



ABOUT > it

DIGITAL IDEAS

CODE OF ETHICS AND CONDUCT

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1 INTRODUCTION

The objective of this **Code of Ethics and Conduct** is to establish the bases, values and guiding principles that will guide the daily performance of the company's activities and is of general application both to the internal members of the company and its external stakeholders.

This document will allow to understand the ethical stance and will of **About IT Digital Ideas SRL** regarding certain elements and aspects that are part of a company committed to compliance, transparency, integrity and mutual respect.

These and other values are what sustain and promote the organization and with which you want maximum consistency in all your business actions.

2 MISSION

About IT Digital Ideas SRL is a Paraguayan company that provides digital solutions and tools incorporating compliance as a pillar of its organizational structure and the basis of its strategic businesses. **About IT Digital Ideas SRL** has the capacity and professional ability to establish digital marketing strategies, digital contents and management of social networks linked to Compliance issues, which represents an absolutely differentiating element from other companies on the market.

Through its **Leaks and Actions** brand, **About IT Digital Ideas SRL** offers advisory services, training and education in Corporate Compliance and its different aspects: corporate ethics, corporate governance, compliance programs, regulatory compliance, criminal compliance, interested parties, risk management, money-laundering prevention, cybersecurity, information security, quality, corporate social responsibility, among other issues related to compliance.

3 VISION

The Vision of **About IT Digital Ideas SRL** is to achieve awareness and adequate training in Compliance for all sectors of Paraguay, understanding that the comprehension and application of a culture of compliance depends mainly on the ethical will of people to advance towards change in the daily act, thus influencing other people and then organizations and institutions. The articulation of alliances between different sectors is another great strategic objective that can facilitate a dynamic process and promote progress even in regulatory matters.

This Code of Ethics and Conduct has been prepared in accordance with the following objectives:

- Maintain a high commitment to honesty and professional responsibility in all business relationships, raising compliance standards, beyond those currently established in Paraguayan legislation, thus demonstrating the institutional position oriented towards self-regulation.
- Define the ethical behavior of the company, which is mandatory for everyone, including the General Management, employees and other interested parties (Clients, Suppliers, Collaborators, State Institutions, etc.)
- Disseminate and promote compliance in all its forms and in all sectors through the real, public and explicit commitment of Senior Management, through the socialization of the content of this Code, its guidelines and the actions promoted by **About IT Digital Ideas SRL** to carry them out.
- Promote spaces for dialogue to analyze the national legal framework towards a more effective and comprehensive regulation that allows action in preventive phases towards protection against increasingly complex corruption crimes that are committed using legal structures.
- Advance the need to establish Compliance and Integrity Programs as a means to guarantee good governance, transparency, ethics, the commitment of senior management and zero tolerance for corruption.
- Establish guidelines to manage conflicts of interest that may arise.
- Establish the guiding principles for the protection of personal data, which must be treated in a lawful, loyal and transparent manner, specifying in advance to the interested party, the purposes for which such data will be collected and the subsequent treatment, in an exact and explicit manner.
- Establish guidelines that respect and protect the right to intellectual property.
- Define the obligation to report behavior contrary to ethics and the law, and the obligation to comply with the confidentiality of the complainant.
- Comply with laws, regulations and obligations in force in the national legal framework, as well as other norms, agreements and regulations and international recommendations and disseminate them; and also, those related to respect for human rights, care for the environment, equal conditions and the fight against corruption in all its forms.

4 NON-COMPLIANCE

Failure to comply with this Code of Ethics and Conduct will lead to disciplinary measures, such as sanctions and suspensions, and, as the case may be, to the immediate termination of the contractual relationship. In addition, these measures may include those legal provisions established by law (at the national level), as well as those that come framed by the signing of contractual agreements where international laws and provisions apply. For **About IT Digital Ideas SRL**, the complementary measures that may arise as a result of international legal provisions derived from signed contractual agreements will be mandatory.

5 SCOPE OF APPLICATION

The scope of application of this Code of Ethics and Conduct extends to all Founding Members, CEOs, Executives, Employees, Clients, Suppliers, Creditors and Third parties linked to the company. In addition, the scope of application extends to the **Leaks and Actions** brand and its activities, as well as to all products, by-products, brands and projects that are part of **About IT Digital Ideas SRL**.

