



Code of Ethics and Conduct

Approved by the Board of Directors at its Meeting No. 192 on 10/06/2023

TABLE OF CONTENTS

- How we work at VENG 4
 - About us 4
 - Mission 4
 - Vision..... 4
 - Our values 4
- How we behave 5
 - Our purpose..... 5
 - Our ethical principles 6
 - Our scope of application 6
 - Our conduct 7
- Pillars of ethics and conduct 8
 - We act with integrity 8
 - Human rights and public freedoms..... 8
 - Diversity, Equal opportunities and non-discrimination 8
 - Objectivity in business and conflicts of interest 9
 - Declaration of secondary activities 9
 - Presents and courtesies 9
 - Zero tolerance for bribery and corruption 10
 - Political contributions 10
 - We act with security..... 10
 - Confidentiality of information 10
 - Computer security 10
 - Protection of personal and sensitive data..... 11
 - Transparency of information..... 11
 - Transparency in purchases and contracts..... 11
 - Occupational health and safety 11
 - Responsibility and care for company assets 12
 - External communications 12
 - We act with sustainability 12
 - Social responsibility and environmental management 12
- Knowledge of the code and resolution of conflicts 13
 - Help guide 13
 - Training..... 14
 - Enquiry channels 14
 - How to report a complaint..... 14
 - Sanctions..... 15

LETTER FROM THE PRESIDENT

At VENG, we aim to develop space technology for Argentina and the world, with the goal of strategically positioning the country and simultaneously contributing tools that improve the quality of life for the population, having as pillars the management of integrity, honesty and economic sustainability of the company.

Therefore, we have the duty to observe and make others observe this Code of Ethics and Conduct in every action we undertake representing this company, since ethics is the governing principle of our work.

The purpose of this Code is to outline the ethical norms and principles which should inspire the conduct of our collaborators and other individuals participating in the processes and activities carried out by us.

In turn, the rules of this code do not exclude others that constitute a decent and proper behavior. The fact that they are not explicitly stated does not mean that we accept actions inconsistent with the stated principles or those which do not adhere to good behavior and/or good faith.

In VENG we are committed to carrying out a responsible and transparent management, promoting the ethical principles and good conduct of our institution.

We thank all our collaborators and the community.
Yours faithfully,

Dr. Eng. Marcos Daniel Actis
VENG S.A. President

HOW WE WORK AT VENG

About us

We are a company specializing in high added value services and technological developments, with expertise in the space activity.

We provide engineering services and manufacturing solutions for complex problems (R+D+i) to the space industry and high technology consumer industries in general.

Mission

To provide high added value services and technological developments, with expertise in the space activity. To operate under the premise of contributing to the strategic positioning of Argentina and, through its activities, providing tools that enhance the quality of life for its population; having as pillars of its management the integrity and economic sustainability of the company.

Vision

To be a supplier of satellite launch services from Argentina to the world. To offer services for Satellite Missions and the commercialization of products and solutions of satellite information.

To be a reference in the aerospace industry in Latin America and a promoter of Argentine technological development.

Our values

We win together – Contribution Mindset

Recognition – Overcoming and learning

Experts – Adaptive intelligence

Focus on customers – Growth Mindset

We win together: We are one team with shared identity and goals. We complement and collaborate to achieve great things together.

Contribution Mindset: We create contribution and value in everything we do. We measure it and seek feedback to dynamically adjust our response. We seek to maximize the contribution to all stakeholders of our system.

Focus on customers: We understand our customers' need and develop valuable solutions. We fulfill our commitments. We take care of the quality of our developments. We respond with agility. We build positive business relationship.

Growth Mindset: We are proactive generators of the growth we want to see. We design and drive transformative initiatives. We expand the business and enhance our competitiveness.

Recognition: We acknowledge and feel acknowledged. We identify the contributions and achievements of our colleagues and recognize them through words and actions. Teams take time to congratulate, appreciate and celebrate achievements.

Overcoming and learning: We seek to develop our individual and team capacities. We are constantly learning. We promote open knowledge exchange and a culture of learning and innovation. We research and experiment to accelerate our development.

Expertise: We stand out for our experience and technical talent; serving as market leaders in our industry. Our professionalism enables us to solidly manage the complexity of our services and technological developments.

Adaptative intelligence: We face changing, uncertain and adverse contexts with determination. We adapt and modify the environment to become stronger with each new challenge.

How we behave

Our purpose

Ethics should be an integral part of decision-making for all activities within the organization, stating the importance not only of achieving results but also of the manner in which they are obtained. It serves as our guide for behavior so that all those individuals involved during their career at VENG, in all type of situations, can refer to it and have the certainty of acting and making decisions correctly and as expected in the performance of their activities.

