



Code of Conduct and Anti-Corruption Policy

CeleriTech Solutions C.A.

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Introduction

Over the years, **CeleriTech Solutions C.A.** has earned a worldwide reputation for professionalism, the cornerstone of our business success. One of the main reasons for the position we have today is that our founders and leaders apply and promote corporate values such as **Honesty, Commitment, Excellence, Passion, and Respect**, which underlie the conduct of our business activities.

Inappropriate behavior by any individual belonging to the organization jeopardizes the excellent reputation of **CeleriTech Solutions C.A.** as a company.

The purpose of the *Compliance Program Anti-Corruption Policies* is to promote employee commitment and create a culture that reflects our values, which are supported by the organization's Code of Ethics; including the responsibilities that **CeleriTech Solutions C.A.** and its employees undertake within the US or anywhere else where we are directly or indirectly present.

Our *Compliance Program Anti-Corruption Policies* document also describes the techniques and methods that should be used to communicate the Code of Business Ethics, which seeks to monitor and supervise the actions of our collaborators and mitigate the risk of non-compliance with the established standards.

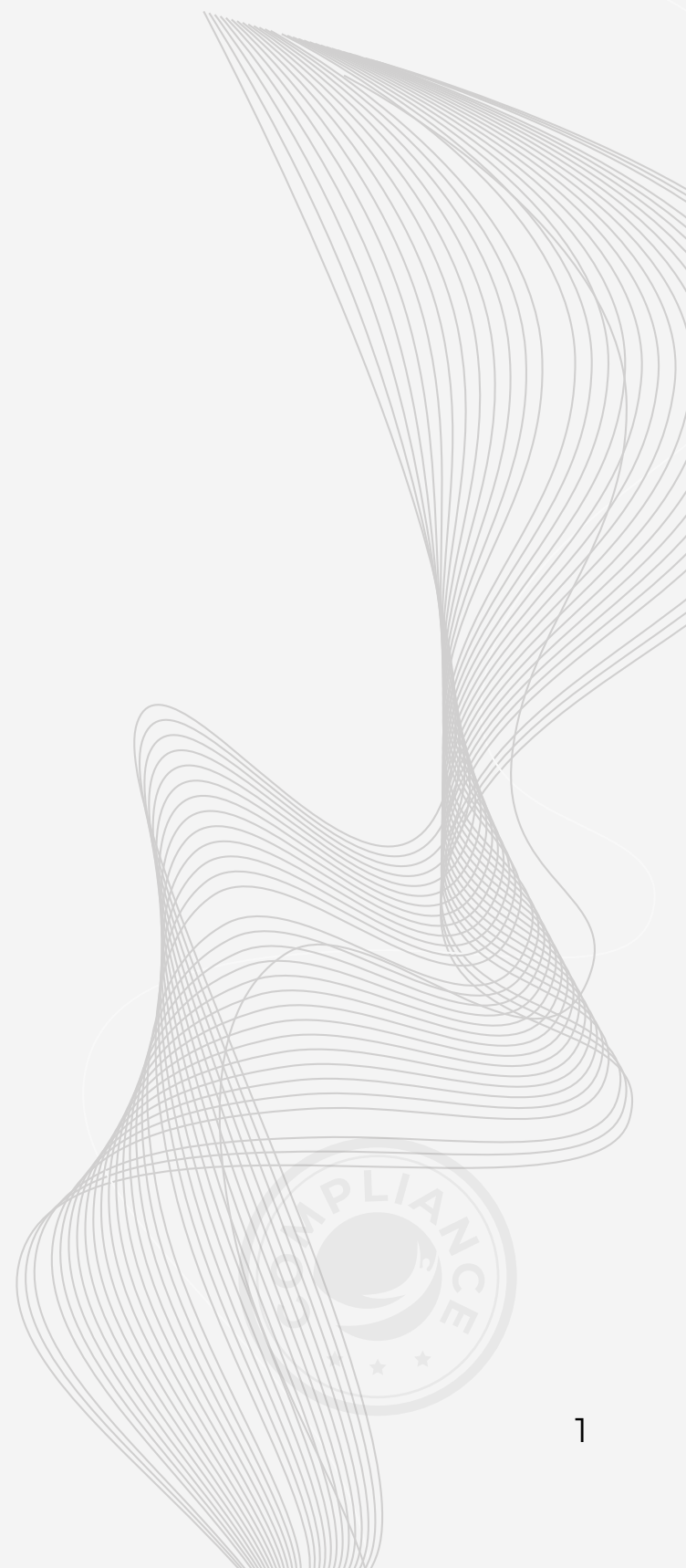
At **CeleriTech Solutions C.A.** we are committed to ensuring a positive impact on our clients, staff, and communities.



