



INTEGRITY PROGRAM



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01. LETTER FROM THE CEO

DEAR INTCOMEX TEAM,

In order to achieve **INTCOMEX's** Mission and Vision, we live by the company's Values on a daily basis. I present to you our Integrity Program, which will guide us every day to act with integrity, always guided by our first value, Ethics.

At **INTCOMEX**, Integrity is a non-negotiable principle, being the main condition for our business. Thus, it constitutes the conduct expected by the company in each one of you, serving this Integrity Program as a guide for our Values and actions.

I extend this call to all **INTCOMEX** employees to abide by, respect and promote this Integrity Program, as it will help us to understand even more the role we play as individuals in our daily work and the impact it has on the company.

Our main commitment is, and must be, to maintain an ethical, integral and transparent behavior, with which our reputation continues to be our greatest capital of care.

We are a single team at **INTCOMEX**. And that is why **Compliance is all of us**.

Best regards,

A handwritten signature in black ink, appearing to read "Mike Shalom", with a long horizontal flourish extending to the right.

Mike Shalom | CEO

02. INTRODUCTION AND OBJECTIVES



INTCOMEX (“Company”) is committed to the adoption and application of Good Corporate Governance practices.

The Integrity Program (hereinafter referred to as “IP”) is applicable to all **INTCOMEX** employees, including collaborators, directors and managers. It also applies to our Stakeholders.

Each employee of the company is required to read and sign an agreement of understanding of the IP. Likewise, our Stakeholders can consult the IP through the **INTCOMEX** website, acknowledging its adherence and applicability.

This IP has been developed in compliance with the regulatory framework of the United States Department of Justice (DOJ), as well as applicable laws and regulations aimed at combating bribery and corruption. These include the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, the principles of the OECD Convention on Combating Bribery of Foreign Public Officials, and leading international practices on compliance and transparency.

INTCOMEX’s IP has been advised and reviewed by the prestigious US law firm based in Washington D.C., Miller & Chevalier Chartered, specialized in cross-border compliance issues. This process has

been particularly focused on ensuring that the Company complies with the Foreign Corrupt Practices Act of 1977 (FCPA), as well as with applicable anti-money laundering and trade compliance laws in the United States.

Miller & Chevalier Chartered has conducted the relevant review and provided valuable comments on the Company’s Compliance policies and procedures. In addition, it has actively collaborated in their implementation together with **INTCOMEX’s** Regional Legal & Compliance Department.

Regarding our operational market, we would like to highlight that in countries with specific local Anti-Corruption and Compliance legislation, Annexes have been developed and form an integral part of this IP in relation to their mandatory applicable regulations. To date, these countries are Peru, Colombia, Mexico, Chile, Costa Rica and El Salvador.

We have also worked on a risk prevention model, which not only satisfies the requirements set forth in current anti-corruption regulations but also strengthens the business model based transparency and integrity that drives the Company. For this reason, it is a necessary condition that our Employees¹ and Stakeholders comply with each guideline defined by **INTCOMEX** in this IP.



OBJECTIVES

At **INTCOMEX**, we have developed a set of internal and external controls that allow us to ensure compliance with the Policies contained in this IP. All this will be possible only if everyone who is a part of the **INTCOMEX** team contributes to promoting a true culture of Integrity, Transparency and Ethics, through information and training, by generally outlining expected behaviors and sanctions for prohibited actions.

We must foster an environment within our teams in which each member feels free to raise concerns about potential IP violations in good faith and in a collaborative manner.



INTEGRITY PROGRAM CONTENT

The IP is composed of the Code of Conduct and Ethics (“Code”), Policies, Whistleblower Channel and IP Regulations. Through the IP, we establish a preventive and risk mitigation guide that will allow us to know how to act correctly and in accordance with internal policies and Values, being necessary to maintain special attention in the conduct of each one of us.

Additionally, Internal Protocols have been developed for the support areas and strategic areas that define recommendations on Compliance.

REVIEW OF THE INTEGRITY PROGRAM

Without prejudice to its ongoing monitoring, this IP will be reviewed annually, by the Regional Legal & Compliance Department (“LC” for its Spanish acronym) and also whenever circumstances require it (such as changes in mandatory material legislation, new developments, etc.). These changes will be carried out by LC with full autonomy considering the new situations that, as a consequence of its activity, **INTCOMEX** must face in the development of its business activities.



03. COMMITMENT AND TRANSPARENCY

At **INTCOMEX**, we are firmly committed to complying with international anti-corruption regulations, including the U.S. Foreign Corrupt Practices Act (FCPA).

We recognize the importance of adhering to these ethical and legal standards in all our operations.

Therefore, all our Employees and Stakeholders must abide by and adopt this IP, which reflects the principles of these laws. This commitment to integrity and transparency is fundamental to ensuring trust in our business practices and maintaining our reputation for excellence.

04. APPLICABILITY

At **INTCOMEX**, we all share the commitment and obligation to comply with and enforce compliance the IP. We will not tolerate or ignore any kind of non-compliance. We are committed to protecting those who report any type of activity contrary to the provisions of the IP.

As **INTCOMEX** Employees, we are all responsible for reading, understanding, and adhering to our IP, as well as to the Company's Code of Conduct and Ethics and the Policies and Procedures it encompasses. Likewise, we must attend and pass all mandatory Compliance training courses, seek guidance if anything is unclear and immediately report anything that may involve a violation of the IP.

Similarly, our Stakeholders must maintain a committed relationship with the Company in matters of Integrity, Ethics and Transparency, by adhering to this IP to the extent that they participate in our value chain.



05. ROLES

5.1. REGIONAL LEGAL & COMPLIANCE DEPARTMENT

INTCOMEX has a Regional Legal & Compliance Department (“LC”) that, with external support when deemed necessary, studies, designs, develops and supports the various Policies and Procedures that make up the IP, including the administration of the Whistleblower Channel.

5.2. REGIONAL COMPLIANCE COMMITTEE

The Regional Compliance Committee (“Committee”) is composed of the Head of Legal & Compliance, the CFO, and Head of Human Capital (“HCH”). They will work in coordination with the CEO and COO, with the objective of supervising the IP in accordance with their roles and the consideration and support in the investigations that, due to their importance and subject matter, require it.

If deemed necessary and with unanimous agreement of the Committee members or if it is mandatory by local law, the General Manager (“GM”) of the legal entity involved or any specific management (e.g. local Manager of CH) may participate.

Both LC, Finance and CH may rely on their local teams to carry out their own investigations, as long as ongoing investigations are not compromised, and when required by local legislation.

They may also rely on the collaboration of external experts when the nature of the investigation, applicable law or potential impact on the Company requires it.

5.3. SYNERGY

Together with the support of LC, the Finance Department will support investigations related to financial and accounting issues. In turn, the Human Capital Department will provide its own support for relational investigations, i.e., in the case of complaints about aspects related to employee behavior. Both departments will receive annual support and training to carry out the investigations.

In addition, LC has developed different Internal Protocols based on recommendations that support the different Compliance scenarios and serve as a guide for dealing with such situations.

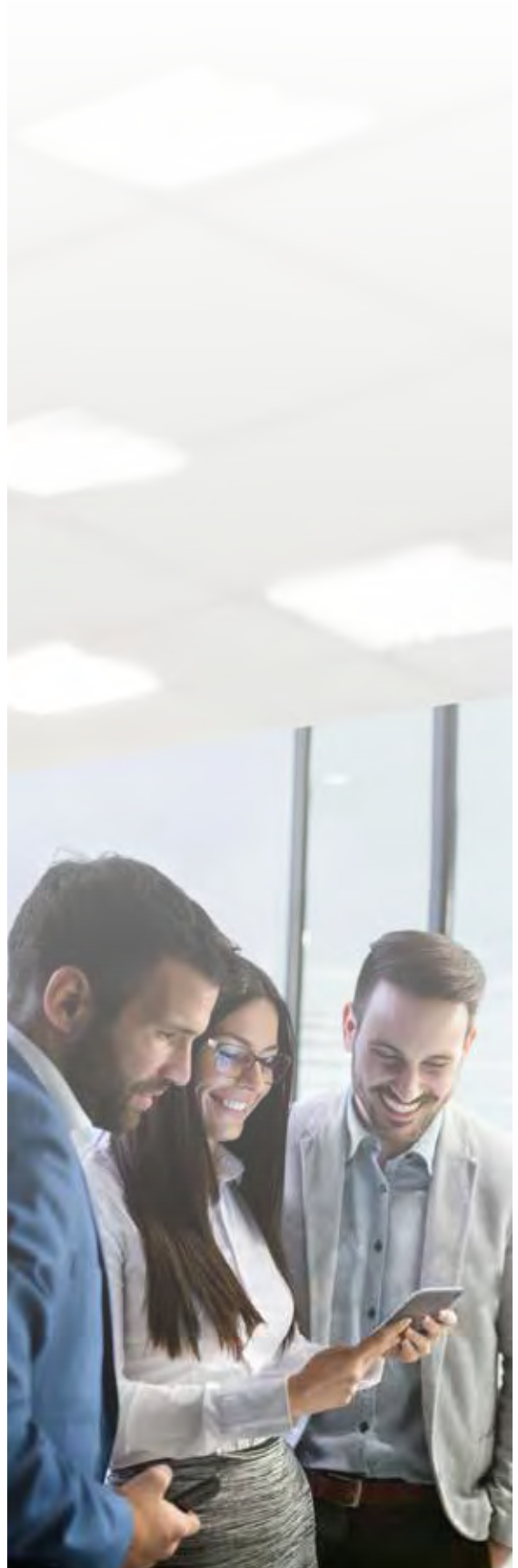
06. CODE OF CONDUCT AND ETHICS

At **INTCOMEX** we are committed to acting with integrity in all our business activities. That is why we have developed this Code of Conduct and Ethics (“Code”), which sets forth the principles that all Employees must adhere to in order to avoid any inappropriate conduct or actions contrary to our Policies and Procedures.

If any of us has doubts about what to do in a particular situation, or faces circumstances that raise questions of Integrity and/or Ethics that the Code does not expressly address, we should contact the Regional Legal & Compliance Department.

Our commitment is vital, as compliance with the Code is a condition of employment and disobedience may result in immediate disciplinary action, a record of non-compliance in your personnel file, and even termination for just cause.

INTCOMEX GMs, VPs, Department Managers and Supervisors are expected to promote an “open door” practice, which means that any employee with doubts, questions or concerns about the IP may approach them in a collaborative and good faith manner and we must be ready to support them.



6.1. OUR EMPLOYEES

At **INTCOMEX** we strive to foster a work environment where the fundamental rights of our Employees are respected. Thus, we must maintain a respectful treatment towards one another at all times.

The Code cannot cover every individual situations in detail, but it does provide guidelines for respectful coexistence and expected conduct. For this reason, we must keep in mind the Company's Values and, along with reasonableness, proportionality and common sense to ensure that we are acting in accordance with the spirit of the Code at all times, respecting our workplace and the Employees who work here, regardless of their hierarchy or type of employment.

6.1.1 DISCRIMINATION AND HARASSMENT

At **INTCOMEX** we guarantee all our Employees a safe work environment. We work to identify and mitigate acts that threaten sexual freedom, discrimination based on race, ethnic origin, gender, creed, religion, age, disability or sexual preference, in order to ensure respect, dignity and personal privacy, physical, psychological and moral integrity.

