



# AD&V®'s CODE OF CONDUCT

## AD&amp;V®'S CODE OF CONDUCT

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## AD&V®'S CODE OF CONDUCT

### AD&V®'S MESSAGE TO YOU

At **Álvarez- Díaz & Villalón (AD&V®)**, we strive to become better as professionals and as people every day, and we are committed to using our business as a force for good in the world. That's why we partnered with the United Nations Global Compact, challenging ourselves to set more ambitious corporate sustainability targets and accelerate the integration of the Sustainable Development Goals (SDGs) into our business strategy, culture, and daily operations.

The SDGs make an explicit case against corruption and for peaceful, just, and inclusive societies. **AD&V®'s** code of conduct ensures that we are engaging in the right behaviors as a company.

At **AD&V®**, we understand that our commitment to complying with all applicable laws, regulations, policies, and terms of executed contracts as well as maintaining the highest ethical standards is key to our business success. We expect all our team members, suppliers, vendors, agents, subcontractors, attorneys, accountants, and any business partners (collectively, "Third Parties") to share this same commitment. This document articulates the standards to which we are committed and the expectations we have of our Third Parties.

**AD&V® does not tolerate non-compliance of the Code of Conduct** or actions that may violate laws, regulations, or contractually agreed-upon requirements. **AD&V®** reserves the right to request and review documentation evidencing or relevant to compliance with laws and conformance to **AD&V®** expectations. **AD&V®** reserves the right to terminate a relationship with a Third Party if a violation is discovered and not corrected by the Third Party.

Additionally, Third Parties are obliged to report concerns related to real or perceived wrongdoing in connection with their engagement to **AD&V®** to **AD&V®'s** Business Manager. **AD&V®** is committed to non-retaliation for reporting concerns in good faith.

If you have any questions or need guidance on topics related to **AD&V®'s** Code of Conduct, please contact our Business Manager, Neydin Alvarado at 787-754-1381 or [nalvarado@advfirm.com](mailto:nalvarado@advfirm.com).

To report an incident or a complaint, please write us at [codeofconduct@advfirm.com](mailto:codeofconduct@advfirm.com)

### COMPLIANCE WITH LAWS & REGULATIONS

Third Parties must comply with **ALL** applicable laws, statutes, ordinances, rules, regulations, and contract terms applicable to the provision of services or supply of goods in connection with **AD&V®'s** business or the businesses of **AD&V®'s** current or prospective clients.

Third Parties are required to maintain the necessary documentation to demonstrate compliance with regulations and conformance to **AD&V®'** expectations.

# AD&V®’S CODE OF CONDUCT

## GUARDING AGAINST BRIBERY & CORRUPTION

AD&V® will not be a party to corruption or bribery in any form. It is AD&V®’s policy, in doing business anywhere in the world, to fully comply with ALL applicable anti-bribery and anti-corruption laws and regulations.

A bribe is the offering, promising, or giving of an advantage to induce an action, whether done directly or through a third-party intermediary. Examples may include gifts of money, goods, services, gratuities, favors, discounts, entertainment, hospitality, travel, lodging, meals, forbearance, service, charitable or political contributions, or any other item having monetary value.

**All team members acting on AD&V® or its clients’ behalf are strictly prohibited from:**

- Offering, promising, giving, authorizing, paying, accepting, requesting, receiving, or agreeing to receive any bribe, either directly or indirectly through or by a third party, in exchange for doing business with AD&V®.
- Bribing any employee, official, or agent of any government, company, or individual to incentivize doing business with AD&V®.
- Making facilitation payments (payments to government officials or others) in exchange for contracts or connections.

**Team members shall not accept any gifts, offerings, or invitations intended to influence their judgment. Third parties should refrain from influencing or bribing team members to specify their goods or services.**

Team members are allowed to participate in trade-catered events designed to familiarize designers with supplier offerings and/or industry advancements. Said events are educational in nature, and although they may include some entertainment components, they in no way constitute an obligation on behalf of AD&V® to do business with said supplier.

## CONFLICTS OF INTEREST

Third Parties must avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict of interest with AD&V® or its clients. In particular:

- Third Parties may not offer or provide gifts, hospitality, or entertainment of significant value to any individual AD&V® team member, partner, or family member of any AD&V® team member or partner. If there is any doubt about whether a gift, hospitality, or entertainment is excessive or of significant value, the Third Party should contact AD&V®’s Business Manager.
- Third Parties must disclose to AD&V®’s Business Manager (a) any familial or economic relationship it has with any AD&V® team member or partner and (b) any relationship between the Third Party and any AD&V® client in connection with which the Third Party is acting for or on behalf of AD&V®. If there is any question about whether any conflict exists, the Third Party must disclose the matter to AD&V®.

## FAIR DEALINGS

Third Parties must not propose or enter into any agreement with any competitor to fix prices, terms, or conditions and must conduct their business in a manner that is consistent with fair competition and in compliance with all applicable anti-trust laws.

## HONEST & ACCURATE DEALINGS

Third Parties must not make false representations in connection with any AD&V® transaction, including but not limited to oral misrepresentation of fact or the promotion or utilization of false documentation such as fraudulent or forged contracts or invoices.

BUSINESS INTEGRITY

## AD&V®'S CODE OF CONDUCT

### INSIDER TRADING

Third Parties must always comply with insider trading laws and regulations that prevent buying or selling securities while in possession of material, nonpublic information about the security. Insider trading violations may include “tipping” such information, as well as securities trading by the person “tipped” and the person that misappropriated the information.