Therefore, all the parties and counterparts of **About IT Digital Ideas SRL** with whom contracts, conventions or agreements are signed will be requested to adhere to this Code by signing their adherence to it. The understanding and acceptance of this Code will be signed in the **"Declaration of adherence to the Code of Ethics and Conduct"**, which will be delivered to **About IT Digital Ideas SRL** physically printed or scanned, either of the two being valid formats.

6 VALUES, PRINCIPLES AND GUIDELINES PROMOTED

ETHICS AND TRANSPARENCY:

We encourage ethics and transparency as the basis of our behavior in each of the actions carried out. We foster this culture among our collaborators and associates, demonstrating with our actions in the way we handle economic resources, investing in moral activities and profitable businesses. We respect, motivate and empower our collaborators, employees, allies and associates, demonstrating tolerance, honesty, inclusion, equality, fair and responsible treatment. We support environmental ethics through the conscious and responsible use of natural resources and respect and care for nature.

HONESTY AND TRUST:

We fulfill the commitments assumed, thus proving to be integrity and trustworthy. We protect the confidentiality of the information that has been entrusted to us, be it from our allies, clients, employees, suppliers, collaborators, public institutions, regulatory entities, national and international organizations of civil society, international cooperation organizations, among others. We provide our stakeholders with relevant information about the context in which their personal data will be processed, ensuring that the data collection is carried out with the express, free, specific, informed consent, in compliance with the duty of lawfulness, as well as in that their storage is limited to what is necessary in relation to the purposes for which they are processed. Moreover, we understand that it is essential to ensure the necessary security measures so that risks related to security breaches are reduced. If at any time this security is compromised, we act quickly and responsibly.

INTEGRITY:

It is manifested through the honesty and leadership values of our Management. At **About IT Digital Ideas SRL** we are honest and loyal people, firm in our actions and we act in the right way, both with our employees and with our clients, suppliers and other interested parties. We do not manipulate information that is collected in our databases.

QUALITY:

We offer innovative, reliable and excellent products and services, understanding that the price must be appropriate to the characteristics and possibilities of our clients, partners and associates. We make sure that our services meet the expected quality standards. We map risk situations, unforeseen events may also arise that have not been previously detected, so we promise to immediately notify the affected party and take the corresponding corrective actions to resolve it in the shortest possible time.

RESPECT FOR HUMAN RIGHTS:

We respect the principles of the United Nations Universal Declaration of Human Rights, as well as the declarations of the International Labor Organization. We promote equal opportunities and treat all people fairly and impartially, without prejudice associated with race, color, nationality, ethnic origin, religion, gender, sexual orientation, marital status, age, disability or of any other nature.

CORPORATE GOVERNANCE:

Corporate governance is understood as the set of internal policies, culture and regulations that guide business management in order to make it more transparent and efficient. Therefore, all the management and organizational structure of the company are oriented towards the principles of Corporate Governance that the OECD promotes and recommends for countries and sectors, whether or not they are part of it. Our interest is focused on following these guidelines and raising standards towards best practices in corporate governance, thus giving **About IT Digital Ideas SRL** a solid image and reputation with its stakeholders.

SUSTAINABILITY:

We are committed to sustainable development, the protection of the environment and the reduction of any negative impact of our operations on the environment, especially the characteristics of development that ensure the needs of the present without compromising the needs of future generations. In addition, the company will pay special attention to the possible negative impacts that we may cause to the environment and people, either directly or indirectly through the development of our activities.

GENDER EQUALITY:

The objective of gender equity is to offer all people, regardless of their gender, the same conditions, opportunities and treatment, but taking into account the particular characteristics of each one to guarantee people's access to their rights. Therefore, we express our intention of an equivalent treatment to overcome the conditions that maintain social inequalities in areas such as the wage inequality that exists between men and women, inequality in the allocation of jobs, unbalanced distribution of functions, sexual harassment, among other topics.

PROFESSIONALISM:

We carry out our tasks with total commitment, measure, responsibility and work ethic, among collaborators, partners, suppliers, company clients, civil society, public institutions, international organizations and agencies, and regulatory entities.