All of us must conduct ourselves with professionalism and integrity at all times.

Our conduct must be governed by reasonableness, consideration and mutual respect regardless of hierarchy or employment status. We expect our workplace to be a pleasant environment, where people treat each other with kindness and consistently act in a professional and transparent manner.

6.1.2 PRIVACY, PROTECTION AND DATA MANAGEMENT

We act in accordance with the collection, processing and protection of personal information that is part of the development of our internal processes, therefore, we process personal data lawfully, we offer access to them within our Company only when strictly necessary and prior consent of the owner is obtained.

Leaking information about our Stakeholders or our confidential information is prohibited. Doing so is subject to sanctions and is considered just cause for termination. Additionally, it may even constitute a criminal offense.

6.1.3 CONFIDENTIAL INFORMATION

Confidential Information refers to information not published or not officially disclosed concerning **INTCOMEX** and its shareholders, directors, employees, subsidiaries, affiliates, branches, stakeholders, operations, businesses, activities, plans, investments and strategies.

Confidential Information of **INTCOMEX** must not be disclosed; doing so may result in disciplinary action in the form of sanctions and constitutes just cause for termination. The Duty of Confidentiality remains in effect even after separation from the Company. Failure to comply with the Duty of Confidentiality may constitute a criminal offense and lead to legal penalties.

When any governmental authority requires **INTCOMEX's** Confidential information through a duly justified legal process, the request may be fulfilled as long as prior inexcusable notice is given to the Controller and the Local General Management, under the supervision of LC.

The work product generated by **INTCOMEX** Employees, as well as the correct use of fixed

assets, is the exclusive property of the Company and will be subject to analysis at the time **INTCOMEX** deems it necessary.

6.1.4 CONSUMPTION OF ALCOHOL AND NARCOTICS

In our ongoing commitment to providing the best internal and external service, we are committed to preventing the consumption of alcohol and drugs at all levels of the Company. Reporting to work under the influence of alcohol or drugs is considered a sanctionable offense and may lead to termination for just cause.

6.1.5 DUTY OF CARE FOR GOODS

At **INTCOMEX** we are extremely careful in managing assets, both our own and those of our Stakeholders.

We avoid any situation that may call into question our personal honesty. We strictly comply with the established procedures, document and support all transactions we carry out and obtain the corresponding approvals.

Any purpose other than the one defined by **INTCOMEX** that is given to its assets will be considered unacceptable, with no justification permitted. Such misuse constitutes a serious breach of our obligations as **INTCOMEX** Employees, and may result in termination with just cause.

INTCOMEX assets, such as equipment, supplies, real estate, tools, inventory, funds, computer systems and equipment, software, computer data, vehicles, records or reports, private information, intellectual property or other information, must be used to conduct and manage its business. However, we must provide limited, responsible and reasonable personal use of certain business systems and

equipment. When using corporate resources for personal use, Employees must exercise good judgment and reasonableness when circumstances warrant.

Personal use of Company resources is limited to meeting basic and reasonable communication needs. Occasional, limited personal use of the Internet is also permissible for reasonable purposes during and appropriate and expected timeframe outside of working hours, provided it is lawful, reasonable, lawfulness and carried out with good judgment.

6.1.6 OCCUPATIONAL HEALTH AND SAFETY

We are committed to maintaining a safe work environment at **INTCOMEX** that supports the well-being of our Employees. All Employees must report to their supervisor and the responsible department of any activity that could be considered a risk.

INTCOMEX, in alignment with the UN International Bill of Human Rights and the standards established by the International Labor Organization (ILO), strictly prohibits child labor and child employment.

6.1.7 CONFLICT OF INTEREST

These are situations in which an Employee's judgment and the Integrity of their actions may be unduly influenced by an economic interest or personal advantage. In other words, they are situations where an Employee's actions are improperly influenced by an economic interest that is profitable for them, thereby disregarding the interests of the Company. This includes favoritisms towards Stakeholders based on family ties and/or personal interests and/or related parties, and/or acting through a known or interposed third party for the same economic and/or personal advantage.

At **INTCOMEX** we expect all Employees to exercise transparent, integral, objective, fair and impartial judgment in all Company dealings, always avoiding situations where personal interests or advantages, direct or indirect, take precedence **INTCOMEX's** interests.

We have a specific policy on this matter, which is part of our IP and is mandatory.

6.1.8 FINANCIAL INTEGRITY

The recording, retention and preparation of financial reports for **INTCOMEX** must comply with applicable legal requirements, with the Accepted Accounting Principles and with the control guidelines issued by **INTCOMEX**. Any operation involving an accounting entry must be supported by documentation that supports the transaction, complies with tax requirements and is accurate. Its preparation must include reasonable detail and proper recording in the accounting ledgers.

It is strictly prohibited to modify or falsify documents, records or reports, as well as to conceal information that could distort financial records that may affect **INTCOMEX**.

INTCOMEX is legally obligated to ensure that all of its books and records accurately and fairly represent transactions and dispositions of our assets in reasonable detail.

We must avoid any inaccuracies in our books and records. Employees must never create or contribute in the creation of erroneous or artificial records. We fully cooperate with both internal and independent auditors to ensure compliance with our responsibilities. Any attempt to improperly or fraudulently influence, impose, manipulate or mislead the independent or internal auditors in connection with our financial statements, accounting practi-

ces, or internal controls is a serious violation of the Code.

6.1.9 ANTI-BRIBERY AND ANTI-CORRUPTION

At **INTCOMEX**, we are committed to conducting business in an ethical, fair, transparent and honest manner, which is why we do not tolerate corruption². We compete in our markets based on the quality and value of our products and services, and we do not resort to corruption to gain an unfair competitive advantage.

We must unconditionally avoid any act of corruption, including conduct involving a Public Official³, a third party related to the Public Official or another with whom the Public Official has a business relationship or transaction of any kind, public or private.

Each of us, as **INTCOMEX** Employees, as well as any Stakeholder or entity acting on their behalf or for their benefit, must not offer or accept a bribe⁴ or perform an act of corruption, either directly or indirectly through Stakeholders, even when it involves mere acts of formality, such as routine or administrative matters. Ignorance of this conduct does not exempt anyone from disciplinary action or termination with just cause.

Acts of corruption include, among others, gifts to Public Officials, or to a Stakeholder related to the former or involved in a business relationship or transaction of any kind, seeking to obtain an undue advantage. This also includes proposals of consulting agreements; compensation or commissions, excessive commissions aimed at the unjustified disbursement of public funds; offers of travel sponsorship; and the provision of unwarranted reimbursements.

A Public Official is defined as a person who maintains a partial or permanent relationship

with the State or any government entity, whether directly contracted or outsourced, including individuals in positions in at state-owned companies. It also includes those who work in international organizations or serving in diplomatic roles, whether on a career or ad-honorem basis.

At **INTCOMEX**, we recognize that engaging in dialogue with the government is a fundamental right of both individuals and legal entities. In this sense, any communication with Public Officials carried out on behalf of **INTCOMEX** must fall within the framework of legitimate dialogue, establishing mechanisms of action against situations of economic extortion or corruption.

- I. Legitimate reason refers to matters that are lawful and not contrary to existing legislation. In this case, it must relate to **INTCOMEX's** interests and justify establishing communication with a public entity.
- II. An intermediary should be understood as a person with the legitimacy to represent both the public entity and **INTCOMEX**. In the case of **INTCOMEX**, only its representatives may engage in a legitimate dialogue, who must have such authority in accordance with the Company's bylaws, or by power of attorney, or by provision of the hierarchical superior, or those who by the nature of their position have to attend to the Public Officials. The intervention of third parties or intermediaries who do not have the power of representation is not valid.
- III. By appropriate manner means using proper and formal means for communication, ensuring that interactions main-

tain professional formality, and that the purpose of the conversation is clearly stated from the outset.

We have a specific policy on this matter, which is part of our IP and is mandatory.

6.1.10 PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

The policies adopted by **INTCOMEX** regarding prevention are aligned with compliance regulations and best practices related to anti-money laundering and/or counter-terrorism financing, within a risk identification framework that includes the verification of Stakeholders prior to their involvement with the Company.

We must ensure that we do not facilitate or support the process of concealing the origin of illicit funds derived from criminal or terrorist activities through our legitimate business operations. Doing so will constitute grounds for sanctions and may result in termination with just cause.

We have a specific policy on this matter, which is part of our IP and is mandatory.

6.1.11 COMPLIANCE WITH EXPORT CONTROL LAWS

At **INTCOMEX**, we are committed not only to complying with the letter of the law but also with the spirit and intent of all export and international trade regulations in each of the countries where we operate commercially, including the United States.

INTCOMEX encourages and expects that its directors, officers, employees, and even third parties providing services to the Company, understand and consistently operate in accordance with the core principles of these regulations; that they comply with them and ensure

their enforcement at all times. Compliance with these rules is essential to the Company, its reputation, and its continued success.

Exports, re-exports, imports of any type of service, tangible or intangible asset, or any other transaction carried out in violation of existing international trade regulations in any applicable jurisdiction, or contrary to governing rules, is prohibited and will be sanctioned.

We have a specific policy on this matter that is part of our IP and is mandatory.

6.1.12 INTEGRATED MARKET COMPETITION

INTCOMEX is subject to “antitrust” or “economic competition” laws that govern the manner in which it may compete to avoid interference with the competitive market system. Under these laws, companies or individuals may not enter into agreements with competitors or engage in unlawful or illegitimate conduct that restricts competition. Illegal practices include, among others, price fixing, exclusive allocation of customers or territories, or the unlawful abuse of a dominant market position.

To ensure compliance with applicable laws, we must avoid sharing competitively sensitive information, such as pricing policies, contract terms, margins, business strategy, sales revenue, market conditions, costs, inventories, marketing and product plans, market surveys and other proprietary or confidential data with competitors.

The local GM and LC must be informed immediately whenever a competitor discusses a confidential matter or otherwise suggests collaboration.

Participating in or entering into agreements

with competitors related to pricing, production, Customer allocation or market sharing by any means, oral or written, including telephone conversations or chats, are improper activities, and will be under full surveillance.

At **INTCOMEX**, we all cooperate with requests for information and inspections conducted by the authorities responsible for ensuring fair competition.

In addition, any violation of U.S. export regulations may result in significant fines, restrictive penalties for directors, employees or agents, suspension of import privileges and immeasurable reputational damage to **INTCOMEX**.

6.1.13 ENVIRONMENT

At **INTCOMEX** we are committed to the good use of natural resources, ensuring environmental protection practices and pollution prevention, minimizing the possible effects produced as a consequence of our business activities.

6.2. STAKEHOLDERS

INTCOMEX is committed to treating its Stakeholders with Ethics, Transparency and Business Integrity, avoiding any form of preferential treatment.

As one of **INTCOMEX's** core values is Customer Obsession, we must strive to find solutions that meet their needs, always in accordance with the objectives of the IP, and therefore of this Code, safeguarding the interests of the company and upholding our Mission, Vision and Values.

INTCOMEX will only engage and/or establish relationships with Stakeholders who meet the

standards of Integrity, Transparency, Security, Quality and Service that allow us to comply with and maintain the Values and principles of **INTCOMEX**, in compliance with its IP.

