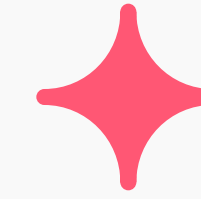




# Code of Conduct





## Code of Conduct

Ualá was born with the mission to bring Latin American financial services into the 21st century, and our entire ecosystem is designed with that purpose in mind. Every day we develop products that make people's lives easier, and we are committed to doing so in a transparent and ethical manner, complying with all applicable regulations. Starting with me, our entire team is committed to integrity in every action we take. Our Code of Conduct represents a fundamental guide for all of us who are part of the Ualá ecosystem to ensure we work in alignment with our principles and values.

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**Pierpaolo Barbieri**  
CEO of Ualá



# What is the purpose of our Code of Conduct?

Our Code of Conduct (hereinafter, the “Code”) is a guide to ensure the integrity, reputation, and commercial objectives of Ualá, acting always with transparency, integrity, and business ethics. Ethics is an integral part of all day-to-day activities; it is important not only what results are obtained, but also how they are obtained.

## Who does it apply to?

This Code applies to all our employees, directors, and shareholders (hereinafter, “Collaborators”).

It is also applicable to providers, business partners and third parties acting in the name of, in the interest of, or for the benefit of Ualá (hereinafter, “Providers”).





## Our Principles

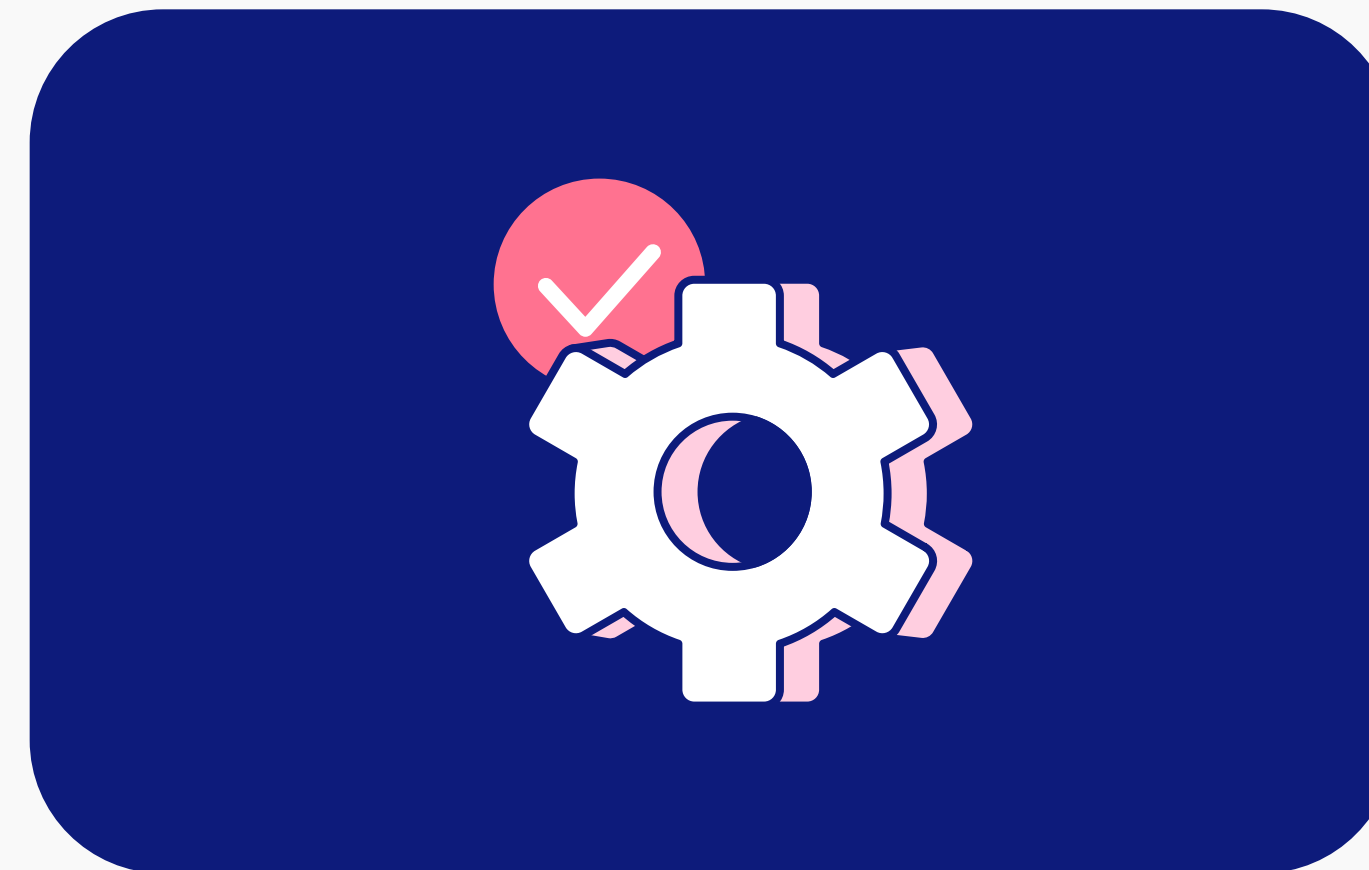
### The team inspires us:

