

Code of Conduct and Business Ethics

Approved by Marcelo Ortolano Revised on May 2019

Introduction

Ethics represent an ideal about human behaviour that guides each person to know what is right and what should be done, while taking into consideration their relationship with their peers and pursuing the common good.

Ethics in the workplace serve as a guide not only at the moment of making decisions (what should be done), but also following process (how it should be done).

When performing their tasks, each person displays their own sets of values. Therefore, it is necessary to ponder about these in order to align their behaviour with our Company's values, our Code of Conduct, our strategic goals and internal regulations, as well as any applicable laws.

Biotec Inc. is a corporation committed to society. Therefore, our Management created this Code of Conduct as part of such commitment and from all our staff by complying with all its regulations.

I. Ethical goals

For all employees of our Company, regardless of the position or function they fulfill, our Code of Conduct pursues the following goals:

- Setting the grounds for the Organizations' sustainable and responsible growth.
- Constitute a formal and institutional reference for personal and professional.
- Reflecting ethical behavior based on corporate values.
- Reducing the subjectivities which lay in personal interpretations about moral and ethical principles.
- Establish the identity and image of Biotec Inc. in the relationship with all parties that manifest interest in our Organization.

II. Ethical principles

The foundation of this Code of Conduct rests on honesty, dignity, respect, loyalty, dedication, efficiency, transparency and awareness in order to guide our staff's performance.

In this way, our Organization aims to reach increasing levels of competency, profitability and social responsibility, by understanding the value of employees, health, safety, environment and contribution to the different business areas.

III. Our commitment to the clients

Biotec Inc. remains committed to:

Reaching agreements with our clients with integrity, transparency and regulatory compliance.

② The products which are dispatched and any associated services provided are in accordance with quality and safety requirements contractually agreed upon.

② All confidential information, the know-how and intellectual property are duly preserved and protected.

② Designing processes to prevent shortcomings that might affect the client and driving their constant improvement.

Biotec Inc. – Lavalle 1125, Autonomous City of Buenos Aires- http://www.biotecsa.com.ar

Ensuring control mechanisms to prevent at any stage of the supply chain child and forced labor, lack of freedom association, discrimination, harassment and abuse, excessive overtime or any circumstance in connection with wages, social charges and safe and healthy working conditions in accordance with the legal requirements.

IV. Our commitment to the Community

Our commitments include:

② Complying with all laws and regulations applicable to the relevant activities and their scope of application.

② Gestionar los negocios con énfasis en la sostenibilidad y en la protección del medio ambiente. Managing business focusing on sustainability and environmental conservation

V. Commitment to our Employees

Our Company is committed to:

- ② Guaranteeing regulatory compliance with the relevant laws relating to work, health and safety.
- Ensuring equal treatment for all employees, marked by respect and dignity.
- 2 Avoiding any type of discrimination.
- ② Encouraging a positive work environment, which should be pleasant, quiet and conflict-free.

VI. Behavior Guidelines

Our employees make a commitment to conduct themselves according to the following guidelines:

1. Workplace relationships

- 1.1 In the exercise of functions and positions
- a) We strive to achieve the best results for our Company while having an attitude characterized by respect, collaboration, and transparency towards those we interact with.
- b) We carry out our activities with enterprising spirit, overcoming challenges and setting our sights towards protecting our Company's interests.
- c) We perform tasks in accordance with our goals, without using our position, role within the company, activity, assets, position or influence in exchange of benefits for ourselves or others.
- d) We work without creating fictional situations that could provoke overdoing our professional performance.
- e) We work effectively by eliminating circumstances that may lead to making mistakes or causing delays at the moment of providing our services.
- f) We are respectful of the work done by each individual and any resulting information, knowledge, idea, etc. will be considered to be part of the Company's property.
- g) We safeguard all confidential information we have access to during the performance of our tasks in accordance with our Organization's regulations.

- h) We maintain confidentiality and a strong sense of discretion towards the developments made by our Company, both internally and externally.
- i) We ensure an efficient use of assets and information, as well as accurate and reliable reports and records which are in keeping with the legitimate purposes of our Organization, without altering or falsifying the content of files, information or data.
- j) We preserve our Company's assets, which include equipment, material, strategic and technological information, as well as facility operations.
- k) We encourage actions destined to improve internal communication, since it is considered to be a management tool.
- I) We focus on integration and developing teamwork skills.
- m) We are actively involved in achieving our strategic goals as an Organization.

