

BUSINESS CONDUCT POLICIES



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INTRODUCTION AND OVERVIEW

The purpose of this code is for all LARM employees to understand the principles and guidelines that make up the foundation of our company. This code will provide guidance throughout your employment with LARM.

- LARM employees must exercise care and discretion in handling personal data.
- LARM protects and respects the confidentiality of personal data, in all forms of media; in paper, verbal and electronic form.
- Protection of all information and intellectual property: Disclosure and use of the company information; both the customer's and ours is restricted to authorized personnel only.
- Ensure that all company material and property are used only for company business.
- Understand the internal controls relevant to your position and follow policies and procedures related to those controls.
- Immediately report any suspicious activity that does not comply with our policy of transparency of company records and internal controls.
- LARM employees must respect and comply with international, local laws and regulations.
- LARM follows the laws that prohibit discrimination in employment practices wherever we do business.
- Receiving commission and/or gifts that would compromise the integrity of your work is not tolerated and violates LARM's policy of not accepting any form of commission.
- LARM provides equal opportunity and respects diversity. Report any incident dealing with discrimination and harassment.
- Inducing an individual, or a local or foreign official to act illegally or improperly, will not be tolerated.
- LARM will not accept any gift from any business partner if there is any suggestion that a return favor will be expected or implied.
- LARM will not disregard or fail to report any indication of improper payments to the appropriate authorities.

- LARM employees will not induce or assist another individual to break any applicable law or regulation.
- Additionally, detailed description of LARM policies to be followed are in this document and must be followed as well.
- Report all possible violations of this code of conduct.

Violation of any of the policies will result in disciplinary action up to and including termination. For any questions about this code, please contact your manager

SAFETY AND HEALTH POLICY

LARM USA Inc., is committed to the protection and promotion of the workers' health, ensuring their physical integrity through the identification of hazards, evaluation and assessment of their risks in order to establish the respective controls; protecting the health and safety of all workers, through the continuous improvement of the Management System for Safety and Health.

All levels of management assume the responsibility to promote a healthy and safe work environment, in compliance with the national regulations in force in the field of occupational risks, linking to the interested parties in the System of Management of Safety and Health at Work and the allocation of human, physical and financial resources required for the system's operation.

The programs developed in LARM USA Inc., will be aimed at the promotion of a culture of prevention and of self-care, to the intervention of the working conditions that may cause accidents at work or occupational diseases, the control of absenteeism and preparing for emergencies, with the deployment, maintenance and continuous improvement.

All employees, contractors and temporary staff will be responsible for complying with safety rules and procedures, in order to perform safe and productive work. They will also be responsible for timely notification of all those conditions that may generate consequences and contingencies for employees and the organization.

CONFIDENTIALITY STATEMENT

All information gathered by LARM USA Inc. to perform the work, as well as all results and information, are considered proprietary to the client and will be kept confidential.

NON-DISCLOSURE STATEMENT

LARM USA Inc. will maintain the confidentiality of all client proprietary information and will not disclose this information to any person or entity without prior written permission of the client company.

CORPORATE SOCIAL RESPONSIBILITY POLICY

Here at LARM USA Inc. We are fully committed to the principles of CSR incorporating them where they are suitable for the benefit of our customers, partners, suppliers, the environment and society in general, seeking to contribute to the development of the country.

The pillars and principles that support compliance with our Corporate Social Responsibility Policy are:

1. Quality of Life in the Company:

LARM USA Inc. Promotes equal and non-discriminatory treatment on grounds of origin, religion, politics, social class, sex and any other form of discrimination in all its human resources processes. Wellness activities are promoted that allow integration with the family.

2. Business Ethics:

The business ethics of LARM USA Inc. is evident in the Code of conduct and business ethics in which it facilitates the action and delimits the behavioral parameters of each of the people that interact within the company and in its environment.

3. Linking with the community:

LARM USA Inc. makes efforts to participate in the development of actions that are focused on supporting the education and health of the community in general, seeking to contribute to their well-being.

4. Link with the environment:

LARM USA Inc. in order to cause the least possible impact on the environment, has an Environmental Policy that seeks to optimize the resources used.

5. Relationship with Customers and Suppliers:

In LARM USA Inc. we offer competitive services that satisfy the needs of our customers, and we expect our suppliers to do so in the same way. We hope to contribute in improving their management systems by evaluating their performance on criteria such as timely, reliable and appropriate service, payment method and coverage.

6. Health and Safety Management System:

LARM USA Inc. implements and follows a Business Continuity Plan to ensure health and safety at all times.