We believe that diverse teamwork is the path to success. Our communication is honest, straightforward, and without fine print. We are close even in distance.



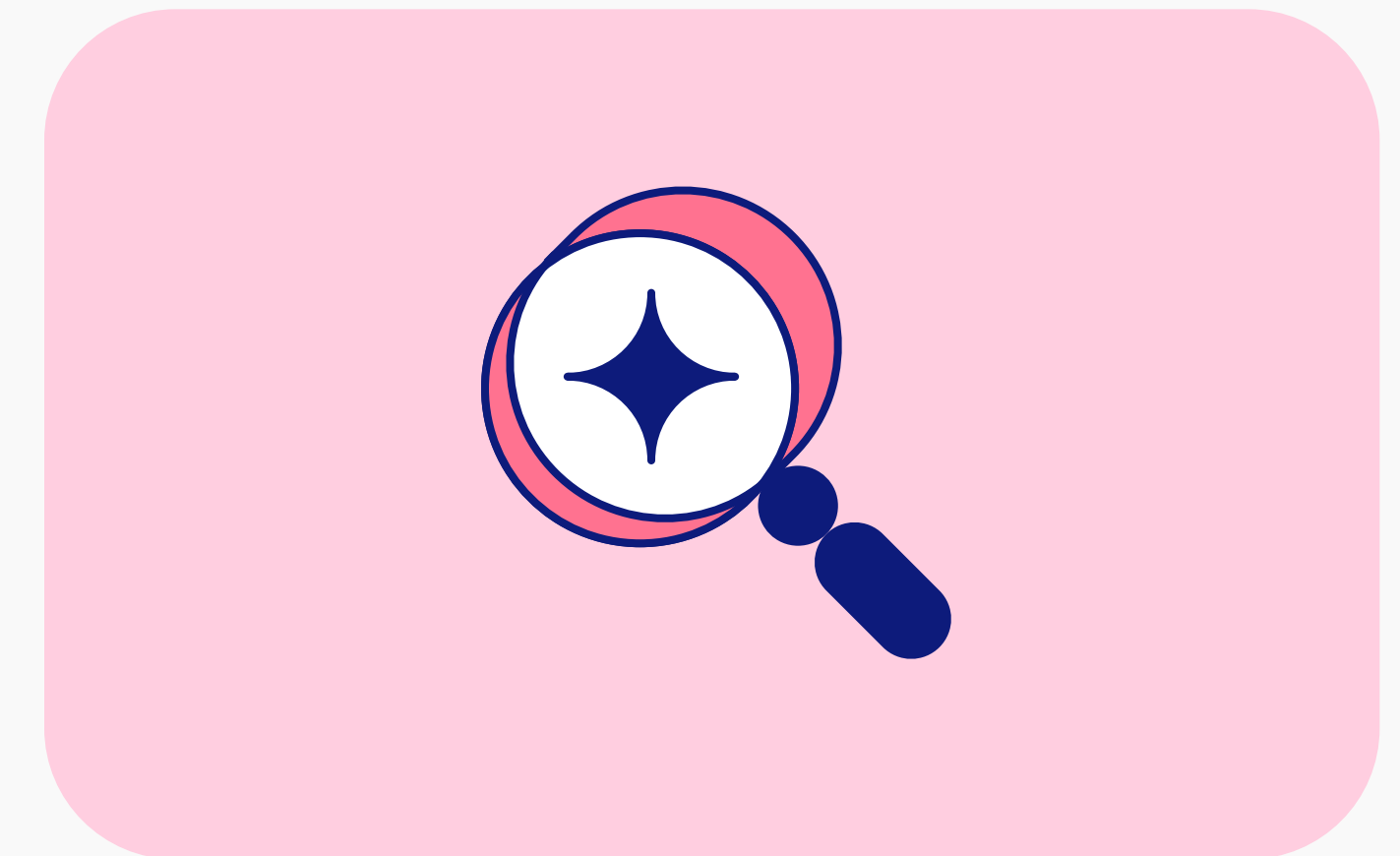
### We are impact-driven builders:

