

Ethics Code

—
This is us.

ADOPTED DECEMBER 17, 2021

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An aerial photograph of rolling green hills, likely in a rural or natural setting. The hills are covered in dense green vegetation, and the perspective shows the undulating terrain stretching towards the horizon. The lighting is soft, highlighting the contours of the hills.

Introduction

Compliance with high ethical standards is an essential part of our nature and our long-term commitment with society.

Enfinity Global Group is committed to the business integrity principles described in this Ethics Code that, together with its values, will guide the daily work of Professionals.

All Enfinity Global Group Professionals and stakeholders are responsible for respecting these ethical standards in what they do, creating a work environment in which integrity rules are the standard operating procedure.

Violating the ethical standards outlined in this Ethics Code is prohibited and may lead to disciplinary action.



Working together, we
will be able to build
sustainable growth,
generate value for our
stakeholders and reinforce
our commitment to create
a zero-carbon future

Message from the CEO

Dear Professional,

We are a leading company in renewable energy and sustainability services. Our goal is to enable a better world by helping society to transition to a zero-carbon future. We will only succeed if we are guided by our purpose and our values: Focusing on execution, competence, ownership, integrity, and innovation.

The Ethics Code describes how we put these values into practice every day. It explains our commitments and expectations towards stakeholders and provides guidance for Professionals and everyone who works on our behalf. The following three priority business principles are equally critical to our success as a responsible organization:

- **Commitment to the highest levels of safety and security in our operations**, as well as protecting employee health and the environments in which we operate.
- **Compliance with the highest integrity standards**, in particular by preventing corruption, fraud and anti-competitive practices.
- **Respect for internationally recognized human rights standards**, and empowerment of equal opportunities.

The Ethics Code has been approved by our Board of Directors and provides the general principles of business conduct that we respect as a company, and believe to be critical to our success.

The Ethics Code applies to each of us. You should read, understand and comply with the guidelines and policies set forth herein.

The leadership team is confident that each and every one of us will conduct business in a manner consistent with the Ethics Code. Working together, we will be able to build sustainable growth, generate value for our stakeholders and reinforce our commitment to create a zero-carbon future.

This is us!



Carlos Domenech

**Chief
Executive Officer**

Scope

The Enfinity Global Group Ethics Code (hereinafter, the “Ethics Code”) includes the catalog of ethical principles and rules of conduct that govern the actions of Professionals acting on behalf of Enfinity Global Inc. (“Enfinity Global”) and its majority-owned and majority-controlled subsidiaries and affiliates’ (collectively the “Enfinity Global Group”). The Ethics Code constitutes the central element of the Enfinity Global Group’s compliance function.

The Ethics Code must be understood and applied together with the rest of the internal regulations of each entity of the Enfinity Global Group.

Compliance with the Ethics Code and internal regulations is also a mechanism for the prevention of legal and reputational risk, that could arise from the potential breaches of these internal procedures.

The Ethics Code is applicable to all directors, officers and managers, and to all employees and other persons working for the Enfinity Global Group, regardless of the type of contractual relationship with the Enfinity Global Group. Thus, it includes employees at all levels, whether permanent or temporary, full or part time, freelance contractors, as well as any other secondees or contractors acting on behalf of any member of the Enfinity Global Group (collectively, “Professionals”), regardless of the territory where they are located.

The Enfinity Global Group expects third parties who act on behalf of any member of the Enfinity Global Group to share the Enfinity Global Group’s commitments to operating with integrity and in a lawful and ethical manner, consistent with the principles set forth in this Ethics Code, within the normal exercise of their activities and transactions for our organization.



Responsibilities

One of the main responsibilities of our Professionals is to conduct the business of the Enfinity Global Group in strict compliance with applicable governmental, state, and local laws, rules, and regulations, including, but not limited to, laws, rules and regulations related to securities, labor, tax, employment, environmental and workplace safety matters. This Ethics Code cannot cover all situations or all applicable local laws and regulations. If a local law conflicts with the Ethics Code, we will follow the local law. In all other instances, the Ethics Code applies to your business activity. If, for example, local custom would allow something prohibited by the Ethics Code, you must follow the Ethics Code and not engage in this activity. When in doubt, do not hesitate to contact the Supervisory Body.

Professionals have the obligation to read, understand and comply with the Ethics Code, and to cooperate with respect to its implementation across the Enfinity Global Group. To support understanding of the Ethics Code, and laws and regulations applicable to our business, Professionals are required to attend and participate in trainings that are assigned to them.

Enfinity Global Group Professionals may be asked to participate in an audit or internal investigation conducted by our internal auditors, external auditors, the Supervisory Body or legal department, or external lawyers they retain. If this happens, Professionals are always expected to cooperate fully and communicate honestly.

