

	Neology Latam	
	Neology Latam’s Environmental, Social Responsibility and Corporate Governance (ESG) Objectives and Policies.	Valid since 01 January 2023

Neology Latam’s Environmental, Social Responsibility and Corporate Governance (ESG) Objectives and Policies.

Corporate Governance

Information Technology Services Management Policy

At NEOLOGY, we develop, integrate, and commercialize products and solutions for automatic identification through radio frequency (RFID) and visual (ALPR) technologies. We offer mobility products, solutions, and services.

Mobility solutions include the electronic registration and automatic identification of vehicles, service, installation, and sale of RFID and ALPR equipment, toll and electronic tolling equipment, software solutions, automatic license plate recognition systems, vehicle classification, and their characteristics using artificial intelligence applications, among others. These solutions are mainly targeted at the vehicle sector. We are always committed to satisfying our customers by meeting the requirements and needs set forth, continually improving our services, under an IT Service Management System based on the ISO 20000-1:2018 Standard.

Information Security Management System Policy

At NEOLOGY, we develop, integrate, and commercialize products and solutions for automatic identification through radio frequency (RFID) and visual (ALPR) technologies. We offer mobility products, solutions, and services through efficient processes that form an ISMS, which is periodically reviewed and updated for continuous improvement. This ensures the availability, integrity, and confidentiality of information in compliance with the ISO 27001:2013 Standard and applicable legal requirements.

Quality Management Policy

At NEOLOGY, we develop, integrate, and commercialize products for the smart cities, safe communities, and travel experience markets. We offer products, solutions, and services such as: Automatic Identification and/or Electronic Registration of Vehicles, service, installation, and sale of RFID equipment, toll and electronic tolling equipment, software solutions, automatic license plate recognition systems, vehicle classification, and their characteristics using artificial intelligence applications, among others, mainly aimed at the mobility sector.

We are committed to satisfying our customers by meeting the established requirements and needs under a Quality Management System based on the ISO 9001:2015 Standard, complying with quality objectives, and continuously improving the established processes.

Information Usage and Management

NEOLOGY values, respects, and protects the information of employees and/or anyone related to the company, as any damage caused could expose the organization to irreparable harm. Therefore, upon joining, the employee must read, understand, and sign the Information Security Policies and the Confidentiality Notice, which will be provided through Human Talent Management.

The disclosure of information, such as business plans, commercial activity proposals, technological information, customer records, salary information, financial statements, internal procedures, and even verbally communicated information, is prohibited unless authorized by the General Management or indicated by the Federal Law on Personal Data Protection. NEOLOGY reserves the right to the information, and any disclosure outside the organization’s interests will result in sanctions as applicable by law.

Anti-Corruption and Bribery Policy

NEOLOGY emphasizes honesty and has zero tolerance for corruption and/or bribery. Participation in such acts is strictly prohibited for employees or third parties acting on behalf of NEOLOGY.

Employees are prohibited from offering or accepting direct or indirect gratuities from public officials, private entities, individuals, or any family member with the intent of obtaining or giving an improper advantage.

Employees must not accept or give gifts exceeding the value of \$100.00 USD to avoid considering the act as bribery or corruption. If such an event occurs, the gift must be reported and delivered to General Management and Human Talent Management.

Any employee who does not comply with this policy will face the termination of their Individual Employment Contract with NEOLOGY.

Anti-Money Laundering Policy

The Financial Action Task Force (FATF) is an intergovernmental organization whose objectives are to set standards and promote effective implementation of legal, regulatory, and operational measures to combat money laundering, terrorist financing, the proliferation of weapons of mass destruction, and other threats related to the integrity of the international financial system. NEOLOGY has zero tolerance for money laundering acts, and participation in such activities is strictly prohibited for employees or third parties acting on behalf of the organization.

Employees are obligated to report any discoveries of money laundering to General Management and/or Human Talent Management if they identify illicit activities involving NEOLOGY.