We create with freedom with a view to provide the best experience. We listen to our users and keep it simple. We are industry leaders focused on our purpose.



### We always strive for excellence:

We are bold when it comes to strategic-decision making. We rely on data with a sustainable regional growth view. The best is yet to come.





## → Our Workplace:

- ☆ We are committed to fostering a harmonious climate based on mutual respect and the appreciation of our differences.
- ✓ Guaranteeing equal opportunities for every member of Ualá.
- ⊕ Under a zero-tolerance policy, we strictly prohibit any situation of harassment, discrimination, mistreatment, or intimidation.
- ✗ As well as the use of weapons or illicit substances, to ensure a safe and professional environment.

! This commitment guarantees respect for the rights of our Collaborators and Suppliers.

## → Commitment to diversity

We believe in a diverse team and an inclusive work environment. Our commitment is to maintain an environment free of discrimination and harassment. For the professional development of Collaborators, training and experience are considered regardless of religion, culture, gender, sexual orientation, age, nationality, or marital status, valuing ability and commitment above any other criterion. We want to reflect internally the same diversity that we find outside.

For any questions, you can consult the People team.

## → Commitment to the community

We commit to caring for the environment and generating a positive impact on society through financial inclusion. We consider sustainability in all our challenges and projects. We reject child labor and require our Suppliers to follow this principle, complying with all applicable regulations.



