



COMPLIANCE POLICY

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1) OBJECT OF THE POLICY

The Compliance Policy developed by Our Code of Conduct and Business Ethics and integrated as part of Parktel USA Compliance Management System, has the goal to define the general principles that inform the mentioned system, as well as the principal commitments that are assumed by the organization in terms of Compliance and must guide its behavior in all actionable scope and in the pursuance of its corporate objectives.

2) COMPLIANCE OBJECTIVES

Parktel USA, being an international company with various business activities throughout different regions and continuous relationship with third parties, makes the company being subject to different norms within different jurisdictions, and exposes the company to different kind of risks.

Parktel USA Code of Conduct and Business Ethics, backbone of the internal company normative establishes respect to the applicable laws, ethical values and human rights as baseline of what must be complied in its actions and activities.

Aligned to these objectives and to Parktel USA values the company has built the Compliance Management System.

3) APPLICATION SCOPE

This policy is framed and approved attending to what is stated in the company Code of Conduct and Business Ethics where Parktel USA, within others, assumes the next global compliance commitments:

- Comply with the applicable laws and obligations, national and international as well as with its internal normative.

- Make sure that the internal normative and all the actions of its management are based in ethical criteria in line with the principles and values of the company and its Code of Conduct and Business Ethics.

4) COMMITMENTS

Based on Parktel USA principles and values the next commitments have been established in terms of compliance:

- Guarantee Parktel USA actions aligned to its Code of Conduct and Business Ethics and the applicable legal legislation, to prevent incorrect conducts or contrary to the applicable laws, to the ethics, or the policies and internal norms, which can be committed by its directors, employees exercising its functions or third parties who act on behalf of the company.
- Promote a zero-tolerance philosophy upon behaviors that could potentially push to breaking the law, the internal norms and policies, especially those linked with criminal risks to which the company might be exposed within its activities scope.
- Encourage a compliance culture through its director's organization which must be example of leadership following the company Code of Conduct and Business Ethics and its norms, reacting quickly towards any non-compliance actions and following up on applicable disciplinary doings based on the valid labor norm.
- To protect Parktel USA reputation keeping its CEO, stockholders, associates, customers, providers and employees' trust.
- Establish and implement a Compliance Structure which will have as main function managing Parktel USA Compliance Program.
- Secure an independent and autonomous management of the Compliance Structure, as a segregated function to guarantee the exemption and impartiality in all its activities.
- Ensure full access to any information backing up investigations when the Compliance Structure considers necessary.
- Guarantee to all constituents of the "Compliance Structure" the confidentiality in its exercise function.
- Provide the Compliance Structure with all minimum required resources (material and human) towards the proper function performance.

- Procure a fair application, non-discriminatory and proportional to the sanctions aligned to what's established in the applicable law.
- Communicate to all employees their responsibilities to inform about any potential illegal or unethical action or activity they are made aware of.
- Implement adequate training formation programs for all employees aligned to the applicable laws with enough periodicity to guarantee the update of their knowledge in the field.
- Review and update the Compliance Structure on a continuous basis in order to secure its adequation aligned to applicable best practices.

5) MANAGEMENT MODEL

Parktel USA has established a Compliance Structure model based on the proper control principle, focused on the commitments compliance mentioned in this Policy which are summarized in the next elements:

- Parktel USA CEO through its Ethics Committee is responsible in what refers to the proper orientation, supervision and control of the Compliance strategy and policy of the Company, as well as the risks and the public information in the matter.
- Parktel USA CEO through its Ethics Committee is responsible, between other tasks, of the implantation and follow up of the Company internal control systems, as well as the supervision of its efficacy.
- The Compliance function which depends on the Audit and Compliance Commission which reports to the Compliance Officer of the Company, is responsible of watching the proper compliance of all commitments established under this Policy, develop the Compliance Structure Model and supervise the controls validity with special attention of the Criminal Compliance.
- The existence of a Code of Conduct and Business Ethics as well as it's normative body developed and conformed on policies, norms, procedures and controls which mark the behavior guidelines of its directors and employees.
- The existence of a Code of Conduct of vendors and service providers as cohesive element of Parktel USA values and principles.

- The existence of an Ethics Committee that, as independent organ, guarantees an adequate management of the communicated incidents through the proper “Whistleblowing” channels established in the organization.

6) APPROVAL

This Policy has been approved by Parktel USA CEO on “xx/xx/xxxx”.