

ANTI- CORRUPTION AND ANTI-BRIBERY POLICY INTERMUD, S.A.

Internacional Mudanzas, S.A. - INTERMUD, S.A. - Is located at 20 Avenida, 18-01 Zona 11, Guatemala City, through this Corruption and Anti-bribery Policy, and in compliance with the provisions of the Constitution of the Republic of Guatemala and Decree Number 31-2012, Act Against Corruption, issues this policy to combat corruption in the area of the operating services.

1. PURPOSE

This policy primarily aims to ensure that all employees of INTERMUD, S.A. and others in the supply chain comply with the provisions of the laws that fight corruption in the country.

Bribery: Consists in receiving or offering a person with public or private responsibilities, any gift, incentive, reward, economic promise or otherwise, to perform some activity dishonestly, in bad faith or abuse of authority.

2. IMPLEMENTATION

Internally, INTERMUD, S.A. trains and informs all staff through its Code of Ethics, of the actions they should avoid to fight corruption inside and outside the company.

Attendance at this training is mandatory for the new personnel and for all staff, these takes place regularly.

3. SCOPE

This policy applies to all employees and third parties who are part of the supply chain in the areas of management and operations performing work inside and outside the company, in the area of the services operated.

Prohibitions:

All employees are strictly prohibited:

- a) To engage in acts of corruption and offering or accepting bribes, including any financial payment or other form of benefit conferred on any government official, for the purpose of influencing any decision that it should take and that is contrary to the law.
- b) To participate in transactions or financial transactions using privileged information of the company, which could be accessed by their position or the exercises of the position held, or allow the improper use of such information for their benefit.



- c) Disclosing confidential or privileged information that can be used for illicit purposes and to which it has access by reason of its attributions.
- d) To participate in actions of corruption, both active (offering or paying bribes) and passive (accepting the pressure resulting from extortion). In case of being threatened, bribed and / or blackmailed, you should inform your immediate boss immediately to solve in the best way the situation.
- e) Provide any gratification (economic benefit), to any foreign public official or in Customs, in order that it omits any of its official acts and thereby ensures or accelerates any operation that relates to the area in which operates.

4. VIOLATION

Company and Employees.

Failure to comply with this policy will result in:

- a) Civil and criminal penalties, including disqualification and imprisonment;
- b) All penalties and responsibilities, may be exercised under the laws of one or more than one jurisdiction;
- c) Damage to corporate image and reputation of the company, including any comments or information that comes out in the media;
- d) Internal disciplinary action, including dismissal.

5. APPLICABLE LAW

- a) Constitution of the Republic of Guatemala;
- b) Law against Corruption - Decree No. 31-2012.

6. CONCLUSIONS

Finally it is the direct responsibility of INTERMUD, S.A. to constantly strengthen this anti-corruption and anti-bribery policy, as well as its basic principles and guidelines, although local management will be under the supervision of the leaders, managers, administrators or those who are responsible for establishing and constantly monitor this policy compliance and reporting failures to the Management Department of the company.

This Anti-corruption and Anti-bribery Policy was issued in order to help you avoid risk areas, and enable you to recognize situations where you should consult the Legal Department about any behavior of our personnel; they can guide you to determine whether the behavior or project is actually lawful and help to identify ways to achieve the same results without the risk of violating the relevant international or local laws of Anti-Corruption.

INTERMUD, would appreciate you to confirm having received, understood and accepted these guidelines, providing a copy of this policy to its legal representative or the Human Resources Manager and then send a copy to the email johana@intermud.com with signature and seal of acceptance.

This signed and accepted policy is added as a permanent part in the records.

Name: _____

Position: _____

Date: _____

Seal: _____