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GENERAL POLICIES MANUAL OF ACADIA GLOBAL CORP (AGC US)

Acadia Global Corp maintains a set of policies that guide its procedures, actions and expectations of all involved and related parties. Not only employees and managers, but also directors, shareholders, contractors, suppliers and clients.

There are a set of public policies, which can be found on our website, www.agc-us.com and others that are for internal use.

In the set of public policies, the actions and procedures expected with all parties related to the company are explained and determined.

In the set of internal use policies, the internal actions of the company are regulated. Some are cited in a general manner in the public documents.


These policies have been developed based on and guided by the best business practices, ethical guidelines and also the applicable laws and regulations.

We expect all related parties to maintain the highest standards regarding them and their application.

The policies are delivered to all company personnel and also the revisions when they occur.

The internal policies are available to all our personnel and/or collaborators.

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Conflict Minerals Policy

GENERAL GUIDELINES

Minerals and metals play an important role in modern economies, as they are needed to produce various products and their components. However, the exploitation, trade and transport of metals and minerals can be associated with significant negative impacts, including serious human rights violations and armed conflicts in the region of origin.

The extraction of tin, tungsten, tantalum and gold, hereinafter also referred to as “3TG” or “conflict minerals”, is of particular relevance as, in the past, armed conflicts and human rights violations arising from them have been directly or indirectly financed through the extraction, trade, handling and export of these minerals.


For the purposes of this Conflict Minerals Policy, the term “conflict-free” means that the transport, extraction and trade of any 3TG minerals contained in any item supplied to Acadia Global Corp has not violated any of the principles.

To this end, Acadia Global Corp. strives to achieve full transparency regarding the sources of 3TG within its supply chains. To further its goal of ensuring that 3TG minerals contained in any supplied item are sourced only from conflict-free sources, an ongoing company-wide due diligence and risk management process is conducted through which the use, source and origin of all 3TG is determined.

Therefore, each supplier shall:

- Implement appropriate supply chain due diligence policies and procedures in relation to 3TG and/or 3TG-containing materials which, as a minimum requirement, shall comply with the standards set out in the OECD Due Diligence Guidance and strive to ensure that 3TG contained in supplied articles originates only from conflict-free smelters and refineries;
- Implement a risk mitigation strategy to respond to the risks identified in its supply chain which, as a minimum requirement, shall comply with the standards set out in the OECD Due Diligence Guidance;
- Disclose all relevant information on due diligence and the origin and sources of 3TG in its supply chain through dedicated due diligence communication tools that allow for tracing and demonstrating that 3TG and 3TG contained in supplied articles originate from conflict-free smelters and refineries.
- Promote sufficient standards of due diligence with its suppliers and other participants in its supply chain.


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REMEDIES IN CASE OF NON-COMPLIANCE

In the event that a supplier fails to comply with this Policy, we shall have, without limiting any other remedies available to us, the right to terminate purchase contracts with the respective supplier for material breach and/or require the supplier to indemnify and hold Acadia Global Corp harmless from all costs, losses and damages resulting from such breach.

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Policy on freedom of association


Acadia Global Corp recognizes and respects the right of employees to freedom of association.

Therefore, Acadia Global Corp will never act against employees who wish to exercise, in any way, participate or not participate in an association, workers' organization or collective bargaining. Suspensions, dismissals or any penalty in the payment of employees will be considered forms of retaliation. Thus, the company or its representatives will not discriminate against applicants who have previously exercised their right to belong to such organizations.

In order to comply with this policy and to have the option to exercise their freedom of association to any organization, we have committed to the following:

1. Permanently guarantee the labor rights of our employees, so that they can freely choose the union organization to which they wish to belong.
2. Ensure that our employees exercise their right to associate or not associate with others.
3. Permanently recognize the freedom of association and collective bargaining of our employees.
4. Respect the rights of our employees to: associate, organize and collectively bargain in a legal and peaceful manner, without punishment, threats or dismissals or interference.
5. Ensure that collective bargaining covers the following points: remuneration, working hours, training, professional development, flexibility in working time and equal opportunities.
6. Respect and protect our employee representatives.
7. Prevent discrimination against our employee representatives.
8. Guarantee the effective exercise of union rights in the workplace.
9. Comply with all laws and regulations on collective bargaining and freedom of association.

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Labor Standards Policy and Code of Conduct

Acadia Global Corp., contemplates various aspects of labor policies and regulations as well as a code of conduct that are developed in internal company manuals, available to all employees and/or collaborators.

These manuals develop, among others, the following elements:

1. Internal work regulations: Regulating the main rules of labor relations within the company, including the admission of workers; work days and schedules; control of work attendance; permits, licenses and absences; weekly breaks; the rights and obligations of the employer and the worker; disciplinary measures; the person or department in charge of dealing with labor matters.

2 Internal regulations for safety and health at work: Contributing to the prevention of occupational risks in the company. It contains the minimum obligations and responsibilities of workers and the employer, as well as the safety and health standards that the company's activities must meet.