Professionals may also receive a request for documents or a request to meet with regulators or lawyers in connection with a legal proceeding or government investigation. If a Professional receives such a request, they must contact the Supervisory Body or legal department for assistance unless applicable law prohibits that Professional from communicating this fact.

Compliance personnel and the human resources department will provide communications about the Ethics Code to all Professionals.

In the event the Enfinity Global Group finds that a Professional has violated the Ethics Code, other Enfinity Global Group guidelines or policies, or applicable law, the Enfinity Global Group will act in accordance with the sanctioning regime established within the relevant entity, adopt measures deemed appropriate, and if appropriate, impose a pertinent sanction and/or file corresponding legal actions in accordance with applicable rules, regulations and laws in each case.



Values and attitudes

Values

Our purpose and values are what really drive us forward as an organization. They define who we are and how we work. Our decisions are based on these values, and they guide our relationship with our stakeholders: customers, suppliers, shareholders, communities and any other third parties.

Our purpose is to help create a zero-carbon society, aligned with our sustainability principles, in what we undertake.

Our values are as follow:



Focus on execution

Think big and make it happen. Decide, commit, work hard, succeed.



Competence

Get good, get better, be the best.



Ownership

Accepting responsibility, empower our Professionals to make things happen.



Integrity

Be authentic, consistent and respectful, and engage others to be on the same journey.



Innovation

Think outside the box and be disruptive. There is always a better way of doing things: find it.

Attitudes

The Enfinity Global Group encourages its Professionals to demonstrate an intra-entrepreneurial, engaged, resilient, committed, reliable, results-driven, hard-working, positive, team cohesion-building attitude, and to act with integrity.





Reporting a concern

Professionals must report actual or suspected violations of this Ethics Code, internal regulations and/or the law, without fear of retaliation, to their direct supervisor or the human resources department, in person, by telephone or by email. Additionally, Professionals may contact the Supervisory Body in person or by email at complaint@enfinity.global.

Enfinity Global Group Professionals should seek guidance whenever they are in doubt as to the applicability of any law, rule, or regulation, or regarding any contemplated course of action.

Both reports and questions, will be directed to the Supervisory Body or members of the compliance team, as applicable, except those for which referral to a different function or person is appropriate.

The Enfinity Global Group will not tolerate any retaliatory action or reprisals threatened or taken against anyone who has raised a question or concern in good faith. Equally, the integrity of the reporting system and the respect we have for one another means that those who act in bad faith and knowingly make a false report may be subject to disciplinary action to and including termination.

Reports may be made anonymously, where legally permissible, but you are encouraged to identify yourself to facilitate communication.

Professionals who report irregularities are afforded confidentiality and protection against any retaliation or reprisals, whether actual or threatened, as a result of speaking-up.



Enfinity Global Group Professionals should seek guidance whenever they are in doubt as to the applicability of any law, rule, or regulation, or regarding any contemplated course of action



The Enfinity Global
Group is committed to
creating a better future
by enabling the transition
to a zero-carbon future

Commitments to Society

Respecting Human Rights

The Enfinity Global Group is strongly committed to the protection of internationally proclaimed human rights, and Professionals, third parties who act on behalf of the organization, business partners, and other stakeholders are expected to be treated fairly and respectfully, without exception.

In the markets where the Enfinity Global Group operates directly and / or through business partners, the Enfinity Global Group complies with applicable laws regarding working hours, compensation, working conditions, discrimination, and employment opportunities.

The Enfinity Global Group will not tolerate child labor or the use of illegal, abusive, or forced labor, including modern slavery and human trafficking. Likewise, respect for freedom of association and collective bargaining in the labor sphere will be secured, both in the organization itself as well as among those who are affected by its activity, in accordance with applicable law.

Sustainability, Environmental and Social Governance (ESG)

The Enfinity Global Group is committed to creating a better future by enabling the transition to a zero-carbon future. This is our core business and an important part of our DNA.

Sustainability is an integral part of who we are and what we do every day. We recognize that progress involves the creation of shared values amongst our stakeholders by balancing the financial, human, environmental and social impact of our activity.

The Enfinity Global Group incorporates sustainability into action by incorporating ESG criteria in our daily activity.



ENVIRONMENT

Clean energy production has a powerful positive impact itself, but it is not enough to define our projects as sustainable ones. We implement a responsible use of the land by selecting the most appropriate locations for our plants, we promote biodiversity by planting autochthonous trees in our projects, we build our plants in an environmentally responsible way, and we strive to have a very low environmental impact from our operations, dismantling and recycling the elements at the end of a plant's life cycle.

A number of environmental laws, standards, requirements and policies apply to our worldwide business operations, practices and projects. Our Professionals have the responsibility to understand and follow these requirements for each applicable jurisdiction, including:

- Complying with environmental laws and permits,
- Managing materials and waste properly, and
- Conserving energy, water, raw materials and other natural resources.

