

## Code of Corporate

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## I. Introduction

Gold Data USA Inc. (“Gold Data” or the “Company”) solemnly affirms its unwavering commitment to conducting business with the utmost integrity, ethical probity, and unassailable adherence to all applicable legal and regulatory frameworks. At the heart of our corporate philosophy lies an immutable dedication to the highest standards of professional conduct, ensuring that every facet of our operations is governed by principles of transparency, accountability, and ethical fortitude.

This Code of Corporate Conduct (the “Code”) is the cornerstone of our institutional integrity, enshrining the fundamental principles that govern our actions, decisions, and interactions with stakeholders across the global business landscape. It delineates the ethical obligations and legal responsibilities that underpin our corporate existence, serving as an unequivocal declaration of our steadfast resolve to conduct business with honor, diligence, and respect for the rule of law.

Gold Data’s reputation is built upon the trust of its partners, clients, employees, and the broader global community. Accordingly, this Code mandates that every officer, director, employee, agent, contractor, and third party engaged in business with or on behalf of Gold Data familiarize themselves with, internalize, and rigorously adhere to its provisions. Ignorance of these standards shall not be an excuse, nor shall deviation from them be tolerated. Each individual operating under the aegis of Gold Data bears a personal and professional obligation to uphold these principles, ensuring that our collective enterprise remains a paragon of corporate rectitude.

Let this Code serve not merely as a guideline but as an unequivocal directive, reinforcing that integrity is not an aspiration but a mandate. It is the duty of all within the Gold Data sphere to embody these principles, safeguard our corporate legacy, and contribute to the enduring ethical excellence that defines our institution.

## II. Compliance with Laws and Regulations

Gold Data USA Inc. (“Gold Data” or the “Company”) operates with an unyielding commitment to compliance, ensuring that its business activities, as well as those of its employees, contractors, agents, and affiliates, adhere strictly to all applicable laws, regulations, and industry standards in every jurisdiction where it conducts business. This commitment is non-negotiable and serves as the foundation of Gold Data’s corporate governance, risk management, and operational integrity. Gold Data’s compliance obligations extend across a comprehensive spectrum of legal and regulatory domains, necessitating strict adherence to the following:

1. **Non-Discrimination, Diversity, And Inclusion:** Gold Data USA Inc. (“Gold Data” or the “Company”) firmly upholds the principles of equality, diversity, and inclusion, ensuring that all employees, contractors, business partners, and stakeholders are treated with dignity, respect, and fairness. The Company categorically prohibits any form of discrimination, harassment, or bias in any aspect of its business operations.
  - a. **Equal Employment Opportunity:** Gold Data is committed to providing equal employment opportunities (EEO) to all individuals, regardless of

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race, ethnicity, color, national origin, religion, sex, gender identity or expression, sexual orientation, age, disability, pregnancy, marital status, veteran status, genetic information, or any other characteristic protected under applicable laws. All employment decisions, including recruitment, hiring, promotion, compensation, benefits, training, and termination, shall be made solely on the basis of merit, qualifications, and business needs. Gold Data shall maintain a workplace free from unlawful discrimination, ensuring that every individual has an equal opportunity to thrive. Employees, contractors, and business partners must strictly comply with anti-discrimination and equal opportunity laws, including but not limited to the U.S. Civil Rights Act, the Americans with Disabilities Act (ADA), and international human rights conventions.

- b. Anti-Harassment and Safe Workplace Policy: Gold Data maintains a zero-tolerance policy for any form of workplace harassment, including but not limited to:
  - i. Sexual harassment, including unwelcome advances, inappropriate remarks, or any conduct of a sexual nature that creates a hostile work environment.
  - ii. Verbal, physical, or psychological abuse, including bullying, intimidation, or threats.
  - iii. Discriminatory harassment, including offensive remarks, gestures, or conduct based on a person's legally protected status.
  - iv. Any employee or third party who experiences or witnesses harassment is strongly encouraged to report such conduct immediately to Human Resources or the Legal and Compliance Department at [legal@golddata.net](mailto:legal@golddata.net). All complaints will be treated with the utmost confidentiality, and Gold Data strictly prohibits retaliation against individuals who report misconduct in good faith.
- c. Workplace Accessibility and Accommodations: Gold Data is committed to ensuring that its workplace, facilities, and business operations are inclusive and accessible to all individuals, including those with disabilities. The Company shall:
  - i. Provide reasonable accommodations to employees with disabilities, ensuring that they can perform their essential job functions without undue hardship.
  - ii. Ensure compliance with accessibility laws and regulations, including the Americans with Disabilities Act (ADA) and international disability inclusion standards.
  - iii. Promote a culture of inclusivity, ensuring that individuals with diverse abilities, backgrounds, and perspectives are valued and empowered.
  - iv. Diversity and Inclusion in Business Practices
  - v. Gold Data recognizes that a diverse workforce and inclusive culture drive innovation, growth, and success. To this end, the Company shall: Foster an inclusive work environment, where diverse voices are heard, respected, and valued; Encourage

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supplier diversity by engaging with minority-owned, women-owned, veteran-owned, and other diverse businesses in its supply chain; and, ensure training and awareness programs are implemented to combat unconscious bias, foster cultural competency, and promote inclusive leadership.