ENVIRONMENTAL POLICY

LARM USA Inc. is committed to incorporating environmental ethics in all activities and services developed to contribute to the protection of the environment.

We understand the protection of the environment as our responsibility and in that sense, we commit ourselves to:

- Promote saving and careful and efficient use of water and energy
- Minimize the consumption of paper, and thus protect the ecosystems of the massive logging of trees (recycling)
- Control and ensure proper disposal of waste generated in our organization (garbage)
- Ensure and meet applicable environmental requirements
- Inform, train and sensitize the collaborators in the guidelines of this Environmental Policy
- Prevent pollution by promoting environmentally friendly practices
- Invite to suppliers and contractors to implement our good environmental practices

CONFLICT OF INTEREST POLICY

Any employee or collaborator of LARM USA Inc. should avoid situations which involve or might entail, conflicts between their own interests and those of their client companies or other parties involved in their activities.

It is expected that the collaborators of LARM USA Inc. put the interests of the company ahead their own. No information should be used regarding the current or future business of LARM USA Inc., for personal gain or to compete against LARM USA Inc., either directly or indirectly, in the provision of services, advice on services, leasing, Purchase or sale of properties or other interests. The collaborators of LARM USA Inc. cannot work simultaneously for LARM USA Inc. and for companies of the competition or that develop activities equal or similar to those of LARM USA Inc.

On the other hand, LARM USA Inc. employees may not be directors, executives, agents or consultants of companies that may be considered direct or indirect competitors to compete against LARM USA Inc.

Steps must be taken to avoid any relationship between these businesses and LARM USA Inc., unless it has been explicitly approved by the Director or shareholders. Finally, the assets of LARM USA Inc. such as equipment, financial assets or confidential information, should be used exclusively for the company's own purposes.

Any employee who violates this policy may be subject to disciplinary sanctions.

ANTIBRIBERY & ANTICORRUPTION POLICY

LARM USA Inc. is committed to combat bribery, extortion, fraud and corruption within our services and anything that could arise in the development of the daily activities. All partners and other interested parties, LARM USA Inc. requires to act in accordance with the principles and business practices and give example with their behavior.

No contributor may directly or indirectly participate, hide, sponsor acts of corruption or bribery to either public or private entities, both local and foreign.

Our business conduct is based on the commitment to act professionally, with justice and integrity and in this sense, we have established:

1. The eradication of corrupt practices such as bribery/extortion:

To ensure the transparency of all income and expenses equally ensuring that resources are applied efficiently.

2. Provision and reception of gifts and hospitality:

Any employee that is authorized to give gifts on behalf of LARM USA Inc., should only do so when it is deemed necessary by trade events, your issue will be properly controlled by the direction of the organization.

The collection of commissions or any improper payment, which goes against the principles and ethics of the organization, made or received by the collaborators or any natural or legal person, done to the degree of obtaining some kind of influence in the initiation or in the preservation of a commercial relationship in which LARM USA Inc. takes part, will be completely rejected and sanctioned up to termination of contract.

3. Detection and limitation of conflict of interest:

Situations that may present a personal and corporate conflict of interest should be avoided; in the case that there is any situation we must inform the Management so that we can give an appropriate solution.

4. Transparency compared to relations with political parties:

LARM USA Inc. does not have any political distinction or preference, for which is left to the freedom of the collaborators its own selection; thus, prohibiting the realization of political proselytism within the organization.

5. Consultation mechanism against doubtful actions:

LARM USA Inc. encourages all employees and collaborators to inform management the facts or circumstances that may be regarded as acts of corruption or bribery, and undertakes to take corrective action on any identified instance.

IT SECURITY POLICY

1. Regarding Passwords:

- ✓ Passwords assigned to each employee are personal, unique and non-transferable.
- ✓ It is recommended to change passwords every thirty (30) days.
- ✓ To create new passwords, it must meet the following requirements: combination of uppercase and lowercase letters; a minimum of eight (8) characters; at least one number and/or special character.

2. Prohibitions for contributors:

- ✓ Install software and / or entertainment programs, which are not properly licensed or that do not correspond to their work activities, in the assigned computer equipment.
- ✓ Attempt to access restricted Information Systems.
- ✓ Try to distort or falsify the records of Information Systems.
- ✓ Modify, alter and / or delete, without the corresponding authorizations, information or configurations of operating systems or applications installed.
- ✓ Install or connect any personal-use hardware to the company's IT resources.
- ✓ Use external storage media (CD, DVD, BR, HDD, USB, SD, MMC, CF, MicroSD, MS) without company authorization.