The purpose of this code is contributing to ensure the ethical behavior of the company by:

- Reducing all types of subjectivities and personal interpretations.
- Promoting actions aimed at increasing the degree of transparency in the company's operation.
- Ensuring that all corporate management will be carried out with integrity.

We expect the commitment of all individuals to whom this document is addressed, without accepting any benefits at the expense of the compliance with the law or ethical and moral principles.

Our Ethical Principles

- **Integrity:** We uphold a line of conduct that is integral and transparent. Furthermore, we maintain behavior aligned with righteousness and honesty to promote consistency between corporate practices and organizational ethical principles. Integrity excludes from our behavior any type of fraud, corruption, favoritism or influence peddling.
- **Responsibility in the exercise of the profession and in task performance:** We work to achieve the goals we set, committing and leveraging all our capabilities in accordance with principles of good faith and assuming the consequences of our action. We do not engage in situations, activities or interests incompatible with the roles performed. We are responsible for the effectiveness and performance of our tasks and those of employees under our charge.
- **Equity:** We encourage the values of justice and equal opportunities in the workplace.
- **Austerity and responsibility in the use of resources:** We manage and use resources responsibly, effectively and efficiently.
- **Transparency:** Our information is integral, accurate and verifiable. We communicate clearly both internally and in our relationships with stakeholders.
- **Commitment:** We constantly strive for the fulfillment of goals set by the company's management and conceive the organizational mission as the motivating core of our performance.
- **Confidentiality:** Knowledge is a fundamental asset of the company. In the course of our activity, we generate and use sensitive information which must be treated with the greatest responsibility and confidentiality.
- **Respect:** We promote mutual respect and the dignity of all individuals. We require respectful spaces, free from discrimination, violence, harassment and mistreatment.
- **Diversity:** We appreciate the unique characteristics of all individuals who are part of VENG, promoting an equal workplace to achieve maximum professional potential and, as a group, accomplish the company's goals. Accordingly, we do not accept distinctions based on age, gender, nationality, ethnic group, marital status, sexual orientation, disability, religion or beliefs, socioeconomic status, physical appearance, political opinion, union affiliation, and family, work or occupational situation.
- **Comradeship and teamwork:** Harmony in interpersonal relationships, a positive work environment and the collaboration spirit are fundamental values in achieving professional growth and the development of VENG.

Our scope of application

This Code of Ethics and Conduct applies to all individuals working for or on behalf of VENG, regardless of their contractual relationship, including the Board of Directors, contractors, subcontractors, suppliers and other partners of the business. Its scope includes any geographical location or office where activities are performed.

We seek the adherence of suppliers providing services to the company. We are opposed to hire companies which violate any of the rights protecting individuals (child labor, labor exploitation, undeclared work, illegal activities, among others).

In no case will the company accept working or conducting business with entities operating outside the law, good behavior or good faith.

Individuals covered by this Code must be aware of it, they will express their adherence in writing, delivering a copy of their acknowledgement of conformity to the Human Resources Management, Supply Management or the Department of Environmental and Occupational Health and Safety, as appropriate, which will be recorded in each personnel file. Additionally, it will be electronically sent via the institutional mail.

Our conduct

Inspired in the article 2 of Law 25.188 “Ethics in the Exercise of Public Function”, individuals affected by this Code must obey the following duties and guidelines of ethical behavior:

- Strictly obey and enforce the National Constitution, International Treaties, laws, regulatory decrees and any other applicable legal provisions.
- Perform with adherence to and respect for the ethical principles and guidelines stated herein.
- Ensure, in all their actions, the interests of VENG oriented to the satisfaction of the company’s general well-being.
- Do not receive any undue personal benefit related to the performance, delay or omission of an act inherent to their functions, nor impose special conditions resulting from it.
- Base their actions and demonstrate the greatest transparency in decisions made without restricting information unless a norm or public interest clearly/explicitly require it.
- Protect and preserve the company’s property and only use its assets for authorized purposes.
- Refrain from using facilities and services of the company for personal benefit.
- Adhere the procurement procedures that involve the principles of publicity, equality, competition and reasonableness.
- Refrain from intervening in any matter in which they are covered by any of the disqualification causes provided for in the civil procedural law.

Pillars of ethics and conduct

We act with integrity

Human Rights and Public Freedoms

VENG commits to respecting and preserving human rights and public freedoms recognized in the Universal Declaration of Human Rights and ratified international agreements, affirming that the principles outlined in these agreements are present in all our policies, procedures and regulations.