7 ETHICAL AND BEHAVIOURAL GUIDELINES

- 7.1 Tone at the Top: The Tone of Senior Management**
- 7.2 Respect for the Rights of Individuals**
- 7.3 Intellectual property. Information processing**
- 7.4 Data Protection**
- 7.5 Principle of Fair and Anti-Trust Competition and Conflict of Interests**
- 7.6 Fight against Corruption and Money Laundering**
- 7.7 Prohibition of bribery, fraud and facilitation payments**
- 7.8 Due Diligence Procedures and Third Parties**
- 7.9 Corporate Reputation**
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7.1 Tone at the top: The Tone of Senior Management

- Corruption is not tolerated in speech and not in deed.
- There will be no hesitation in making ethical decisions, even if they affect the organization's business.
- Businesses will be abandoned when they are clearly associated with undue conditions originated by public officials.
- The improper acts of public officials towards the legal person will be reported to the competent authorities in order to be punished. Requests for bribes of any nature, whether from the public or private sphere, will not be tolerated. They will be denounced and the maximum public exposure will be given.
- The attitude of zero tolerance to corruption will be transmitted to all interested parties through contractual clauses within the framework of alliances and commercial agreements with third parties, as well as with the staff themselves who will be trained to properly understand the consequences of the corruption breach.
- Through due diligence carried out on all parties, the company will make its involvement in risk management explicit.
- Ethical behavior will be monitored by Senior Management and the sanctions stipulated in this code will be carried out, including the termination of the employee or the termination of the contract with the third party involved.
- Reports that are not true and clearly contain bad intentions will also be sanctioned.
- The supporting accounting documentation must be sufficient for due compliance with the applicable national legislation and those derived from the international agreements accessed by **About IT Digital Ideas SRL**.
- The hiring procedures will be carried out with total transparency, preserving the criteria of quality, price, delivery, professionalism, etc.
- All company employees, as well as interested parties, must know and prove knowledge of this Code of Ethics. The accreditation must be done by signing the ***Declaration of Adherence to the Code of Ethics***.

7.2 Respect for the Rights of Individuals

About IT Digital Ideas SRL is committed to respecting at all times the fundamental rights of people in all their forms and assumes the commitment to act in accordance with current legislation, established internal regulations and respect for ethical practices and good governance internationally accepted. In this sense, any type of attitude of aggression, hatred or manifestation of discrimination towards people is rejected, whether for reasons of sex, age, race, religion, disability, political orientation, social level or any other categorization that induces or tries to circumvent discrimination. The employees of **About IT Digital Ideas SRL** will receive at all times fair and equal treatment (equal conditions), complying with the company, fully with the established norms that the law assists in their rights. **About IT Digital Ideas SRL** rejects physical, verbal or psychological harassment, as well as offensive treatment or abuse of authority towards its collaborators.

On the other hand, employees and collaborators of **About IT Digital Ideas SRL** must act at all times in compliance with the law, behaving with transparency, honesty, decency and honesty as established by this Code. Therefore, they must refrain from carrying out any conduct that poses a risk to the reputation, image and interests that the company wishes to promote both nationally and internationally.

About IT Digital Ideas SRL supports the implementation of public policies that promote a corporate culture based on merit, equal opportunities and the development of competencies and skills for the best professional and personal performance of people.

About IT Digital Ideas SRL fosters an environment of teamwork and dynamic collaboration, which allows enhancing the skills of the staff and therefore expresses its support for the training and education processes that the company organizes individually or as a product of alliances agreed with other companies and / or institutions (public or private).

Moreover, the company will promote at all times a safe, emotionally healthy work environment that ensures the integrity of its collaborators, so that any behavior that puts the integrity of the personnel at risk will not be tolerated, whether this risk comes from its own staff, collaborators or company facilities and equipment. Therefore, it will be considered a serious offense to incur in unsafe behaviors or breaches of safety regulations.

7.3 Intellectual property. Information processing

The information that **About IT Digital Ideas SRL** manages and provides is considered a fundamental asset for the credibility of the company. Therefore, it must be treated at all times with the veracity that characterizes it, with eloquence and precision. In the cases that it requires with due confidentiality, the employees respecting this confidentiality. Senior Management, employees and third parties who have access to confidential and reserved information, such as new or developing products or services, undertake to maintain strict confidentiality regarding this information and its development, respecting the intellectual property rights of **About IT Digital Ideas SRL**.

About IT Digital Ideas SRL reserves the right to take the corresponding legal actions in the event that intellectual property rights are affected, as a result of a breach in the confidentiality chain, and as a result it puts the strategy of the company at risk, company, businesses or agreements pending formalization or in execution.