This policy meets the requirements of the Federal Law for the Prevention and Identification of Operations with Illicit Resources. Any employee who fails to comply with this policy or fails to report money laundering discoveries will face the termination of their Individual Employment Contract with NEOLOGY.

Anti-Terrorism Policy

Terrorism is a method, not a single group or social phenomenon. Paul Pillar states, "Terrorism is premeditated violence, politically motivated, perpetrated against non-combatant targets by subnational groups or clandestine agents, usually intended to intimidate the population."

Terrorism refers to:

- Domination by fear.
- A series of violent acts executed to spread fear.
- Criminal actions by organized groups aiming to create social alarm for political purposes.

Any employee participating in an act referenced as terrorism (for political or personal reasons) will face the termination of their Individual Employment Contract with NEOLOGY, and charges will be filed with the relevant authorities in accordance with the Federal Penal Code, Articles 139, 139 Bis, and 139 Ter.

Conflict of Interest Policy

A direct conflict of interest is defined as helping or favoring a known person, whether family or friend, and indirect conflict of interest is giving priority to a third party in exchange for something.

At NEOLOGY, we do not allow decision-making to be influenced by the personal interests of an employee, whether it is selecting a supplier, job vacancy, or making an internal or external decision that affects a group of people by favoring one individual specifically because of their relationship with the employee.

NEOLOGY does not tolerate this behavior, and employees acting or making decisions based on personal interest will face the termination of their Individual Employment Contract with NEOLOGY.

Fraud Policy

Fraud is an illegal act carried out by one or more individuals responsible for monitoring public or private contracts to gain advantage at the expense of another's interests.

NEOLOGY has several procedures and policies in place to prevent fraud, whether internal (committed by an employee) or external (committed by an outside entity).

NEOLOGY has zero tolerance for fraud. If fraud is discovered involving an employee, regardless of the amount of money involved, the consequence will be the termination of their Individual Employment Contract with NEOLOGY.

If the fraud amount is not returned, and the employee refuses to provide information about the case they are involved in, NEOLOGY will take the matter to the relevant legal authorities to conduct an investigation and determine the employee's legal status. This applies to cases where external entities are involved as well.

Personal Information/Privacy Policy of the Contributor

General Description of the Privacy Policy. The company collects personal information for various reasons related to employment and business operations. This section provides a general description of the types of information collected, how it is processed, and your rights concerning that information. The information provided here is a relevant part of the company's Employee Privacy Policy. It describes in more detail the information, obligations, and rights concerning personal information as laid out in that policy. By acknowledging this manual, you also acknowledge your acceptance and understanding of the Employee Privacy Policy.

Personal information. Personal information, also known as personally identifiable information or personal data, for this policy, refers to any information that:

- Directly and clearly identifies a person.
- Can be used in combination with other information to identify a person.

Personal information does not include data that is anonymous or anonymized by removing identifiers.

Examples of personal information include: name, photograph, employee identification number (if applicable), personal home address, personal phone number, personal email address, family members' names, and the person's date of birth.

Confidential personal information is a subset of information that includes the following examples: race and ethnicity, sexual orientation, political/religious beliefs, social security or other taxpayer/government-issued numbers, financial information, medical/health information, criminal records, and in some regions, such as the European Union, union membership.

Collection, Processing, and Transmission. Although the company is headquartered in the US, it operates in various locations around the world. To facilitate global operations, it may be necessary to use, access, transfer, and process your personal information in regions other than where you are employed, including countries with different personal information protection requirements.

In some cases, your personal information may be provided to third parties for employment and benefits administration, to process your employment application, to use services provided to employees by the company, or for other related purposes. Such third-party services may be governed by separate terms of use and privacy policies outside the company's control and are not subject to this Employee Privacy Policy. Contact these third parties directly if you have questions about their privacy practices or if you wish to request the deletion of your personal information.

