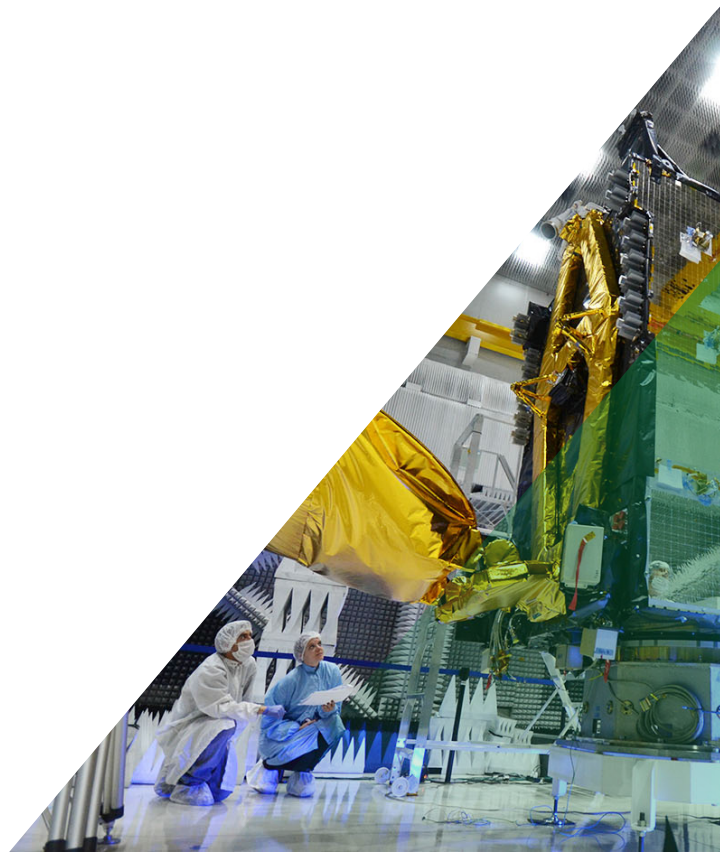


## ENVIRONMENT

- The suppliers shall undertake their activities in an environmentally responsible way, in agreement with the legislation in force in each working place.
- The parties that provide goods and/or services to INVAP should adopt a preventive approach to environment protection, both in relation to risks and to negative environmental impacts.
- The vision on environment protection and continuous improvement of the performance in that respect shall include the facilities, products and services of the suppliers.

## CONFIDENTIALITY

- The suppliers shall protect all the information to which they have access as a result of the business relation with INVAP and must refrain from sharing, disclosing or misusing it.
- If the suppliers consider that they had received or had access to confidential information on INVAP and/or its stakeholders (customers, suppliers, partners, etc.,) by mistake, INVAP should be notified within 24 hours of taking notice of that fact.



## CARE OF INVAP'S ASSETS AND TOOLS

- When the suppliers make use of INVAP's facilities, tools or any other property or asset belonging to INVAP, they must act responsibly and take the utmost care for their preservation.



# SUPPLIERS'S RESPONSIBILITY

The parties that provide goods and/or services to INVAP should be committed to:

1. Respect and enforce respect for this Code and their own, always giving preference to that document which is more demanding in ethical terms.
2. Communicate those situations in which it is considered that INVAP's staff or representative is behaving or trying to behave contrary to the guidelines set forth in this document.
3. Provide INVAP with all the information it may require in order to control the compliance with this Code of Ethics trying to maintain by all means an ethical conduct and refraining to do business or activities inconsistent with an ethical behavior.
4. Implement corrective actions, if necessary, in case that INVAP has verified cases of noncompliance in the organization.
5. Communicate to INVAP any information or situation that is considered relevant in connection with the requirements stipulated herein.

# ACTIONS FOR MISCONDUCT

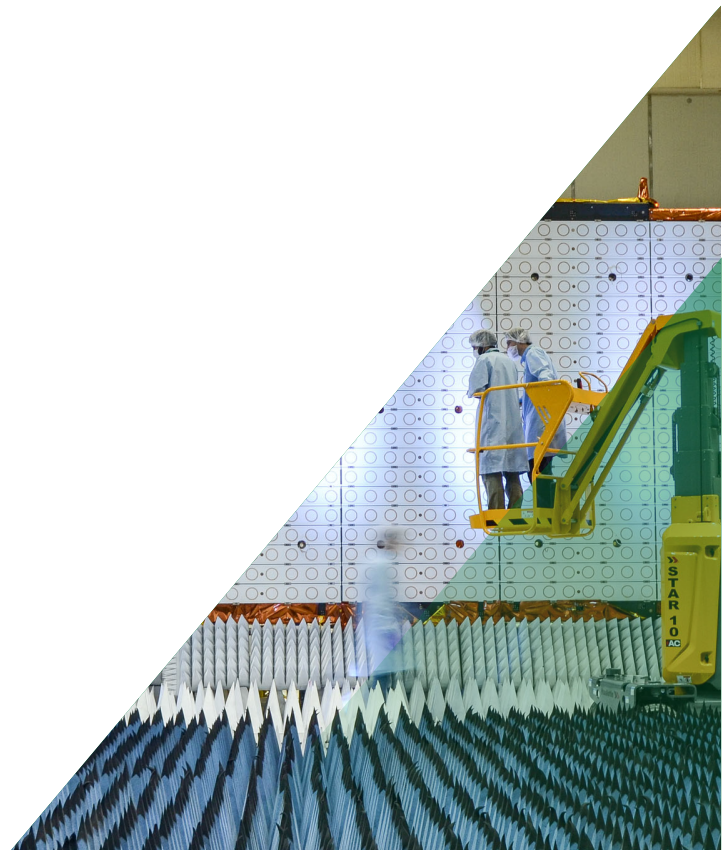
Noncompliance by the suppliers with the provisions of this Code may have different consequences in the contractual relation with INVAP depending on the seriousness of the offense, including termination with cause of the contractual relation, or even the disqualification to provide goods and/or services to INVAP in the future, subject to any other legal actions that may be applicable.

# COMMUNICATION ABOUT MISCONDUCT AND INQUIRIES

In case of detecting any non-compliance or suspected non-compliance with this Code of Ethics, the suppliers must immediately report it. To this end, the company provides several channels of communication (with anonymous or named registry) available 24-hours a day all year long, at <https://www.invap.com.ar/en/the-company/integrity/ethics-and-integrity/>

Those persons or companies that have expressed their concern or made a complaint in good faith will not see their relation with INVAP negatively affected and their confidentiality will be safeguarded.

**In case you need to make an inquiry, please send an email to [integridad@invap.com.ar](mailto:integridad@invap.com.ar)**



[www.invap.com.ar](http://www.invap.com.ar)