6.3 CODE OF CONDUCT AND ETHICS FOR SUPPLIERS



GENERAL PRINCIPLES

INTCOMEX is committed to ensuring respect for the law, transparency and honesty in all business practices. This Code of Conduct and Ethics establishes the standards to be met by all suppliers and business partners.



CONTRACT FORMALIZATION

All contracts, agreements, and/or commitments must be formalized in a written document. Accounting records must strictly reflect the reality of the products and/or services provided.



STANDARDS OF INTEGRITY AND QUALITY

INTCOMEX is committed to ensuring respect for the law, transparency and honesty in all business practices. This Code of Conduct and Ethics establishes the standards to be met by all suppliers and business partners.

- **Integrity:** Act honestly and ethically in all transactions.
- **Transparency:** Keeping clear and open commercial practices.
- **Safety:** Ensure safety in all processes and products.
- **Quality:** Provide high quality products and services.
- **Service:** Offer an excellent service that meets the expectations of **INTCOMEX** and its customers.



WHISTLEBLOWER CHANNEL

Any report to be made by a supplier or business partner under this Code shall be made to the **INTCOMEX** Whistleblower Channel. If a supplier believes that an **INTCOMEX** employee or someone acting on their behalf has acted unlawfully or improperly, they should immediately report this to the Whistleblower Channel.



CONFIDENTIALITY AND PROTECTION

Information sent to the WHISTLEBLOWER CHANNEL will be treated confidentially. **INTCOMEX** will review and investigate all complaints and will communicate the resolution to the supplier who made the complaint. **INTCOMEX** guarantees that the relationship with the supplier or business partner will not be affected in any way by the complaint.

07. ASSOCIATED POLICIES

7.1. ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

OBJECTIVE

Establish **INTCOMEX** ("Company") guidelines within the regulatory framework of the U.S. Foreign Corrupt Practices Act (FCPA) as well as the provisions of the U.S. Department of Justice (DOJ), the principles of the OECD Convention on Combating Bribery of Foreign Public Officials simultaneously with the laws of the countries in which we have presence that regulate the fight against Corruption and Bribery. This policy also aims to identify, monitor and correct situations related to Bribery and Corruption that may arise against the Company, promoting a culture of transparency in line with Compliance standards, safeguarding the reputation of the Company.

Compliance with the guidelines and rules contained in this policy will always take precedence over compliance with business goals and other indicators that have been established to measure the management of **INTCOMEX** Employees.

SCOPE

This policy is mandatory for all Directors, Managers and Employees (hereinafter collectively referred to as "Employees") of **INTCOMEX** and its subsidiaries, who must implement it according to the particular needs and requirements of their different business units and local jurisdictions.

RESPONSIBILITIES

The LC is responsible for defining this policy. The CFO, General Managers, Controllers, and other Managers of each subsidiary will be responsible for enforcing it, along with all Company Employees.

DEFINITIONS



BRIBERY

Offer, give or promise to a national or foreign public official or public servant, something of value, a gift, promise, advantage or benefit to perform or omit acts in compliance with or in violation of their obligations, either directly or indirectly.



CORRUPTION

Refers to the improper use of entrusted power to obtain personal advantages.



GIFT

A good or object that, regardless of its value, is voluntarily given to a person without receiving anything in return.



PUBLIC OFFICIAL

A person who holds a partial or full-time employment relationship with the State or any government entity, whether directly contracted or outsourced. This includes individuals who hold positions in companies with state participation and those working in international organizations.



INFLUENCE PEDDLING⁵

The use of real or perceived influence with any public official, to obtain, offer, or promise for oneself or for a third party, a gift, promise, or any other advantage or benefit, in exchange for interceding before a public official involved or who has been involved in a judicial or administrative case.



STAKEHOLDERS

Individuals, groups or entities that have a direct or indirect interest in a company's activities and results. However, it is important to distinguish between different types of stakeholders:

Service: A service stakeholder is an entity that benefits from the services provided by the Company. These may include clients, service users or entities dependent on the Company's services for their operation.

Manufacturer: An entity that produces the goods or services marketed by the Company. These may include suppliers, product manufacturers, or Vendors.

Business Partner: An entity that works in collaboration with the Company to achieve common objectives. This may include strategic partners, business or commercial allies, or suppliers to the Company.

Therefore, a Stakeholder is not simply someone who purchases the Company's products, but someone who may have a variety of roles and relationships with **INTCOMEX**. Each type of stakeholder has unique interests and expectations that the Company must consider and manage effectively.

GENERAL ASPECTS

COMMITMENT TO REFRAIN FROM ACTS OF CORRUPTION

INTCOMEX does not tolerate any type of corruption. Therefore, all Directors, Managers and Employees must refrain from engaging in any act of Corruption and/or Bribery, including activities involving a Public Official, a Stakeholder and/or a third party related to, or commercially connected with, either.

No one in **INTCOMEX**, nor any Stakeholder or third party or entity acting on its behalf or for its benefit, may offer or accept a Bribe, or engage in an act of Corruption, whether directly or indirectly through third parties, even in the case of procedural acts.

Acts of Corruption include, but are not limited to, gifts to Public Officials, or to third parties related to them or involved in any kind of commercial transaction with them, in order to obtain an improper benefit. Common business practices must never have the appearance of irregularity or imply an improper offer or proposal.

Incentive payments are gifts or cash payments made to any Public Official, in order to accelerate or encourage the performance of a routine duties are also considered acts of Corruption and Bribery.

BUSINESS WITH STAKEHOLDERS

When contracting Stakeholders, whether individuals or legal entities, **INTCOMEX** must comply with a series of requirements under applicable anti-corruption laws, including but not limited to the following:

- I. Before entering into commercial agreements or contracts with Stakeholders, a reasonable and documented due diligence process must be carried out, requesting documentation that provides

insight into any background information relevant to the commercial relationship.

- II. Payment to Stakeholders for the activity they perform must reflect fair market value, be clearly specified in the contract, and be proportional to the activities to be carried out.
- III. The activities of the Stakeholders must be monitored.
- IV. Payments made to Stakeholders must be recorded in adequate documents.

ACCOUNTING RECORDS AND FINANCIAL CONTROL

All monetary disbursements made by Employees must be recorded in the accounting records, especially in proceedings before public institutions. The record must reflect the exact amounts and concepts of use.

The purpose of the transactions carried out by **INTCOMEX** must be recorded accurately and immediately. The recording of **INTCOMEX's** assets, liabilities, income and expenses must also be immediate and accurate.

INTCOMEX maintains internal accounting controls designed to prevent inaccurate financial records and accounts.

PROHIBITION ON THE USE OF INFLUENCE

It is strictly prohibited to resort to influences of any kind to expedite, obtain, process, present, and, in general, to obtain the performance of an administrative or jurisdictional act from any Public Official, or the issuance of documents, resolutions, permits, and other documentation that must emanate from a Public Official, including for approval of actual or potential business activities, whether personal, in partnership with Stakeholders, or involving participation in the value chain.

Employees and Stakeholders of **INTCOMEX** may not invoke influence with Public Officials,

whether real or perceived, to obtain any benefit for themselves or in favor of **INTCOMEX**. Nor may they rely on third parties who claim to have such influence over Public Officials.

PROHIBITION OF IRREGULAR AGREEMENTS

Any coordination, conversation, communication, visit, meeting, etc., to be held with any Public Official must be done through the publicly known official channels and in designated venues appropriate to the relevant procedure in which **INTCOMEX** is participating or considering participation. Any agreement reached in such context must comply with the applicable legal framework; the execution of agreements that violate this framework is expressly forbidden.

It is forbidden to enter into, award, or propose agreements with Public Officials, entities or public companies on behalf of **INTCOMEX**. This prohibition also extends to the commercial activities of third parties where **INTCOMEX** is favored by the conclusion of an agreement with the State.

NON-COMPLIANCE DETECTION

All Employees are required to report to the Whistleblower Channel compliance@intcomex.com any suspicion or information about any breach or potential breach of this Policy.

7.2. POLICY ON CONTACT WITH PUBLIC OFFICIALS

OBJECTIVE

Establish **INTCOMEX** ("Company") guidelines in accordance with the regulatory framework of the U.S. Foreign Corrupt Practices Act (FCPA) as well as the provisions of the U.S. Department of Justice (DOJ), the principles of the OECD Convention on Combating Bribery of

Foreign Public Officials, and the applicable anti-corruption and anti-bribery laws of the countries in which we operate. This policy also aims to identify, monitor, and address potential incidents related to Bribery and Corruption that may arise within or against the Company, promoting a culture of transparency in line with Compliance standards, safeguarding the reputation of the Company.

Compliance with the guidelines and standards contained in this policy will always take precedence over compliance with business goals and other performance indicators that have been established to evaluate the management of **INTCOMEX** Employees.

SCOPE

This Policy is mandatory for all employees and stakeholders and complements the Company's Anti-Corruption and Anti-Bribery Policy. It addresses actions and situations involving actual or potential contact between employees and Public Officials, as well as stakeholders who may have contact with Public Officials. Employees and stakeholders must implement the provisions of this Policy according to the specific needs and requirements of their respective business units and local jurisdictions.

RESPONSIBLE PARTIES

The Legal & Compliance Department ("LC") is responsible for defining this Policy. The CFO, General Managers, Controllers and other Managers of each subsidiary will be responsible for enforcing it with all Company Employees and Stakeholders.

DEFINITIONS



STAKEHOLDER

Individuals, groups, or entities that have a direct or indirect interest in a company's activities and results. However, it is important to distinguish between different types of stakeholders:

Service: An entity that benefits from the services provided by the Company. These may include clients, service users, or entities that depend on the Company's services for their operation.

Manufacturer: An entity that produces the goods or services marketed by the organization. These may include suppliers, product manufacturers or Vendors.

Business Partner: An entity that works in collaboration with the Company to achieve common objectives. These may include strategic partners, business or commercial allies, or suppliers to the Company.

Therefore, a Stakeholder is not simply someone who purchases the Company's products, but may hold a variety of roles and relationships with **INTCOMEX**. Each type of Stakeholder has unique interests and expectations that the Company must consider and manage effectively.



EMPLOYEE(S)

Refers to all those individuals who maintain an employment relationship with **INTCOMEX** regardless of the type of contract or their position within **INTCOMEX** (including Directors, VPs, Managers, etc.).



CORRUPTION

The misuse of entrusted power to obtain personal advantages and/or improper benefits.



PUBLIC OFFICIAL

Any officer, employee, elected or appointed official, who maintains a partial or permanent employment relationship with the State or any government entity at any level, whether directly contracted or outsourced. This includes individuals holding positions in companies with state participation, political parties, party officials, candidates for political office, and persons working in international organizations.



HOSPITALITY

Refers to expenses related to meals, entertainment, travel, lodgings, social outings, event tickets, tourist attractions, and similar expenditures.



LC

Regional Legal & Compliance Department.



GIFT

A good or object that, regardless of its value, is voluntarily given to a person without receiving anything in return.



BRIBERY

To offer, give, pay, authorize or promise to a Public Official and/or Stakeholders, or any other third party related to them, national or foreign, anything of value (a gift, promise, advantage or benefit) in order to induce them to perform or omit to perform acts in compliance with or in violation of their obligations, either directly or indirectly, that help the Company (or any other Stakeholder) in obtaining an undue advantage.