Wilbert Moreno

CEO CeleriTech

A handwritten signature in black ink, appearing to read 'Wilbert Moreno', positioned below the printed name and title.





Culture of Ethics and Compliance

Our Code of Business Ethics is based on our fundamental values. It details the behavior expected of our employees to promote a culture of compliance, ethical conduct, and responsibility.

Five enduring values (**Commitment, Honesty, Excellence, Passion, and Respect**) define our corporate culture, shape the character of **CeleriTech**, and serve as the basis for our actions and decision making.



Commitment

To create innovative products and offer quality services that add value and have a positive impact on our customers, we strive to apply to the utmost the capabilities that we have developed over the years.



Honesty

We behave authentically, making what we think, what we promise, and what we do coherent. We act with honesty and integrity, adhering to ethics and taking responsibility for our actions.



Excellence

We are determined to be better people and professionals, consistently. We focus on generating value for our clients, satisfying their needs, and exceeding their expectations, thanks to high levels of quality and the continuous improvement in all our processes.



Passion

We are motivated to know that we are contributing to the global objectives of sustainable growth through innovation and business transformation, improving viability while creating more and better jobs.



Respect

We accept and understand that everyone is unique, with different stories, ways of thinking, and points of view. We value those differences and act with kindness and courtesy at all times; we listen and promote the exchange of ideas. We are diligent, and we value others' time and the trust they place in us.



Innovation

We promote new ideas, the continuous improvement of our processes and the creation of solutions that generate high impact in our products and services to satisfy the needs of our internal and external clients.

Who Must Comply?

Our Code of Ethics applies to all the people who are part of **CeleriTech Solutions C.A.** (owners, directors, managers, and employees worldwide) and to all tax entities that make up the organization. We even demand that third parties such as channels, referrals, allies, consultants, and suppliers comply with the Code of Ethics when acting on behalf of **CeleriTech Solutions C.A.**

Our Responsibilities

- Act ethically and abide by the organizational values and principles when developing any action or activity in the company.
- Comply with the laws in each country where we have a presence: Code of Conduct, Anti-Corruption Policy, in addition to other **CeleriTech** policies, regulations and procedures at all times. Violations of the standard break trust with **CeleriTech** and with our clients, and will also result in individual disciplinary action, including termination or legal liability.
- **CeleriTech's** ethical practices and foundations are global and consistent. We recognize that some corporate cultural practices may violate our core values. However, even when defending them is uncomfortable or challenging, it is our duty to do the right thing under all circumstances.
- Understand and follow clients' "Code of Business Conduct" during interactions with their different work teams. Therefore, it is advisable to seek clarity on their code of conduct at the beginning of the business relationship.
- When compliance is not possible, it is necessary to be open to discussion and negotiation with the client, seeking to comply with the fundamental principles of their code without ignoring our own values.



CeleriTech International Corp. Employee Pillars

1 Innovation, collaboration, and focus on value

At **CeleriTech Solutions C.A.** we focus on understanding the underlying needs of our clients and delivering relevant solutions that enable them to achieve their long-term business goals. Effective communication is essential to consolidate the business relationship.

We collaborate with our clients, developing and maintaining long-lasting relationships built on a foundation of integrity, transparency, and proven results.

All our actions focus on satisfying the client's interests, even when this requires investing a more significant amount of time and other resources in negotiating and reaching agreement. Accordingly, we consider it an error to agree to any request that is unlikely to offer value or results.

2 Productivity and Responsibility

In the same way that we aim to add value for our customers, each **CeleriTech Solutions C.A.** employee is responsible for driving productivity and the efficiency of internal processes.

CeleriTech Solutions C.A. employees seek to achieve outstanding performance through continuous improvement. Therefore, it is our responsibility to constantly participate in appropriate internal initiatives and notify our direct supervisor.

