

# CODE OF CONDUCT

**ARAQUEREYNA**

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# MISSION

We offer quality legal solutions tailored to the needs of our clients, creating value through integrity, innovation and excellence.

# VISSION

We seek to increase our positive impact on society as leaders in the provision of legal services at a national and international level, oriented towards the construction of a sustainable future and consolidating our institution as one of the most solidified in Venezuela.



# OUR VALUES

In everything we do in regard to our people, our customers and our communities, we are inspired by these values.

## EXCELLENCE

We excel in what we do, giving our perfect effort to add maximum value

## SHARED VALUE CREATION

We go beyond the expectations and needs of our environment.

## COMMITMENT

We unreservedly assume our responsibility to our people, our clients and our community.

## INTEGRITY

We are consistent and congruent with our values in everything we believe, say and do.

## INNOVATION

We set trends in the way we provide legal services by adapting to the needs of this new era, for which we build the legal solutions of the future.



# MESSAGE FROM THE EXECUTIVE COMMITTEE

35 years ago we founded **ARAQUEREYNA** with a clear vision, to create a space for the professional practice of law, always adhering to the values that became our pillars and that would serve us in the future to consolidate us as a model institution and a reference in our society, transcending its founders.

We firmly believe that excellence, integrity, the ability to adapt to changing times and the commitment we have with our people, our clients and our community, are factors that differentiate us and allow us to consolidate in time to transcend as an institution for future generations.



Maripi Viso  
Socia Fundadora



Pedro I. Sosa  
Socio Administrador



María Carolina Cano  
Socia Administradora Suplente



Manuel Reyna  
Socio Fundador

That is why we created this Code of Conduct, where we set forth the principles that inspire our way of doing business and providing legal services, with the understanding that our mission, vision and values are the basis of everything we do as an institution.

At **ARAQUEREYNA** we always focus on doing the right thing. Our reputation is one of the main assets of our organization, the integrity of our practice and being recognized as an outstanding law firm for its excellence and professional ethics, depends on all who make life in this institution. Therefore, we invite you to comply with these standards, make the right decisions, add value and leave a positive mark in everything we do. Making our brand the expression of our values is the best proof that we are fulfilling our vision.

Since our beginnings, values such as excellence, integrity and the generation of value for our team, our clients and society, have infused the spirit of our brand promise, have inspired our path and have driven us to become the institution we are today.

Below, we present our Code of Conduct, which develops the principles and values on which our firm was founded and developed. It provides us with a guide that inspires the decisions we make, inviting us to reflect on the impact they have on the institution and motivating us to always act ethically, with integrity and in defense of one of our main assets as an organization, our reputation.

As individuals who are part of ARAQUEREYNA, we must be aware of the impact that our actions have on this institution, particularly on its reputation. As its spokespersons, we are responsible for being worthy ambassadors of the attributes of our brand, even outside the workplace, in everything we say and do, thus guaranteeing the trust of third parties and, therefore, our transcendence in time.

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<sup>1</sup> Its content was approved by ARAQUEREYNA's Executive Committee on September 7, 2022, and reflects our commitment to business ethics, the enforced legal framework and transparency, establishing a set of principles, values and guidelines for conduct aimed at guaranteeing the ethical and responsible behavior of all our members.

This framework is presented as a guide for conduct applicable to all levels of the organization, regardless of their hierarchy, and offers only general guidelines on how to act, without indicating specifically what decisions to make.

Our principles and values, together with our purpose, are the cornerstone on which the pillars of the institution are built, guiding us in choosing the right way to act on each occasion. When in doubt, we should always ask ourselves the following questions:

- Am I doing the right thing?
- Are my actions detrimental to ARAQUEREYNA, its interests or reputation?
- Am I acting honestly and in compliance with the applicable regulations?
- Am I considering ARAQUEREYNA's interest above my personal interests?

Addressing and resolving ethical dilemmas is very complex and the Code cannot answer all questions or situations, but what it does do is provide us with a framework, based on principles, that helps us think and make decisions for the benefit of ARAQUEREYNA and its reputation.