GENERAL ASPECTS

COMMITMENT TO REFRAIN FROM ACTS OF CORRUPTION

INTCOMEX does not tolerate any form of Corruption. Therefore, all Employees and Stakeholders must comply with this Policy and the Company's Anti-Corruption and Anti-Bribery Policy and avoid committing an act of Corruption and/or Bribery in activities involving a Public Official, a Stakeholder and/or third parties related to them or others with whom they have a business relationship or transaction of any kind.

No Employees and/or Stakeholder acting on their behalf or for their benefit may give or accept a Bribe, or engage in any act of Corruption, either directly or indirectly through Stakeholders, even in the case of procedural acts. This prohibition is absolute.

Acts of Corruption include, among others:

- I. Gifts or hospitality offered to Public Officials, or to a third party related to or engaged in a commercial relationship with the official, for the purpose of obtaining an undue advantage.
- II. Gifts or Hospitality between private parties are also considered Acts of Corruption, if intended to obtain personal advantages and/or undue benefits or advantages. Common business practices should be prevented from having any irregular appearance that implies an improper offer or proposal.
- III. Incentive payments, as defined below, whether Gifts, Hospitality or cash pay-

ments made to any Public Official, to accelerate or incentivize the performance routine duties, are also considered acts of Corruption and Bribery.

- IV. Consequently, Employees must remain especially vigilant when interacting with government entities and Public Officials, so that any signs or alerts of Corruption and/or Bribery are promptly identified and addressed.

RISKS

The main corruption risk scenarios for the Company include:

- Providing and/or receiving excessive Gifts or Hospitality or those exceeding authorized limits
- Expenses related to interactions with Public Officials
- Contracting and collaborating with Stakeholders
- Incentive payments, i.e., payments made to Public Officials to expedite or secure routine governmental business.

Beyond these specific risk situations, Employees are encouraged to seek guidance from LC members any time when questions arise regarding appropriate interactions with entities and Public Officials.

GENERAL GUIDELINES FOR INTERACTION WITH PUBLIC OFFICIALS

INTCOMEX employees and Stakeholders shall comply with the following general guidelines of conduct:

- When carrying out any act, procedure, or business on behalf of **INTCOMEX**, we

must assume a courteous attitude, and use formal, respectful, and clear language, appropriate to the position of the Public Official. Reference to personal matters that may be misinterpreted by others should be avoided, even when the Public Official is known outside his or her work environment, since we are acting on behalf of **INTCOMEX**. For example, it may be interpreted that we enjoy a preference of the Public Official that affects his impartiality or neutrality towards us.

- In case of attending a meeting, the **INTCOMEX** employee must be accompanied by another employee who serves as a witness on behalf of the Company, in addition to acting as their own witness.
- To request meetings, make inquiries, provide information, or engage in any interaction with Public Officials, only the formal means of communication established by the respective public entity should be used (for example, institutional emails, as well as landline and cell phones assigned by the corresponding entity, if applicable). The use of WhatsApp, Gmail or other means of personal communication of the Public Official (e.g. cell phones or personal emails) should be avoided.
- If the Public Official initiates contact through such personal channels, respond by redirecting the communication to the official channels. If there is uncertainty as to whether, in a given context, it is possible to use WhatsApp or other means of personal communication, you should consult with the Local GM.
- When engaging with Public Officials in academic or social contexts (universities, institutional events and the like),

we shall conduct ourselves with due caution, depending on the context, in order to avoid misinterpretations about the nature of the relationship.

- Always provide accurate and current information to Public Officials, as well as any other clarifying or additional information when required to do so.
- Refrain from formulating requirements that lead the Public Official to fail to comply with any of the obligations of his or her position.
- Always strictly observe the **INTCOMEX** Code of Ethics and Conduct. This includes never making or accepting any type of prohibited offer.
- Always maintain a prudent attitude and remain alert to warning signs that could compromise and/or be interpreted as an ethical departure from **INTCOMEX** or as participation in an act of corruption.
- In the event that an **INTCOMEX** Employee or Stakeholder encounters a situation that could be interpreted as an act of Corruption (for example, a request or offer that is misleading, ambiguous or unreasonable, depending on the circumstances), they must reject it and report it immediately through the Whistleblower Channel **compliance@intcomex.com** or to LC, who will coordinate the appropriate course of action.

SPECIFIC GUIDELINES FOR INTERACTION WITH PUBLIC OFFICIALS IN THE CONTEXT OF MEETINGS

To properly manage meetings held by **INTCOMEX** Employees with Public Officials on behalf of the Company, it is necessary to consider three stages:

- Arranging the meeting
- Attending the meeting
- Reporting on the meeting or engagement; observing in each of these moments the specific guidelines described below.

ARRANGING THE MEETING

- The meeting must be formally requested (by letter, e-mail or telephone), observing the rules provided by the respective public entity.
- If the applicable formality consists of requesting the meeting via e-mail, the request must be made to the official account of the Public Official or of the entity itself, as appropriate. For this purpose, the request must be made using the corporate email account provided by **INTCOMEX**, not a personal email address.
- If an **INTCOMEX** Employee or a Stakeholder receives a meeting request from a Public Official, they must inform the head of the area responsible for handling the matter so that they may authorize it or, failing that, arrange the response to be given to the requesting Public Official. It should be noted that the provisions herein do not apply to hearings or oral reports, or meetings in public entities, for which the corresponding notifications are made.
- If a meeting with Public Officials is required, prior authorization must be obtained from the Local General Manager, head of the corresponding area or LC (e.g. via email). To do so, the reason for the meeting and the Public Official(s) who will attend must be disclosed.
- Exceptions to the provisions of the pre-

ceding paragraph are those meetings of mere formality (e.g., reading of files, presentation of documentation), which may be coordinated without prior authorization or need for further communication, always observing the rules provided herein.

- Meetings with Public Officials -except those of mere formality- shall be attended by at least two (2) persons representing **INTCOMEX**. This is so that there is another person who can inform - and even testify, if necessary - about the incidents of the meeting. It is also a way to dissuade the authority or Public Official from making any improper requests.
- **INTCOMEX** Employees or Stakeholders who are related (up to fourth degree of consanguinity or second degree of affinity) to the Public Officials participating in the meeting should not attend the meeting. In case of doubts about the kinship relationship, please consult LC directly.
- Stakeholders who have a commercial or business relationship with **INTCOMEX** may not hold meetings with Public Officials on behalf of **INTCOMEX** unless they have prior written authorization (e.g. via email) from the Local Controller.

ATTENDING THE MEETING

- Meetings must be held during working hours and at the premises of the corresponding public entity, as a general rule. By exception, when duly justified, meetings may be held at **INTCOMEX's** offices provided that the Local Controller's approval is obtained (e.g. by e-mail) and the Public Official is requested to have the meeting previously recorded in his/her official agenda.

- This rule does not apply to inspections and supervisions which, as a general rule, are carried out at **INTCOMEX** facilities.
- The public entity must be accessed through the official entrance, registering upon arrival. The purpose of the meeting should be specified.
- It should be assumed that the meeting may be recorded, being mindful of any expressions, so that what is said cannot be misinterpreted and/or decontextualized.
- It is absolutely forbidden to make or accept any offer at the meeting that is contrary to **INTCOMEX's** ethical conduct or that, because it is misleading, ambiguous or unreasonable, depending on the circumstances, could be misinterpreted as **INTCOMEX's** participation or consent to an act of Corruption.
- If during the meeting the Public Official makes an improper request (e.g., makes a direct demand for payment, delivery of an object of economic value or similar) in exchange for granting any type of favor, advantage or other type of benefit to **INTCOMEX**, they should be informed that it is not possible to comply with the request since it is against **INTCOMEX's** policy. For this purpose, we propose to use the following sentence:

"INTCOMEX policies are very strict and prohibit us from accepting your order/offering; we will obtain the [license/authorization/permit/permit/registration/etc.] through the regular channels."

- After that, the meeting should be terminated.
- If, given the subtlety or vagueness of the Public Official's request, it is not clear whether we are dealing with an improper request, we must kindly and respectfully redirect the conversation to the original reason for the meeting, making it clear that **INTCOMEX's** policy is to respect legal norms and the principle of integrity.
- After a Public Official expresses an improper request, the meeting will be terminated, as indicated.
- At the end of the meeting, one must register our departure, as done so upon entry, if possible.

REPORTING ON THE ACTIONS OR MEETING HELD

- In the event of any incident occurring during the meeting (for example, an improper request has been received, an intention to unjustifiably hinder a procedure has been noticed, among others), **INTCOMEX** Employees must inform LC through the Whistleblower Channel.
- In the event that a Stakeholder who has a commercial or business relationship with **INTCOMEX** has attended a meeting with a Public Official, acting on behalf of or in representation of **INTCOMEX**, and in the context of such meeting, any incident has occurred, such Stakeholder must report it to LC through the Whistleblower Channel.

SPECIFIC GUIDELINES FOR INTERACTING WITH PUBLIC OFFICIALS IN THE CONTEXT OF INSPECTIONS

INTCOMEX also interacts with Public Officials on the occasion of inspections and/or supervisions carried out at its premises, such as: (i) inspections at the Company's facilities (for

example, to verify that the business activities align with the zoning regulations); (ii) labor inspections, to verify that working hours are respected, safety conditions in the workplace, among others; and (iii) tax inspections, to verify compliance with tax obligations; among others.

As **INTCOMEX** may face an inspection at any time, it is important to take the following precautions:

- Identify who are the Employees that should attend the inspection, based on the type of inspection. Also, foresee who will attend the inspections in the absence of those designated (for example, in case of vacations or leaves of absence).
- Establish an attention protocol for locally responsible personnel so that they immediately inform LC if a notification for an inspection has arrived or if an inspector has shown up to conduct an unannounced inspection (so LC can instruct who should attend). In such cases, the reception staff should ask the inspector, politely and respectfully, for his National Identity Card, and his credential or authorization granted by the administrative authority to carry out the inspection. This verification process may not last more than five (5) minutes; otherwise, the inspector may issue a report indicating resistance to the inspection.
- The person responsible for the inspection must provide the inspector with the facilities required, always within reason (for example, access to the inspection site, information requested, among others).
- It is forbidden to make or accept any offer contrary to the **INTCOMEX** Code of Conduct and Ethics or that, because it is misleading, ambiguous or unreasonable, could be misinterpreted.
- If the inspector makes an improper request, it must be rejected with the following sentence:

“We apologize, but our policies are very strict and prevent us from accepting your order/offering, please continue with the inspection on as scheduled.”
- If the inspection is extended and overlaps with meal hours, the person in charge may offer the inspector the prearranged refreshment. If the inspector does not accept it, do not insist.
- It is forbidden to give cash to the inspector to cover expenses for refreshments, mobility or similar.
- At the end of the inspection, the responsible person must ensure that the inspection report meets the minimum legal requirements.
- It is also important to be fully aware of the powers and duties of the inspection authority, in order to contribute to its work without harming the interests of **INTCOMEX**. If any incident occurs during the inspection (e.g., an improper request has been received), this should be reported to LC through the Whistleblower Channel at: **compliance@intcomex.com**.