## → Representing Ualá

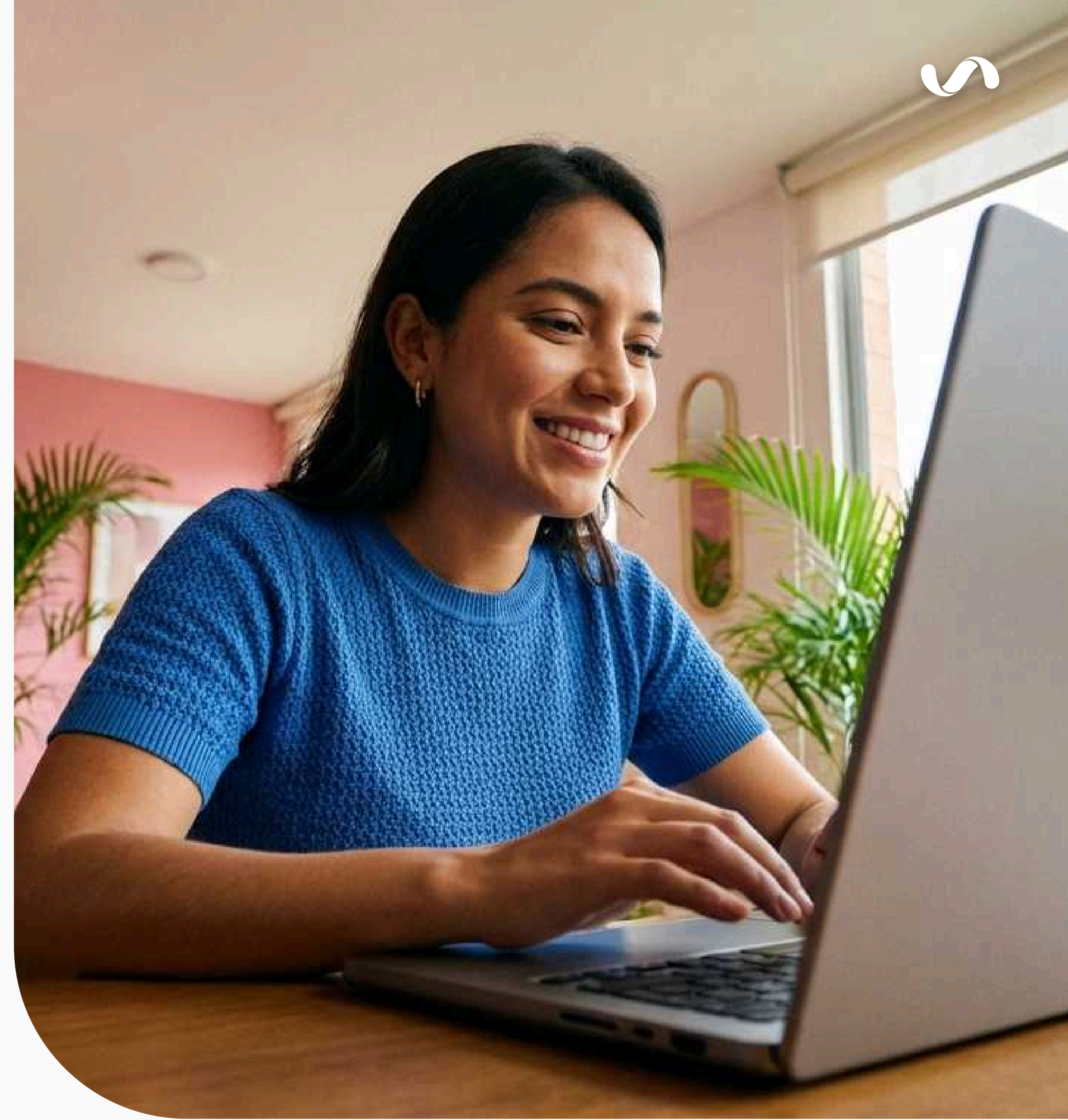
In various situations, Collaborators will participate in exchange and dissemination activities. It is fundamental that they act responsibly when making comments or publications in public media and social networks related to Ualá. In no case should they disclose confidential information. Collaborators are responsible for the personal opinions they share on social networks. Ualá has official representatives authorized to express themselves and present themselves publicly in communication media or events.

## → Relations with the public sector

Ualá has a policy for managing interactions with the public sector, which establishes principles of action that Collaborators must follow when interacting, whose main purpose is to mitigate corruption risks. Ualá does not tolerate corruption and therefore:

- Complies with anti-corruption legislation
- Prohibits its Collaborators from offering, performing, or promising improper payments
- Commits to collaborating and cooperating by providing necessary information in case of receiving a requirement from a state body.

For any questions, you can consult the Public Affairs team.