The information collected by the company, according to applicable laws, may include but is not limited to: name, gender, home address, phone number, date of birth, marital status, employee identification number, emergency contacts, residency and work permit status, military status, nationality, passport information, social security or other taxpayer/government-issued numbers, payroll information, bank account details, salary and benefits information, retirement account details, sick pay, paid time off (PTO), insurance information, and other benefits (including gender, age, nationality, and passport information for any spouse, minor children, or other dependents and eligible beneficiaries), telephone interview and assessment information (if applicable), employment history, technical skills, educational background, certifications, professional records, language abilities, and training records, actions related to collaborators, emergency contact information, health, physiological details, work attendance, disciplinary actions. For a full list of the types of information the company may collect, refer to the Employee Privacy Policy.

Collection, Use, and Transmission. In general, we collect personal information directly from you when you provide personal information, such as during the onboarding process, benefit enrollment, or direct deposit setup, or when you request services. However, in some cases, we may collect information through inferences based on other information you provide, through your interactions with us or others, or from third parties. When we collect your personal information from

third parties, it is because you have given us express permission to do so, your permission is implied by your actions (for example, by using a third-party employee service made available to you by us), or you provided explicit or implied permission to a third party to share the personal information with us.

We reserve the right to monitor the use of our workplaces, parking lots, equipment, devices, computers, telephones, networks, applications, software, and other similar assets and resources. If such monitoring occurs, it may result in the collection of personal information about you. This monitoring, when permitted or required by applicable laws or regulatory requirements, may include using closed-circuit television cameras (CCTV) within and around our facilities. Therefore, we may collect personal information about you without your knowledge or consent, for example, by using video surveillance in the workplace.

The company may use your personal information for various purposes, including managing all aspects of an employee's employment relationship, such as establishing, maintaining, and terminating employment relationships, and fulfilling any obligations the company may have.

We may share or sell your information to third parties in some cases, such as to provide the services you have requested, or otherwise at your request or with your consent, or as part of a transaction involving certain company assets. In each case, the company will share or transfer the necessary information to fulfill the purpose and take reasonable steps to secure and safeguard the information in compliance with applicable laws. For complete information on how the company collects, uses, processes, and transfers your information, refer to the Employee Privacy Policy.

Access, Correction, Retention, Deletion Requests. You may request to view the personal information we hold about you. If you would like to review, verify, or correct your personal information, please submit a request via email to Human Talent Management. Your right to access the personal information we hold about you is not absolute and may be limited by applicable law or regulatory requirements.

The company will make reasonable efforts to ensure that the personal information in our possession is accurate, current, and complete. However, you may request a review or correction of information you believe to be incorrect or erroneous by contacting Human Talent Management. The company may choose not to change any personal information it considers accurate. If it is in the possession of third parties, the company will make reasonable efforts to review any erroneous personal information.

Submit requests to delete your personal information via email to Human Talent Management. The information you provided to third parties may or may not be deleted. If you require a third party to delete some of your personal information, you must contact them directly to request the deletion.

In certain circumstances, you may have given express consent regarding the provision of certain personal information to us or for a specific use of your personal information. In certain countries, you may have the right to withdraw that consent.

For more information about your personal information, how it is collected, used, processed, and transferred, requests related to your personal information, concerns about the company's policy and handling of disputes related to your personal information, and the rights you have under applicable privacy laws, refer to the company's Employee Privacy Policy.

Social

Diversity and Inclusion

At Neology, diversity and inclusion are embedded in our core values and are key drivers of our success. Our team is composed of individuals from a wide range of backgrounds and experiences, which enhances our innovation and allows us to better understand our customers and the communities in which we live and work.

Diversity is expressed in many different ways, such as race, gender, pregnancy, age, military or veteran status, ancestry, color, religion, creed, mental or physical disability, marital status, medical condition, genetic information, national origin, gender identity, gender expression, sexual orientation, citizenship status, or any characteristic protected by applicable state, federal, or local laws. These are differences we embrace at Neology.