We further support a precautionary approach to the materials used in our projects and strive to reduce and minimize the use of hazardous materials and the environmental impact of our projects. We observe laws and regulations applicable to our operations regarding the generation, use, storage and disposal of hazardous chemicals and other materials.

The Enfinity Global Group expects our third parties and other business partners to also comply with applicable environmental, health and safety laws and standards in their operations.



SOCIAL

The people of the Enfinity Global Group underpin its enduring success. We recruit, engage and develop innovative, high-performing people and help unleash their potential for growth. We require respect for human rights along our whole supply chain, and we support equal opportunity without regard to race, color, gender, religion, national origin, or other factors that are irrelevant to the execution of our core values.

The Enfinity Global Group promotes the economic and environmental progress of the communities where we operate by providing access to cleaner and more affordable energy, investing in their environmental needs, and contributing to the local economy by generating employment and using local suppliers.



GOVERNANCE

Every company requires governance. Governance refers to all principles, policies, requirements, systems and processes implemented to ensure in particular proper compliance, risk management and strategic steering. The Enfinity Global Group has developed its own internal regulations in order to ensure the achievement of its values, attitudes, and objectives and aspires to achieve the highest possible degree of compliance and dissemination of its governance system.

The Enfinity Global Group contributes to the achievements of the Sustainable Development Goals (SDG) approved by the United Nations.

SUSTAINABLE DEVELOPMENT GOALS



Working at the Enfinity Global Group

Equal opportunities, diversity and non-discrimination

It is the responsibility of all Professionals to respect the diversity of individuals and cultures inside the Enfinity Global Group and in the communities in which we operate.

This sensitivity to diversity will benefit each and every one of us in the Enfinity Global Group by increasing our ability to understand one another, and to better serve our constituents.

Each Professional is responsible for creating a discrimination-free workplace, which promotes equal opportunity and respect for all Professionals and third parties. The contracts signed, or employment-related decisions made, must be conducted in a non-discriminatory manner, in accordance with applicable laws. We base employment decisions on business needs, skills, experience, and relative work performance and prohibit discrimination.

The Enfinity Global Group is engaged in creating a professional workplace free of verbal or physical harassment, bullying, or violence. The Enfinity Global Group prohibits harassment as well as the creation of an intimidating, hostile or offensive work environment. We will not tolerate harassing behavior directed towards or from Professionals, supervisors, co-workers, vendors, consultants, customers, visitors, third parties, stakeholders, or anyone else with whom we come into contact in the course of the performance of our daily work.

It is expected that the following labor standards must be fulfilled both by the Enfinity Global Group and its service providers.



Prevention of occupational risks

We endeavor to perform our activities in a safe way and give top priority to the health and safety of our employees, of our business partners and their workforce who assist in our operations, and of the people who live and work near our sites. We foster a culture in which everyone feels responsible for reducing risks and promoting safe practices. For further information please consult related policies and guidelines or members of the legal department.

People development commitment

Developing our people is a key pillar of our culture. We commit to developing a highly skilled and performance-based workforce. We empower our people to develop their teams in ways that reinforce our responsible management culture within a strong and disciplined leadership. Our objective is to create positive working relationships with our Professionals and to provide them with opportunities for career growth, as they contribute to the success of our business and of society as a whole.

Our talent development strategy is based on building leadership capabilities, creating a responsible management culture, and recognizing and rewarding performance. From the moment our people join us, whatever their level of experience, we work with them to establish a clear development pathway to assist them in achieving their goals.

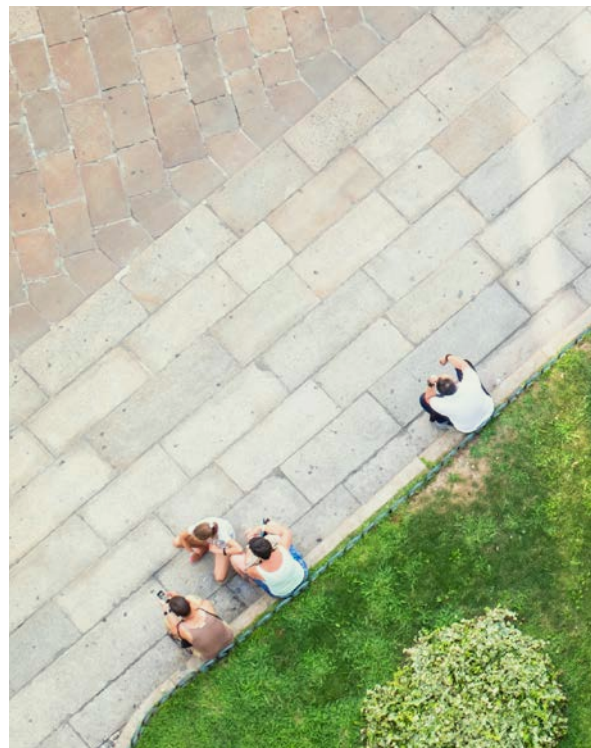
Use of Social Media

The Enfinity Global Group owns and manages different social media as a communication channel with its internal and external stakeholders. The use of Enfinity Global Group social media must be appropriate and always for purposes related to the organization, avoiding in all case behavior which can potentially harm the Enfinity Global Group's reputation.