Regarding the exposure of the information for accounting, tax and financial purposes, it will contain with accuracy, truthfulness and fidelity the movements of the operations carried out. **About IT Digital Ideas SRL** is committed to complying in a timely manner with the presentation of the financial statements before the corresponding government agencies.

7.4 Data Protection

Regarding Data Protection, **About IT Digital Ideas SRL** undertakes to comply with the duty of legality, for which one of the following conditions must be met:

- a. the interested party must give their consent for the processing of their personal data for one or more specific purposes;
- b. the treatment is necessary for the execution of a contract in which the interested party is a party or for the application at the request of the same of pre-contractual measures;
- c. the treatment is necessary for the fulfillment of a legal obligation applicable to the person in charge of the treatment;

- d. the treatment is necessary to protect vital interests of the interested party or of another natural person;
- e. the treatment is necessary for the fulfillment of a mission carried out in the public interest or in the exercise of public powers conferred on the person responsible for the treatment;
- f. The treatment is necessary for the satisfaction of legitimate interests pursued by the person responsible for the treatment or by a third party, provided that the interests or fundamental rights and freedoms of the interested party that require the protection of personal data do not prevail over said interests, in particular when the interested party is a child.

Personal data obtained directly from the owner

In this case, **About IT Digital Ideas SRL** must comply with its duty to inform the interested party by previously informing, expressly, precisely and unequivocally the following aspects:

- a. The existence of a file or processing of personal data.
- b. The purpose of collecting the data and the recipients of the information.
- c. The identity and address of the person responsible for the treatment or, where appropriate, of his representative.
- d. The consequences of obtaining the data or of the refusal to supply them.
- e. The possibility of exercising the rights of access, rectification, deletion, opposition, portability, limitation of treatment and not to be subject to automated decisions.
- f. The mandatory or optional nature of your response to the questions posed.

When questionnaires or other forms are used for the collection, all the points mentioned will appear in them, in a clearly legible way.

In addition, the data must be collected for specific, explicit and legitimate purposes, and may not be subsequently processed in a manner incompatible with said purposes or for other matters for which the consent of the interested party has not been obtained, except for purposes of archiving in the interest of public, scientific and historical research purposes or statistical purposes.

These data must be accurate or updated, adequate, pertinent and limited to what is necessary in relation to the purposes for which they are processed, that is, no more data

should be collected than is essential to carry out the specific treatment, and they should not be kept for longer than is necessary for the identification of the interested parties and their treatment.

About IT Digital Ideas SRL is committed to complying with the **duty of loyalty and transparency**, so that in no sense may personal data be collected using fraudulent means, deceptive or illegal practices against the holders of personal data.

About IT Digital Ideas SRL undertakes to comply with the **duty of Consent of the Interested Party**. When the treatment is based on the consent of the interested party, it must be demonstrated that the interested party consented to the processing of her personal data.

If the consent of the interested party is given in the context of a written statement that also refers to other matters, the consent request will be presented clearly identifying all the matters, in an intelligible and easily accessible way and using clear and simple language.

The interested party will have the right to withdraw their consent at any time and in a simple way. The withdrawal of consent will not affect the legality of the treatment based on the consent prior to its withdrawal. Before giving consent, the interested party will be informed of it.

Consent is essential to demonstrate the free, unequivocal, specific and informed will through which the interested party consented to the processing of her personal data.

About IT Digital Ideas SRL is committed to complying with the **duty of secrecy**, where those responsible and those in charge of the data processing as well as all the people who intervene in any phase of the treatment will be subject to the duty of confidentiality even after the treatment has ended.

Consent given over the internet

In the event that **About IT Digital Ideas SRL** collects data through the internet, consent will be obtained through a form which will be accessed through a link or link clearly indicating the purpose of collecting such data, and the affected party must expressly accept, thus giving your consent. In no case may you enter personal data without having previously granted your consent. At any time, the affected person can exercise their right of access, cancellation of consent, rectification or opposition.

7.5 Principle of Fair and Anti-Trust Competition and Conflict of Interests

We abide by antitrust and fair competition laws in order to promote competition in our services offered to clients at competitive prices.

We reject all types of agreements or arrangements, written or oral, formal or informal, whose purpose is restrictive supply or distribution and the unfair use of a market position to damage competition.

In terms of conflict of interest, there is a conflict of interest when an employee or contractor cannot impartially perform his duties or provide objective and impartial professional advice, because his personal interest conflicts with that of the company.