## Taking decisions clearly and transparently

Our decisions must be clear and transparent, following these principles:

Be made with clarity and transparency

Have the required approvals

Be based on risk assessment

Record the reasons for which they were made

Always prioritize Ualá's interests

Be timely communicated



## Conflict of interest

Ualá has a conflict of interest policy, which establishes what is understood by conflicts and how to act in different situations. A conflict of interest exists when, in a specific matter, our personal interests oppose those of Ualá. When we deal with clients or Suppliers, we must privilege the company's interests, avoiding any situation that could be interpreted as a personal benefit.

For more details, enter our conflict of interest policy.



## Hiring of relatives, close associates, and collaborators from the public sector

Ualá allows the hiring of Collaborators who come from the public sector, relatives, and close associates, complying with certain requirements. These control rules do not apply to the appointment of directors or statutory auditors.

### Collaborators coming from the public sector

- We must ensure that no incompatibilities exist after finishing their function and obtain approval from the integrity team.

### Hiring relatives or close associates

- Evaluations and selection processes must be met.
- They must not be incorporated into the same management area or in a direct hierarchical relationship with their relative.





## Responsible use of resources

The resources provided by Ualá to Collaborators must be used responsibly, using only authorized programs. All information stored in Ualá's systems and technological resources is the exclusive property of the company.

Ualá has the authority to, in certain situations, monitor, supervise, and access all information generated through its technological resources.

Each Collaborator is responsible for taking the necessary measures to preserve Ualá's information and ensure its custody for the time established by laws and internal regulations.

The use of information for purposes not directly related to work is strictly prohibited.

For any questions, you can consult the Information Security team.



## Information security

Access to Ualá's information is limited to authorized Collaborators, and its improper disclosure is prohibited.



## Confidentiality of information

Ualá's information is one of its main assets, and therefore we must care for its security and confidentiality. As a general rule, information may only be made available to authorized persons and when necessary.



## Intellectual property rights

At Ualá we value and respect intellectual property rights. Our brands, technology, software, and everything we create are important assets protected by law. Every innovation arising from the work of Collaborators in the workplace belongs to Ualá.

We comply with the protection and respect of intellectual property at all times. It is part of our commitment to innovation and respect for creative work.