# CUMPLIANCE WITH APPLICABLE REGULATIONS

Compliance, both with the law and with the institution's internal rules and regulations, is fundamental for us. Our commitment is always inspired by a spirit of doing the right thing, transcending even the legal duties of those who make life in ARAQUEREYNA.

Beyond the regulations that the members of ARAQUEREYNA must comply with, belonging to this institution implies acting and behaving in a sensible manner and in accordance with the principles and values that it represents. There is an individual responsibility and a principle of self-regulation to which we as individuals must adhere, always keeping in mind how essential it is to protect the reputation of the firm and maintain the trust of our stakeholders. Protecting ARAQUEREYNA's reputation is everyone's responsibility.



We care about and are concerned with respecting Human Rights, and we are committed to promoting the implementation of the Sustainable Development Goals (SDGs) and the United Nations (UN) Global Compact in everything we think, say and do as an institution. Therefore, our policies and operational management are aligned with human rights, fair labor, the environment and anti-corruption measures. We are a socially responsible firm, which seeks to add value in its main lines of action in relation to all its stakeholders.

ARAQUEREYNA will communicate and disseminate this Code of Conduct among all its personnel, informing each new person joining the organization of its contents at the time of hiring, as well as any subsequent modification approved by the Executive Committee.

It is the duty of all members of ARAQUEREYNA to comply with and ensure compliance with all the criteria contained in this Code of Conduct. Failure to comply will result in disciplinary sanctions, including labor sanctions, without prejudice to civil, criminal and any other type of liability that may arise.





## COMMITMENT TO CLIENT SERVICE

At all times, we seek to exceed our clients' expectations of us, proposing quality legal solutions tailored to their needs.

Part of our commitment to our clients involves our ethical duty to provide them with timely reports that accurately and clearly reflect the work actually done and the time invested in it.

Our professional services are guided by the highest standards of quality and excellence, and always aims to create shared value, since client satisfaction is at the center of our concerns.



# PROTECTION OF CONFIDENTIAL INFORMATION

Part of our commitment to our clients extends to the confidential treatment given to their information and identity. Therefore, as members of the institution, we have the duty to preserve the secrecy of all confidential data and information to which we have access through ARAQUEREYNA, both that of the firm and of third parties (clients, suppliers, allies, among others).

No member of our team shall use the information obtained as a result of the professional relationship for any purpose other than the one agreed with the client, nor shall they use confidential information for their personal benefit or that of the institution.

Our duty of confidentiality implies that the right treatment of information is an obligation of all members of the institution, so we must be familiar with and apply all security measures and technological resources available to the firm for its protection.

All internal data of the institution, such as the identity of our clients and employees, their strategic plans and their financial, legal and other similar information, will be considered confidential and may not be disclosed. All data and information belonging to ARAQUEREYNA is its sole and exclusive property.

Protecting confidentiality is key to the success of our business and to maintain the trust placed in us by our team, clients and allies.

ARAQUEREYNA has the obligation to safeguard, protect and preserve the corporate, financial and accounting records and documentation provided by its clients, in accordance with applicable laws and regulations.

Any contravention of this provision may lead to disciplinary sanctions, including labor sanctions, without prejudice to civil, criminal and any other type of liability that may arise.





## USE OF SOCIAL NETWORKS

For ARAQUEREYNA, social networks are an institutional communication tool that, aligned with our strategy and objectives, contribute to our brand positioning and strengthen our identity.

It is important to use good judgment when posting messages, images, comments and/or any information, in general, on social networks, even if they are of a personal nature, avoiding sharing content that may be offensive, discriminatory, in violation of confidentiality, that may create a conflict of interest, that undermines our business interests or those of our clients, or any other information that compromises the reputation of the institution, our team or our clients.

Thus, as ambassadors of our brand, we carry a seal that distinguishes us, which implies that we actively represent the principles and values that it embodies and, therefore, we urge to appeal to common sense and self-regulation in the use of any social network, even personal ones.

