

MANUAL RELATIONS WITH THE STATE AND PUBLIC ADMINISTRATION

TELESPAZIO ARGENTINA S.A.

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Abbreviations and Acronyms

Abbreviation or Acronym	Meaning
TPZ GROUP	Telespazio Group
LDO	Leonardo
R&P	Rules and Procedures
TPZ ARG	Telespazio Argentina S.A.

Clarifications

This document pursues the following objectives:

- a) Establish R&P that must be mandatorily adopted on any occasion that, any person belonging to or linked to TPZ ARG interacts with national state units -National States, infra-nationals- regional, provincial, district, municipal, local or similar state units-, supra national or international - communities, unions or leagues of Nations or groupings of National States - (hereinafter referred to as "Units") or with Ministries, Secretariats, Repartitions or in general any other estate or sub-administrative or public management belonging; linked or dependent on the Units (hereinafter referred to as "AP") even if it is autarchic or autonomous.
- b) Establish R&P that must be mandatorily adopted on any occasion that any person belonging to or linked to TPZ ARG interacts with mandataries, agents, employees or, in general, with any person acting on behalf of or representing the Units, or that develops or manages temporary or permanent tasks or activities for them (hereinafter "Public Officers", being the same "National Public Officers", "Foreign Public Officers" or "Officers of a Public International Organization")
- c) Assign responsibilities and establish internal control guidelines to ensure compliance with R&P.
- d) Establish internal mechanisms for reporting acts that could infringe the R&P.
- e) Establish internal investigation and sanction procedures before the alleged action contrary to R&P.
- f) Establish mechanisms for spontaneous self-report of illegal conduct linked to corruption and related crimes.

1 Introduction

This document is issued within the framework of the zero tolerance commitment with respect to corrupt behaviors and, even, in relation to those that without constituting a criminal, administrative, civil or derivative of any other sector of the legality block, are at odds with the values and behaviors considered ethically acceptable by TPZ ARG, by TPZ I and by LDO.

In particular, this document constitutes one of the mandatory components provided in the Integrity Program of TPZ ARG, in line with the provisions in this regard by Law 27.401 on Criminal Liability of Legal persons and its regulations.

The R&P established in this document are mandatory for the performance of managers, officers, dependents and any other internal personnel of TPZ ARG.

Likewise, compliance with the rules established by TPZ ARG for the relations with the State and the Public Administration would constitute an essential contractual obligation for third parties linked to TPZ ARG.

The scope is not only restricted to the Argentine Republic, but also reaches any other part of the world.

In this sense, TPZ ARG disapproves and sanctions all behaviors that are contrary to current legislation in any country, as well as those that, without being illegal or legally prohibited, collide with the values and behaviors considered ethically acceptable by TPZ ARG and LDO, even those acts that are executed under the belief that they are pursuing, in whole or in part, the interest of TPZ ARG, of the TPZ Group or LDO.

2 Normative and documentary sources.

The present R&P have been prepared considering the following regulations:

- a) Law 27,401 on Criminal Liability of Legal Persons and its regulations, Resolution 27/2018 of the Anti-Corruption Office under the Ministry of Justice and Human Rights of the Nation.
- b) Criminal Code: Articles 210-210 bis (Illicit Association), 256-259 bis (Bribery and Influence Traffic), 265 (Negotiations incompatible with the exercise of public functions), 266-268 (Illegal Exactions), 268 (1), (2) and (3) (Illicit enrichment of officials and employees), 300 bis (Financial Statements and Aggravated False Reports) and 303, 304 and 306 (laundering and cover-up of criminal assets and terrorist financing)
- c) Art. 13 Tax Criminal Regime, according to the drafting of Law 27,430
- d) TPZ ARG Integrity Program
- e) TPZ ARG Code of Ethics and Conduct.
- f) LDO Corporate Regulations that are applicable to the subject: in particular, the Anti-Corruption Code, the Code of Ethics, the Charter of Values and rules for relations with the State and Public Administration.

In all cases the enumeration of the preceding regulations, as well as the mention of any other indicated in this document, must be understood without prejudice to any other mandatory local or foreign or those that in the future complement, modify or result of application, even if the present version of this document has not been updated by then.

2.1 Recipients of this document

This document is addressed to any person who works within the internal scope of TPZ ARG, for example, merely by way of illustration and not in an exhaustive manner: directors,

managers, staff in relation to dependency hired for an indeterminate or determined time, including under contingent employment, members of comptroller bodies, etc. and also to any other third party that has links with TPZ ARG in the course of its business.