The company promotes an inclusive culture, creating a dynamic, active, and intentional environment that enhances individual and organizational performance and provides opportunities for all employees to reach their full potential.

We believe in fostering an environment free of discrimination and harassment and ensuring equal opportunity in all areas of employment, including recruitment, hiring, training, and promotion. We strive to ensure that all employment practices

are objective and free from bias, based solely on job criteria and individual merits, and aligned with the company's broader goals and objectives. We believe that differences such as gender, culture, generation, race, and sexual orientation enhance our ability to succeed, both internally and externally.

To leverage diversity and inclusion as a competitive advantage, the company's policy is to:

- Ensure that all individuals are treated equally in all aspects of employment policies and practices.
- Foster an open work environment, free of discrimination and harassment.
- Employ a workforce that reflects the diverse communities in which we operate.
- Raise employee awareness through the design and implementation of diversity initiatives.
- Act as an employer of choice, influencing our industry peers and business partners to adopt similar diversity standards and goals.

Equal Employment Opportunity

The company is an equal opportunity employer. All employees and candidates are evaluated based on their qualifications and job competencies. The company does not tolerate discrimination based on race, color, religion, national origin, gender identity or expression, genetic information, ancestry, pregnancy, age, marital status, sexual orientation, medical condition, physical or mental disability, uniformed service member status, or any other classification protected by law.

Against Harassment, Discrimination, and Retaliation

The company expects all employees to act professionally and respectfully towards their colleagues.

According to the Federal Law for the Prevention and Elimination of Discrimination, discrimination is understood as any distinction, exclusion, restriction, or preference that, by action or omission, intentionally or unintentionally, is not objective, rational, or proportional and aims to or results in hindering, restricting, preventing, impairing, or nullifying the recognition, enjoyment, or exercise of human rights and freedoms.

The company prohibits any form of discrimination and harassment in the workplace, including sexual harassment and other forms of harassment such as pregnancy, childbirth, or related medical conditions, race, religious creed, color, gender, national origin, ancestry, physical or mental disability, medical condition, marital status, sexual orientation, age, gender identity or expression, genetic information, military service, or any other basis protected by federal, state, or local law, ordinance, or regulation. All such harassment is illegal.

Our anti-harassment policy applies to all individuals involved in our operations and prohibits unlawful harassment by any employee of our organization, including directors and area managers, as well as by anyone doing business with or for our company, including consultants, vendors, and volunteers.

Sexual Harassment is defined as any physical or verbal behavior of a sexual nature intended to or resulting in the violation of a person's dignity, particularly when creating an intimidating, degrading, or offensive work environment, in accordance with ILO 2014 (International Labour Organization).

Workplace Harassment:

Examples of Sexual Harassment include a wide range of behaviors, including harassment based on sex, gender, gender identity or expression, and sexual orientation. For illustration purposes only, and not as a limitation, some examples of illegal and unacceptable behavior include:

- Unwanted sexual advances.
- Requests for sexual favors when submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment or employment opportunities.
- When submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting the individual.
- When such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.
- Offering an employment benefit (such as a raise, promotion, or career advancement) in exchange for sexual

favors, or threatening an employment detriment (such as termination or demotion) if an employee does not engage in sexual activities.

- Visual conduct, such as leering, making sexual gestures, and displaying or posting sexually suggestive objects, pictures, cartoons, or posters.
- Verbal sexual advances, propositions, requests, or comments.
- Sending or posting sexually-related messages, videos, or messages via text, instant messaging, or social media.
- Verbal abuse of a sexual nature, graphic verbal comments about a person's body, sexually degrading words used to describe a person, and suggestive or obscene letters, notes, or invitations.
- Physical conduct, such as touching, groping, assaulting, or impeding movement.
- Verbal or physical abuse based on gender, gender identity, or gender expression.
- Verbal abuse regarding a person's characteristics, such as voice tone, facial hair, or body size/shape, including comments about a man being too feminine or a woman being too masculine.