All Professionals, when using social media, must follow the Enfinity Global Group's main ethical principles, which are respect, objectivity, accessibility, credibility, honesty and legality.

Official posts or comments on behalf of the Enfinity Global Group may be subject to a review and approval process as detailed in a specific social media policy and that will be applicable to the professionals within the organization responsible of social media.

Enfinity Global Group Professionals shall never participate in social media in the name of the organization, unless official and public information is used in alignment with the organization's values and ethical principles.

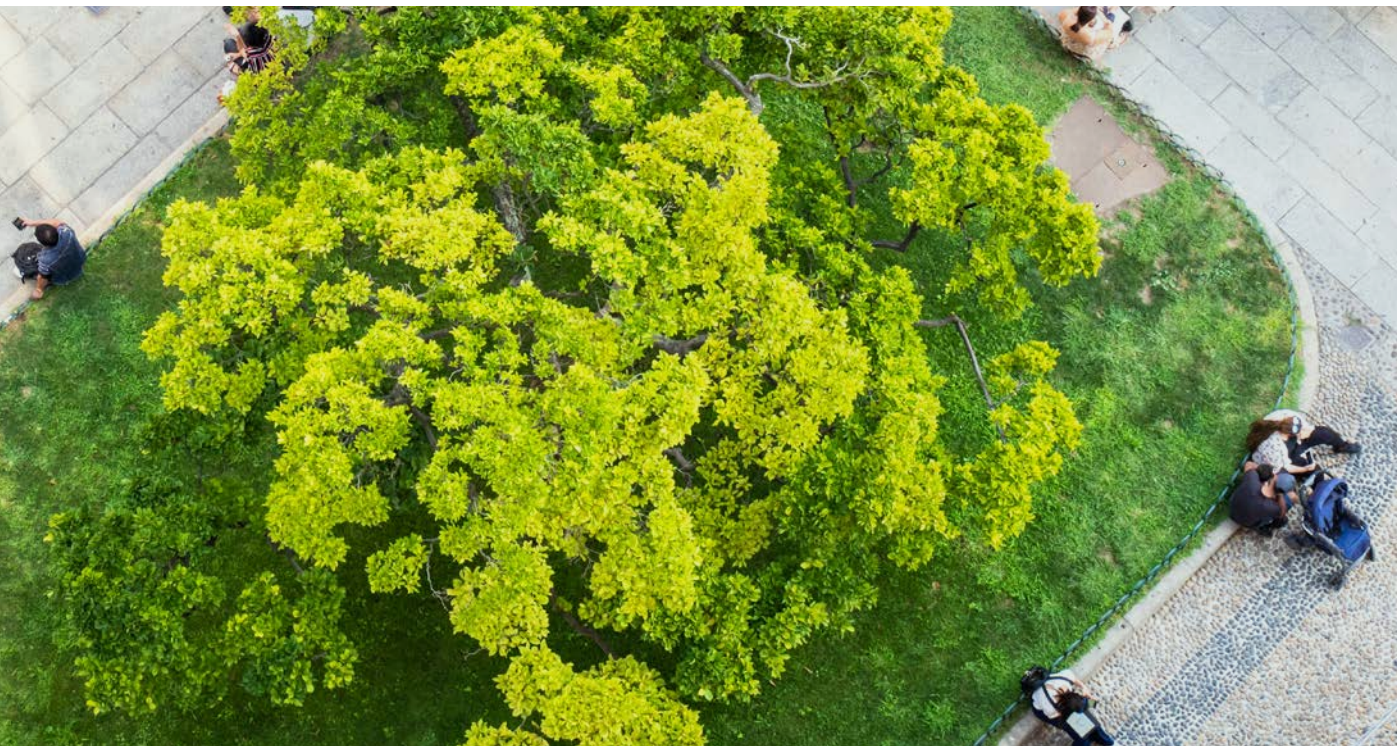


Your commitment to the Enfinity Global Group

Use of Corporate Assets

Professionals must protect Enfinity Global Group assets from theft, fraud, misuse, damage, waste, improper alteration, or loss. Enfinity Global Group property includes Enfinity Global Group material, equipment (including offices and project sites, and any other location where business activity occurs), supplies, keys, computers, phones, tablets, reports and records, computer software information and facilities. This includes willful acts such as sabotage, acts or omissions constituting gross negligence, and tampering with or other improper use of computers, electronic mail, and / or voice mail.