2.2 Required subjects

These R&P are mandatory for anyone who works within the internal scope of TPZ ARG, that interacts or manages in the name, representation or in favor of TPZ ARG in any way, either regularly or sporadically, for consideration or for free with Units or with National Public Officers, Foreigners or an International Public Organization.

In turn, the strict observance of the rules established by TPZ ARG for the relations with the State and the Public Administration will constitute an essential contractual obligation for third parties, such as, by way of example and not in an exhaustive manner: hired, suppliers in general, advisors, consultants, promoters, subjects with whom they have formalized or intend to formalize consortiums or alliances to participate in public or private contracts, etc. In this sense, it is established that in the contractual documents and/or purchase orders and/or similar that link TPZ ARG with said third parties, explicit mention should be made that they assume such obligation.

In accordance with the provisions of section 1) of this document and the provisions of section 3.3 of Annex I of Resolution 27/2018 of the Anti-Corruption Office under the Ministry of Justice and Human Rights of the Nation, which refers, to its time, to what is established in article 2 of the "United Nations Convention against Corruption" (New York 10/31/2003) and to 1.4 subsection a) of the "OECD Convention to Combat the Bribery of Foreigners Public Servants in International Commercial Transactions" (Paris 12/17/1997), approved by Laws 26.097 and 25.319, respectively, is understood as:

a) " National Public Officer " as:

- i. Any person who occupies a legislative, executive, administrative or judicial position in the Argentine Republic, belonging to a Unit corresponding to national, provincial or municipal jurisdiction, whether appointed or elected, on a permanent or temporary basis, remunerated or honorary, whatever his seniority in office
- ii. Any other person who performs a public function, even for a public body or for a public company, or who provides a public service in the Argentine Republic
- iii. Any other person defined as a "public officer" in accordance with the regulations of the Argentine Republic.

b) For "Foreign Public Officer" to:

- i. Any person who occupies a legislative, executive, administrative or judicial position of a foreign country, whether appointed or elected, on a permanent or temporary basis, remunerated or honorary and any person exercising a public function for a foreign country, including for a public agency or for a foreign public company.
- ii. Any other person defined as a "public officer" in accordance with the regulations of the Foreign State in question.

c) By "Public Officer of a Public International Organization" to an international public employee or of an International or Supra-National Public Organization or to any person that such organization or Organism has authorized to act, manage or administer on their behalf or in their favor.

2.3 Interactions to consider.

All the interactions that the persons belonging to or linked to TPZ ARG carry out with Public Units or Officers are included within the scope of these R&P. Notwithstanding the foregoing, especially for the purpose of risk assessment and prevention, control and measurement of improvements, those stipulated for purely exemplary and non-exhaustive nature in point 3.3 of Annex I of Resolution 27/2018 of the Anti-Corruption Office under the Ministry of Justice and Human Rights of the Nation, should be considered- hereinafter, "Sensitive Interactions" -, namely:

- a) Interactions related to purchases and contracts made with Public Officers that:
 - i. Have significant decision-making capacity in relation to the allocation of state resources
 - ii. Be responsible for the elaboration of investment projects, technical specifications, general, particular specifications or intervene in the definition of requirements of goods and services
 - iii. Are in charge of the publication of calls or the dissemination of bidding procedures.
 - iv. Are in charge of the organization, approval or formalization of the acts of reception and opening of offers
 - v. Integrate evaluation commissions or be responsible for the preparation of technical reports on the occasion of the evaluation of offers
 - vi. Have activities in charge of inspection of works, supervision or certification of progress of works or contracted works
 - vii. Integrate commissions receiving goods or services
 - viii. Be responsible for expressing conformity or certifying deliveries in relation to products or services purchased
 - ix. Are in charge of accounting or financial areas, especially those with the ability to authorize or release payments

- b) Interactions not directly related to purchases and contracts made with Public Officers that:
 - i. Are in charge or have decision-making powers regarding authorizations and permissions
 - ii. Are in charge or have decision-making powers or manage type of collection activity or tax control.
 - iii. Are in charge, have decision-making powers or perform inspection and superintendence activities
 - iv. Are in charge or have decision-making powers regarding regulations.