Other examples of prohibited harassment: In addition to the behavior mentioned above, the company strictly prohibits harassment related to any of the protected characteristics mentioned above. For illustration purposes only, and not as a limitation, such prohibited harassment includes:

- Racial or ethnic slurs and other offensive comments.
- Jokes, whether written, verbal, or electronic.
- Threats, intimidation, and other abusive behavior.
- Verbal, graphic, or physical conduct.
- Sending or posting harassing messages, videos, or messages via text, instant messaging, or social media.
- Other harassing behavior based on one or more of the protected categories identified in this policy.

Retaliation Prohibition:

The company is committed to prohibiting retaliation against those who, themselves or their family members, report, oppose, or participate in an investigation of alleged illegal harassment, discrimination, or other workplace wrongdoing.

Complaint Procedure for Harassment and/or Discrimination Claims

If you feel that you are being or have been harassed, discriminated against, or retaliated against in violation of this policy, or if you observe such behavior by another employee, immediate supervisor, manager, or third party doing business with the company, you must immediately contact Human Talent Management.

Employees can also use Neology's ethics hotline to report incidents of discriminatory, harassing, or retaliatory behavior in the workplace or any other violation of company policies.

Accommodation Requests

The company is committed to complying with all laws that protect qualified individuals with disabilities and the religious beliefs and practices of employees. This policy extends to all aspects of our employment practices, including, but not limited to, recruitment, hiring, discipline, termination, promotions, transfers, compensation, benefits, training, leave, and other terms and conditions of employment. The company will provide reasonable accommodations for any known physical or mental disability of a qualified individual and/or the religious beliefs and practices of employees, provided that the requested accommodation does not create an undue hardship for the company and/or does not pose a direct threat to the health or safety of others in the workplace and/or the individual.

Environmental

Environmental Management Policy

Neology has established and implemented an environmental management system based on the requirements of the ISO 14001:2015 standard. At NEOLOGY, we develop, integrate, and commercialize products for the smart cities, safe communities, and travel experience markets. We offer products, solutions, and services such as: Automatic Identification and/or Electronic Registration of Vehicles, service, installation, and sale of RFID equipment, toll and electronic tolling equipment, software solutions, automatic license plate recognition systems, vehicle classification, and their characteristics using artificial intelligence applications, among others, mainly aimed at the mobility sector. Our environmental policy defines our commitment to conducting our activities within the parameters of sustainable development, maintaining control and management of the environmental aspects produced, especially the most significant ones that may occur in our offices during product design, services, production, logistics, and procurement.

To meet these commitments, Neology has established the following fundamental principles:

- Ensure the protection of the environment by working in a respectful manner, preventing pollution, and minimizing the environmental effects resulting from our office activities.
- Promote research and development of technologies that contribute to climate change mitigation and enable sustainable use of natural resources.
- Ensure compliance with applicable environmental legal requirements in the countries where we operate and the voluntary commitments assumed by the organization.
- Establish indicators and reporting systems that provide objective information about the environmental impact of our offices.
- Maintain awareness and consciousness among all our employees, promoting environmental training and encouraging active participation, including improvement suggestions proposed by them to foster continuous improvement.
- Integrate the environmental management system into the integral management of the company.
- Set a goal to reduce greenhouse gas emissions to minimize our environmental footprint.
- Conduct an annual periodic assessment of the environmental aspects derived from our activities, to maintain and continuously improve the environmental management system.
- Respect nature and biodiversity in the environments surrounding Neology's offices. Likewise, the identification and evaluation of environmental aspects allow the company to maintain environmental management based on three pillars:
- Precaution: Avoid actions that may pose an environmental risk, regardless of the severity of potential consequences.
- Prevention: Avoid environmental consequences associated with a particular action.
- Correction: Anticipate ways to counteract environmental consequences in case a risk materializes.

All of us at Neology are committed to practicing these principles. Neology promotes environmental improvement and allocates the necessary resources to ensure the successful implementation of this environmental policy.