Professionals are expected to use Enfinity Global Group's resources in a proportional and efficient manner, and limited to Company-related professional purposes. Professionals are responsible for acquiring and using such resources to carry out Enfinity Global Group business. Any personal use of Enfinity Global Group resources must not result in significant added costs, disruption of business processes, or any other disadvantage to the Enfinity Global Group. The use of Enfinity Global Group resources for non-professional purposes is appropriate only when it is specifically authorized by an internal procedure or when the user receives express authorization from his or her manager. Managers are responsible for the resources assigned to their respective organizations and are empowered to resolve issues concerning their proper use.



Intellectual and industrial property

Intellectual property is essential to our economic success and the success of our business partners. You must protect our intellectual property, including any patents, trademarks, copyrights, trade secrets, technical and scientific knowledge or know how, and expertise developed in the course of our business. Any invention and/or discovery made during your work on behalf of the Enfinity Global Group constitutes Enfinity Global Group intellectual property.

Moreover, Professionals will respect the intellectual and industrial property rights that are held by third parties outside the Enfinity Global Group. In particular, Professionals will not incorporate, use or employ in the Enfinity Global Group any type of physical or electronic information or documentation belonging to another company, that has been obtained as a result of the performance of a prior position or without consent. If you duplicate or misappropriate someone else's intellectual property without authorization, you may be subject to significant fines and criminal penalties, in addition to disciplinary actions from the Enfinity Global Group.

Secret and confidential information



SECRET AND CONFIDENTIAL BUSINESS INFORMATION

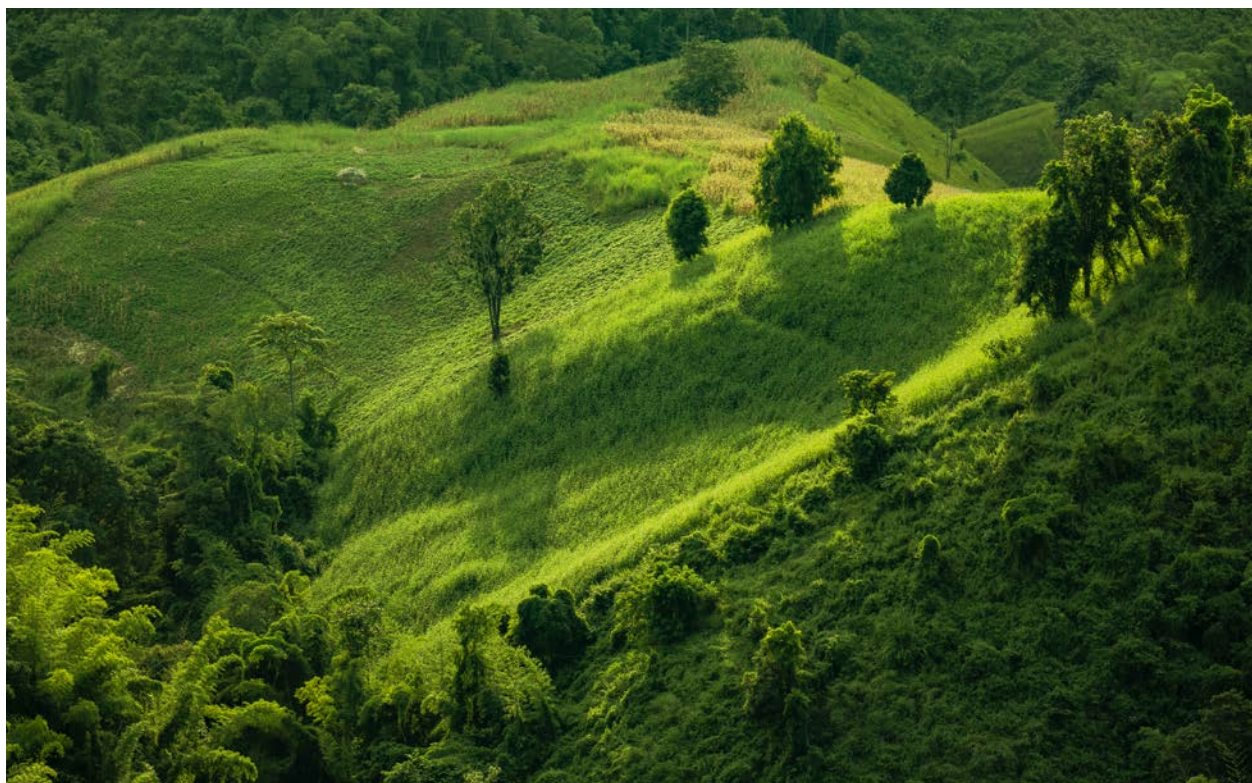
In general, Professionals must maintain professional secrecy regarding non-public data or information they know of through the exercise of their professional activity, whether they come from or refer to clients, the Enfinity Global Group, other Professionals or managers, or any other third party. Confidential information includes all non-public strategic, financial, and technical or business information of the Enfinity Global Group, as well as all business and trade secrets of the Enfinity Global Group's business partners. This confidential information includes information regarding our products, customers, vendors, pricing, systems, employees, and the like. Consequently, and without limiting the foregoing:

