



## Latinex Holdings, Inc. and Subsidiaries

### Code of Ethics and Conduct for Vendors/Suppliers

**2024**

The subsidiaries (Bolsa Latinoamericana de Valores, S.A. and Central Latinoamericana de Valores, S.A.) are regulated and supervised entities under the Superintendency of the Securities Market of the Republic of Panama. They are licensed to operate as Self-Regulatory Organizations under Resolution No. CNV-349-90 dated March 30, 1990 and Resolution No. CNV-68-97 dated July 23, 1997, respectively.

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## 1. Objective

Grupo Latinex, in compliance with the ethical principles on which its Corporate Governance is based, seeks to ensure that the Vendors/Suppliers with whom it maintains a commercial relationship maintain ethical behavior in its company.

The purpose of this Code of Ethics and Conduct for Vendors/Suppliers is to outline the minimum and necessary standards to ensure that Vendors/Suppliers maintain safe working conditions, fair and respectful treatment of their employees and ethical practices that are consistent with our Code of Ethics and Conduct of Latinex Holdings, Inc. and subsidiaries.

The Code of Ethics and Conduct for Vendors/Suppliers is an integral part of the contracts, agreements or conventions signed by the companies of Grupo Latinex, in force or that are given from time to time. If there is a conflict of terms between the present Code and the contract, the contract will have priority to the extent that it is legally allowed.

## 2. Scope of application

This Code is applicable to Vendors/Suppliers that offer services, goods, sponsorship to Grupo Latinex companies, as well as to their employees and/or representatives, as determined in the Vendor's Manual.

## 3. Reference Documents

The present Supplier Code of Conduct has been designed to define the best practices and ethical conduct that must be adhered to by the Suppliers of the Latinex Group.

Additionally, the internal rules of the Latinex Group should be taken as a reference, including but not limited to:

- Code of Ethics and Conduct of Latinex Holdings, Inc. and Subsidiaries
- Personal Data Protection Policy of Latinex Holdings, Inc. and Subsidiaries
- Corporate Governance Code of Latinex Holdings, Inc. and Subsidiaries

## 4. Terms and Definitions

The words written in capital letters maintain a definition established in the Internal Rules of Grupo Latinex, especially in the Code of Ethics and Conduct of Latinex Holdings, Inc. and subsidiaries.

Grupo Latinex shall be understood as, that formed by Latinex Holdings, Inc., Latinex Capital, Inc., Bolsa Latinoamericana de Valores, S.A. (hereinafter Latinex) and Central Latinoamericana de Valores, S.A. (hereinafter Latinclear), as well as any other company that from time to time is part of the group.

## 5. Code of Ethics and Conduct for Vendors/Suppliers

### 5.1. Rules of Conduct

The Vendors/Suppliers of the Group Latinex commit themselves to the following conducts, which should not be considered as exhaustive, unique or limited:

#### 5.1.1. Relationships based on ethical and legal principles

1. Maintain policies that guarantee legal business with honest, transparent, equitable conditions and integrity between the parties.
2. Comply with the internal procedures of the Grupo Latinex companies for contracting services, goods or other activity.

#### 5.1.2. Transparent and fair employment practices

1. Comply with the legal provisions regarding the hiring of its personnel that guarantee fair labor rights and conditions, without any type of discrimination or inequality of any kind (social, gender, disability, among others).
2. Not to allow any conduct by its employees among themselves and/or third parties that involves acts of harassment, physical or verbal abuse, including intimidation, threats, sexual or moral harassment, racism or sexism.
3. Refrain from hiring underage workers, nor demand work or service from a person under threat or coercion.
4. To abstain from hiring personnel that works with Grupo Latinex companies during the time that they maintain the commercial relationship with Grupo Latinex companies.
5. To maintain a safe and healthy work environment that complies with the current health and safety laws.

#### 5.1.3. Disclosure of Confidential Information

To take the necessary measures to guarantee that its employees do not disclose Grupo Latinex's information that due to its nature is confidential, with the exception of the information that by legal mandate is public or that mediates order of competent authority to deliver it. In case this happens, the event shall be communicated to the Grupo Latinex companies.

#### 5.1.4. Use of Confidential Information

Take the necessary measures to ensure that its employees do not use Confidential Information to create a false impression about the market or the price of a registered security, including, but not specifically limited to, any of the following situations: (a) buying or selling securities, directly or indirectly, while in possession or knowledge of such information by taking advantage of another person; and/or (b) sharing the information with third parties, whether or not obtaining a benefit from it, including but not limited to family members, clients, colleagues and friends, through an

advice, recommendation or opinion about the advantages or disadvantages that a stock or security could be presenting as a consequence of such information.

#### **5.1.5. Bribery and Corruption**

Grupo Latinex is zero tolerant to any act of bribery or corruption, reason why it does not accept any payment, bonus, commission, royalty or any other benefit convertible into money with the purpose of speeding up a procedure before a third party or in favor of a third party. By virtue of the foregoing, the Vendor/Supplier or its employees:

1. Must not bribe or offer favors or benefits in exchange for obtaining business for themselves or for the company with any Governmental or private Entity.
2. Must refrain from accepting, directly or indirectly, gifts, courtesies, donations, discounts or personal benefits (for direct or family benefits) from a third party, when the intention of the gift, courtesy, donation, discount or benefit is to interfere in their favor to enter into a contract with a Governmental or private Entity.
3. Must not allow any act that implies unfair competition.

