

GLOBAL MIND + ICOLIC

SUPPLIER CODE OF ETHICS

The Glic group, for their companies Global Mind and Icolic, its subsidiaries and affiliates, as an adherent of the Partnering Against Corruption Initiative by The United Nations (UN) (<http://www.pactomundial.org/wp-content/uploads/2015/08/Los-negocios-contra-la-corrupci%C3%B3n.-Global-Compact.pdf>) states the following supplier and strategic partners code of ethics:

1) CURRENT LEGISLATION

The Global Mind + Icolic supplier must comply with the current legislation of the countries in which it operates.

It should also avoid any conduct that, although not illegal, might undermine the reputation of Global Mind + Icolic and generate adverse consequences for the company or its environment.

2) ETHICAL BEHAVIOR AND POLICIES AGAINST CORRUPTION AND BRIBERY

The supplier shall establish procedures to enable the fight against all forms of corruption and bribery in the development of their activities.

This means: Do not make or offer, directly or indirectly, any monetary compensation or other benefit in kind to any employee, officer or director of Global Mind + Icolic

The supplier also agrees to report any act of corruption of an employee of Global Mind + Icolic. Any request for money, benefit or attention, tangible or intangible, must be reported in person or by e-mail to the President of the company, Marcelo Montefiore (mmontefiore@globalmind.la)

3) MONITORING OF GLOBAL MIND POLICY REGARDING GIFTS AND INVITATIONS

The supplier must follow these guidelines for each of the cases listed:

- Business or personal gifts: All gifts, hospitality, benefit or discount a supplier wishes to give to any or some members of the Global Mind + Icolic staff, must be addressed to the Director of the appropriate area (in Argentina) or to the Country Manager in the case of offices located in foreign territories.

- It is included within this policy, those gifts and/or hospitalities sent or delivered out of the office or that are made in a personal capacity (for instance: a birthday gift).

- Invitations to events, conferences and/or trainings: The guest list for any of these events or meetings must be drawn up by the Director of the appropriate area (in Argentina) or by the Country Manager in the case of offices located in foreign territories. Therefore it must take the invitation to the Director or the Country Manager indicating the event description and quota share

for the company. Gifts or hospitalities given in these events are included in the policy described above.

- Invitations to travel: As in the previous point, such invitations should be made to the director of the appropriate area or to the Country Manager in the case of offices located in foreign territories. Only they are authorized to confirm who or whom will attend this trip, regardless of whether it has recreational, technical or training goals.

4) CONFIDENTIALTY

The supplier must respect the principles of confidentiality about that information to which it may have access as a consequence of their relationship with Global Mind + Icolic while doing their professional activities.

This includes any information about the company, its employees, managers or customers.

5) COMMITMENT

The supplier agrees to:

- Respect this code
- Implement the necessary actions to ensure that rules here described are accomplished
- Communicate to Global Mind + Icolic any other information they deem relevant regarding the requirements set out in this current code.