HOW TO RESPOND TO REQUESTS FOR IMPROPER PAYMENT IN ANY OTHER CIRCUMSTANCES

Employees who receive a request for an improper payment or incentive payment in any other circumstance shall:

- Immediately refuse payment.
- Explain that the Company does not make such payment.
- If a Stakeholder is involved, explain that they are not authorized to make the payment on behalf of the Company, instruct them not to do so and explain that the Company cannot continue to work with them if they make the payment.
- Understand that refusals are absolute and are not accompanied by a “wink and a nod”.
- Immediately report the LC request through the Whistleblower Channel compliance@intcomex.com or directly to the Local Controller.
- Wait to receive guidance on the next steps.

It is important to remember that requests for improper payments are not always explicit. For example, an agent may suggest that a “special fee” will expedite government approval. In such circumstances, consult with LC to determine whether the “fee” is legitimate and do not pay or agree to pay it until LC provides clear guidance.

PROHIBITION OF PAYMENT AND RECEIPT OF GIFTS AND HOSPITALITY FROM PUBLIC OFFICIALS

INTCOMEX does not permit Employees to make payments of Gifts or Hospitality to Public Officials under any circumstances. Gifts or Hospitality provided to spouses, children or other close relatives of Public Officials are also prohibited. Receiving Gifts or Hospitality from Public Officials is also prohibited.

PROHIBITION OF POLITICAL DONATIONS AND CONTRIBUTIONS

INTCOMEX prohibits Employees from making charitable donations on behalf of the Company or using the Company’s name or resources, whether in cash or in kind, without prior authorization from LC and our CEO.

In case of considering making a donation, the local GM must request LC’s approval and legally and duly justify the request under a sworn statement, so as to not to expose the Company in the process.

INTCOMEX also does not permit Employees to make political contributions on behalf of the Company or to use the Company’s name, whether in cash or in kind, to political parties, party officials or candidates for office. Such contributions are restricted by applicable anti-corruption laws to the same extent as payments to Public Officials. However, Employees may make personal political contributions, volunteering for campaigns, etc., always making it especially clear, even if they were not consulted in this regard, that they do so exclusively in their own personal capacity and time and commit Company resources.

INCENTIVE PAYMENTS AND HEALTH AND SAFETY

An incentive payment is a payment made to a Public Official solely to expedite or ensure compliance with routine governmental actions, such as:

- Obtaining licenses, permits or other official documents
- Processing government documents, such as visas and work orders
- Providing police protection, courier services, and inspection of goods or fulfill-



ment of contracts

- Providing telephone services, utilities, loading or unloading cargo or protecting perishable goods or merchandise from spoilage
- Any similar routine services

Due to the many legal and ethical risks they pose, incentive payments are prohibited by the Company. Employees must report any request for incentive payments to LC.

ACCOUNTING BOOKS AND RECORDS AND FINANCIAL CONTROL

All cash withdrawals made by Employees, especially in proceedings before public entities, must be recorded in the accounting records. The record must reflect the exact amounts and concepts of use.

The purpose of the transactions carried out by **INTCOMEX** must be recorded accurately and immediately. The recording of **INTCOMEX's** assets, liabilities, income and expenses must also be immediate and accurate.

INTCOMEX maintains internal accounting controls designed to prevent inaccurate financial records and accounts.

Employees must ensure that they record all transactions involving **INTCOMEX** funds or assets with reasonable accuracy and detail as follows:

- The record must fully reflect the Company's transactions and disposals of assets wherever they occur.
- The record must fully comply with all Company requirements applicable to the preparation and submission of ex-

pense reports. For example, Hospitality expense reports and purchase requisitions must identify:

- the amount of the expense,
- business purpose,
- the location of the event and all attendees or recipients (including names, titles, and business or employer affiliation), and
- any attendees or recipients known to be Public Officials.

If you have any questions regarding record keeping, please contact the Finance Department or LC.

MONITORING AND TESTING

The Company's LC Department may conduct periodic tests and audits to assess the Company's compliance with this Policy. However, each GM is responsible for this process at the local level.

CONSEQUENCES FOR VIOLATIONS OF THIS POLICY

Acts contrary to this Policy will be considered serious misconduct, will be subject to sanctions and will be in accordance with the local regulations in force in each territory where INTCOMEX is present, including possible termination with just cause according to the severity and impact of the act in question.

ANTI-CORRUPTION CERTIFICATION

At LC's request, Company Employees and Stakeholders must submit a signed Anti-Corruption Certification Form, certifying that they have read and agree to comply with all provisions of this Policy.

COMMUNICATION AND REPORTING OF INAPPROPRIATE OR UNUSUAL BEHAVIORS

When an inappropriate or unusual conduct or operation or any concern related to the topics covered in this Policy is identified, LC should be contacted through the Whistleblower Channel compliance@intcomex.com, in order to proceed with the analysis and evaluation. If it is determined that the conduct warrants investigation, appropriate mitigating actions will be taken.

Reports of concerns will be handled confidentially upon request, to the extent permitted by applicable law.

All Company Employees have the right to address ethical concerns in good faith without fear of retaliation, including retribution or harassment from co-workers, supervisors or Company managers. The Company prohibits any form of retaliation against Employees who in good faith report potential or actual violations of this Policy. We value their commitment to our ethical and professional standards.

If it is determined that the Employee has not communicated or has concealed to the Company information about any Stakeholder related to the topics addressed in this Policy, they shall be subject to termination with just cause and legal actions in accordance with the local regulations in force in each territory where **INTCOMEX** has presence.

All Employees shall be required to report to the Whistleblower Channel compliance@intcomex.com any suspicion or information about any breach or potential breach of this Policy.

7.3. POLICY ON ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING

OBJECTIVE

To establish a framework for action and a general guide for **INTCOMEX** ("Company"), to comply with the legislation regulating Money Laundering and Terrorist Financing (hereinafter "ML/FT"), and in turn have the ability to respond and mitigate the risk of being used as an instrument for carrying out ML/FT operations.

Compliance with the guidelines and standards contained in this policy shall always take precedence over compliance with business goals and other indicators that have been established to measure the management of **INTCOMEX** Employees.

SCOPE

This policy is mandatory for all Directors, Managers and Employees (hereinafter all together "Employees") of **INTCOMEX** and its subsidiaries, who must implement it according to the particular needs and requirements of their different business units and local jurisdictions.

RESPONSIBLE PARTIES

The Regional Legal & Compliance Department ("LC") is responsible for defining this policy, and the General Manager, Controllers, and other Managers of each subsidiary will be responsible for enforcing it.

All Employees are responsible for:

- I. Abiding by the guidelines and mechanisms defined in this policy.
- II. Reporting in a timely manner to the LC or through the Whistleblower Channel **compliance@intcomex.com**, the facts or circumstances classified as warning signs or unusual operations.
- III. Cooperating with the investigations that the Company carries out regarding ML/FT, preserving the principle of confidentiality and reserve.
- IV. Refraining from providing or disclosing information related to internal supports, reports and documents on suspicious transactions, or any other confidential document related to the ML/FT risk management processes.
- V. Successfully completing the mandatory training programs issued by **INTCOMEX**, related to identifying and controlling ML / FT risk.

DEFINITIONS



MONEY LAUNDERING (ML)

It is the crime committed when resources originating from illicit activities are given the appearance of legality.



TERRORISM FINANCING (TF)

It is the crime related to funds, goods or resources accessed by terrorist organizations or terrorists in order to finance their activities.



DUE DILIGENCE

It consists of the search and analysis of positive and negative aspects of a company, which facilitate decision making, whose ignorance and lack of decisions based on these aspects in some cases may jeopardize the existence or continuity of a business or business relationship.



RESTRICTIVE LISTS

These are databases that collect information, reports and background information on different organizations, individuals and/or legal entities that may present suspicious activities, investigations, prosecutions and/or convictions for money laundering and terrorist financing crimes.



UNUSUAL TRANSACTIONS

Transactions carried out by individuals or legal entities, which, due to their number, quantity or characteristics, do not fall within the usual systems and practices of the businesses of a given industry or sector.

DEFINITIONS



SUSPICIOUS TRANSACTIONS

Transactions carried out by individuals or legal entities, which, due to their number, quantity or characteristics, do not fall within the systems and usual business practices of a given industry or sector, and which, in accordance with the uses and customs of the activity in question, could not have been reasonably justified.



RISK

The possibility of something happening that will have an impact on the entity's objectives.



RISK MANAGEMENT

Application of policies, procedures and management practices to the tasks of setting the context, identifying, analyzing, assessing, evaluating, monitoring and communicating risks.



WARNING SIGNS

Facts, situations, indicators, financial ratios and other information that the entity determines as relevant, from which it can be inferred in a timely or prospective manner the possible existence of an event or situation that goes beyond what the Company determines as a normal operation.



POSITIONING

Entry of money into the legal market circuits.



STRATIFICATION

Conducting successive transactions to divide, accumulate, conceal, or erase the origin of funds.



INTEGRATION

Conversion or investment in assets of apparently legitimate origin.



STAKEHOLDER

Stakeholders are individuals, groups or entities that have a direct or indirect interest in a company's activities and results. However, it is important to distinguish between different types of stakeholders:

Service: A service stakeholder is an entity that benefits from the services provided by the Company. They may be customers, service users or entities that depend on the Company's services for their operation.

Manufacturer: A manufacturer stakeholder is an entity that produces the goods or services that the organization markets. They can be suppliers, product manufacturers or Vendors.

Business Partner: A business partner is an entity that works in collaboration with the Company to achieve common objectives. They may be strategic partners, business allies or suppliers to the Company.

Therefore, a Stakeholder is not simply someone who purchases the products that the Company markets but may have a variety of roles and relationships with **INTCOMEX**. Each type of Stakeholder has unique interests and expectations that the Company must consider and manage effectively.

GENERAL ASPECTS

INTCOMEX does not admit under any circumstances actions, behaviors, misconduct or situations of ML / FT committed by its Employees and/or Stakeholders. Any such misconduct is considered serious and could result in disciplinary action including termination with just cause.

Therefore, the Company:

- I. Must have a ML/FT risk management system as a fundamental part of the Integral Risk Management in accordance with the regulations in force.
- II. Allocate the necessary resources for the ML/FT risk management system to operate properly, as part of the process of analysis and knowledge of Employees and Stakeholders.
- III. Implement adequate mechanisms to know Stakeholders in order to obtain the necessary information and the most relevant characteristics for prevention, monitoring and detection of unusual or suspicious operations.
- IV. It is forbidden to link, establish or maintain business relationships or conduct operations with persons or companies that are included in restrictive or binding lists.
- V. All employees in their induction process must have knowledge and understanding of the policies and the IP, through the available means of dissemination.
- VI. Refrains from providing or disclosing information related to internal supports, reports and documents on suspicious transactions, or any other confidential document related to ML/FT risk management processes.
- VII. All Employees are responsible for complying with the internal provisions of the ML/FT Risk Management System and the legisla-

tion in force, committing themselves to **INTCOMEX's** ethical standards.

A transaction or conduct will be considered suspicious when it can be presumed that the funds or goods used have illicit origins, or when the legality of their origin is not duly established.

STAKEHOLDER AWARENESS GUIDELINES

For the knowledge of Stakeholders, the guidelines established by the LC will be applied, which involves:

- Verifying whether Employees and Stakeholders fall within acceptable onboarding guidelines and conducting restrictive list checks.
- Performing due diligence processes and screening for Politically Exposed Persons ("PEPs") representing Stakeholders.

