



Compliance  
**Integrity Program**

# In TGN



We maintain the highest standards of ethics and professional conduct in the way we conduct business.



We firmly believe that acting with integrity and transparency guarantees a successful and sustained relationship with our stakeholders.



We expect integrity throughout the organization - at all levels. The culture of ethics and transparency is a fundamental pillar in the development of our activities.



# Integrity and Transparency Program

We designed TGN's Integrity Program based on risks, in order to contribute to strengthening the company's anti-corruption culture and to accompany our business.

We work to generate actions, mechanisms and internal procedures to promote integrity, supervision and control aimed at preventing, detecting and correcting irregularities and illegal acts.





## Clear Policies

We have clear and defined policies that guide the actions of our employees and executives regarding anti-corruption issues, such as the Code of Ethics and the Anti-Corruption Policy; together with processes for hiring third-party intermediaries and business partners for participation in public biddings, for dealing with conflicts of interest, gifts, lodging and travel expenses, and also with procedures for donations, memberships and sponsorships, among others.

We ensure that we periodically communicate to employees, at all levels of the organization, what is expected of them and train them to comply with the procedures and controls.



## Our levels of **action:**



PREVENT



DETECT



RESPOND



# Work Blocks

Based and focused on **risks**



- 1 Leadership
- 2 Risk Evaluation
- 3 Norms and Controls
- 4 Communication and Training
- 5 Monitoring and Response

**Sustainability, Efficiency and Consistency**



# Structure

Since 2018, we have had a Compliance Office, which is an autonomous body with sufficient resources together with the power to report directly to the Audit Committee or the Supervisory Committee, as the case may be.



## Compliance Office

Led by a Compliance Officer appointed by the company's Board of Directors.



## Compliance Officer

Reports to the Board of Directors through the Audit Committee, and hierarchically to the Chief Executive Officer.



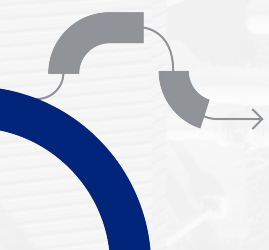
## Board of Directors

Power to approve all policies and procedures related to the Integrity Program.



## Chief Executive Officer

Promotes the support of all employees and executives at the highest levels of the organization regarding internal control measures as well as their ethical commitment to the fight against corruption; understanding that they are fundamental factors.





# Responsibilities of the **Compliance** **Office**

- Design, implementation, **control and monitoring** of the **Integrity Program**.
- Provide **guidelines and advice** to all employees and executives, especially in difficult situations or when in **doubt about ethical behavior**.
- Conduct **compliance risk evaluation** in all management areas of the company.
- Appropriately and consistently **remedy and sanction** non-compliance with our policies.
- Periodically review the Program in order to improve it and adapt it to our activity as well as to the development and **evolution of the rules and recommendations on the subject**.
- Offer confidential lines of communication for those who may feel under pressure or receive unethical instructions from their superiors, or wish to report a breach of law or procedures within the company. **Provide the possibility of reporting such situations anonymously**, free of charge, around the clock and with the guarantee of not being subject to any type of retaliation.



# Zero tolerance regarding corruption

We reaffirm **our commitment to zero tolerance of corruption, and to the promotion of a culture of transparency** based on ethical behavior and compliance with the laws which are essential conditions for the long-term sustainability of our company, and allow us to continue to guarantee excellent service to our customers.

## Confidential reporting channels



### Web form

available at [www.tgn.com.ar](http://www.tgn.com.ar)



### E-mail address

[linea.transparente@tgn.com.ar](mailto:linea.transparente@tgn.com.ar)



### Línea Transparente 0800-122-8464.

24 hours a day, every day, free of charge.



Direct superior



Any company leader



Compliance Officer

**More information**  
[www.tgn.com.ar](http://www.tgn.com.ar)



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