From the point of view of those who carry out such interactions on behalf, representation or in favor of TPZ ARG and always in accordance with the provisions that are merely exemplifying and not exhaustive in point 3.3 of Annex I of Resolution 27/2018 of the Anti-Corruption Office under the Ministry of Justice and Human Rights of the Nation, must be considered especially - for the purpose of evaluation and prevention of risks, control and measurement of improvements - those carried out by:

- i. Commercial, sales, purchasing and marketing sectors

- ii. Managers, promoters, legal and commercial representatives
- iii. Areas of institutional relations and relations with governments or official national, foreign or international organizations
- iv. Distributors and operational areas responsible for delivering goods or providing services to the public sector
- v. Technical representatives in works and operational areas responsible for the execution of contracted works
- vi. Financial areas responsible for approving or channeling payments.

3 Authorizations and delegations to engage in sensitive interactions

Sensitive Interactions with Public Units and Officers on behalf, on behalf or in favor of TPZ ARG, may only be initiated by persons who have the proper authorization to do so in accordance with the regulations established in this regard by TPZ ARG.

This regulation establishes different levels of authorization and powers of delegation in order to establish such sensitive interactions.

As a general rule, third parties, such as, by way of example and not in an exhaustive manner: hired, suppliers in general, advisors, consultants, promoters, subjects with whom they have formalized or intend to formalize consortia or alliances to participate in contracts public or private, cannot establish sensitive interactions in the name, representation, management or in favor of TPZ ARG, unless something different is expressly provided in the aforementioned internal regulations.

4 Traceability of sensitive interactions.

Sensitive interactions with Public Units and Officers must be traceable.

5 Prohibited conducts

Relationships or interactions, sensitive or not, that any person belonging to or linked to TPZ ARG, maintains with the Units and Public Officers must, without exception, be inspired by the principles of legality and strict adherence to regulations, transparency, truthfulness, ethical integrity and professionalism.

Therefore, conduct that violates the applicable regulations in the Argentine Republic or abroad and/or the LDO Anti-Corruption Code - which has been adopted by TPZ ARG - and/or the Code of Ethics and TPZ ARG behavior, are unacceptable without exception.

For purely exemplary and non-exhaustive purposes, the following behaviors are strictly prohibited, even if they do not constitute a crime or illicit act, or are carried out with the belief that they could derive benefits of any kind for TPZ ARG or LDO, or with the intention to obtain them and whatever result they may or may not achieve:

- Offer, promise, or directly or indirectly provide money, goods, services, favors, gifts, contributions, employment opportunities, etc., to the Units or Public Officers, to influence their decisions, obtain more favorable treatments or undue benefits or for any other purpose.

- Promise, pay or offer, directly and indirectly, money, goods, services, favors, gifts, contributions, etc., to Public Units or Officers in order to facilitate, accelerate or delay the normal performance of acts and procedures.
- Receive directly or indirectly from a third party money, goods, services, favors, etc., in order to assert real, lied or alleged influences with respect to Public Units or Officers.
- Provide, in any form, false or incomplete information or statements to the Public Units or Officers.
- Press or unduly request Public Units or Officers to perform or not to perform certain actions.
- Allow any human or legal person that is not duly and formally authorized to do so, to act as representative, agent or business manager of TPZ ARG.
- Act on behalf of or in the name of TPZ ARG or LDO in relation to Public Units or Officers in any case in which the related party has conflicts of interest with TPZ ARG or LDO.
- Give, promise or grant any form of homage, gift, entertainment, hospitality or similar, either directly or indirectly to Public Units or Officers so that in real or potential way the decisions of the Public Units or Officers can be influenced. The granting of symbolic attentions and without appreciable economic value in order to satisfy merely protocol or courtesy purposes, is exclusively deferred to the president of the board of TPZ ARG, who only exceptionally may expressly delegate material delivery to a third party. Specific rules will be established in writing for the granting of these tributes and courtesies, which will be in line with the provisions in this regard by the applicable regulations and the LDO directives in this regard.
- Promote sponsorships and/or advertising initiatives and/or of any kind for the benefit of Public Units or Officers that can lead in real or potential way to obtain an undue advantage for TPZ ARG. In the case of donations and contributions to associations and institutions, they are prohibited from being made in cash.
- Negotiate with Public Units or Officers in sanction proceedings against TPZ ARG, beyond the procedures and modalities expressly permitted by the regulations.
- Improperly influence bidding processes or public contracts.
- Convert, transfer, administer, sell, encumber, conceal or otherwise put into circulation in the market goods received directly or indirectly from Public Units or Officers from illegal activities, with the possible consequence that the origin of the originating goods or surrogates acquire the appearance of a lawful origin.
- Falsify or omit data or information in States or Accounting or Tax Reports, in corporate documents or in instruments addressed to Public Units or Officers with the purpose of hiding or covering up any of the prohibited conduct or its effects.
- Simulate fiscal gains or losses with the purpose of hiding or covering up any of the prohibited behaviors or their effects.