1.2 Relationships among coworkers

- a) We are cordial, available and attentive towards every person we interact with. We are respectful of individual differences.
- b) We show loyalty towards the people who we perform our activities with.
- c) We recognize the merits of our peers' work.
- d) We do not harm the reputation of members of the Organization by making prejudgments, bearing false witness, baseless allegations, unjustified information or any other way.
- e) We do not obtain favors in exchange for personal commitments or obligations.
- f) We encourage generating ideas which are in line with the aims of the Organization, even though they might translate in significant changes in the status quo, and we put them into practice through formal means.
- g) We offer fair, confidential and transparent procedures that provide a fast and unbiased solution for difficulties that might arise as a result of workplace relationships.

1.3 Prejudgments

We promote the common good, without any prejudgments based on ethnicity, nationality, religion, gender, marital status, sexual orientation, union membership and political participation, age, set of beliefs, health or any other form of discrimination.

1.4 Workplace intimidation

- a) Dignity and being respectful to people are essential values. Therefore, we do not admit any type of pressures, threats or harassment.
- b) We do not expose ourselves to moral harassment (the action of belittling through words, gestures or attitudes, the self-esteem, confidence or image of employees) and we raise concerns about those who perform these actions by using internal reporting mechanisms.

c) We show respect the values of our Organization, without giving into pressures that promote the undue advantages.

1.5. Criticisim

We consider constructive feedback, when it is given genuinely and through the appropriate channels, to be a display of loyalty towards the Company and its members. We take as an opportunity to improve our processes and overall behaviour.

1.6. Learning from mistakes

- a) We learn from our own mistakes and the ones made by others, taking action over the cause and avoiding repeating them.
- b) We ask for help to other members of the Organization when we do not consider ourselves capable of handling certain tasks in order to have the resources to overcome such limitations.
- c) We weigh mistakes and good decisions, with our direct Management taking part, with the aim of constantly improving the quality of our work and sharing experiences with other members of the Company

1.7. Staff's commitment

Our Company considers personal effort to enhance our results to be of utmost importance and fosters performance-based recognition.

1.8. Personal and functional information

- a) The Company ensures that personal, administrative, medical and benefit information is available only for the employees themselves and the staff which is in charge of supervising, taking care and treating such information. Requesting, analyzing and transferring will only be performed by the person who is authorized to do so, in accordance to the exact terms of legislation and regulatory provisions by virtue of being presented as evidence in court, as instructed by the legal area.
- b) The Company guarantees employees that they will have access to such information.
- c) Biotec Inc. constantly updates personal information of the employees, who notifies the Company about any change.

1.09. Questions about rights and interests

The Company guarantees the employees their right to request and receive the relevant answers concerning their rights and interests.

1.10. Workplace environment

- a) The rights of each individual are considered legitimate and shown respect. In addition to this, they are coordinated with the common good and corporate values.
- b) The Company guarantees the employees an appropriate work environment, in pursuit of safety, hygiene, health and overall well-being.
- c) The Company will be able to cease activities if the lives and physical integrity of the members of the Organization were in serious impending danger. All necessary measures will

be taken for correction and the direct supervisor will be immediately informed about the event.

1.11. Information and communications technologies

- a) We encourage institutional communication through physical and electronic media which speed up information exchange, facilitate knowledge management and allow people to grow closer and take part in order to reach business goals and align our organizational policies.
- b) Media and communication channels provide us with immediacy, strategic content and the possibility of sharing opinions to optimize professional growth and task and process performance. For that reason we use these tools responsibly, preserving information confidentiality, without disclosing e-mails with pornographic, archaistic, illegal, political and similar contents.
- c) The company own the domain 'biotecsa.com.ar', which is used for all communications related to work and in this way avoiding resorting to personal accounts or public domains.
- d) E-mail accounts are not for personal use. Only our staff and Management can have access to them. Any communication done in search of our business' goals belong to the Company.
- e) Web access and navigation through devices or by users can be supervised and audited if necessary, in case they represent an obstacle to the proper working of the Company's IT infrastructure, for instance: downloading and installing programs without the authorization of the IT administrator, excessive broadband usage by the user or infected software.

Such navigation must be used for work purposes, avoiding access to website that contain obscene, pornographic, discriminatory material (in terms of race, age, disabilities, religion, nationality or sexual preferences), or related to illegal activities.