Individuals covered by this commitment must cooperate and ensure observance, performing their professional tasks with total respect and guarantee of the human rights and public freedoms.

Diversity, Equal opportunities and non-discrimination

The Board of Directors and the rest of the staff must create a healthy and equitable workplace, based on collaboration and teamwork, where mutual respect, collaborative spirit and inclusion prevail. Individuals must refrain from engaging in any behavior which may be offensive or discriminatory for reasons of religion, beliefs, ethnic group, nationality, gender, sexual orientation, marital status, political views, disability or any other personal characteristic, considering it a mere expository list. No harassment conducts, abuse of power, threats or moral harassment which create an atmosphere of intimidation will be tolerated.

The Board of Directors and the staff of VENG must take into consideration the diversity and inclusion of all employees, convinced that cooperation among individuals from different cultures, genders, sexual orientations, abilities, points of view and experiences enhances and strengthens diverse work teams, contributing to the achievement of institutional objectives.

For these reasons, at VENG we have a Zero Tolerance policy for situations of gender-based violence:

We believe that respect, integrity and dignity of each individual are the most important values, something that we must protect and foster among VENG's staff. Therefore, no situation violating individuals' rights and integrity through any kind of violence, whether physical, psychological, emotional, economic and/or sexual, will be tolerated. Additionally, no situations involving mockery, disrespect, harassment, discrimination, insult, humiliation, bullying or any action that endangers the safety, integrity and comfort of those working at VENG will be accepted.

If you suffer or witness any of the aforementioned situation or treatment by a person in a position of authority (direct or indirect), workmate, supplier or contractor external to VENG, you should contact the Unit of Gender, Diversity and Equal Opportunities (diversidad@veng.com.ar), under the Human Resources Management.

Objectivity in business and conflicts of interest

Those who are part of VENG are expected to behave in accordance with the corresponding honesty, loyalty and transparency. In decision-making, the benefit of the company will always take precedence over any other external and/or personal interest/benefit. Furthermore, our activities or relationships should not affect objectivity in the proper execution of our job. Any activity that could generate a conflict of interest must be reported to the company.

A conflict of interest occurs when a direct or indirect personal interest (personal situation, family, romantic, friendship, commercial activity or any other type of circumstance) could affect our objectivity or independence of judgement in the development of our activity in the company, making it difficult to act in pursuit of its objectives.

If you have a conflict of interest or believe that you are facing with a situation which could involve or lead to a conflict of interest, you must complete the “conflict of interest declaration” and send it by e-mail to lineaetica@veng.com.ar. When in doubt of a potential conflict of interest, contact us through any of the inquiry channels.

Following, we will detail, by way of example, but not excluding, situations which may constitute a conflict of interest:

- Being a supplier directly or through third parties o VENG.
- Receiving or granting any advantage or benefit from other companies, entities, organizations or individuals.
- Obtaining benefits for ourselves or third parties through the misuse of our positions.
- Working for a competitor, customer or supplier in any function.
- Hiring suppliers of the company to provide goods or services on properties of individuals covered by this code.
- Competing with the company for the purchase or sale of properties, products or services.
- Having vested interests in transactions involving the company, competitors, customers or suppliers.
- Receiving loans, guarantees or discounts from customers, suppliers or competitors greater than those offered to the general public.

Declaration of secondary activities

Employees engaged in any commercial or professional activity outside of VENG, parallel to those performed for the company, which somehow could compete with any of its business, must report it to Human Resources Management.

Presents and courtesies

VENG’s staff, authorities and individuals associated with the company, could not accept nor give presents, courtesies, donations or rewards of goods or services, in cases it may affect his/her

objectivity in decisions-making or influence a commercial, professional or administrative relationship or represent an incentive for obtaining preferential treatment or influence in the outcome of a business decision. Those promotional or courtesy presents which are routinely offered and of little economic value may be accepted. In the case of corporate or courtesy presents, they are considered acceptable as long as their value do not exceed the amount established by the article 3 of Decree 1179/2016, Annex 1, or the regulation replacing it.

Zero tolerance for bribery and corruption

At VENG, we do not tolerate corruption in any form, whether direct or indirect. It is strictly forbidden for all individuals covered by this policy to make, offer or receive any cash payment, kind, favor or benefit from any individual, official, public or private entity, political party or candidate for a public position with the intention of illegally obtaining or maintaining business or other improper advantages. Facilitation payments made to public officials in order to ensure, advance or accelerate a public action or procedure are also forbidden. Compliance with the law and various regulations is our responsibility and obligation, as well as rejecting and reporting any act of corruption.

Political contributions

The financing of electoral campaigns and/or contributions to political parties is strictly forbidden in any form. The use of funds or resources from the company, whether directly or indirectly, to help financing political parties, political campaigns and candidates is prohibited.