# COMMITMENT TO OUR PEOPLE

Our team is one of our main assets, so we try to get involved in their personal and professional growth, promoting a positive and respectful work environment and an organizational culture of excellence, where we work to be better and to do things better every day.

We promote training initiatives for our team, both internal and external, always encouraging, and in some cases sponsoring, their participation in inductions, lectures, seminars and conferences, as well as encouraging the writing and publication of articles and books.

Our contribution to the construction of the country's future requires getting involved in the training of new generations and encouraging their talent. Therefore, we support and celebrate the teaching spirit of our members. We privilege education as one of our fundamental pillars for the growth, development and progress of the firm and the country.

We are different, we think about our team and its needs, we like to listen to everyone's opinions, we work together and we succeed when we collaborate, dialogue and debate with respect. We excel by innovating and setting the standard in the provision of legal services through collective knowledge and technology. In unity and respect, we find our success.





## HARASSMENT, DIVERSITY AND INCLUSION

At ARAQUEREYNA we have a "zero" tolerance policy for harassment, verbal or physical, in any environment, including social networks, regardless of whether the person harassed or the person committing the harassment is an employee or not, since this type of conduct damages the integrity of our relationships and is openly contrary to our principles and values.

We strive to maintain a safe working environment where trust and respect prevail. For this reason, we do not condone or tolerate abusive or violent behavior, any form of intimidation or discrimination based on origin, nationality, religion, race, gender, age, sexual orientation or disability.

Fairness, transparency and non-discrimination are fundamental characteristics of our hiring, personnel evaluation, promotion, advancement and salary-setting processes.

We encourage open and honest dialogue, respect people's dignity, diversity and privacy. We believe in equal opportunities and pay special attention to the labor integration of all members of our team.

If you perceive any conduct that is detrimental to the above, do not hesitate to report it.



# PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

At ARAQUEREYNA we only provide services to clients engaged in legal activities, transactions and operations, using funds from lawful sources.

We comply with all applicable laws and regulations against money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction. We do not engage in money laundering and/or terrorist financing activities, nor do we provide legal services for operations and transactions that are intended for the purpose of money laundering and/or terrorist financing.

Consequently, we do not provide legal advice or assistance for participation in transactions or operations intended to conceal or give the appearance of legality to capital, property, funds, assets or other assets derived from illicit or criminal activities.

For all the above mentioned, we guarantee the establishment and application of adequate policies and procedures for knowing of our clients before accepting a new client, and even before opening a new matter of an existing one; requiring information and supporting documentation of their activity and the lawful origin of their funds; and in general, carrying out due diligence processes of our potential clients, or, as the case may be, of the possible new matters of existing clients.





## GIFTS AND ENTERTAINMENT

Impartiality is paramount in the performance of our activities, so the provision of our legal services will always be premised on equal treatment of all interested parties. We compete benefiting solely from the talent of our professionals, our track record and our commitment to excellence.

Accordingly, our members are prohibited from asking for, giving or receiving commissions, gifts, entertainment or any other benefit that appears to have, or is intended to improperly influence the decision making or business relationship with a client or supplier. Gifts may only be accepted or offered when their value is symbolic and/or economically irrelevant. In case of doubt, consult your immediate supervisor, the Executive Committee and/or formulate your inquiry in writing and ask for guidance by e-mail at: [compliance@araquereyna.com](mailto:compliance@araquereyna.com).

In summary, we must keep in mind that if the gift or invitation creates an obligation for either party or influences their business decision, it is no longer a simple gift and could be considered a bribe.

## ANTI-CORRUPTION AND PROHIBITION OF BRIBERY

We disapprove of any corrupt conduct and/or practices and reject the payment of bribes to both public sector officials and private sector employees.

In addition to complying with local anti-corruption legislation, we are also committed to complying with applicable international anti-corruption and anti-bribery laws and standards, including, but not limited to, the U.S. Foreign Corrupt Practices Act (FCPA), (the "FCPA"), the United Kingdom Bribery Act (the "UKBA") and any other international law or regulation for the prevention and combating of corruption and bribery that, according to its objective and personal scope of application, is applicable.