SUSPICIOUS CONDUCT INDICATORS

Unusual conduct by a Stakeholder may be considered:

- I. The data provided by the Stakeholder is not consistent or true, is outdated, unverifiable or insufficient and the Stakeholder insists on not clarifying or completing it.
- II. The Stakeholder refuses to comply with **INTCOMEX's** established engagement processes.
- III. The financial background is not clear or there is opposition to provide information on the work activity, business and source of funds.
- IV. Refusal to submit information on creditworthiness.
- V. Interest in establishing commercial ties with **INTCOMEX** on behalf of another Stakeholder for which clear and complete information is not provided.
- VI. Existence of judicial legal issues in the coun-

- try of origin not reported or not clarified.
- VII. Repeatedly performing split transactions.
 - VIII. Intending to use cash as the only means of payment when it is not in accordance with the nature of the operation being carried out.
 - IX. Frequently performing operations for sums of money that are not related to the occupation he/she declares to have.
 - X. Intending to carry out substantial operations in cash, on behalf of Stakeholders whose profile is not consistent with such operations.

COMMUNICATION AND REPORTING OF UNUSUAL BEHAVIOR AND TRANSACTIONS

When unusual conduct or a suspicious operation is identified, it must be reported to the LC through the Whistleblower Channel, in order to proceed with the analysis and evaluation. If it is determined that the conduct merits investigation, the necessary mitigation measures will be taken.

If it is proven that the Employee failed to report or has concealed to the Company information on any Stakeholder related to the prevention of money laundering or terrorist financing, they shall be subject to termination with just cause and legal action.

7.4. POLICY ON CONFLICT OF INTEREST

OBJECTIVE

Establish the necessary parameters to guide all those who are part of **INTCOMEX** ("Company"), in making decisions that may influence or prejudice

their opinions or actions compromising the name of the Company.

Compliance with the guidelines and standards contained in this policy will always take precedence over compliance with business goals and other indicators that have been established to measure the management of **INTCOMEX** employees.

SCOPE

This policy is mandatory for all Directors, Managers and Employees (hereinafter all together "Employees") of **INTCOMEX** and its subsidiaries, who must implement it according to the particular needs and requirements of their different business units and local jurisdictions.

RESPONSIBLE PARTIES

LC is responsible for defining this policy, and the General Manager, Controllers, and other Managers of each subsidiary will be responsible for enforcing it.



DEFINITIONS



CONFLICT OF INTEREST

These are situations in which the judgment of an Employee and the Integrity of their actions tend to be unduly influenced by an economic interest or personal advantage. In other words, situations in which an Employee's actions tend to be unduly influenced by an economic interest that is profitable for them, thus leaving aside the Company's interest. This includes preferences towards Stakeholders based on family and/or personal interests and/or related persons, and/or acting through a known or interposed third party for the same economic and/or personal advantage.



TECHNOLOGICAL RESOURCES

Personal equipment, servers, cell phones, software, instant messaging media, e-mail, storage space, and any technological tool provided by the Company for the fulfillment of the Employee's work tasks.



STAKEHOLDER

Stakeholders are individuals, groups or entities that have a direct or indirect interest in a company's activities and results. However, it is important to distinguish between different types of stakeholders.

Service: A service stakeholder is an entity that benefits from the services provided by the Company. They may be customers, service users or entities that depend on the Company's services for their operation.

Manufacturer: A manufacturer stakeholder is an entity that produces the goods or services that the organization markets. They can be suppliers, product manufacturers or Vendors.

Business Partner: A business partner is an entity that works in collaboration with the Company to achieve common objectives. They may be strategic partners, business allies or suppliers to the Company.

Therefore, a Stakeholder is not simply someone who purchases the products that the Company markets, but may have a variety of roles and relationships with **INTCOMEX**. Each type of Stakeholder has unique interests and expectations that the Company must consider and manage effectively.

GENERAL ASPECTS

All Employees must avoid situations that present or may present a Conflict of Interest.

A Conflict of Interest exists when personal interest influences the decisions or actions of Employees, or affects, compromises or conditions in any way the obligation of loyalty that they must fulfill. In many cases, ties of friendship or closeness with Stakeholders may create situations of Conflict of Interest that must be reported to the LC.

CONFLICT OF INTEREST CONSIDERATIONS CONFLICTING ACTIVITIES

Company Employees may not act as Directors, Executives, Partners, Collaborators, Advisors, Agents or Representatives of a competitor, Stakeholders, without the express authorization of **INTCOMEX**.

DUTY OF CONFIDENTIALITY

You may not use for personal gain or in any way disclose information relating to any aspect of the Company's business or information obtained in connection with your employment with the Company. Such information may not be disclosed to any other person or entity, except as required for the performance of their duties within the Company.

All Employees must maintain the confidentiality of internal Company information, as well as information obtained from Stakeholders as a result of the performance of their duties.

In case of breach of the duty of confidentiality, the Employee shall be liable for any damages caused to **INTCOMEX**, and shall be subject to sanctions, including termination with just cause and without prejudice.

USE OF TECHNOLOGICAL RESOURCES AND INTERNET ACCESS

Employees shall use the Technological Resources provided by the Company in a responsible manner and exclusively for the performance of their duties

within the framework of the employment relationship that binds them to **INTCOMEX**.

The Company tolerates limited and appropriate personal use of electronic means, provided such use is reasonable, respectful, and does not interfere with the Employee's job responsibilities, commercial operations, or involve illegal or unprofessional activity. Employees must use good judgment and responsibility to ensure that any personal use does not hinder job performance.

Use of Company Technological Resources for purposes other than those described shall be considered a serious breach of the obligations of obedience, fidelity and contractual good faith, regardless of whether or not it causes any kind of benefit or profit for the Employee or damage to the Company.

The Company is authorized to monitor the use of the Technological Resources and to carry out controls and audits to this effect. **INTCOMEX** reserves the right to access the different digital communication media, as well as the information storage systems or devices provided by the Company to the Employees.

The messages sent by electronic means must always have work purposes and in no case expressions or information of a defamatory, discriminatory, libelous or harmful nature, pornographic content, or in general, outside the strictly labor level.

The Company's Employees shall not use or incorporate to the personal equipment (e.g., computers) provided by the Company, integrated or not to its internal network, computer programs that do not have the respective license or authorization of the respective manufacturer and that, in addition, have not been authorized by the administrator of the computer network, and shall notify the Company when they become aware of this type of situation.

The Employee in charge of the personal equipmen-

t(s) in the conditions of use mentioned in this point assumes full responsibility for the facts and damages that may correspond.

Failure to comply with the aforementioned provisions may lead to immediate disciplinary action, including termination with just cause.

INTELLECTUAL PROPERTY

The Employees acknowledge and accept the assignment of the products derived or that could be derived from their work in **INTCOMEX**, which could generate industrial and intellectual property rights in favor of **INTCOMEX**, being the Company the owner of such rights.

This acknowledgment and assignment is made on a definitive and exclusive basis, with the power of transmission and license to Stakeholders and for the whole world and during the entire term of protection recognized in the legislation in force for copyrights and related rights, as the case may be.

The Employees undertakes to execute any public or private document in favor of the Company or Stakeholders and to carry out any act necessary to give effect to the intellectual or industrial property right in favor of the Company.

DUTY OF LOYALTY

Employees must observe all those duties of loyalty that derive from the tasks they perform.

Employees may not divert to other persons or entities the commercial opportunities that they know or can reasonably anticipate in the performance of their duties and that could be of interest or detrimental to **INTCOMEX**.

USE OF ASSETS AND WORK TOOLS

All **INTCOMEX** assets, from a physical asset to an

intellectual property asset, are fundamental tools for our success. It is the responsibility of each Employee in the first instance, and the Manager in the last instance, to protect and give proper use to the goods and work elements that are given to them by the Company and to avoid their deterioration, destruction, being stolen or diverted to fulfill personal purposes or other than the best interest of the company. The assets must be returned at the end of the employment relationship with the Company in the same conditions in which they were received, except for the normal deterioration produced by their proper use.

POTENTIAL CONFLICT OF INTEREST SITUATIONS

PERSONAL INVESTMENTS

A direct or indirect financial interest held by an Employee in a company that competes with **INTCOMEX** or offers services to it, where the Employee is in a position to make or influence decisions that may affect the Company.

PRODUCT TRADING

INTCOMEX's negotiations shall always be carried out within the ethical framework, thus prohibiting its Employees to negotiate outside the policies of the products that are marketed by the Company. This prohibition includes all **INTCOMEX** Employees.

BUSINESS OPPORTUNITIES

No Employee shall acquire any interest, directly or indirectly, in any entity or business when it is known that **INTCOMEX** may acquire or is acquiring an interest in that same entity or business.

OWNERSHIP OR PARTICIPATION

For the purposes of this policy, the ownership or participation of an Employee's spouse directly or on behalf of his or her minor children shall be con-

sidered as ownership or participation of the Employee for purposes of determining the Conflict of Interest.

CONFLICTS OF INTEREST INVOLVING DIRECT AND INDIRECT FAMILY MEMBERS

The situations that imply that a relative of a Employee has interests in a company that competes with **INTCOMEX**, must be informed before agreeing to any type of commercial relationship with **INTCOMEX**.

The incorporation of a family member shall take place as long as they comply with the requirements requested for the fulfillment of the function as any regular Employee. A possible Conflict of Interest involving a relationship of subordination or control must be avoided. In case of doubt, LC must be informed in order to analyze the situation and mitigate any potential risks.

With regard to indirect interests and relationships, three general rules must be respected:

- I. The Employee must not make decisions or influence decisions made by others in matters involving companies in which a family member works.
- II. The Employee must not obtain an indirect benefit from a transaction of the Company with a company of or in which a family member works.
- III. The Employee shall disclose any situation in which a family member has an interest in a competing company or in any Company transaction.

PROPERTY INTERESTS

It is forbidden to buy, sell, lease rights or interests, of any kind of property, directly or indirectly, with the knowledge that **INTCOMEX** has active or potential interest in them.

LOANS

It is forbidden to lend or receive financial loans from any **INTCOMEX** Stakeholder or any person related to them.

LOAN OF GOODS

All products that go out on loan and that have an inventory valuation must be managed locally in order to control the inventory outflows.

OBLIGATIONS IN THE EVENT OF A CONFLICT OF INTEREST

- I. It is a primary duty of the Employee to represent **INTCOMEX** at all times to the best of their ability and Integrity. Therefore, no Employee shall be involved in any situation, other than those mentioned above, that interferes with this paramount duty.
- II. The Employee is responsible for recognizing and communicating through the Whistleblower Channel compliance@intcomex.com possible situations of Conflict of Interest. At the same time, in case of any doubt, he/she must consult LC through the same channel.
- III. VPs, Directors and Managers, in turn, should discuss any of these situations directly with LC.
 - I. On the other hand, the Employee must follow the advice given on possible conflicts, taking into consideration that these policy guidelines have been formulated to provide maximum protection to both the Employee and **INTCOMEX**.



7.5 EXPORT CONTROL POLICY

OBJECTIVE

To establish a framework of action and general guidelines for **INTCOMEX** (“Company”) to comply with legislation governing export control and international trade, particularly United States regulations, and to ensure the Company is equipped to respond to and mitigate any risks associated with non-compliance.

Compliance with the guidelines and standards contained in this policy shall always take precedence over compliance with trade goals and other indicators that have been established to measure the management of **INTCOMEX** Employees.