- Confidential information must be used exclusively for the performance of one's professional activity in the Enfinity Global Group, and it will not be provided to parties other than to those other professionals who need to know it for the same purpose. Professionals must not use confidential information for their own benefit.

- The data and information related to accounts, financial positions, statements, financial, business and, in general, customer activity will be treated with confidentiality and will only be transferred to third parties outside the Enfinity Global Group with express authorization from an authorized Enfinity Global Group person and according to commercially reasonable procedures (e.g., when formalized by a non-disclosure agreement signed with that third party or where legally required).

This obligation of secrecy persists even after the relationship with the Enfinity Global Group has ended.

What is indicated in the preceding paragraphs is without prejudice to requirements formulated by competent authorities, under applicable regulations. When in doubt, Professionals should consult with the Enfinity Global Group's compliance personnel.



CONFIDENTIAL PERSONAL INFORMATION AND DATA PRIVACY

Professionals are obliged to respect the personal and family privacy of our Professionals, customers, suppliers, and any other persons whose data they have access to as a result of the Enfinity Global Group's activity, which includes personal, medical, economic or data of any other nature that may affect the intimate sphere in any way. The Enfinity Global Group treats such personal data as strictly confidential and protects it in accordance with applicable law.

Personal data will be treated in a particularly restrictive manner, in such a way that:

- Only that which is necessary will be collected.
- The collection, computer processing and use will be carried out in such a way that is intended to ensure security, truthfulness, accuracy, individuals' rights to privacy and compliance of the Enfinity Global Group's obligations resulting from the applicable regulations.

- Only the Professionals authorized to do so for their functions will have access to said data as necessary.

Professionals of the Enfinity Global Group are also expected to promptly report lost, stolen or damaged devices owned by the Enfinity Global Group or containing information of the Enfinity Global Group.

Refer to your local employee handbook, policies or procedures for additional information on your privacy rights and obligations under applicable local laws.

Our Professionals, when responding to requests for information and seizure and/or blocking of customer funds from judicial bodies, public administrations or from any other public body legally empowered to do so, will contact legal department and follow the instructions provided by the legal department.



The trust placed in the Enfinity
Global Group by other parties we
deal with is very important to us

External relationships

Honesty in relations with other parties

The trust placed in the Enfinity Global Group by other parties we deal with is very important to us, whether they are suppliers, clients, business partners or other third parties, and whether they belong to the public or private sector. For this reason, we treat them with professionalism, transparency, honesty, loyalty and respect, always providing them with useful and accurate information and facts.

Responding to information requests

We properly respond to all government audits and requests for information regarding the Enfinity Global Group's business. Such communication must be consistent, honest, accurate, timely and in compliance with local and international laws, while protecting the Enfinity Global Group's interests. Because of this, interactions with governments, regulators, or legislators must only be made by authorized and appropriately trained individuals, regardless of the form of the communication. Professionals who receive a request for information of this nature must report this to the legal department and follow the instructions of the legal department.

Open and honest communication is a prerequisite to maintaining the trust of our third parties who act on behalf of the organization, business partners, and other stakeholders. The Enfinity Global Group may only guarantee consistent, open and honest communication if every statement or information to the media is pre-approved by the legal department.



We treat our third parties with total professionalism, transparency, honesty, loyalty, and respect

Conflicts of interest

A potential or actual conflict of interest appears when, either directly or indirectly, the individual Professional's private interest (or the private interest of a Professional's family members or close affiliates) is, or could reasonably be, contrary to the entity's interests, interfering or risking interference with the fulfillment of professional duties and responsibilities.

A Professional's functions must be performed without the existence of any conflict of interest which divides, or appears to divide, loyalty to the Enfinity Global Group. Professionals must not engage in any personal, business or professional activity, nor hold any direct or indirect financial interest, which conflicts with their duties and responsibilities to the Enfinity Global Group.

Professionals must inform their direct supervisor of any personal interest that might jeopardize that Professional's objectivity or professionalism in the performance of work for the Enfinity Global Group, and must refrain from participation in that activity until the conflict has been resolved. Failure to disclose any actual or potential conflict of interest increases the likelihood of improper judgment and may create a situation which cannot be properly resolved.