#### **5.1.6. Use of trademarks or other assets of Grupo Latinex companies**

To abstain from exploiting in any way the intellectual property rights of Grupo Latinex, including its distinctive signs (that is to say, brands, emblems and commercial slogans), business plans, computer equipment and all those of which they have knowledge by the commercial relation or by any other cause, unless it has specific authorization from Grupo Latinex.

#### **5.1.7. Prevention of Money Laundering, Financing of Terrorism and Financing of Weapons of Mass Destruction Proliferation (PBC/FT/FPADM):**

1. Comply with national and international legal provisions against Money Laundering, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction (BC/FT/FPADM).
2. Not to do business and/or work, directly or indirectly, with persons or companies that are on restrictive international sanctions lists (OFAC, UN, Interpol, among others).

#### **5.1.8. Protection of Personal Data**

1. Comply with the legal provisions for the protection of Personal Data and its treatment.
2. To adhere to the Personal Data Protection Policies of Latinex Holdings, Inc. and subsidiaries, as applicable, and to maintain the same or better policies for the treatment of the personal data of the owners that it has access to in a direct or indirect way.
3. To immediately inform Grupo Latinex in case of any incident involving unauthorized access, disclosure or (potential) loss of such information, including, among others, theft, damage, destruction, attempted cyber-attack, ransomware, etc.

### 5.1.9. Conflict of interest

1. To communicate to the Grupo Latinex companies through the channels established in the Code of Corporate Governance of Latinex Holdings, Inc. and Subsidiaries any activity, transaction or relationship that constitutes a real, apparent or potential Conflict of Interest.
2. To avoid performing acts or transactions that can be considered conflict of interest with respect to the contract of services or goods subscribed with Grupo Latinex. In the event of having knowledge of a possible conflict of interest, before or during the commercial relationship, the Vendor/Supplier shall communicate it to Grupo Latinex.

### 5.1.10. Public Disclosures

1. To perform any act, by action or omission, that discredits Grupo Latinex companies or constitutes a reputation risk during and after the end of the commercial relationship.
2. Not to make by any means, physical or electronic, misleading and false statements about Grupo Latinex or to issue dishonest opinions.
3. Not to use the brand, logo and image of the Grupo Latinex companies without having been previously authorized to do it or to use them without complying with the technical specifications.
4. Not to use resources of Grupo Latinex companies or objects that identify the group for the company's own activities.

### 5.1.11. Sustainability and Corporate Social Responsibility

Vendors/Suppliers are encouraged to implement practices that favor sustainability in Environmental, Social and Governance matters (ESG).

## 5.2. Handling of Complaints

Any person who has knowledge of a possible violation of this Code of Ethics and Conduct for Vendors/Suppliers may inform or report it, according to the channels and processes established in the Code of Corporate Governance of Latinex Holdings, Inc. and Subsidiaries.

## 5.3. Non-Compliance Measures

In case of violations of this Code of Ethics and Conduct for Vendors/Suppliers, Grupo Latinex will be able to:

- i) Give improvement recommendations to the vendor/supplier or request corrective action plans.
- ii) Temporarily suspend the service until the Vendor/Supplier demonstrates that it has remedied the non-compliance.
- iii) Terminate the service contract.

Additionally, Grupo Latinex may file civil and/or criminal claims against the violator.

#### 5.4. Statement of Readability and Knowledge

Grupo Latinex may request a declaration of knowledge and compliance of the general guidelines contained in this document when so required and by any means, physical or electronic.

If you have any questions or concerns about this Code, please contact the Compliance Department at email [cumplimiento@latinexgroup.com](mailto:cumplimiento@latinexgroup.com), telephone number (507) 214-6105 or the offices of Latinex and/or Latinclear at Avenida Federico Boyd y Calle 49, Edificio Latinex, Planta Baja.

#### 6. Disclosure

The current version of this code will be published on the website <https://latinexholdings.com/en/corporate-governance/> and on the Latinex Group intranet.

The Code of Ethics and Conduct for Vendors/Suppliers may be amended from time to time by Latinex Holdings, Inc.

#### 7. Effectiveness and Modification

Version	Document Owner	Reviewed by	Date	Approved by	Date
1	Compliance Manager of Latinex y Compliance Manager o Latinclear	Ethics and Compliance Committee of Latinex y Latinclear	January 13, 2023	Board of Directors of Latinex Holdings, Inc. Board of Directors of Latinex y Latinclear	February 27, 2023
2	Vice President of Compliance	----	-----	-----	December 12, 2024

##### 7.1. Modification Control

Version	Date	Modified by	Description
2	December 12, 2024	Vice President of Compliance	The header, structure and format of the Code were modified following the recommendations for ISO 27001 certification, as mandated by the Board of Directors on November 18, 2019.