2. Anti-Corruption and Anti-Bribery Laws: Gold Data upholds a zero-tolerance policy toward bribery, corruption, and unethical inducements in any form. Employees, directors, officers, agents, subcontractors, and affiliates are strictly prohibited from offering, promising, giving, soliciting, or accepting bribes, kickbacks, or improper advantages, whether directly or indirectly, in any business dealings. All payments, gifts, entertainment, or favors intended to secure an undue advantage are expressly forbidden, and political contributions on behalf of the Company are not permitted. Dealings with public officials must be conducted transparently and in full compliance with all applicable laws and regulations. To ensure compliance, Gold Data and its representatives shall adhere to the most stringent global anti-corruption laws, including but not limited to:
  - a. The U.S. Foreign Corrupt Practices Act (FCPA), which prohibits bribery of foreign officials and mandates robust internal accounting controls.
  - b. The UK Bribery Act, which criminalizes not only bribery of public officials but also commercial bribery and the failure to prevent bribery within an organization.
  - c. Any other applicable anti-bribery legislation in the jurisdictions where Gold Data operates.
  - d. Gold Data mandates that no facilitation payments be made to expedite routine governmental actions be made or received under any circumstances. Employees, officers, and third parties representing the Company must undergo periodic anti-corruption training and participate in risk-based due diligence for engagements involving government entities, politically exposed persons (PEPs), and high-risk markets.
  
3. Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) Laws: Gold Data is committed to maintaining a business environment that is free from illicit financial activities, including money laundering, terrorist financing, and fraud. To this end, the Company shall:
  - a. Implement rigorous customer due diligence (CDD) and know-your-customer (KYC) procedures to verify the legitimacy of its clients, suppliers, and business partners.
  - b. Monitor transactions and report any suspicious activity to the appropriate authorities in accordance with applicable anti-money laundering laws.
  - c. Adhere to international financial compliance standards, including the Financial Action Task Force (FATF) Recommendations and other country-specific AML/CTF frameworks.
  - d. Prohibit any transactions or business relationships with entities or individuals subject to sanctions, including those listed by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), the European Union, or the United Nations Security Council.

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- e. Gold Data shall conduct periodic audits and financial compliance assessments to ensure that its operations remain free from financial crime risks. Any employee or third party who becomes aware of any attempt to launder money, conceal illicit funds, or circumvent financial regulations must report such concerns to the Legal and Compliance Department without delay.
  
4. Data Protection, Privacy, and Cybersecurity Compliance: In recognition of the paramount importance of data integrity and privacy, Gold Data rigorously complies with all applicable data protection laws, ensuring that sensitive and personal data is collected, stored, processed, and shared in strict accordance with legal and regulatory requirements. The Company shall:
  - a. Ensure full compliance with the General Data Protection Regulation (GDPR) for data processing activities within or affecting the European Union.
  - b. Adhere to the California Consumer Privacy Act (CCPA) and other U.S. privacy laws governing the handling of consumer data.
  - c. Maintain strict cybersecurity measures, including encryption, access controls, and threat monitoring, to safeguard sensitive business information from unauthorized access, breaches, and cyberattacks.
  - d. Require third-party vendors and service providers to comply with robust data protection and privacy obligations through contractual safeguards.
  - e. All employees handling personally identifiable information (PII) or confidential corporate data must undergo mandatory data protection training and report any suspected data breaches immediately to the Data Protection Officer (DPO).
  
5. Global Trade Compliance and Economic Sanctions: Given its presence in the international marketplace, Gold Data is fully committed to upholding global trade laws, export controls, and economic sanctions regulations. The Company shall:
  - a. Ensure compliance with all export controls and embargoes enforced by the U.S. Department of Commerce's Bureau of Industry and Security (BIS), the U.S. Department of State, and equivalent regulatory bodies worldwide.
  - b. Conduct enhanced due diligence to prevent dealings with sanctioned countries, entities, or individuals identified by the U.S. Treasury's OFAC, the European Commission, and the United Nations.
  - c. Prohibit the shipment, transfer, or re-export of restricted goods, software, or technology without the appropriate government authorization.
  - d. Employees and business partners must remain vigilant in identifying potential trade compliance risks, including red flags such as inconsistent shipping routes, unverified end-users, or financial transactions linked to high-risk jurisdictions. Any suspected violation must be immediately reported to the Trade Compliance Officer.