Time and expense reports have a direct impact on **CeleriTech Solutions C.A.** and our business partners. We are responsible for accurately reporting hours worked and vacation periods enjoyed, specifying the corresponding charge codes on time. Therefore, it is necessary to monitor that the collaborators under our supervision report their commitments accurately and on time.

3 Meritocracy and Non-Discrimination

CeleriTech Solutions C.A. provides equal opportunity in all aspects of employment and does not tolerate any discrimination or harassment of any kind.

4 Responsabilidad Social Empresarial

CeleriTech Solutions C.A., we are committed to:

- Supporting our people to improve their quality of life, that of their families, and the communities where we operate, through business support focused on professional growth to provide the necessary tools to face new challenges.
- Supporting women entrepreneurs in fulfilling their work goals, betting on the growth of the necessary skills aimed at developing sustainable and competitive companies.
- Accompanying our clients so that their strategies are focused on their clients through digital transformation to offer a better experience, greater profitability, and productivity. We generate growth and better jobs supported by technology.
- Believing that the future lies in the new generations, and we want to support sharing the knowledge of new technologies so that they are fundamental actors in the fourth generation.



Anticorruption Policy

CeleriTech Solutions C.A. commitment to strictly comply with the regulations for the prevention and fight against corruption aligns with the principles included in the compliance framework. The dissemination of this policy extends not only to all employees of the organization but also to our business partners¹.

This policy establishes the rules of **CeleriTech Solutions C.A.** to avoid corruption in our operations in the countries where we have a presence, by conformity with the local laws and our values. It applies to all directors, officers, employees, and independent contractors. We hope and strive to ensure that partners, suppliers, and agents will comply with them as well.

There are no exceptions to compliance with these rules, even if our competitors misbehave or if corruption is an accepted practice in the country where we operate. We must adhere to the spirit and letter of this policy when conducting our business anywhere in the world.

Guideline

CeleriTech Solutions C.A. has established this *Compliance Program Anti-Corruption Policies* document to support our ongoing commitment to comply with all legal obligations. This scheme is designed to ensure that CeleriTech International Corp. and its employees abide by the laws and regulations of the United States and other countries in which we operate.

Within the compliance portal, you will find exercises to determine the legal, due diligence responsibilities of **CeleriTech Solutions C.A.** Personal information and any additional information provided in this questionnaire will be used to validate compliance with all laws, regulations, and policies, and to conduct investigations about possible infractions.

To prevent corruption, **CeleriTech Solutions C.A.** will carry out its activities by current anti-corruption legislation, in the areas of action and in the countries in which it operates, adhering to its spirit and purpose, and committing to:

- Reject all forms of corruption by applying a zero-tolerance criterion regarding any breach of this policy.
- Adhere to the Compliance Framework mentioned in this policy, ensuring its complete execution.
- Monitor and validate that employees and business partners may only offer and accept gifts, meals, and other forms of commercial entertainment from third parties related to business when the said business gift²:
 - Is for a bona fide business purpose.
 - Does not improperly influence, in reality or to appearances, any business decision.
 - Is not offered during any negotiation or bidding process.
 - Is granted openly and with transparency
 - Is not illegal or contrary to ethical business principles, local business customs, or company policies of customers, suppliers, competitors, or partners.
- Not allowing any employee of the organization or third party to act on its behalf to offer, promise, or deliver payment or any object of value³ or other advantages to a public official or private company to obtain, retain, or secure any business or to benefit the organization.
- Ensuring that employees of **CeleriTech Solutions C.A.** safeguard the goods and services assigned by the company to exercise their activities.
- Ensuring that the collaborators of **CeleriTech Solutions C.A.**, during the validity of the employment relationship, do not acquire or maintain, either directly or indirectly, any participation or interest, and are no longer a shareholder, partner, officer, participant, member, administrator, advisor, worker, collaborator, intermediary, contractor, for the benefit of or through any company, entity, association, company, and or business that is or has been a client or competitor of **CeleriTech Solutions C.A.**
- Explicitly prohibiting any form of entertainment related to travel expenses of any kind, donations, or entertainment concepts, which may be interpreted as mechanisms to obtain benefits or generate a conflict of interest for some of the parties involved: organization, worker, or third party.