3. Correctly handling information:

- ✓ The data, documents, folders and records generated by users, corresponding to their work activities, are owned by the company. Therefore, any disclosure, incorrect deletion or incorrect modification or copying to external entities without authorization, is considered a serious fault that can lead to termination of contract and their respective penalties.
- ✓ Each user is responsible for the computer that is assigned, and the information that is stored in it.
- ✓ Each user is backed up from the "Documents", "Desktop" and "Favorites" folders. Therefore, it is recommended that relevant company data be stored in these places. The storage of photos, music and / or personal character files are not allowed on the company network.
- ✓ Employees whose job functions require the use of their assigned resources, outside the central facilities, are obliged to have a data encryption tool for the protection of stored information.

4. Regarding the proper use of internet:

- ✓ Navigation to non-productive pages such as: Leisure, adult sites, online games, P2P file sharing, and security risk is not allowed on the company network.

5. Regarding the screens and clean desktops:

- ✓ Files containing confidential information should not be stored on the computers desktop. These files must be stored in the "Documents" folder or, if necessary, in the Quality Management System.
- ✓ If a computer remains idle for a period of 5 minutes or more, a user session will automatically lockdown.
- ✓ When absent from work, the user must block their session and keep in a safe place any physical document that contains confidential information.
- ✓ Each time a login is required on the computer, the user name and password will always be requested. No other data will be requested.
- ✓ When using reproduction devices (printers / scanners), any document with confidential information must be removed immediately.

DATA PROTECTION POLICY

LARM USA Inc. maintains strict procedures and policies for the safeguarding of the personal data that have been or are collected in development of its activities.

Your personal data may be included in a database and will be collected, stored, used, shared and treated safely for the following purposes:

- Maintain constant and effective communication with our customers, affiliates, employees, partners, suppliers, and any person in respect of whom we are authorized to carry out the treatment of your personal data
- Send commercial, advertising or promotional information about commercial services, events and / or promotions for the fulfillment of contractual duties and in general for the development of the corporate purpose of LARM USA Inc.
- Evaluate the quality of Service
- Develop joint commercial activities with companies or entities linked or allied
- Keeping information about petitions, complaints and claims presented by our clients and affiliates in the performance of our services
- Preserve information related to compliance with the Quality Policies
- Carry out statistical, demographic and market analysis
- Any other purpose that corresponds according to the link that is generated between the owners of the personal data and the company

In accordance with the above rules, the owners of personal data may exercise the following rights:

- Know, access, update and rectify your personal data
- Be informed of the use that has been made of your personal data
- Revoke the authorization and / or request the suppression of the data when in the treatment the constitutional and legal principles, rights and guarantees are not respected

All data is stored on a server of LARM USA Inc. which is guarded by advanced mechanisms of computer security, with the objective of preventing unauthorized access by third parties to its information.

PERSONNEL SECURITY POLICY

When a new employee is On-boarded, must go through the mandatory security and PII training. In addition to this, a mandatory yearly refresher training on security and PII safety is provided to all employees. Employees must speak to their managers to allocate time to complete this each year, training must be verified and signed by the managers. This ensures employees understand their responsibilities to security practices.

Employee access is also determined and monitored so that it is terminated immediately upon completion of employment, where management always must notify the IT department in order to terminate access of an employee.

ALCOHOL, TOBACCO, SUBSTANCES AND WEAPONS POLICY

Prevention of Alcohol and Psychoactive Substances:

LARM USA Inc. is aware that alcoholism, drug addiction and the abuse of substances by employees have adverse effects on performance and significantly affect the health, safety, efficiency and productivity of employees and the company in general, and has defined and established the following guidelines to prevent, improve, conserve, preserve the welfare of employees, their quality of life, performance, and the promotion of healthy lifestyles:

- The sale or possession of alcohol by employees is not permitted in the company's premises, or in the places where it is developing its job functions.
- It is the responsibility of each employee to ensure that while in service, they are not under the influence of alcohol, drugs or any substance that may negatively influence their behavior.

Prevention of Smoking:

LARM USA Inc. is aware that smoking poses a risk to the health of the smoker and the people who are around a smoker, it also impacts the environment. Smoking also poses a risk the company as potential a source of fire.

LARM has defined the following guidelines to prevent the materialization of these risks:

No smoking:

- Inside the fixed installations such as jobs and meeting rooms.
- Inside the facilities of our customers.
- In work related meetings arranged by the company or third parties.

Prevention of Carrying Weapons:

LARM USA Inc. prohibits the use or carrying of weapons, concealed or not, to the inside or outside the premises of the organization and in the development of work related activities.