



MARTKOM GLOBAL INDUSTRIES

ANTI-CORRUPTION POLICY

Martkom staff has an obligation to protect the information and knowledge generated within the organization, the property or that the company custodies.

Employees shall not use any data, information or documents obtained during the course of their professional activity for its own benefit. Nor divulge information to third parties, except in compliance with the applicable legislation, the rules of the company or when it is explicitly authorized to do so. Nor the use of confidential data, information or documents from a third company without a prior written authorization.

Martkom staff is committed to maintaining the confidentiality and make a use consistent with the internal legislation governing the matter, of any data, information or documents obtained during the exercise of their responsibilities in the company. In general, and unless otherwise instructed, the information to which the company has access should be considered confidential and may only be used for the purpose for which it was obtained.

They shall not duplicate, reproduce and make more use of the information than the needed for the development of their tasks and nor store it in information systems that are not owned by Martkom, except for expressly authorized purposes.

The obligation of confidentiality shall remain once the activity in Martkom is concluded and shall include the obligation to return any materials associated with the company that are in possession of the employee at the time of cessation of their relationship with the company.

Martkom staff must respect the personal and family privacy of all persons, either employees or others to whose data has access. Authorizations for use of data must be the result of specific and substantiated claims. Martkom employees must strictly follow the standards, both internal and external, established to ensure the proper handling of information and data provided to the company by third parties.



In the collection of personal data of clients, employees, contractors, or any person or entity with which it exists a contractual relationship or of any other type, all Martkom staff obtain the consents, if it is required, and if they are committed to the use of the data according to the purpose approved by the grantor of such consent.

Also Martkom staff shall know and respect all internal procedures implemented regarding the storage, custody and access to the data, which are intended to ensure the different levels of security required in accordance with the nature thereof.

Employees shall inform the corresponding department or area if detect any issues related to information confidentiality or protection of personal data.

PROTECTION OF INTELLECTUAL AND INDUSTRIAL PROPERTY

Martkom is committed to the protection of its own intellectual and industrial property, as well as any external. This includes, among others, copyrights, patents, trademarks, domain names, rights of reproduction, design rights, database extraction rights, and rights about technical expertise.

Martkom staff is expressly forbidden to use works, creations or distinctive signs of intellectual or industrial property from third parties without proof that the company has the rights and/or licenses.

Martkom staff shall adopt the necessary measures to protect intellectual and industrial property by ensuring that processes and decisions on this area are traceable, in the sense of being documented, justifiable and verifiable, especially through the titles of its own works, creations or distinctive signs and the application of contractual clauses to ensure originality and peaceful use of third parties.

The intellectual and industrial property resulted from the work of employees during their tenure at the company, and related with the actual and future Martkom business, will be property of the company.

Only shall be used in marketing and advertising those brands, images and texts duly authorized by the General Management of the company.



REGISTER AND TRANSPARENCY

All operations with economic significance shall appear clearly and accurately on the appropriate records of accounts, as a true representation of the transactions carried out by the company, which shall be available to the internal and external auditors.

Martkom employees shall insert completely, clearly and precisely financial information in the company systems, in order to reflect, on the relevant date, their rights and obligations under applicable law. Additionally, exactitude and integrity of the financial information, which according to the current legislation should be communicated to the market, shall be ensured.

Martkom is committed to implementing and maintaining an appropriate internal control system over the preparation of financial information, ensuring regular supervision of its effectiveness.

The records of accounts shall be available at any time to internal and external auditors. To this end, Martkom agrees to provide their employees with the training that is necessary for them to know, understand and fulfill the commitments made by the company in internal control of financial reporting.

The Management