

Who we are and why are we here

For two decades we have helped our clients to grow.

We work with your brand to create and execute marketing campaigns that reach your target audience, build customer loyalty and incentivize your customers, sales reps or employees.

If you are working with us you must know that we earn customers for life and our brand inspires passion and loyalty.

Scope

Our Code of Conduct reflects who we are as a company and our commitment to the highest ethical standards.

Because every decision we make at all levels define who we are as a company, our Code applies to everyone working with or on behalf of Paladina, including:

- Employees
- Collaborators or Suppliers
- Board of Directors

This Code provides you with easy-to-understand information that will help guide your decisions when you face a compliance concern or an ethical dilemma.

We depend on you to use good judgment to protect Paladina's Reputation.

Values

Diversity and Inclusion

Pursue the creation of the very best by harnessing diversity and inclusion, add new points of views and expand your mind.

Integrity and Sincerity

We earn customers for life thanks to our ethically responsible conduct and sincerity.

Passion and Loyalty

Our success depends on our relationships inside and outside Paladina; we encourage diverse thinking and collaboration to create great customer experience.

Excellence

We act with integrity, put the customer at the center of everything we do. We listen to our customer's needs. Each interaction matters to achieve excellence.

Core Principles in our Business Relationships

We lead by example, these are the core principles we have to maintain to be a role model for others and support our team.

Good Faith

We adjust our actions at all times to the principles of loyalty and good faith with the company, with superiors, colleagues and collaborators with whom we interact. We emphasize the desire to achieve and the spirit of self-improvement. We promote optimistic versus pessimistic attitudes. We subordinate personal objectives to the general objectives of the Company. We ensure that there is no conflict between the two, and we act giving priority to the interests of the company over personal interests or those of third parties.

Teamwork

We recognise the importance of teamwork and aim to foster an environment and culture that promotes trust, open communication and

active collaboration in the open sharing of ideas. Each voice counts and is part of the success of our organization.

Respect for Human Rights

Paladina believes that all human beings should be treated with dignity and respect. We are committed to uphold internationally recognized human rights of all people and we will use reasonable efforts to avoid adverse human rights impacts that may arise from our services and/or business relationships, and we will act diligently to help fix any undesired impact that may occur.

Confidentiality

Paladina understands that information is fundamental as a business resource, so its management must be adequate and responsible. We take care not only of confidentiality but also of its integrity.

Efficient Management

At Paladina we work efficiently during the working day, making the most of the time and resources we have at our disposal in a rigorous and rational way.

We all provide the dedication required by the performance of our functions, aiming to achieve results in the most optimal and productive way possible.

Data Protection

Privacy is a fundamental right.

The processing of personal data involves protecting the privacy of the people behind the data.

Paladina collects, processes and retains personal data to the extent strictly necessary for the achievement of its purposes.

We continually review Paladina's internal processes and documentation to keep the personal data we process secure.

Decalogue of questions to ask before making a decision

Before making a decision on what to do about a particular situation, we should ask ourselves the following questions:

1. Does it follow our policies?
2. Does it comply with the law?
3. Will it help us maintain the trust people place in Paladina?
4. Does it seem to be the right thing to do?
5. Who else could be affected by this (other people in the organization, customers, suppliers, etc.)?
6. Is there an alternative solution that does not pose an ethical conflict?

Principles of Behavior at work

1. Diversity and Inclusion

1.1 Commitment to Diversity

We value the individual backgrounds, capabilities, differences and experiences of each employee, supplier and client, that enhance our world view.

We are committed to fostering an accepting and inclusive work environment, where any person feels welcome no matter their education, gender or gender identity, race, ethnicity, sexual orientation, age, generation, cultural expertise, technical skill or thinking styles.

We base our decisions on the respect to each individual or any personal characteristic protected by applicable law.

We have created an environment that empowers women, so that more than 50% of our team is made up of women, including managing positions.

1.2 Maintaining a respectful workplace

As we are committed to diversity we maintain a workplace where employees are treated with dignity and respect. We protect against discrimination or any behavior that creates an offensive, intimidating or hostile environment.

Paladina works to create a positive workplace where each member of our team feels comfortable and where they are able to do their jobs without fear of harassment or discrimination.

Paladina never tolerates retaliation against employees who report or speak up against this activities in good faith.

1.3 Career development

At Paladina we make sure that our employees are continuously trained, so that they reach a high level of specialization in their job functions.

In the last 20 years of activity our staff has been maintained and has grown, being few of those who have left our team.

We hold events to strengthen the bonds of partnership and choose suppliers who share our values.