We act with security

Confidentiality of information

For VENG, information is one of its main assets. All non-public information belonging to the company or under its custody is considered reserved and confidential. Information belonging to the company includes the product of work, software, designs, reports, contracts, business proposals, procedure manuals, technical documentation, patents, list of customers, etc. We must keep confidentiality and strict discretion as consequence of our activity in VENG, just as the information we receive from employees, customers or third parties is confidential. In the case of legal requirements, the Legal Advisory Department must intervene in order to safeguard VENG's information.

The duty of confidentiality is maintained even after the employment relationship has finished.

Computer security

All computer and communication equipment provided by VENG, including email, is for exclusive working use. The user account and/or email that the company has assigned to every employee with

the domain “@veng.com.ar” or “@vengsa.com.ar” is for their personal use and should only be used for habitual works pertaining to their work.

Passwords must be strong and difficult to guess. Each employee must commit to keep the privacy of their password. Any task executed with a user account or email account will be considered as performed by its owner. It is forbidden to copy and/or share company information through services based in the cloud, both public or private (Google Drive, Dropbox, etc.) which are not expressly authorized by the company.

Employees must refrain from adding, removing or changing the hardware or software configuration provided by VENG, as well as making modifications to the security settings on devices. Any attempt to violate the conditions of computer security will be considered a serious offense. The employee is committed to familiarize themselves with the Information Security Policy that VENG approves in due course, as well as the procedures that depend on it. The company will implement appropriate formal mechanisms to ensure the proper use of its resources. In the event of identifying any user altering any of the above rules, the company will proceed to report this incident, and if it is considered in bad faith or a repetition of such actions, the company will take legal measures to safeguard its rights.

Protection of personal and sensitive data

At VENG, we work applying new technologies while we ensure the right to privacy by protecting personal and sensitive data in accordance with laws in force. We collect, use and access information related to compensations, evaluations and medical reviews, which will be protected with the same standards as customer information. All employee records are considered confidential documents and cannot be disclosed, except in case of legal defense of the employer or as required by law.

Transparency of information

The transparency of information is a fundamental principle considered by the company, for that reason measures will be taken in order to ensure its transparency in compliance with the legal provisions in force.

Those individuals covered by this Code must communicate to the company the information available both internal or external in a true, verifiable and faithful way, always reflecting the entirety of transactions with clarity and precision in all records, files and books, whether in physical or digital format. Under no circumstances will they provide incorrect, incomplete or inaccurate information that could confuse the recipient.

This principle of transparency and accuracy of information applies to both internal communication and external communication, as well as to in any request from public or external entities to VENG.

Transparency in purchases and contracts

Access to goods, services and contracts must be within the regulatory and operational framework in favor of good practices and efficiency, in a context of transparency based on timely publicity and dissemination of actions and contracts.

Its management will be performed under the principles of concurrence, competition and equal treatment of suppliers and interested parties, through the modality applicable according to the Procurement Procedure Manual.

Occupational health and safety

The company is committed to its employees' safety, health and occupational protections in accordance with legal regulations in force. Therefore, VENG provides proper occupational health and safety environments in all its workplaces.

The principles of hygiene, care for the work environment, safety and preservation of work places are of vital importance for the development of daily tasks within the company. For this reason, all behavior that jeopardizes the integrity of employees, suppliers, customers or any person inside the company's facilities is strictly prohibited.

All the individuals covered by this policy will comply with the guidelines and recommendations for occupational health and safety, regulated by the Department of Environmental and Occupational Health and Safety.

Responsibility and care for company assets

VENG provides its employees with the necessary resources to carry out their professional, technical or operational activities. Individuals covered by this policy must protect and preserve the real estate, furniture and resources provided to them with responsibility and seriousness. In his/her custody the maximum care must be observed, avoiding misuse, waste or mismanagement.

The mentioned assets and resources cannot be used for personal benefit nor should it be deliberately allowed for a third party to use them.

The items detailed below are considered as such:

- Vehicles, machinery and tools.
- Furniture, computers, photocopiers and phones.
- Office supplies (stationery, pencils and pens) and bibliographic material.
- Offices and common areas.
- Computer systems
- Documents or legal instruments or other rights over assets.

This list corresponds to an enumerative and non-exhaustive nature. Besides, in case of breakage or malfunction of any of VENG's resources, it must be reported to the direct responsible in order to communicate it to the corresponding department as appropriate.

External communications

You may only disclose corporate information if you have specific permission to do it and after the Institutional Relationships and Communications Management has verified it. If the media gets in touch with you, do not make statements and refer them to the department of our company authorized for such matters.