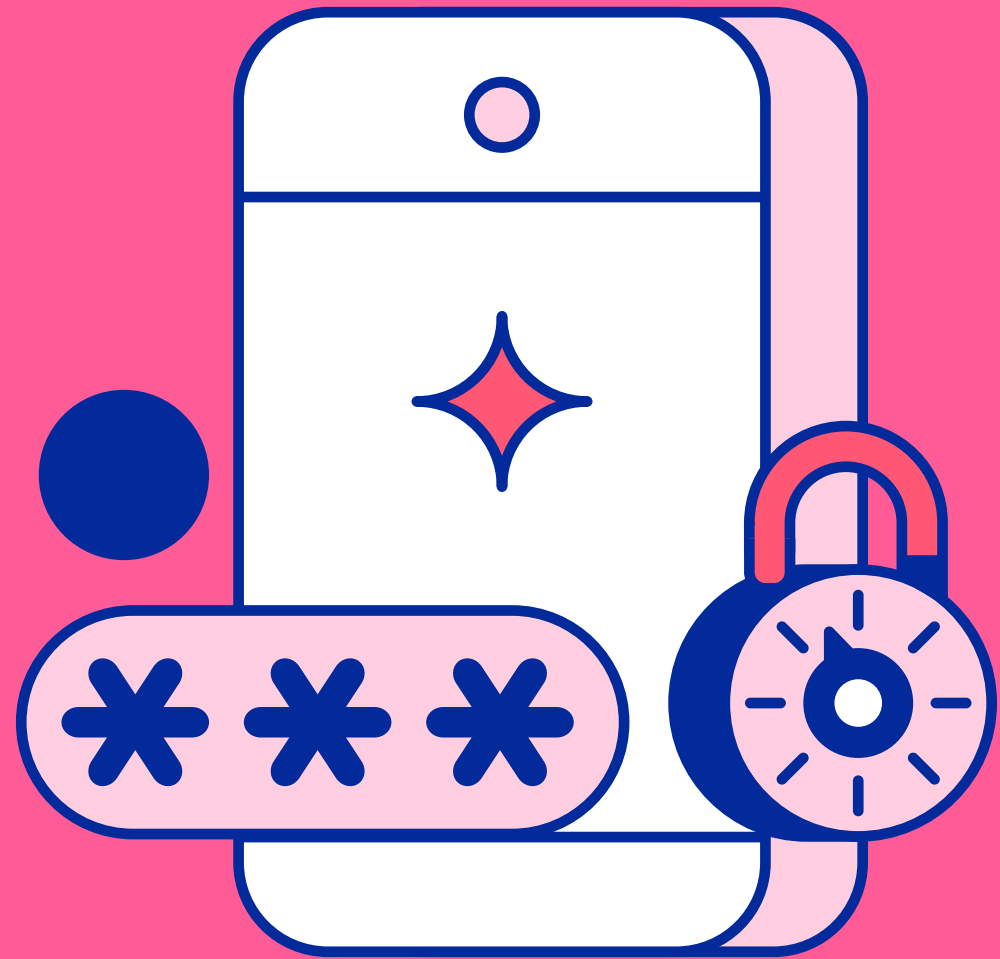


## Prevention of money laundering, terrorist financing, and financing of the proliferation of weapons of mass destruction (AML/CFT)

Ualá applies policies to prevent, detect, and report possible suspicious operations of money laundering, terrorist financing, and financing of the proliferation of weapons of mass destruction. The obligations detailed in the AML manual must be understood as complementary to this Code.

Collaborators commit to maintaining an absolute reserve of information related to the AML system they have become aware of in the exercise of their functions, except when expressly empowered authorities request it. Information related to the AML system meets criteria of integrity, availability, auditability, and confidentiality regarding the conservation and safeguarding of information and documentation.

For any questions, you can consult the AML team.



## Accounting and financial records

Collaborators are responsible for properly accounting for, recording, and documenting all operations, income, and expenses, so they can be verified by the control team and auditors. Concealment or falsification of records are considered breaches of the Code and will not be tolerated.

The integrity of our financial and accounting records is fundamental to ensure transparency in business development; therefore, we ensure that transactions are carried out through traceable means, corroborate that records are complete and reliable, respect applicable regulations for data generation and processing, and perform internal controls to reinforce compliance with our record policies.



## Personal data protection

The security of personal data is a responsibility and, at the same time, an opportunity to build trust and value in our relationships. Collaborators, Suppliers, and users of our services trust us by providing personal data to carry out our tasks.

At Ualá we value that trust by protecting that information with high standards of privacy and security. We collect, use, and access information in accordance with our policies and corresponding data protection laws.



## Defense of competition

Fair competition is fundamental for Ualá. We comply with competition defense laws, taking into account the following practices:

- 1 Not engaging in anti-competitive behavior.
- 2 Not engaging in price fixing or imposing business conditions on our competitors.
- 3 Not agreeing with competitors on the division of customers, territory, participation in tenders, etc.
- 4 Collaborators must not seek any personal benefit by taking advantage of business opportunities arising as a result of their position at Ualá.



## Purchasing and contracting

We consider that each of our Suppliers has a key role in the advancement and sustainable development of our ecosystem.

At Ualá we encourage everyone to maintain high ethical standards. We have processes and perform internal controls so that our commercial relationships are carried out with integrity, respecting our Purchasing Policy. In the purchasing and contracting process, equal opportunities must be ensured, information confidentiality protected, actions documented, and Suppliers requested to commit to our Code or present their own.

For any questions, you can consult the Procurement team.