SCOPE

This policy is mandatory for all Directors, Managers and Employees (hereinafter all together “Employees”) of **INTCOMEX** and its subsidiaries, who must implement it

according to the particular needs and requirements of their different business units and local jurisdictions.

RESPONSIBLE PARTIES

The Regional Legal & Compliance Department (“LC”) is responsible for defining this policy, and the CEO, COO, VPs, General Manager, Controllers, and other Managers of each subsidiary will be responsible for enforcing it.

GENERAL ASPECTS

INTCOMEX is committed to comply not only with the letter, but also with the spirit and purpose of all export and international trade regulations of each of the countries in which it operates commercially, including the United States.

Exportations, re-exportation, imports of any type of service, tangible or intangible asset, or any other transaction made contrary to the existing international trade regulations of any applicable jurisdiction or contrary to the provisions of this Policy is prohibited and will be sanctioned.

The export regulations of the United States Department of Commerce (hereinafter the “Department of Commerce”), which control exports, deemed exports, imports, re-exports, and transfers of goods and services, are not applicable:

- I. Commercial (non-military) products, software and technology.
- II. Items that may have both commercial and military use.
- III. Ammunition that is under the control of the Department of Commerce.

The U.S. Department of State’s International Traffic in Arms Regulations, which include:

- I. The manufacture, export, transactions assimilated to exports and intermediation in transactions involving defense articles.
- II. Access to technical information.

- III. The provision of defense services.
- IV. Other activities related to items designed, developed, configured, adapted, or modified for military use or that are on the U.S. Munitions List.
 - a. Imports, exports and activities related thereto.
 - b. The commercial activity with certain countries, governments, entities and individuals.

The Department of Commerce's Foreign Trade Regulations, which are enforced by U.S. Customs and Border Protection. These regulations set forth the requirements for electronic filings necessary to export from the United States.

Foreign Assets Control Regulations, enforced by the Office of Foreign Assets Control of the U.S. Department of the Treasury (the "Treasury Department"), which include prohibitions and restrictions on exports and trade and financial transactions with certain countries, governments, and individuals under U.S. economic sanctions programs.

Anti-boycott regulations that are enforced by the Department of Commerce's Office of Anti-Boycott Enforcement and the Treasury Department's Internal Revenue Service. These regulations include reporting obligations, prohibitions and tax obligations that may apply if the Company complies with international economic boycotts in which the United States does not participate.

Prohibitions and restrictions on exports and other trade links with:

- I. Any person who is prohibited from receiving certain products, technology and software from the United States.
- II. Any person engaged in certain activities, such as unregulated development, stockpiling, and distribution (proliferation) of weapons, terrorism, and drug trafficking.
- III. Any person affiliated with governments that are on the U.S. economic sanctions list.
- IV. It is also the Company's policy to comply with any other regulations applicable to INTCOMEX's operations and activities in jurisdictions other than the United States that restrict:

CONSIDERATIONS

LC is in charge of informing **INTCOMEX's** internal controls and procedures in relation to this Policy. LC is also responsible for implementing them in the day-to-day operations of **INTCOMEX**, with the necessary support from other departments and the Company's Management at all levels, especially taking into account the need to keep all those responsible informed of the frequent regulatory changes.

INTCOMEX Management is committed to ensuring that all employees have the necessary training and resources to be able to fulfill their responsibilities.

It is the responsibility of all levels of Management to advise Senior Management on any export or trade related fact, inquiry, concern or investigation that may reasonably become of legal significance to **INTCOMEX** or any of its associates.

International business generates a significant portion of **INTCOMEX's** revenues. Consequently, any violation of any regulation in this area may jeopardize **INTCOMEX's** ability to continue operating globally.

In addition, any violation of U.S. export regulations can result in substantial fines, restrictive penalties for directors, employees or agents, suspension of import privileges and immeasurable reputational damage to **INTCOMEX**.

DETECTION OF NON-COMPLIANCE

All Employees are required to report to the Whistleblower Channel **compliance@intcomex.com** if one has any suspicion or information about any breach or potential breach of this Policy.

08. WHISTLEBLOWER CHANNEL



A Whistleblower Channel has been created in order to receive reports on all those events that may originate the commission of a crime or the materialization of any risk to the detriment of **INTCOMEX**.

The Whistleblower Channel is a direct, effective and confidential channel to report alerts from Employees related to non-compliance with the IP. For this purpose, the e-mail address compliance@intcomex.com is available as a formal channel.

NO RETALIATION

Retaliation against Employees who raise ethical questions or complaints will never be tolerated and will be considered a serious violation of the IP, subject to termination with just cause.

INTCOMEX expects Employees to act in good faith, that is, with a genuine and honest conviction of what they are raising, a collaborative and committed attitude. On the other hand, if a collaborator makes a false report, they will not be able to take refuge under the principle of “no retaliation”.

INTCOMEX guarantees that the confidentiality for all parties involved, particularly the Employee or Stakeholder submitting the alert, insofar as the nature of the report permits. The investigative process initiated by the report will also remain confidential. Any information provided will be kept strictly confidential and used exclusively by the Committee. Reports can be submitted via [**compliance@intcomex.com**](mailto:compliance@intcomex.com).

09. INTEGRITY PROGRAM REGULATIONS

PURPOSE

These Regulations form part of the Integrity Program (“IP”) and thus integrates the internal regulations of **INTCOMEX**. Its purpose is to establish basic rules of organization and operation of the IP, providing a mechanism capable of identifying conduct that may occur within the Company, liable to disciplinary or legally punishable measures.

SCOPE OF APPLICATION

These Regulations are applicable to all **INTCOMEX** Employees. The Company is responsible for ensuring compliance. Failure to adhere to the provisions set forth herein will result in disciplinary action against the employee who commits them, in accordance with applicable law.

9.1. REGIONAL LEGAL & COMPLIANCE DEPARTMENT AND REGIONAL COMPLIANCE COMMITTEE

REGIONAL LEGAL & COMPLIANCE DEPARTMENT (“LC”)

The LC is responsible for analyzing, designing, working and supervising the different policies and procedures that govern the IP including the administration of the Whistleblower Channel.

Guillermina Pinnel is **INTCOMEX’s** Compliance Officer, appointed to this position based on her proven expertise and international credentials in the field. The Compliance Officer may be removed from her position by decision of the CEO with the agreement of the COO, for duly justified cause. Until a new Compliance Officer is appointed, an interim officer shall be designated by the CEO.

REGIONAL COMPLIANCE COMMITTEE

- I. The Regional Compliance Committee (“Committee”), will be responsible for enforcing internal control measures to detect and prevent the commission of all types of infractions to **INTCOMEX**.

- II. The Committee shall be composed of:
 - Head of Legal & Compliance, Guillermina Pinnel
 - The General Manager of each legal entity
 - Local Controllers of each legal entity
- III. Decisions adopted by the Committee shall be made by vote of each member. In the event of a tie, or if a member is involved in the matter under review, the CEO and COO shall jointly cast the deciding vote.

LOCAL SENIOR MANAGEMENT

The Local Senior Management together with the support of local Finance and local Human Capital is, within its scope of control and competence, in charge of guiding the operation of the IP under the monitoring and support of LC.

The participation of Local Senior Management may be required in investigations when warranted by the nature of the report, as determined by LC in coordination with the relevant **INTCOMEX** departments.

Reports submitted to LC must include the following:

- How the controls established for the IP are working.
- What updates or revisions to the IP are needed, along with the reasons motivating such updates.

9.2. WHISTLEBLOWER CHANNEL

In order to avoid any type of non-transparent or disrespectful exposure of this IP and/or **INTCOMEX’s** values, this tool allows gathering information on all those events that may originate the commission of a crime or the materialization of any risk to the detriment of **INTCOMEX**. For this purpose, the Whistleblower Channel is created as a support instrument for the Company, since it will provide the necessary information to be able to know and sanction this type of conduct.

Financial Reports: These are reports that raise concerns about potential irregularities or non-compliance related to the Company's economic, financial, or accounting management. Such reports may involve conduct including conflicts of interest in financial activities, violations of Anti-Money Laundering (AML) regulations, internal or external fraud, falsification or manipulation of accounting records, embezzlement of funds, among others.

Relational Reports: These are reports submitted by an Employee regarding irregular conduct of a labor, hierarchical, contractual, or personal nature. Within the scope of Compliance, this type of report is typically associated with situations such as workplace harassment, sexual harassment, intimidation, discrimination, or other behaviors that negatively impact the work environment and undermine the Company's values. Due to the nature of the underlying relationships, these reports require particularly sensitive handling to ensure confidentiality, impartiality in the process, and effective protection of the whistleblower from any potential retaliation.

WHISTLEBLOWER CHANNEL PRINCIPLES

- I. The Whistleblower Channel is constituted as a direct, effective and confidential channel to report on the conduct of Employees or Stakeholders related to non-compliance with the IP, and any similar event by **INTCOMEX** employees.
- II. **INTCOMEX** guarantees that the confidentiality of the individuals involved will be maintained, particularly that of the collaborator or third party filing the complaint as long as the reported event permits. Likewise, the data provided will be kept confidential, being only for the exclusive knowledge and use of the area involved and LC. Notwithstanding the above, **INTCOMEX** may disclose the information if it receives a requirement by law, court order, a government agency or a regulatory authority, or due to circumstances that **INTCOMEX** deems necessary and can be legally justified.
- III. **INTCOMEX** guarantees the protection of the Employee or Stakeholder who submits the alert, against retaliation or any other form of discrimination or intimidation for having provided information of irregular facts, unless it is proven that it was made in bad faith.
- IV. All complaints received shall be filed with a record by the Committee, with restricted access depending on the subject matter.
- V. The Committee guarantees an efficient and effective investigation of the alerts submitted.
- VI. Reports or complaints filed by a whistleblower may not be closed or reopened at the request of the whistleblower; investigations shall continue until the case is closed. Doing so constitutes a serious misconduct and may be considered for termination with just cause.

REPORTING VIOLATIONS AND DUTY OF CONFIDENTIALITY

- I. Through the Whistleblower Channel, any person, whether collaborator, supplier, client, third party or Stakeholder, who obtains information and/or becomes aware of the existence of a violation of **INTCOMEX's** IP, of an irregularity of non-compliance or of the commission of a crime, may communicate it to the Company through the open and confidential communication channels.
- I. Complaints may be submitted with identification of the complainant, whose identity will be kept confidential by the Committee, ensuring that, if it is an **INTCOMEX** employee, no action will be taken against them that may harm or jeopardize their job. In the case of a supplier, their services shall not be dispensed, except for a justified reason duly substantiated before Senior Management.
- II. In the case of a clearly malicious complaint, the complaint will be filed without further investi-

gation, although it will first be brought to the attention of the Committee for evaluation, with a recommendation for sanctions or any other measures deemed necessary.

- III. Act with honesty, sincerity and fairness throughout the process. This implies that whistleblowers and defendants must be transparent, in data and results, avoiding any form of deception or manipulation when declaring or providing information required for an investigation; giving and/or sharing adulterated or false information may be grounds for serious misconduct and may even result in termination with just cause.

EXECUTION OF THE INTERNAL RELATIONAL RESEARCH PROCESS

In cases where the report is relational in nature, meaning there is a direct relationship between the whistleblower and the reported individual, special measures must be taken during the internal investigation to ensure procedural integrity, protect the whistleblower, and guarantee impartiality.