There may be a conflict of interest, for example when an employee accesses privileged information of the company, about price trends, transactions of other users or new products that will be launched at a certain time and uses it in violation of the confidentiality rules, ethical and behavioral rules and regulations of this Code. Another situation that may arise is that a contractor (a third party hired by **About IT Digital Ideas SRL**) or an advisor, provides services to another institution during the same period of time. In this case there would be no conflict of interest as long as the information is kept confidential.

The **real** conflict of interest occurs when there is a particular interest of the person on a certain judgment or professional discernment, and he is in a situation in which he has an obligation to provide this judgment. For **About IT Digital Ideas SRL** this is a real risk that must be identified and prevented. A **potential** conflict of interest occurs if the person has a particular interest that could influence the professional judgment of the position or position, they occupy, but is not yet in a situation in which they must offer such insight.

Therefore, the type of conflict of interest that is occurring may lead to situations of unfair competition, so this Code establishes the obligation of immediate communication by **About IT Digital Ideas SRL** to the person (whether employee, collaborator or third party) when he is in any of these situations and having knowledge of it. Likewise, employees, collaborators and third parties are also expected to carry out the same communication action to **About IT Digital Ideas SRL** when they become aware that they are in a conflict-of-interest situation.

Regarding interactions with the public sector, they will be documented, both direct and indirect, the company urges the use of adequate and formal channels that provide evidence of the communications made in order to minimize risks.

The collaborators of **About IT Digital Ideas SRL** must act with loyalty and professionalism, attending at all times to the defense of the interests of the company and avoid all those situations in which there is a coalition of interests. If so, they must refrain from incurring in dual situations such as those explained in this section.

7.6 Fight against Corruption and Money Laundering

About IT Digital Ideas SRL declares itself against promoting corruption (whatever its form or nature), influencing it through people to obtain some benefit through illegal and unethical practices, or any other direct or indirect means.

About IT Digital Ideas SRL expressly declares that it will not tolerate that other institutions or companies implicitly and explicitly suggest the carrying out of such crimes to Senior Management, staff or any third party that is linked to **About IT Digital Ideas SRL**. All those involved in the development of functions within the company will ensure compliance with the internal control and risk management established to avoid these illegal and improper practices in the relationship that **About IT Digital Ideas SRL** may have with third parties. The interested parties that carry out commercial acts with **About IT Digital Ideas SRL** must assume commitments similar to those contained in this Code. To avoid irregular payments or any situation that indicates any activity originating from money laundering or corruption, **About IT Digital Ideas SRL** undertakes to use all its knowledge and expertise in the monitoring, evaluation and prevention of these practices, establishing the control mechanisms and the necessary internal policies on those economic transactions, both of collections and payments, of an unusual or suspicious nature, either for the amount or for the movement of cash or from territories of dubious fiscal reputation, proceeding to immediately inform the competent authorities and collaborate in everything that the process requires.

7.7 Prohibition of bribery, fraud and facilitation payments

All types of bribery are prohibited. It is not allowed to promise, offer or give any benefit or advantage of any nature to natural or legal persons, in order to influence decisions of any kind (including governmental, administrative or judicial) that result in undue advantages for **About IT Digital Ideas SRL**. Accepting any benefit or advantage that may result in a breach of the obligations and duties of the company's employees and collaborators is expressly prohibited. **About IT Digital Ideas SRL** does not offer or accept gifts, gifts, compensation, invitations or other types of incentives that may reward or influence a business decision.

Rules on Gifts and Hospitality

- The making of corporate gifts and gifts to public officials is absolutely prohibited.
- As an exception, prior authorization may be admitted, gifts of a reduced amount (less than Gs. 200,000. -) for courtesy purposes. In these cases, it must be documented by means of a delivery certificate, in addition to the purchase invoice. In the case of lunches or dinners, these expenses must also be documented.
- It is absolutely forbidden to give gifts of any kind whose purpose is to influence the will or decision of public officials in exchange for obtaining a benefit or favor for the company.
- If an “exceptional” circumstance occurs, such as a health emergency or catastrophe, the case and the mechanisms for making a donation viable will be analyzed in such a way that it can be supported by documentation as such and the process is transparent.
- Regardless of the applicable legal regime, acts susceptible to bribery will be sanctioned as established in the “sanctions” section of this Code.