### USE & SECURITY OF AD&V®'S INFORMATION

Third Parties must ensure that non-public — including client confidential — information obtained while doing business with AD&V® is not used for the personal benefit of the Third Party, their employees, or other persons. Third Parties must protect AD&V®'s information and that of its current and prospective clients and not disclose it to any unauthorized party. Such information must be used only for the purpose of doing business with AD&V®.

### PRIVACY & PERSONAL DATA

AD&V® respects the privacy of individuals. Data protection is an essential element in maintaining the trust that clients have in AD&V®. Additionally, a variety of laws, regulations, and contractual arrangements require AD&V® to protect the security of personal data. Third Parties must protect the privacy and security of all the confidential information that is obtained when working with AD&V®, including personal data.

Third Parties must process personal data fairly and sensitively and in accordance with applicable laws and only for the purpose of doing business with AD&V®. We expect all our team members to respect the privacy of personal data collected from Third Parties and AD&V® has implemented a variety of security measures to protect such personal data.

Third Parties must notify AD&V® as soon as possible in the event of any confidentiality or security breach with respect to any personal data or other information obtained while working with AD&V®.

### INTELLECTUAL PROPERTY

Third Parties must use AD&V®'s intellectual property, copyrights, and trademarks only in a manner that is permitted under their contract with AD&V®. Third Parties must not misappropriate or infringe upon the intellectual property, trademarks, or copyrighted works of AD&V® or others.

# AD&V®’S CODE OF CONDUCT

## FREELY CHOSEN EMPLOYMENT & MODERN SLAVERY

For an individual, access to decent work is a fundamental human right. For a society, enabling sustainable economic growth is a survival imperative. With mission-driven businesses, social entrepreneurs enable corporations to enact social change. **AD&V®** is committed to SDG Goal 8, which promotes sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all. At **AD&V®** we advance social and inclusive entrepreneurship by promoting job creation with expanded access to banking and financial services ensuring that everyone reaps the benefits of entrepreneurship innovation.

Treating our team members with respect and dignity is a fundamental part of **AD&V®**’s culture. We have implemented many practices to ensure our team members enjoy a positive work culture and environment.

In line with SDG Target 8.7, **AD&V®** focuses on contributing to the eradication of forced labor, modern slavery, and human trafficking by 2030.

Employment with Third Parties must be an expression of free choice and there must not be any forced, bonded, or involuntary labor.

Third Parties must not be engaged in the use of slavery or human trafficking. **AD&V®** is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business.

## CHILD LABOR

SDG Goal 8 aims to promote inclusive and sustainable economic growth, full and productive employment, and decent work for all.

As this relates to children, SDG Target 8.7 aims to eliminate the worst forms of child labor, including the recruitment and use of child soldiers, as well as to end all forms of child labor by 2025. Child labor is both a cause and consequence of poverty, reinforcing social inequality and discrimination. **AD&V®**’s contribution towards reaching this goal centers on the prevention and response to child labor, addressing the impact of supply chains, fostering entrepreneurial culture by mentoring young entrepreneurs, partnering with schools, and building communities that offer equal employment and access to education.

Third Parties must not use child labor and should adopt procedures to verify and maintain documentation that no workers are younger than the local legal age for employment.

## LAWFUL EMPLOYMENT

Third Parties must review and validate all relevant documentation to ensure that a worker has a legal right to work in a jurisdiction before employing a worker.

## NON-DISCRIMINATION OR HARASSMENT

Third Parties must provide a workplace free of harassment and must provide equal employment opportunities to all employees and applicants for employment without regard to race, sex, sexual orientation, color, creed, religion, national origin, age, disability, marital status, parental status, family medical history or genetic information, political affiliation, military service or any other non-merit based factor in accordance with all applicable laws, directives, and regulations of federal, state and city entities.

LABOR STANDARDS

## AD&V®'S CODE OF CONDUCT

### WAGES, BENEFITS & WORKING HOURS

Third Parties must provide wages and benefits that comply with all applicable local wage and hour laws and regulations, including those related to minimum wages, overtime hours, and mandated benefits. Working hours must comply with laws and regulations.

### FREEDOM OF ASSOCIATION

Third Parties must respect the rights of employees, as outlined in local laws, to join or to refrain from joining worker organizations, including trade unions. Workers must be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment.

### SAFE CONDITIONS

Substandard working conditions are often related to poverty, inequality, and discrimination. Therefore, improving workplace safety and health culture must become a global priority in the pursuit of building a sustainable workforce in alignment with the United Nations Sustainable Development Goals.

In line with SDG Target 8.8, to protect labor rights and promote safe and secure working environments for all workers, including migrant workers, particularly women migrants and those in precarious employment, **AD&V®** is committed to building a sustainable workforce by establishing a safe and healthy culture at all levels of the firm as well as a proactive, participatory approach that supports and empowers team members to contribute to **AD&V®**'s goals and objectives.

Third Parties must provide workers a safe and clean working environment and appropriate safety equipment and training.

### ACKNOWLEDGEMENT

I, including all my agents, representatives, and other personnel acting for or purporting to act on my behalf, certify that I have received, read, understand, and agree to abide by **AD&V®**'s Code of Conduct. If I have questions regarding this document or any other **AD&V®** policy or legal or regulatory requirement, I shall consult with **AD&V®**'s Business Manager.

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Signature

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Name

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Company Name

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Title

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Email

---

Phone Number

---

Date



**Neydin Alvarado**

Business Manager

[nalvarado@advfirm.com](mailto:nalvarado@advfirm.com)

787.754.1381

To report an incident or a complaint, write us at:

[codeofconduct@advfirm.com](mailto:codeofconduct@advfirm.com)