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6. Conflicts of Interest: Employees and associates must avoid conflicts of interest that could compromise their duty to act in Gold Data’s best interests. Conflicts may arise from financial or personal relationships with suppliers or competitors, outside employment or business ventures that compete with the Company, or accepting gifts, benefits, or hospitality that may impair impartiality. All potential conflicts must be promptly disclosed to the Legal Department for review to ensure transparency and compliance.
7. Commitment to Quality, Compliance, and Continuous Improvement: Gold Data is committed to excellence, reliability, and customer trust, ensuring that all products, services, and operations adhere to the highest quality standards, regulatory requirements, and industry best practices. Employees, contractors, and business partners must uphold a culture of quality, precision, and continuous improvement, ensuring that deliverables meet or exceed expectations. Compliance with quality control protocols, product safety measures, and service reliability standards is mandatory, and any deficiencies, defects, or deviations must be promptly reported and rectified. Gold Data fosters innovation and efficiency, requiring regular training, quality audits, and performance evaluations to mitigate risks and enhance operational excellence. Customer satisfaction remains paramount, with all personnel expected to be responsive to feedback, proactively address concerns, and implement corrective actions as needed. Furthermore, Gold Data mandates that suppliers and third parties adhere to strict quality control measures, ethical sourcing standards, and responsible production practices, subject to ongoing audits and assessments. By embedding quality, compliance, and continuous improvement into its corporate culture, Gold Data ensures that integrity, accountability, and excellence define its global operations.

### **III. Enforcement and Accountability**

Gold Data unequivocally upholds a zero-tolerance policy for any violation of its non-discrimination and anti-harassment policies, treating such infractions with the utmost gravity and responding with swift and decisive measures. Any individual or entity found in breach of these principles shall be subject to disciplinary action, which may include the immediate termination of employment or cessation of business relationships, without recourse or mitigation. Furthermore, where such violations constitute an infringement of applicable local, national, or international laws, the Company shall pursue all necessary legal avenues, ensuring that offenders face civil and/or criminal liability as prescribed by governing authorities. In addition to enforcement actions, Gold Data will implement corrective and remedial measures, such as mandatory training, policy revisions, enhanced compliance oversight, and systemic workplace interventions, to prevent recurrence and fortify its culture of equity, inclusivity, and respect. As a corporate institution committed to the highest standards of ethical conduct and social responsibility, Gold Data remains steadfast in cultivating a diverse, inclusive, and harassment-free workplace, where every individual is accorded the fairness, dignity, and respect that form the cornerstone of its corporate identity.

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#### **IV. Reporting NON-Compliance and Escalation Procedures**

Gold Data is resolute in its commitment to ethical conduct and requires all personnel and business associates to promptly report any known or suspected violations of legal or regulatory requirements, including breaches of this Code.

1. **Mandatory Reporting of Compliance Violations:** Any employee, contractor, or third party with knowledge of a violation or potential violation must report it to the Legal and Compliance Department at [legal@golddata.net](mailto:legal@golddata.net). Gold Data strictly prohibits retaliation against any individual who, in good faith, reports misconduct, fraud, corruption, or any unethical behavior. Employees and third parties may submit reports confidentially or anonymously via designated compliance reporting channels.
  
2. **Consequences of Non-Compliance:** Failure to adhere to this Code or any applicable legal requirement will result in swift and decisive action, including but not limited to:
  - a. Termination of employment or contractual relationships with the non-compliant party.
  - b. Referral of the matter to law enforcement authorities for prosecution, where applicable.
  - c. Financial penalties or civil liabilities for individuals or entities found in breach of applicable laws.
  - d. Gold Data reserves the right to conduct internal investigations, third-party audits, and enhanced monitoring to ensure ongoing compliance with all legal and regulatory obligations.

#### **V. Training, Monitoring, and Continuous Improvement**

Gold Data recognizes that compliance is a continuous and evolving obligation, requiring ongoing education, oversight, and enhancement. To this end, the Company mandates comprehensive compliance training for all employees, executives, and third-party partners, ensuring awareness and adherence to all applicable legal and ethical standards. Gold Data will conduct annual compliance risk assessments to identify vulnerabilities, strengthen internal controls, and mitigate potential risks. Furthermore, the Company is committed to fostering a culture of integrity and accountability, embedding ethical considerations into all business decisions. Through these measures, Gold Data upholds its commitment to legal and regulatory excellence, ensuring its continued operation as a responsible and compliant corporate entity.

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## VI. Third-Party Code of Conduct

Gold Data mandates that all third parties, including suppliers, subcontractors, and business partners, adhere to the same stringent ethical and compliance standards that govern its own operations. Any entity engaged in business with Gold Data must conduct its operations ethically, lawfully, and in full compliance with all applicable regulations. Third parties are strictly prohibited from engaging in fraudulent, deceptive, or corrupt practices, and must ensure that their books, records, and accounts accurately reflect all transactions with full transparency. Any breach or failure to uphold these fundamental principles may result in the immediate termination of the business relationship with Gold Data, without prejudice to any further legal or contractual remedies available to the Company.