2. Our commitments as a Business

2.1 Advertising and Marketing

Paladina sells services based on their merits and doesn't engage in false or misleading advertising or advertising that slanders others.

Whenever referencing a competitor or its products or services we will ensure that the comparison can be substantiated and that the statement is complete, accurate and not misleading.

2.2 Fair Competition

Paladina's policy is to comply with all applicable antitrust, competition and fair trade laws and regulations.

These laws and regulations are designed to prohibit agreements or practices that fix prices, divide markets or impede or destroy fair competition in markets.

2.3 Conflicts of Interests

As Paladina employees, we share a common interest in protecting our company.

We avoid situations that put our personal interests in conflict with those of Paladina or lead others to question our business or professional objectivity.

If you become aware of a potential conflict, you have an obligation to disclose it. Below are some situations commonly associated with potential conflicts and that must be disclosed per the Conflicts of Interest Policy.

We must avoid situations that could

- Cause or create a perception of favoritism to outside organizations or individuals.
- Impair objectivity in performing our jobs duties.
- Create actual or potential harm to Paladina's business or brand reputation.

2.4 Anti-corruption, Anti-bribery

2.4.1 Recognizing and avoiding Bribery

Corruption can harm our reputation and disrupt markets. That's why we're committed to winning customers and business based on the merit of our services and never because of bribery or other illegal activity.

Bribery involves exchanging or offering something of value to improperly influence a business decision or obtain a business advantage.

Bribes can take many forms and include things like giving cash, gift cards, entertainment, inappropriate discounts, hiring a family member or a friend of someone you seek to influence, or even making certain charitable contributions.

Anti-bribery laws prohibit anyone from offering, accepting, receiving, or giving bribes. follow the law, our code and our policies and avoid activities that even suggest something improper.

2.4.2 Gifts and facilitation payments

Receiving or providing gifts, entertainment and hospitality can strengthen business relationships, but it can also cause conflicts of interest. We safeguard our reputation by making sure that gifts are legal, appropriate and reasonable.

We never accept or provide anything of value that could create a conflict of interest or suggest impropriety. Inappropriate gifts include those that create an obligation, are in the form of cash, or appear lavish or extravagant.

The details we receive at Paladina from collaborators will not be received on a personal basis, but will be made available to the entire Paladina team.

2.5 Speaking on Behalf of Paladina

Everything we say on behalf of Paladina affects our reputation. As Paladina's employee, you must act with Paladina's best interest at heart and ensure all messages are accurately aligned with our brand.

We must take into account the following points:

- Demonstrate Paladina's ethical Principles in our professional Behavior and Language.
- Avoid giving our opinion on colleagues and the workplace on professional development sites.
- Always keep in mind that nothing is "secret" or "private" on the internet.
- Always ensure that any digital communication on Paladina or one of its brands has undergone adequate preparation.

2.6 Use of Company Assets

Paladina provides its employees with the necessary resources so that, together, we can achieve our business objectives.

Misused or wasted Paladina's resources, including employee time, hurt us all and adversely affect the operational and financial performance of Paladina.

We must respect and protect Paladina's assets to ensure that they are not lost, damaged, misuse or wasted nor loaned to others.

2.7 Protection of Intellectual Property

Ideas, information and works are vital assets for any company and they are protect by the intellectual property law.

Our know how and our intellectual property is one of the Paladina's most important assets and the key to differentiate our services from our competitors.

We will actively protect our rights and we won't knowingly misuse or violate the intellectual property of others.

2.8 Cybersecurity

As we offer products and services in a digital world, we understand the role of Cybersecurity to protect our Employees, Clients and Suppliers' Data.

At Paladina we implement Cybersecurity by design as an integral part of all phases of the service delivery.

2.9 Environmental Conservation

Paladina recognizes the importance of preserving the environment and creating a quality of life for all humanity and for future generations to come. We are committed to the creation of a more sustainable society.

From small actions, such as recycling in the office, selecting suppliers or temperature maintenance of air conditioners, to large projects, we will strive to evaluate and implement programs that meet or exceed legal requirements, and we will consider environmental impact as a key criterion when evaluating the delivery of our services.

Noncompliance with the Code

It is the responsibility of each employee to ensure full compliance with all provisions of this Code and, if necessary, to seek assistance from Human Resources, Legal or Compliance. "Doing the right thing" and ensuring the highest standards of integrity is the personal responsibility of each employee and cannot be delegated.

In case of doubt, employees should always be guided by the basic principles set out in the introduction to this Code. Any failure to comply with this Code may result in disciplinary action, including the possibility of dismissal and, if appropriate, legal action or criminal sanctions.