7.8 Due Diligence Procedures and Third Parties

About IT Digital Ideas SRL is committed to carrying out all the necessary due diligence actions to third parties, looking for risks or possible risks that may exist and, therefore, it will be able to demonstrate that it acted appropriately in compliance with the established ethical and legal parameters. Likewise, it will seek that the related parties respect the Law, this Code of Ethics and Conduct and behave in an integral manner as promoted and expressed in this document. To carry out such activities, risk prioritization or categorization parameters will be adopted, the list of third parties being:

- **Business Partners**
- **Distributors**
- **Agents**
- **Commercial representatives**
- **Intermediaries**
- **Managers**
- **Lobbyists**
- **Contractors**
- **Consultants**
- **Customs brokers**
- **Suppliers**
- **Service providers**
- **Clients**
- **State Regulatory Entities**
- **Civil Society Organizations (National and International)**
- **Educational Institutions**
- **Financial and Credit Institutions**
- **Chambers of Commerce**
- **Other Organizations and Institutions**

In all cases, the necessary processes and procedures will be carried out to verify the integrity and trajectory of third parties, partners or business allies, including clients, allied companies, suppliers, distributors, service providers, agents and intermediaries, state entities, academic institutions., NGOs, etc., at the time of hiring their services and during the commercial relationship.

In the event of corporate acquisitions or company transformations with companies with which **About IT Digital Ideas SRL** already has a commercial agreement, due diligence will be carried out during the merger, transformation or acquisition process, in order to ensure that they are carried out with total normality, that the risks can be identified sufficiently in advance for the detection of possible irregularities, illicit acts, risks linked to legal or natural persons of dubious reputation, which in turn may put the image at risk and reputation, operability, solvency and functioning of **About IT Digital Ideas SRL**.

In the field of contests and bidding processes, **About IT Digital Ideas SRL** will carry out specific procedures to prevent illegal activities derived from such processes or from the execution of administrative contracts or other interaction with the public sector.

7.9 Corporate Reputation

About IT Digital Ideas SRL bases its structure, mission, vision and organizational values on the corporate image and reputation, built through the Corporate Compliance guidelines, so reputation and its care are fundamental for the company, its founders and CEO, collaborators and employees. That is why **About IT Digital Ideas SRL** pays special attention to each employee, each ally, each counterpart with whom it relates, being a priority to share the same principles and promote them.

We understand that reputation is our greatest asset, so we insist on special care in preserving it with each ethical action, with responsibility, discipline, with respect for others, with optimism, with perseverance, with prudence and with the necessary knowledge to mitigate the risks that may affect this reputation.

For this reason, we urge our interested parties to accompany us in this care that results in mutual benefit, especially in what has to do with the management of social networks, the contents that are promoted, the public exposure of the trainings, the seminars and spaces where **About IT Digital Ideas SRL** must participate, as well as in every opportunity where respect and proper use of the image and reputation of **About IT Digital Ideas SRL** can be demonstrated.

Likewise, special mention is made that **About IT Digital Ideas SRL** does not finance political parties or representatives of political parties or candidates. If an employee of **About IT Digital Ideas SRL** is associated with a political party, he does so personally and will be completely oblivious to the activities that **About IT Digital Ideas SRL** develops and promotes. In these cases, the employee is obliged to communicate this link to the company, as well as the obligation to communicate the existence of links with public officials. In both cases, due diligence processes will be applied ensuring at all times adequate monitoring of the risks that the situation may pose. Campaign contributions on behalf of the legal person or the legal person are prohibited.

7.10 Use of Company Assets

About IT Digital Ideas SRL must carry out routine checks on the company's assets, taking care at all times of the proportionality of these checks and communicating the performance of these procedures in writing and in advance.

The assets of the company are:

- The computer delivered by the same to the employer for the performance of its functions.
- The cell phone or mobile device owned by the company.
- Corporate email and messaging history.
- The company vehicle and its satellite tracking device.
- Corporate documents stored on company devices or virtual storage.
- Video surveillance of the office facilities.
- Furniture where there are physical files of the company.
- Physical and virtual servers of the company.

About IT Digital Ideas SRL clarifies that the delivery of computers, mobile devices or access to platforms and servers are for the performance of the employee's functions and for each case it will notify the policies and conditions of use.

