



Code of Conduct

1. Purpose and Scope

This Code of Conduct establishes the principles, values and rules of conduct that guide LOGESPEC SpA in all its commercial activities and operations. It applies to all employees, managers, representatives, contractors and any third party acting on behalf or for the account of LOGESPEC, regardless of their geographic location.

As a Chilean company dedicated to technological surveillance, access to international technical standards and distribution of regulatory compliance solutions, LOGESPEC recognizes that trust, transparency and integrity are the foundation of our relationship with clients, suppliers, technology partners and regulatory authorities.

2. Fundamental Principles

- **Integrity: We act with honesty and ethics in every decision and operation.**
- **Transparency:** We maintain clear, truthful and complete records of all our activities.
- **Fair Competition:** We compete in the market based on the quality of our services, not on improper practices.
- **Responsibility:** We assume the consequences of our actions and decisions.
- **Respect:** We value people, diversity and the laws of the countries where we operate.
- **Confidentiality:** We protect sensitive information of our clients, partners and the company itself.

3. Compliance with Laws and Regulations

LOGESPEC strictly complies with all applicable laws in Chile and in the countries where it provides services, including:

- Chilean and Brazilian anti-corruption laws (Law 12.846/2013)
- United States Foreign Corrupt Practices Act (FCPA)
- UK Bribery Act
- Brazilian General Data Protection Law (LGPD)
- Competition defense laws and intellectual property and copyright laws

No provision of this Code may be interpreted as authorization to violate the law.

4. Conflicts of Interest

Every employee must avoid situations where their personal interests conflict with the interests of LOGESPEC or its clients.

The following constitute conflicts of interest:

- Participating in decisions that directly or indirectly benefit a family member or personal relationship.
- Accepting gifts, travel, entertainment or any benefit that may influence business decisions.
- Having economic interests in suppliers, competitors or clients without proper disclosure.
- Using confidential information of LOGESPEC or its clients for personal benefit.

Obligation to disclose: Every employee must report in writing to their superior or to the Reporting Channel any situation that may generate a conflict of interest.

5. Anti-Corruption

LOGESPEC strictly prohibits the offering, payment, promise or authorization of any improper advantage, bribe, illegal commission or benefit to:

- Public officials, government authorities or political agents.
- Employees of client companies, including PETROBRAS.
- Political parties, candidates or party members.
- Intermediaries acting on behalf of LOGESPEC.

This prohibition applies to both direct and indirect payments through third parties, and extends to any amount, however small.

Gifts and Hospitality:

- Exchange of promotional gifts of symbolic value (under USD 50) is permitted.
- Any invitation to meals, travel or events must be previously approved by General Management.
- Delivery or receipt of cash or equivalents (gift cards, vouchers) is prohibited.

6. Relationship with Clients and Partners

- **Service Quality:** LOGESPEC commits to offering technological surveillance services and access to technical standards with the highest quality standards.
- **Truthfulness of Information:** All information presented to clients, regulatory entities or in bidding processes must be truthful, complete and up to date.
- **Confidentiality:** The commercial, technical and contractual information of our clients is strictly confidential and will not be disclosed without express authorization.

Intellectual Property: LOGESPEC respects the intellectual property rights of Standards Developing Organizations (SDOs) and NIMONIK Inc., and guarantees that access to technical standards is carried out in accordance with current licenses and agreements.

7. Integrity in Bidding

In all participation in public or private bidding processes, LOGESPEC commits to:

- Prepare proposals independently, without coordinating with other competitors.
- Not obtain or use confidential or privileged information about the process.
- Not offer undue advantages to officials or employees of the contracting entity.
- Maintain accurate records of all proposed costs and prices.
- Reject any attempt to manipulate the bidding process.

8. Personal Data Protection

LOGESPEC processes personal data of clients, employees and third parties in accordance with Chilean Law 19.628 and the Brazilian LGPD, when applicable.

Principles:

- Collect only the data necessary for the provision of the service.
- Obtain informed consent when required.
- Implement technical and organizational security measures to protect data.
- Not retain personal data longer than necessary.
- Notify data subjects and authorities of any data breach.

9. Accounting and Financial Records

LOGESPEC maintains complete, accurate and verifiable accounting and financial records that faithfully reflect all transactions and operations of the company.

Prohibitions:

- Creating unregistered or off-book funds.
- Issuing false or inaccurate invoices or documents.
- Using resources for purposes other than those recorded.
- Altering, destroying or concealing relevant financial information.

10. Work Environment and Human Rights

LOGESPEC promotes a respectful, inclusive work environment free from discrimination or harassment.

Commitments:

- Equal opportunities regardless of gender, age, race, religion, sexual orientation or disability.
- Prohibition of sexual harassment, workplace harassment or any form of violence.
- Working hours that respect legal limits and the right to disconnect.
- Safe and healthy working conditions.
- Rejection of child labor and forced labor throughout our value chain.

11. Use of Resources and Information

The technological resources, equipment, systems and platforms provided by LOGESPEC must be used exclusively for work purposes.

It is prohibited to:

- Use client systems or credentials without authorization.
- Install unlicensed software.
- Share passwords or access credentials.
- Access, modify or delete information without authorization.
- Use technical standards access platforms for purposes other than those contracted.

12. Reporting Channel

LOGESPEC has a confidential Reporting Channel, accessible to all employees, clients and third parties, to report in good faith any violation or suspected violation of this Code.

Channel Features:

- Guaranteed confidentiality: the identity of the reporting person will be protected.
- Option of anonymity.
- Prohibition of retaliation against those who report in good faith.
- Impartial and timely investigation of all reports.
- Corrective and disciplinary measures if the violation is confirmed.

Email: denuncias@logespec.cl

Web form: <https://logespec.cl/canal-de-denuncias>

Postal address: El Boldo N°72, Casablanca, Región de Valparaíso, Chile

LOGESPEC will not tolerate retaliation, threats, harassment or discrimination against any person who makes a report in good faith, even if the report is not confirmed.

13. Violations and Consequences

Non-compliance with this Code of Conduct may have serious consequences, including:

- Internal disciplinary measures (warning, suspension, dismissal).
- Civil and criminal liability for the offender.
- Loss of business, contracts or disqualification as a supplier.
- Damage to LOGESPEC's reputation.

Every violation will be investigated and resolved fairly, respecting the right of defense of the person involved.

14. Implementation and Training

LOGESPEC commits to:

- Publish this Code on its official website (logespec.cl).
- Distribute it to all employees and obtain their written acceptance.
- Conduct periodic training on the content of the Code.
- Include integrity clauses in contracts with suppliers and partners.
- Review and update this Code annually.

Every new employee will receive a copy of this Code and must sign a declaration of knowledge and adherence before starting their functions.

15. Approval and Validity

This Code of Conduct was approved by the General Management of LOGESPEC SpA and enters into force as of its publication date on the corporate website.

Version 7.0 – January 2026

Next review: January 2028

José Santos González Páez

General Manager

LOGESPEC SpA