## Gifts and business courtesies

Ualá has a gifts and courtesies policy, which establishes principles to keep in mind:

- They must not exceed USD\$ 150,00- (ONE HUNDRED FIFTY DOLLARS) or its equivalent in local currency.
- We must not give or accept money or property readily convertible into money.
- Giving or receiving gifts to or from public officials is prohibited.
- No applicable law or regulation can be violated.
- Making donations in cash or in kind to political parties or organizations is prohibited, either directly or through third parties.

Exceptions to be reviewed by the integrity team will include business or commercial meals, invitations received to participate in business events, conferences, conventions, commercial presentations, or technical courses.

For any questions, you can consult the Integrity & Compliance Processes team.



## Contribution to political organizations and other entities

Ualá prohibits contributions in money or kind in its name or through third parties to politicians, public officials, parties, or political organizations. Likewise, donations to for-profit individuals and organizations, paid into private accounts, and to organizations whose objectives are incompatible with Ualá's principles are prohibited. Nonetheless, Ualá may make donations destined for education and science, art and culture, and social and humanitarian interest projects.

Such donations must always be made through traceable means, with the delivery of receipts to the beneficiary and documentary material that accounts for the use of those funds for the proposed objectives.

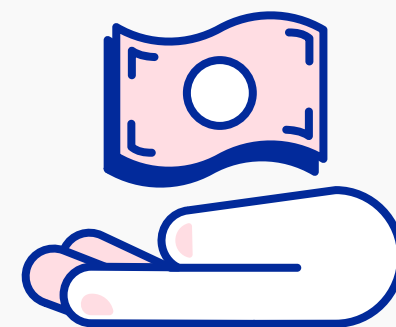


## Zero tolerance for bribery

Bribery is understood as the offer, promise, acceptance, or request, directly or indirectly, of an undue advantage of any value in violation of applicable law as an incentive or reward for a person acting or refraining from acting in relation to the performance of their duties.

At Ualá we do not tolerate corruption in any of its forms.

The payment of bribes, incitement to receive bribes, or any other proposal or suggestion of this kind is totally prohibited and must be reported immediately.



## Ethics helpline

### Open-door policy

which means each Collaborator can talk to their leader or the integrity team.

### Ethics helpline

Where any breach of our Code can be reported anonymously, without providing data, or confidentially to ensure identity is protected. This line is managed by KPMG, which guarantees greater transparency. Reports received through the line or internally will be handled by the corresponding integrity committee, following the instructions in the report treatment protocol and committee regulations.



[somosuala.lineaseticas.com](https://somosuala.lineaseticas.com)

- Argentina 0800-122-0871
- Colombia 0180-0752-2260
- México 0180-0123-3284



For any questions, you can consult the Integrity & Compliance Processes team.



## Non-retaliation policy

Retaliation is direct or indirect action taken against someone who honestly reports an irregularity. It can include unjustified contract termination, denial of promotions, changes in role assignments, and other forms of discrimination.

At Ualá, we do not tolerate retaliation against those who report misconduct in good faith. We guarantee job continuity and confidentiality for those using our ethics helpline and protect against adverse actions such as threats, intimidation, and discrimination. Therefore, retaliation will not be applied when our ethics line is used in good faith.

At Ualá, we foster transparency and security, encouraging everyone to use the channels to maintain an ethical environment of trust.



## Breaches of the Code of Conduct

All Collaborators will be subject to internal rules and policies. Any breach of our Code will result in gradable internal sanctions, such as:

- A Verbal or written warnings
- B The right to disengage or terminate the contract and withhold payment owed and demand appropriate reparations.
- C The filing of the corresponding civil, commercial, or criminal complaint.
- D Communication to the respective Professional Association, Chamber, or Association that performs oversight or supervision of the correct ethical performance of its members.
- E Dismissal with just cause according to the labor contract law.



Code of Conduct