Routine controls may include the review of all these devices and their browsing history, so the employee is informed by means of this Code that the storage of personal files such as photographs and others must be done on personal devices and not on those delivered by the company for exclusively labor purposes. **About IT Digital Ideas SRL** does not intend at any time to promote vigilance attitudes that do not correspond to the safeguarding of the principles of the organization.

In addition, it is made known to employees, collaborators, contracted external parties and third parties in general, that in the case of internal or external investigations, when appropriate, prior communication, the following situations may occur: inspection of bags, satellite monitoring of the vehicle or tests consumption of narcotics, so we urge employees, collaborators, contracted external parties and third parties in general to collaborate with the ethical and conduct standards outlined in this Code.

7.11 Corporate Social Responsibility

The exercise of Corporate Social Responsibility promotes a better quality of life in the social environment, which is why it is a crucial instrument that is part of our actions around caring for the environment, respecting human rights, consumer protection, appropriate and responsible use of technology. We support the empowerment of people through education and the different training processes that we carry out.

We are committed to maintaining a safe and healthy workplace. We protect the confidentiality of the personal, medical, family and financial information of our colleagues. We have a corporate identity on social media but we are also people with our own thoughts and opinions.

7.12 Whistleblower Channel, Management and Protection of Whistleblowers.

About IT Digital Ideas SRL will establish an internal reporting channel so that employees and third parties can report violations of the Code of Ethics and Conduct, on conduct, principles and values or illegal acts, confidentially or anonymously and without fear of retaliation. The internal reporting channel does not suppress natural communication channels such as conversations with supervisors, in which a culture of open discussion on integrity issues should be promoted.

The report will not be limited to information on verified infractions, but will extend to all allegations in good faith of possible improper acts, so that the information is useful for preventive purposes. This channel is open to third parties and its use is encouraged.

To guarantee the protection of the person who contacts us and as well as the content of the information entrusted to us, we will give you the corresponding instructions when you contact us.

The following will not be tolerated:

- Reports made in bad faith.
- Retaliation against the person who reports a fact. For which anti-retaliation sanctions and a whistleblower protection policy will be adopted.

The email assigned to the Ethical Channel is: canaletico@aboutit.com.py

Upon receipt of the communication, the following actions will be carried out:

- 1- Record of communication and start of the review process.
- 2- Internal analysis of the report and the documentation received with specific evidence.
- 3- Communication resolution (15 business days)
- 4- Claim of the communication. (15 business days to object)

The confidentiality of the person who contacts the company is guaranteed at all times. Likewise, special mention is made that communications received without reliable documentation will not be taken into account because they lack formal elements to process it.

Internal or external communications through the ethical channel do not exempt **About IT Digital Ideas SRL** from reporting crimes, in cases where these events occur, to the competent public authorities and bodies and collaborating with the courts when the situation so requires.

7.13 Disciplinary regime

Any breaches that may arise from this Code of Ethics and Conduct will be analyzed, case by case, and will be sanctioned in accordance with internal procedures and respecting current labor regulations at all times.

The seriousness of the offense will be conditioned by the degree of intentionality, the impact generated on the interests, principles and reputation of **About IT Digital Ideas SRL** or the people who represent it.

Very serious offenses will be considered:

- All those contrary to this Code.
- Behaviors that prevent the disclosure of the fact.
- Breach of the duty to report the breach detected.
- In the event that one of the parties is in a judicial investigation process, the contractual relationship will be immediately terminated.
- **About IT Digital Ideas SRL** reserves the right to take the legal actions it deems appropriate against the person (natural or legal entity involved), for actions contrary to those clearly established in this Code and where the non-tolerance to the same, as well as any action that has the intention of damaging the reputation and image of **About IT Digital Ideas SRL** and against the issuer of a bad faith complaint. In such cases, **About IT Digital Ideas SRL** will resort to the legal mechanisms and the corresponding authorities regarding the persons subject to this Code of Ethics and Conduct, for the legitimate defense of their rights.

7.14 Supervision and Monitoring

The supervision and monitoring of compliance with this Code of Ethics and Conduct is the responsibility of the Senior Management of **About IT Digital Ideas SRL**.

7.15 Effective Date

This Code of Ethics and Conduct enters into force from the moment of its approval and publication on the website of **About IT Digital Ideas SRL** and its division and exclusive brand **Leaks and Actions** and will remain in force until an update is necessary, in which case the updated version will replace the previous one.