The Local General Manager, acting on behalf of the Company, must immediately express their support to the whistleblower, explicitly stating that the Company takes the report seriously and is committed to providing a safe, retaliation-free environment. This support must be clearly communicated and locally documented so that the whistleblower is aware of confidential channels, proper protection measures, and the Company's commitment to transparency and ethics.

Additionally, the team in charge of the investigation must be impartial (if designated by the General Manager), properly trained in handling sensitive cases, and conduct the process in strict compliance with both internal and applicable external regulations.

In particular, it shall:

- **Confidentiality:** The investigation must be conducted under strict confidentiality. It is recommended that the General Manager, Controller and/or Finance Manager, and Human Capital Management sign a legal confidentiality agreement.
- **Decision:** It is at the discretion of the General Manager to carry out the investigation with the support of external legal counsel, or to refer it internally to the Local Human Capital Management team.
- **Identification:** The whistleblower, the reported individual, and potential witnesses must be identified.
- **Interview:** Invitations to interviews must be formalized, and interviews must be conducted individually to investigate facts and evidence, always in the presence of a witness. The method of citation will depend on the nature of the report, except where local law mandates specific procedures (e.g., sexual harassment, workplace bullying, and harassment). In case of doubt, consult with local labor counsel.
- **Follow-Up:** The investigation must be followed through to completion according to Company protocols. No report may remain unresolved.
- **Open-Door Policy:** The Open-Door Policy outlined in Section 5 of the Code of Conduct and Ethics of the Integrity Program must be promoted at all times. Records must be kept of situations known to Management, even if not formally reported through the Whistleblower Channel at compliance@intco-mex.com.
- without the need to be formally reported through the Whistleblower Channel at compliance@intco-mex.com.

ANALYSIS OF A REGIONAL RELATIONAL COMPLAINT

- IV. If the person denounced is a member of the LC, the CEO will determine to whom the investiga-

tion should be referred, maintaining total impartiality. If the person reported is a member of the Committee, the investigation will be conducted by the LC together with external support, whose evaluation and sanctions to be applied will be in charge of the LC, maintaining total impartiality.

- V. If the person denounced has the rank of General Manager, Regional VP, the investigation will be conducted by the LC together with the regional positions related to the investigation and with a view to the CEO and COO.
- VI. If the report concerns an **INTCOMEX** Employee with regional impact, the investigation will be carried out by LC together with the department most closely related to the case. If the whistleblower's testimony or presence is required, the session will be led by the **INTCOMEX** Compliance Officer or a delegate, always with a Committee member present as a witness. The whistleblower's identity will be kept confidential.
- VII. The internal investigation shall respect the principles of due process and, consequently, the right of defense. In this regard, the persons involved shall have the right to know the charges brought against them.

RESEARCH

- I. LC will have daily view of the Whistleblower Channel.
- II. LC will be responsible for forwarding relational Compliance reports to the Local General Manager, who, based on LC's recommendations and the guidelines of the IP, must initiate the appropriate investigation—provided the report was submitted through the Whistleblower Channel.
- III. The local Finance Department must immediately notify LC of any Financial Reports received. LC will lead the investigation. LC will also notify the relevant authorities to implement the appropriate actions as established in the IP.
- IV. The Local General Manager and the Controller and/or Finance Manager may consult with external professional experts when circumstances warrant it, at their discretion.
- V. LC, the Local General Manager, and the Controller and/or Finance Manager will maintain a record of all submitted reports. They must also safeguard all received information, guaranteeing confidentiality at all times.
- VI. In cases where a report is deemed unfounded, a record of the decision not to initiate an investigation must be documented. This decision does not preclude a future investigation if additional information is later received that justifies reopening the matter.

9.3.

DISCIPLINARY SYSTEM

SANCTIONS

- I. In accordance with these Regulations and in order to strengthen the proper implementation and operation of **INTCOMEX's** IP, the following is a list of infractions that, if committed by any collaborator, shall be punishable:
 - Failure to uphold **INTCOMEX's** Values
 - Failure to comply with and enforce the IP
 - Failure to comply with the training established in the IP for employees who are required to do so.
 - Obstructing or attempting to impede supervision or control actions in the area of regulatory compliance, as well as refusing to provide information requested by the LC or the Committee.
 - Making a malicious complaint to the Whistleblower Channel.
 - Failure to cooperate in good faith in internal investigations.
 - Lying or providing false information during an ongoing investigation

- Infringing the duty of confidentiality and reserve of internal investigations
 - Carrying out or allowing any unlawful activity
 - Failure to comply with current regulation
 - Having any kind of complicity or connection point to avoid carrying out the investigation and development of the complaint or hinder it.
 - Obstructing investigations will constitute a serious violation of the PDI and will result in termination with just cause
- II. The aforementioned list of infractions is only enunciative and not exhaustive, and may include other infractions related to the IP that are not listed here and which related to the Company's Values and/or this IP.

APPLICATION OF SANCTIONS

- I. In cases involving sanction recommendations, the severity of the incident and clarity of the violation will be considered, and the reasoning will be justified.
- II. The Local General Manager must approve the final investigation report.
- III. Exceptionally, if the Local General Manager does not approve the final report and the Human Capital Department does not reconsider, the Committee may request an additional written response from the Employee to address specific points required to reach a decision.

9.4.

DISSEMINATION, TRAINING, EVALUATION AND MONITORING OF THE INTEGRITY PROGRAM

DISSEMINATION AND TRAINING

INTCOMEX will carry out permanent and periodic dissemination and training programs on the contents of the IP and its Regulations, leaving a record of their implementation. The dissemination and training may be carried out in person or by electronic means (onboarding),

and at least once a year.

INTCOMEX's training program will be directed to Directors, Managers and Employees, in order to allow them to be instructed in the prevention of Corruption and prevention of Money Laundering and Financing of Terrorism LA/FT.

PERMANENT MONITORING AND EVALUATION

INTCOMEX will establish feedback mechanisms for the IP through evaluation and monitoring processes. LC will be in charge of adapting the IP to new situations that require it.

10. ADMINISTRATIONS AND VIOLATIONS

The provisions of this IP are mandatory for all **INTCOMEX** employees regardless of their position. All **INTCOMEX** Employees must sign the receipt of a copy of this IP in written or electronic form, both being equally valid, assuming in the same document the commitment to read it.

Any acts contrary to the provisions contained in this IP that occur at **INTCOMEX** and of which **INTCOMEX** becomes aware of must be reported to compliance@intcomex.com.

Violations of the IP will be considered serious misconduct and will be subject to sanctions including termination with just cause according to the severity and impact of the act in question.

This IP will remain under continuous review, and communication channels will stay open to guide any day-to-day questions. We all share responsibility and commitment to cooperate in any internal or external investigation with integrity and confidentiality. Withholding information, failure to participate, or remaining silent may also constitute serious misconduct and grounds for termination.



GLOSSARY

COLLUSION: is the agreement to defraud the State's assets made between a private individual and a public official or servant who directly or indirectly intervenes, by reason of his position, in any stage of the modalities of procurement or public contracting of goods, works or services, concessions. In case the agreement is materialized in an effective defrauding of the State's patrimony, the figure will be aggravated.

EMPLOYEE(S)¹: Refers to all those persons who maintain an employment relationship with **INTCOMEX** regardless of the type of contract used, regardless of the position they hold within **INTCOMEX** (Directors, VPs, Managers, etc.).

CORRUPTION²: is the practice of abusing power, functions or means to obtain economic or other benefits.

PUBLIC OFFICIAL³: is anyone who maintains a partial or permanent relationship with the State or any government entity, whether directly contracted or outsourced, including people who hold positions in companies with state participation. Also those who work in international organizations.

MISSION: To empower the growth of people, organizations and communities in the Americas and the Caribbean, connecting them with the latest technology, facilitating their digitization, thus generating a favorable impact that drives technological development in the region.

BRIBERY⁴: offering, giving or promising to a national or foreign public official or public servant, a gift, promise, advantage or benefit to perform or omit acts in compliance with or in violation of their obligations, either directly or indirectly. Among the purposes of bribery we can find, without being limited to, the following: Exerting undue influence or rewarding a desired action, exerting undue influence or rewarding an act in breach of a lawful duty, causing someone to refrain from acting in breach of a lawful duty, providing an undue advantage, exerting undue influence on the decision of a government or government official.

INFLUENCE PEDDLING⁵: includes the invocation of real or simulated influences with any public official, aimed at receiving, giving or promising for oneself or for a third party, a donation or promise or any other advantage or benefit with the offer to intercede with that public official or servant who will hear, is hearing or has heard a judicial or administrative case.

VALUES:

1. **AGILITY, FLEXIBILITY AND INNOVATION:** We act fast, we are flexible and innovative to exceed the needs of our customers and manufacturers, providing them with the best experience in a proactive way. We take into account different points of view and change our behaviors in order to continuously improve by adapting quickly and efficiently to diverse situations.
2. **ETHICS:** We act in accordance with professional practices and organizational policies at all times. We do the right thing even when no one is watching.
3. **PASSION:** We work enjoying what we do and achieve together. We are proud and committed to the growth and technological development of Latin America and the Caribbean. Our work inspires us deeply and that drives us to keep growing.
4. **CUSTOMER OBSESSION:** Our daily work revolves around our customers. We are passionate about helping them grow and continuously improve their experience through the added value we offer. We give our best so that our clients can be the best choice of theirs. Our success depends on yours.
5. **RESPONSIBILITY FOR AMBITIOUS RESULTS:** We seek to reach the highest of levels, and always be the greatest. Every day we leave everything on the field. We work to our maximum capacity being proactive to achieve our goals. We deliver what we promise, we overcome obstacles and we learn from our experiences.
6. **SENSE OF COMMUNITY:** At **INTCOMEX**, we are one big family. We share a common goal for which we work together as a team. We create purposeful connections with each other and with our manufacturers and customers, caring for each

other and always acting with respect.

VISION: To be the best technology distribution platform, reaching every corner of Latin America and the Caribbean. We contribute to the growth of our manufacturers and the success of our customers, providing them with omnichannel access to the maximum variety of products and services in their category, achieving an exceptional and sustainable experience.

STAKEHOLDERS: Stakeholders are individuals, groups or entities that have a direct or indirect interest in a company's activities and results. However, it is important to distinguish between different types of stakeholders:

- **Service:** A service stakeholder is an entity that benefits from the services provided by the Company. They may be customers, service users or entities that depend on the Company's services for their operation.
- **Manufacturer:** A manufacturer stakeholder is an entity that produces the goods or services that the organization markets. They can be suppliers, product manufacturers or Vendors.
- **Business Partner:** A business partner is an entity that works in collaboration with the Company to achieve common objectives. They may be strategic partners, business allies or suppliers to the Company.

Therefore, a Stakeholder is not simply someone who purchases the products that the Company markets, but can have a variety of roles and relationships with **INTCOMEX**. Each type of stakeholder has unique interests and expectations that the Company must consider and manage effectively.

**REGIONAL LEGAL AND
COMPLIANCE DEPARTMENT**

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PREPARED BY:Paula Patiño
Adolfo Piffaretti
Guillermina Pinnel**REVIEWED BY:**Guillermina Pinnel
Jeff Lethmann
Miller Chevallier**APPROVED BY:**

Mike Shalom