## VII. NON-Compliance and Consequences

Infractions of Gold Data’s Code of Corporate Conduct, in any form and at any level, shall be met with the full weight of corporate enforcement mechanisms, reinforcing the Company’s unwavering commitment to integrity, accountability, and ethical excellence. Any breach—whether in relation to compliance with laws, anti-corruption mandates, financial integrity, non-discrimination, harassment prevention, data protection, trade compliance, or any other provision within this Code—shall trigger swift, resolute, and uncompromising repercussions, including but not limited to:

1. **Disciplinary Measures of the Highest Severity:** Individuals found in violation of this Code shall face stringent disciplinary action, which may culminate in immediate termination of employment or the cessation of contractual and business relationships, without recourse or mitigation. No breach shall be treated as inconsequential or permissible.
2. **Legal and Regulatory Consequences:** Where a violation constitutes an infraction of applicable local, national, or international law, Gold Data shall take all necessary legal action, including reporting to competent authorities, cooperating with regulatory investigations, and ensuring that violators face civil and/or criminal liability under the full extent of the law.
3. **Remedial and Corrective Mandates:** In instances where misconduct is identified, Gold Data shall impose rigorous corrective measures, including but not limited to mandatory training, extensive policy reforms, operational restructuring, increased compliance oversight, and workplace interventions, ensuring that violations serve not only as cautionary examples but as catalysts for systemic improvement.

Gold Data remains unyielding in its dedication to the highest ethical and professional standards, steadfastly upholding a corporate culture that prioritizes compliance, fairness, and transparency. Every officer, director, employee, contractor, and affiliate is expected to internalize, uphold, and enforce the provisions of this Code without exception.

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## VIII. Reporting Mechanism and Whistleblower Protection

Gold Data strongly encourages the immediate and proactive reporting of any known or suspected violations of this Code of Corporate Conduct. Employees, contractors, business partners, and any other stakeholders may submit reports confidentially through the designated compliance channels, including email at [legal@golddata.net](mailto:legal@golddata.net). The Company is unwavering in its commitment to maintaining a safe and transparent reporting environment and, as such, strictly prohibits any form of retaliation against individuals who, in good faith, report a potential violation or cooperate in an investigation. Retaliation in any form—whether through intimidation, adverse employment actions, or any form of coercion—will be treated as a serious infraction, subject to disciplinary measures, including termination. Gold Data ensures that all reports will be handled with the highest level of confidentiality, impartiality, and diligence, reinforcing its steadfast commitment to ethical integrity, accountability, and corporate compliance.

## IX. Final Provisions

This Code of Corporate Conduct shall take immediate and binding effect upon its issuance and shall govern the actions, obligations, and ethical responsibilities of all individuals and entities engaged in business with Gold Data USA Inc., including but not limited to employees, officers, directors, contractors, agents, and third-party affiliates. The provisions contained herein shall serve as the immutable standard by which all corporate conduct is measured, ensuring that every facet of Gold Data’s operations is executed with unwavering integrity, unassailable transparency, and the highest degree of ethical probity. Gold Data, in its absolute discretion and in alignment with evolving legal, regulatory, and corporate governance imperatives, reserves the unequivocal right to amend, modify, or supplement this Code as necessary to ensure continued adherence to the most rigorous standards of corporate compliance and ethical responsibility. All individuals bound by this Code shall be duty-bound to remain apprised of its provisions and any subsequent revisions, without exception or exemption. By steadfastly upholding the principles enshrined in this Code, every stakeholder within the Gold Data ecosystem contributes to the fortification of the Company’s legacy of integrity, its culture of transparency, and its enduring commitment to ethical excellence. Let it be understood that compliance is not merely an expectation but a sacred obligation—one that serves as the foundation of Gold Data’s reputation, operational success, and continued standing as a paragon of ethical business conduct.

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**X. Acknowledgment and Agreement**

By affixing my signature below, I hereby affirm and attest that I have read, comprehended, and unequivocally agreed to abide by the provisions set forth in the Gold Data USA Inc. Code of Corporate Conduct. I acknowledge that adherence to this Code is a fundamental condition of my engagement with the Company and that any violation thereof may result in disciplinary action, including but not limited to termination of employment, contractual relationships, or legal recourse, as applicable. I further recognize my obligation to remain informed of any amendments or updates to this Code and to conduct myself in strict accordance with its principles, thereby upholding Gold Data’s commitment to integrity, compliance, and ethical business practices.

Signature: \_\_\_\_\_  
 Name: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_