Our members are prohibited, either directly or through third parties, from offering, giving, soliciting or receiving bribes or inducements of any kind or nature that are intended to influence the recipient's decisions or to obtain business, favors, benefits or commercial advantages.

Any violation of this provision may lead to disciplinary sanctions, including labor sanctions, without prejudice to civil, criminal and any other type of liability that may be involved.





## CONFLICT OF INTEREST

When our personal interests, or those of third parties, are in conflict with those of the institution or those of our clients, we are faced with a conflict of interest. As far as possible, we must prevent this from happening, and if it does, it is our duty to report it to our immediate superior and/or the Executive Committee or, failing that, to the e-mail address: [compliance@araquereyna.com](mailto:compliance@araquereyna.com), in order to resolve the situation in an honest, fair and impartial manner.

In order to resolve any conflict of interest that may arise in a timely manner, it is vital to adhere to the applicable legal regulations, internal rules, as well as the professional and ethical principles that inspire the practice of law.

In relation to our clients, we must always keep their best interest in mind, and refrain from dealing with matters that could in any way violate it. That is why it is essential, before accepting a new client, or handling a new matter for an existing one, to verify the possible conflicts of interest that may arise.

Consequently, the acceptance of a new client or the opening of a new matter of an existing one will require: requesting express authorization from the Executive Committee, whether or not there is a potential conflict of interest; making an evaluation of possible conflicts of interest, and if any exist, their acceptance or opening, as appropriate, will be decided by the Committee; and, in general, complying with the rules and parameters established by the firm in its internal regulations on conflicts of interest.

We are committed to select our suppliers according to objective and transparent criteria, always seeking, in defense of the reputation and legal responsibility of our institution, that such suppliers do not have a conflict of interest to provide their services to the firm and comply with all applicable laws, especially those on human rights, the environment, anti-corruption, competition and intellectual property.

In relation to our team, all ARAQUEREYNA's collaborators are obliged to declare possible conflicts of interest that may exist with suppliers or clients. Likewise, the firm commits, if known, to report any conflict of interest of which it becomes aware and which could affect or personally involve any of its collaborators



## COMMITMENT TO SOCIETY AND SUSTAINABILITY

We adapt our corporate social responsibility strategic planning to our strengths and opportunities in the provision of our legal services, always aiming at creating value for all stakeholders.

We assume the commitment to care for the environment, to minimize our impact on the environment and to disseminate a culture of respect for the environment as a guiding principle for the conduct of our team.

In ARAQUEREYNA we help to solve important problems by contributing with our professional experience and collaborating with other organizations to achieve better results in our environment, understanding that what we do today is determinant for future generations.

## COMPLAINTS AND CONSULTATION CHANNEL

If any member of the firm becomes aware of or perceives the performance of activities and/or conducts that are reportedly illegal or suspicious and/or detrimental to our values and ethical principles, they must report it to their immediate superior, who in turn must report it to the Executive Committee, with the complainant having the right to make their complaint anonymously and in strict confidentiality.

You may also make your complaint to the e-mail address provided by the firm: [compliance@araquereyna.com](mailto:compliance@araquereyna.com). In addition to serving as a direct and confidential channel for the receipt of complaints, this email will be available to any member of the organization for sending inquiries and, therefore, for the written formulation of questions, concerns or doubts about the interpretation and application of the provisions of this Code of Conduct.

Any complaint shall be processed without risk or fear of retaliation, direct or indirect, for the complainant, under penalty of disciplinary action. The complainant shall cooperate in any internal investigation initiated as a result of the complaint to clarify the facts and determine responsibilities, actions and measures to be taken.







## PRO-BONO WORK

We are aware of the fundamental role that solidarity plays in the progress of our society. For this reason, we are deeply committed to carrying out pro-bono and volunteer activities for the benefit of the community and, particularly, for those who need it most, whether they are individuals or non-profit organizations, in order to have a favorable influence on the lives of others, generating a change that will last over time for the benefit of our society.

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