We act with sustainability

Social responsibility and environmental management

All individuals who are part of VENG without distinction of their position, responsibility and/or hierarchy, including suppliers, contractors, third parties, among others, must commit themselves to activities developed by the company, focused on environmental protection and corporate social responsibility.

Individuals covered by the Code must understand Corporate Social Responsibility as the commitment that the company establishes with those involved, based on positive labor relationships, responsibility within the business chain, active policies and collaboration with public policies.

Corporate goals must be compatible with the sustainable development of the company.

Environment preservation is integrated into our business decisions and practices. We focus on the efficient and sustainable use of natural resources. We encourage our environmental awareness in all business activities, complying with applicable environmental laws, policies, standards and regulations. This involves developing actions of environmental responsibility, such as awareness-raising operations, training; paper use reduction; paper recycling, differentiated waste separation and initiatives of energy saving and/or any other action adopted by VENG in the future regarding this matter.

Knowledge of the code and resolution of conflicts

Each individual is responsible for knowing, understanding and complying with this Code, as well as all laws, regulations, policies and procedures of VENG that pertain to their functions and obligations in the company.

The Code does not cover all circumstances that individuals may encounter, but it establishes clear conduct guidelines.

All individuals covered by this Code are obliged to apply its principles and practices.

Compliance with the Code of Ethics and Conducts and related policies is a necessary condition to continue or start a working or contractual relationship with VENG. Failure to comply with it may result in disciplinary sanctions, which may come to a disengagement from the company. If failure is worth of it, civil or criminal actions will be pursued.

Some examples of behavior that deviate from this Code include:

- Violating or induce others to violate the established guidelines in the Code.
- Disregarding this Code by not acquainting oneself with it.
- Taking reprisals against another employee who, in good faith, states a concern or who participates in the investigation of a reported case.

Help guide

Notwithstanding enquiries that can be made to the President of the company, Internal Audit Unit, the reporting manager or Human Resources, the phrases and questions listed below may help to determine if you are facing a compromised ethical situation.

Questions to help you to make a decision or act with integrity:

- ✓ Is it legal?
- ✓ Is it good for VENG?
- ✓ Can I share it with my colleagues?
- ✓ Would the most decent and fair person I know do it?
- ✓ What would my family and friends think if they know about it?
- ✓ How would I feel if this were published in media and/or social networks?

Training

Training in ethics and integrity matters is mandatory for all staff, regardless of their hierarchy. You will receive training in ethics and integrity matters at the beginning of your relationship with the company, and then you will receive periodic training sessions.

Enquiry channels

Submit your enquiries securely through any of the following authorized channels:

- From an e-mail to: lineaetica@veng.com.ar
- In person, verbally or in writing to:
 - VENG S.A. president.
 - Internal Audit Unit.
 - Direct supervisor.
 - Human resources.
- Online form: <https://forms.office.com/r/8uM1PPemq7>



How to report a complaint

It is mandatory to report any violation of this Code. VENG considers it essential that interested parties feel secure when reporting any action they believe violates this Code and encourages everyone to express their concerns with complete frankness, providing the greatest amount of data as possible for the investigation. All contacts and investigations will be treated with the utmost confidentiality and in agreement with applicable laws and regulations.

If the interested party believes that there is deviation from the established guidelines in this Code or any type of violation to the ethical standards governing this company, the problem must be reported through some of the following authorized channels:

- Email: lineaetica@veng.com.ar
- In person, verbally or in writing. Those complaints will be received by the President of the company and the Internal Audit Unit.
- Anonymously through the following link: <https://forms.office.com/r/8uM1PPemq7>



When reporting a complaint, please bear in mind that:

- The complaint may or may be not anonymous (it will be admitted as long as the elements attached or recorded in the submission allow presuming the authenticity and seriousness of alleged facts, as well as investigating it), either with reserved or identified identity.
- The description of the facts must be clear, well-founded and involve employees and those providing professional services or suppliers or contractors of the company.
- If possible, date and place where the irregularity took place must be informed.
- Inform third parties outside the organization (contractors, suppliers, employees from other companies, public officials, etc.) who could be involved in the incident.
- It is not necessary to provide data of the complainant, not to sign the complaint if it is done in writing.

VENG trusts in the integrity of its collaborators until the violation of this Code of Ethics and Conduct is proven.

Sanctions

Possible disciplinary sanctions that may be applied include:

- Warning or reprimand.
- Suspension.
- Precautionary suspension or with the threat of dismissal.
- Dismissal with just cause.
- Promotion of corresponding legal actions, whether criminal or civil.