- Not financing or showing support or support of any other kind, directly or indirectly, to any political party, its representatives, or candidates.
 - Not using donations to cover up improper payments.
 - Not requesting or receiving unduly, directly or indirectly, commissions, payments, or benefits from third parties on the occasion of or due to the investment, divestment, financing, or expense operations carried out by the organization.

- Pay special attention to those cases in which there are indications of a lack of integrity of the persons or entities with whom business is carried out, to ensure that the organization establishes business relationships only with qualified and reputable persons and entities.

- To consider as a priority the training and induction of the personnel, in the subjects related to the fight against corruption and bribery, as well as in the mechanisms to communicate on time any eventuality in this context.

- Not offer, promise, or deliver material or monetary goods, including gifts and donations, directly or indirectly, to any official of any organization, commercial or not, to obtain or retain business or for securing any other improper advantage.
 - Not engaging in conduct considered fraudulent.
 - Not soliciting or accepting bribes.
 - Maintain very accurate business records that reflect the reality of the transaction or event.

- Respect the privacy and confidentiality of information related to or belonging to clients, partners/directors, staff, and others with whom you do business. **CeleriTech Solutions C.A.** protects the personal and confidential information of those involved in its business relationships.

- Not disclose or use any customer information (for example, financial projections, acquisition proposals, cash flows, inventories, etc.) that has not been published.



Conflicts of Interest

Conflicts of interest are viewed as a situation where decisions are divided between the interests of **CeleriTech Solutions C.A.** employees, or of anyone outside of CeleriTech International Corp. Therefore, make sure you make decisions for the benefit of our organization.

Conflicts of interest may constitute a violation of anti-corruption laws. You must disclose any actual or potential conflicts of interest. Examples of conflicts of interest:

- Any employee or contractor of **CeleriTech Solutions C.A.** is a government official or customer responsible for regulating or providing business to CeleriTech International Corp
- Contract with a supplier whose organization is wholly or partially owned by you, a family member, a friend, or another employee/contractor of **CeleriTech Solutions C.A.**
- When **CeleriTech Solutions C.A.** hires a family member of a government official or client as an employee or contractor for regulatory approval or a business opportunity.



Anti-corruption Channel

If employees have evidence, doubts, or suspicions regarding any form of corruption or unethical conduct, they must immediately notify their hierarchical superior, Human Resources, or the Board of **CeleriTech Solutions C.A.** If you wish to make the report anonymously, go to the intranet in the Compliance section (<https://celeritech.sharepoint.com/compliance>), where you will find the form for anti-corruption complaints.

Employees, partners, suppliers, and other third parties of the organization may also transmit their doubts or concerns through the email account **compliance@celeritech.biz**

CeleriTech Solutions C.A. will not tolerate any retaliation against anyone who, in good faith, reports facts that could constitute a breach of this policy.



Sanctions Regime

The punishable offenses related to non-compliance with the Anti-Corruption Policy are detailed below. It should be noted that the list is enumerative but not limiting:

- Failure to comply with the guidelines established in this policy.
- Fails to carry out the scheduled training sessions on anti-bribery prevention in the Foreign Corrupt Practice Act (FCPA) in an unjustified manner.
- Failure to communicate through the email compliance@celertech.biz any warning signs detected in the course of the company's activities related to any collaborator, client, or supplier.

Although the *Code of Conduct and Anticorruption Policy* establishes a large number of guidelines on integrity and professional conduct, it doesn't replace the responsibility and demand to judge our actions. In case of any doubts, you can seek advice from those responsible for ensuring the compliance with appropriate professional conduct (immediate supervisor, Humans Resources, Board) or communicate through the email channel compliance@celertech.biz.

Employees who violate these provisions will be subject to the corresponding disciplinary measures, including at the end of the contract and other possible actions and legal sanctions. Likewise, the organization reserves the right to adopt the measures it deems appropriate against business partners who fail to comply with the provisions.

Commitment to Acceptance of Code of Conduct and Policy Anti-corruption

I recognize and confirm that I have received and read from **CeleriTech Solutions C.A.** the Code of Conduct and Anti-Corruption Policy and that I understand its content.

I express my commitment to complying with the rules and procedures.

I understand that I must adhere to it responsibly and report all violation of the Code of Conduct and the Anti-Corruption Policies, as established in this document, regardless of the person's identity who violates it.

Name and Last name: _____

Position: _____

Date: _____

Signature: _____