Examples of real or potential conflicts of interest include, but are not limited to, the following:

- Personal or family relationships with the Enfinity Global Group's actual or potential third parties.
- Investments by close family members in vendors, suppliers, contractors, and competitors of the Enfinity Global Group (except for ownership of small amounts of publicly traded securities).
- Outside employment – with or without compensation – which creates an actual or potential conflict of interest with employment at the Enfinity Global Group.
- Family that can potentially be hired by the Enfinity Global Group as a Professional.

With regards to a conflict of interest, family relationships can include relatives, spouses, and persons living together.

Any business opportunity encountered while conducting business affairs on behalf of the Enfinity Global Group belongs to the Enfinity Global Group and not to any Professionals in their personal capacity. Professionals must not: (i) use Enfinity Global Group's property, information or their position at the Enfinity Global Group to obtain a personal benefit or advantage, or to benefit or give advantage a third party; or (ii) set up a competing business, otherwise acting as a competitor of the Enfinity Global Group, or set up their own business to take advantage of their position at the Enfinity Global Group.



Bribery and corruption

The Enfinity Global Group has a zero-tolerance policy approach to any form of bribery or corruption. Thus, the Enfinity Global Group is committed to act in compliance with the applicable laws, statutes, regulations and codes in those jurisdictions where it conducts business.

The Enfinity Global Group does not engage in, or otherwise tolerate, any form of corruption in its business dealings, even when observance of this commitment may place the Enfinity Global Group in a non-competitive business position. The Enfinity Global Group specifically prohibits directly or indirectly through third parties, authorizing, promising, offering, giving, soliciting or receiving any form of bribe, kickback or other corrupt payment, or anything of value to obtain or retain business, or secure an improper advantage in the conduct of business, to or from any person or organization (including government agencies, individual government officials, private companies and employees of those private companies), under any circumstance.

The Enfinity Global Group strives to adopt the necessary measures to prevent bribery and corruption and effectively manage these types of risk.

The receipt and giving of gifts and hospitalities are common in business, and in many situations not unlawful. However, under certain circumstances, these may be, or appear to be, perceived to be given for bribery or corruption purposes. To avoid this, Professionals and any of the Enfinity Global Group's business partners must observe the rules set out in the policies and procedures of the Enfinity Global Group relating to anti-corruption and anti-bribery.

Donations (in any form, such as donations of cash or assets, or sponsorships) must be made with a legitimate purpose (i.e., not to directly or indirectly secure and improper advantage, or induce anyone to act improperly) and must comply with local law. Its approval shall follow the process set out in the Anti-Bribery and Anti-Corruption Policy.

Even the perception of corruption can harm Enfinity Global Group reputation and trigger government scrutiny - we strive to avoid even the appearance of wrongdoing. When in doubt, Professionals should pre-emptively consult with the Legal Department regarding the appropriateness of gifts and hospitalities, and act in accordance with internal policies and instructions from the Supervisory Body.

Professionals must reject and report to the Legal Department any request by a third party for payments, commissions, gifts, or rewards such as those mentioned in this section. Furthermore, Professionals should conduct business transparently and openly, enter agreements only with appropriate prior written documentation, make payments only once adequate justification is received and following the Purchase Order Process defined, and agree to commercially reasonable terms consistent with fair market value principles.



Fair competition and anti-trust

Professionals must undertake to compete fairly and effectively in commercial transactions carried out through the exercise of their professional activity within the Enfinity Global Group, promoting free and effective competition for the benefit of the market, the Enfinity Global Group's customers, and those with whom they have commercial and / or professional relationships.

The Enfinity Global Group is not interested in any sale or competitive opportunity that cannot be obtained through its own merits and through competition that is entirely fair. Professionals are not permitted to seek a competitive advantage for the Enfinity Global Group through fraud, concealment, misrepresentation of material facts, or illegal means.

Furthermore, the Enfinity Global Group will not attempt to obtain from any source or use a competitor's proprietary information, except when permitted under an appropriate written agreement with said competitor. Professionals must avoid unauthorized use of any information that is patented, copyrighted, privileged or confidential.

Professionals must refrain from discussing, verbally or in writing, certain information with competitors including prices, bids, discounts, sales figures, or pricing policies. If any unusual communication is received from a competitor, this must immediately be reported to the Supervisory Body or legal department.

The Enfinity Global Group will not join in agreements with other companies, or take any formal or informal concerted action with other companies, that are intended to restrict competition or result in unjustified price discrimination. Furthermore, the Enfinity Global Group will not take improper advantage of our market position to exclude competitors or to exploit customers.

Professionals, in acting on behalf of the Enfinity Global Group, will comply with applicable legislation and internal regulations in each region, and must report any anticompetitive practices detected in their relationship with competitors. The consequences of violating these laws are severe and can result in individual liability. When in doubt, Professionals should consult with the Enfinity Global Group's legal or compliance personnel.