In all cases, it should be understood that the prohibited conduct with respect to Public Officers, are also such indirectly those referred to:

- a) Human persons with whom they were related by kinship within the fourth degree of consanguinity and second degree of affinity or with whom they maintained ostensible affective or friendly relations.
- b) Legal persons of public or private law, with or without profit, in which they maintain economic or political control or an influence that could determine their actions decisively.

- c) Human or legal persons with whom these were linked by formal or informal corporate or associative relationships, or by representation, mandate, business management or similar relationships.

In all cases, it should be understood that the prohibited conduct with respect to Units is also indirectly related to legal persons of public or private law, with or without profit, in which said Units had economic or political control or such an influence that could determine his work decisively.

6 Consultation Procedure

In the case that any person belonging to or linked to TPZ ARG to which the present R&P are applicable maintains doubts about whether a conduct is admissible or prohibited, they should submit the matter to consultation with the authorities of TPZ ARG. In turn, must refrain from executing such conduct until received tax clarifications and instructions as to whether it is admissible by a competent company officer.

In any case, if it is not possible to arrive with total degree of certainty to the conclusion that the analyzed behavior is admissible, the abstention of its execution corresponds.

The consultation procedure should be traceable and, if necessary, legal and/or technical opinions will be required in order to clarify the issue.

7 Denunciation of allegedly prohibited conducts

Any person belonging to or linked to TPZ ARG to which the present R&P applicable, to the alleged commission of a prohibited conduct or of the reasonable probability that it is committed, must give immediate and circumstantial notice of it.

For such purposes, the complainant shall have at least the following means:

1. Internal reporting channels established in accordance with the Whistleblowing procedures of TPZ ARG. For this purpose, complaints may be sent through the following email address: denuncias.ar@telespazio.com and/or any other means established in the following link: <https://www.telespazio.com/en/argentina> or in which in the future replace it.
2. Live knowledge of the President of the Board of Directors or of any member of the Board of Directors of TPZ ARG
3. Reporting to TPZ hierarchical officials
4. Report to those who have been designated with internal operational responsibility for the purposes of the TPZ ARG Integrity Program,
5. Live knowledge of the Monitoring Body established in the Integrity Program of TPZ ARG.

Whenever the complainant expressly requires it, or if he is silent about it, his anonymity must be strictly protected, without prejudice to the responsibilities that may fit him in cases of false, malicious or reckless complaints. In this regard, all complainants should be informed that in the case that the complaint has any such qualities, their identity will be disclosed to the complainant, even if the complainant had requested the preservation of his anonymity.

The members of the Board of Directors of TPZ ARG, the Monitoring Body established in the Integrity Program, who have been designated with internal operational responsibility for the purposes of said Program and the hierarchical officers responsible for company units are required to report situations that involve the alleged commission of prohibited conduct or the reasonable likelihood of it being committed.

TPZ has adopted the "Whistleblowing Management Guidelines" document approved by the LDO Group.

8 Investigation and sanctioning procedure

Regardless of the judicial or administrative procedures that could be substantiated by the competent state authorities, in all cases in which complaints are received, an internal summary procedure will be opened in order to investigate the allegations and, if applicable, apply sanctions.

All procedures will be traceable.

The investigation and sanctioning procedure will be substantiated by ensuring impartiality and objectivity, due respect for the right of defense for the accused and the anonymity of the complainant, unless he prefers to reveal his identity.

9 Specific rules and procedures

In the case that the Board of Directors of TPZ ARG deems it necessary or convenient, it may provide for the adoption of specific rules or procedures related to certain interactions with Public Units or Officers, considering the nature, particularities or risks inherent therein.

10 Supplementary Provisions

In everything that has not been expressly established in the present R&P, the provisions of the TPZ ARG Code of Ethics and Conduct will be applied in a supplementary manner.

END OF THE DOCUMENT