- f) Access to information from outside the Company: in case of receiving requests for granting access to information, it must be done so to the VPN access manager (without exemption). Any other tools will not be allowed since they do not ensure IT safety and a unique entry point.
- g) Employees must not reveal the Company's confidential information via email or Internet without previous authorization. This will be given through the IT department, which will apply the relevant protection mechanisms, such as encryption policies, platforms or media.
- h) The Company provides each employee the technological equipment and access to ICT to perform their activities. In doing this, the Company ensures the proper functioning and interoperability with information sources. The use of such tools can be audited by the IT administrator and supervised by the Company, while protecting the privacy of the users.
- i) Video surveillance systems are designed for the safety of people and assets, without disrespecting our staff's right to privacy.

2. Relationship with society

2.1 Terms of employment

- a) Our Company and our staff remain committed to respectfully abide by all applicable laws and regulations in any territory in which our activities take place.
- b) Our Company has adopted market practices and policies and is committed to information disclosure in a direct, truthful, sufficient and timely through reports and documents presented to any entity or way to make information public.

2.2 Customer service, suppliers and competitors

- a) Our treatment towards our clients, suppliers and competitors is kind and respectful while enhancing communicational process and personal relationships.
- b) We keep our clients and suppliers who expect a resolution informed about the actions in process.
- c) We provide all the necessary answers to suppliers, clients, service providers and others without deceptive maneuvers that cause delays or damages to the exercise of their rights.
- d) We negotiate when required by our tasks legally, with honesty and integrity. Any and every of bribery, corruption, extorsion or embezzlement remains banned.

2.3 Information for clients, suppliers, competitors and partners

- a) The individuals in charge are allowed to inform and/or send documents for external communication only when duly authorized and must always identify the authorship.
- b) We provide honest information, which remains at disposal equally for any person who is interested in it. In the case of being unable to answer a question, we inform the person who made the request about such situation.
- c) We resend public information about our Company equally to whoever manifests interest, based on informed procedures and analysis.
- d) Strategic and confidential information which has not been published by the Company must not be issued. It will only be published if the task requires to do so and when a non-disclosure agreement is reached.

2.4 Conflict of interests

- a) We are do not become involved in activities or situations in which personal interests interfere with the ones of Biotec Inc.
- b) If any conflict of interest related to commercial transactions and that we are aware of might arise, the client will be informed so that relevant measures can be taken.
- c) We perform our tasks on behalf of the Company, without providing technical assistance or replying to queries to current suppliers, clients, service providers of Biotec Inc., except whenever there is an explicit formal authorization from Management.
- d) We do not take on personal tasks during our shift since they might be at odds with the time and attention devoted to the Company.

- e) Our resources (such as information, technology and equipment are used for work purposes in accordance to the Company's goals and not suit particular interests.
- f) In the exercise of our professional activity, comments referring to our competitors or the quality and performance of their products. If a formal statement is required, it will first be approved by the Board of Directors.
- g) We communicate our direct supervisor or relevant Management any situations that constitutes a potential conflict of interest.

2.5 Personal advantages

- a) We do not accept invitations of personal nature for stays, trips or other attractions that might harm the image or interests of our Company.
- b) We do not let ourselves be influenced by personal relationships with clients, suppliers, partners or competitors at the moment of decision-making.
- c) We do not maintain private commercial relationships with clients, suppliers or competitors through which we could obtain personal advantages due to our charge or position.
- d) We do not represent partners, managers, consultant or intermediary of any entity that perform transactions or competes against our Company.
- e) We do not receive, request, suggest or induce any financial aid, rewards and awards, commissions, donations, gifts or benefits of any kind for personal use, our families or any other person while in the exercise of our professional activities. We do not influence any other member of our organization at the moment of making a decision.
- f) We do not use information we have access to as a result of our responsibilities or position to obtain personal advantages for relatives or third parties.
- g) Contact with former employees of Biotec Inc. through personal or commercial relationships must not influence any decision made by the company or lead to take advantage of insider trading.
- h) We do not make suggestions to clients, suppliers or partners that might lead to hire consulting firms or personnel for a particular interest.

Ethical behavior

- a) The guidelines in this Code of Conduct and Corporate Ethics allow us to improve the quality of our relationships to the exercise of citizenship and succeed in business.
- b) Any member of our staff who might have doubts regarding the extension or interpretation of regulations any must contact their superior directo immediately.

- c) If any attempt of bribery, irregularity or potential dishonest behavior that go against the interests of our Company and any failure to fulfill this Code, laws and regulations should happen, they must be informed to our Management along with the relevant information in order for the necessary measures to be taken.
- d) Our Company safeguards confidentiality by not allowing any retaliation for providing information and contributing to investigations conducted by official entities or any official authorized to do so.
- e) The responsibility for the effective implementation and compliance with this Code of Conduct is bestowed upon our Board of Directors.