Taxation and financial integrity

The Enfinity Global Group maintains zero tolerance with respect to illicit tax avoidance and it is committed to complying with tax obligations in all its entities.

Professionals will avoid those practices that presuppose the illicit avoidance of the payment of taxes.

The Enfinity Global Group business records and reports shall be prepared and maintained accurately, completely and in compliance with the applicable laws and recognized business standards.

The Enfinity Global Group's financial information and business records will be prepared reliably and rigorously, ensuring that:

- The transactions, purpose, substance, facts and other events collected by the financial information exist and have been accurately and timely registered in the proper accounts.
- The information accurately reflects the true nature and extent of all transactions, expenditures, facts and other events in which the entity is an affected party.
- Transactions and events are recorded, valued, classified, presented and disclosed in accordance with the applicable regulations.
- The financial information reflects the rights and obligations of the corresponding assets and liabilities, in accordance with the applicable regulations.

The Enfinity Global Group additionally maintains internal accounting controls to ensure that financial records and accounts are accurate. In support of these obligations, Professionals must preserve all paper and electronic records (including documentation associated with Enfinity Global Group policies and procedures) in accordance with applicable laws on data retention. Professionals must not attempt to circumvent an Enfinity Global Group financial or accounting policy or control. These prohibitions apply, even if a Professional believes that such behavior will ultimately benefit the Enfinity Global Group.

If any Professional believes documents or data are being concealed, altered, falsified, or destroyed, that Professional should immediately report this to the legal department or the Supervisory Body.



Financial Crime Prevention

The Enfinity Global Group recognizes the importance of financial crime prevention, including the fight against money laundering and terrorist financing, compliance with international sanctions programs, and the need to ensure that the Enfinity Global Group does not facilitate or have any role in criminal activities. Likewise, the Enfinity Global Group will collaborate with the competent authorities in this matter, should it be required.

Professionals shall comply rigorously with the applicable Enfinity Global Group and / or local policies and procedures.



MONEY LAUNDERING

At the Enfinity Global Group we are aware that money laundering is a global problem and that any participation in these activities can undermine an organization's integrity, damage its reputation, and expose it to serious legal and financial sanctions. Money laundering is broadly defined as engaging in a transaction with criminally-derived property (proceeds), structuring a transaction with money in order to avoid detection of criminal conduct, or engaging in a transaction with money in furtherance of criminal conduct.

The Enfinity Global Group is committed to complying with all applicable anti-money laundering laws, rules and regulations, and has various procedures in place that allow us to evaluate and detect, in advance, possible money laundering risks. We take necessary steps in order to conduct business with reputable business partners involved in legitimate business activities with funds derived from legitimate sources.



EMBARGOES, BOYCOTTS AND TRADE SANCTIONS

Trade embargo and boycott laws and regulations generally prohibit companies located in a particular country from doing business in another specific country or with another country's government, nationals or companies (or transferring certain goods, services, or technologies across international borders). On the other hand, sometimes a country makes it illegal for companies to recognize embargoes put in place by other countries.

The Enfinity Global Group's international operations can trigger issues under applicable trade sanctions and trade embargo laws. The Enfinity Global Group monitors these embargoes and sanctions and implements procedures to make sure we follow them. Any Professional that is involved in the transfer of goods or services across national borders on behalf of the Enfinity Global Group must comply with these laws, regardless of where that Professional is located. At the Enfinity Global Group, we conduct due diligence procedures that allow us to assess business partners from an "international sanctions" perspective and confirm that we do not do business with countries, governments, entities and / or individuals subject to such international sanctions.

ADMINISTRATION AND IMPLEMENTATION

This Ethics Code is an internal document of the Enfinity Global Group. It has been adopted on behalf of the Enfinity Global Group for its sole use and benefit. This Ethics Code shall be administered on behalf of the Enfinity Global Group by the Supervisory Body. The Board of Directors of Enfinity Global shall have the sole and exclusive right to amend, waive, terminate, or otherwise modify the terms of this Ethics Code, whether directly or indirectly, and in any specific case or generally. Subject to the preceding sentence, the Supervisory Body shall have the sole and exclusive right and duty to construe and interpret the terms of this Ethics Code, and all such constructions, interpretations and decisions by the Supervisory Body shall be final and binding on all persons and entities whatsoever. There are no third parties who have any right to rely on the terms of this Ethics Code, nor do any third parties have the right to enforce the terms of this Ethics Code. None of Enfinity Global, any member of the Enfinity Global Group, nor any officer, director, employee, agent, or affiliate of any of the foregoing, shall be required to account to, or otherwise inform or notify, any third parties with respect to the matters described in this Ethics Code.



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