3. Rules of coexistence and conduct. To ensure the healthy and respectful existence of our employees, preventing the conduct of some from harming others.

4. Dress code: In order to regulate the way our employees dress, maintaining a common code that serves the company to identify its employees or that respects the formal impression of the company to its visitors.

5. Rules for the selection and hiring process of personnel guaranteeing, without any discrimination of nationality, gender, economic, social, political, physical, cultural, among others, the effective enjoyment of the right to work and to meet the requirements of the required profile.


We also adhere to and subscribe to the "United Nations Supplier Code of Conduct" which can be found at the following link:

https://www.un.org/Depts/ptd/sites/www.un.org.Depts.ptd/files/files/attachment/page/pdf/unsc/condct_spanish.pdf

Or through an online search for the "United Nations Supplier Code of Conduct" and reflected on an official website of the organization.

Our suppliers must adhere to this code or notify us if they do not agree.

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Child Labor Policy

Acadia Global Corp. promotes a policy of zero tolerance for child labor, through compliance with the country's legislation and international agreements regarding the prohibition of such work. We recognize and protect the basic rights of children in accordance with the precepts established in the Convention on the Rights of the Child, in the United Nations International Bill of Human Rights and in the standards established by the International Labor Organization, ILO, on child labor.


The company strives to protect children's rights such as economic exploitation and the performance of any potentially dangerous work or that prevents access to education, or that is harmful to their health or physical, mental, spiritual, moral or social development of the population of direct or indirect influence, applying the Commitment to respect human rights in accordance with the International Bill of Human Rights, the United Nations Global Compact and the principles of action and recommendations for the development of business activity, the Organization for Economic Cooperation and Development and the International Labor Organization.

PRINCIPLES

Acadia Global Corp. applies and recognizes the fundamental principles based on the prevention of child labor and human rights, such as the following:

1. Comply with the minimum age provisions established in the Panama Labor Code (or applicable country and/or jurisdiction) and international provisions on the subject.
2. Use adequate and reliable mechanisms to verify the age of employment (identity card or passport).
3. Maintain accurate and updated records of all workers.
4. If cases arise, immediately remove children who have not reached the legal age to work from work with the accompaniment that this implies.
5. Include contractual clauses for subcontractors, suppliers and other business partners that imply firm commitments to eradicate child labor.

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Policy on forced labor, freedom, human rights and no to slavery or sexual abuse

Acadia Global Corp. prohibits the use of any form of forced labor (human exploitation), including prison labor, indentured labor, debt bondage or slave labor, and any form of human trafficking or abuse. Ensuring that all persons working for this company do so voluntarily and are not coerced or coerced by other persons or employment agencies, ensuring that all dealings are direct and of their free will.


Principles:

1. Free will: All persons who wish to work for our company must come of their own free will and with the freedom to make any employment decision, just as all our collaborators work of their own free will.
2. Recruitment and hiring of personnel: Our Recruitment, Selection and Hiring Process of Personnel is based on a clear and transparent process, to minimize the risk of forced labor and human trafficking.
3. Benefits and schedules: All applicants who are going to be collaborators of our company must know all the benefits, perks and schedules that the company offers and if they agree with them, the applicants can continue with the hiring process; otherwise, they have the freedom to abandon this process.
4. Working hours: All our collaborators have the right to leave the facilities after completing their working hours.
5. Termination of employment: All our collaborators have the freedom to terminate their employment relationship at any time without penalty, giving prior notice with a reasonable time.

Acadia Global Corp's commitment to respect Human Rights is based on the following international declarations and standards:

1. The United Nations International Bill of Human Rights.
2. The 10 Principles of the United Nations Global Compact.
3. The United Nations Guiding Principles on Business and Human Rights.
4. The OECD Guidelines for Multinational Enterprises.
5. The UN WOMEN Principles.
6. The Global Standard of Conduct for the Protection of LGBTI Persons in Business.
7. The Principles and Rights Established in the Main Conventions of the International Labour Organization (ILO).
8. The ILO Declaration of Fundamental Principles and Rights at Work.

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Acadia Global Corp, based on the above, assumes the commitment to:


1. Reject discriminatory practices or those that undermine the dignity of people based on their age, gender, marital status, nationality, religion, disability, race or ethnicity, or any other personal circumstance.
2. Reject child labor and forced or compulsory labor.
3. Respect freedom of association, trade unions and collective bargaining.
4. Implement supervision and control procedures that allow for the identification of possible situations of risk of violation of Human Rights and establish mechanisms to prevent and mitigate such risks.

Acadia Global Corp respects and promotes the observance of the following rights internally:

1. The right to freedom of opinion, information and expression, respecting the diversity of opinions in the company and encouraging dialogue and communication.
2. The right to freedom of association, trade union and collective bargaining of its employees, as well as the role and responsibilities of workers' representation in accordance with the laws in force in each country.
3. The right to data privacy and intimacy.
4. The right to a safe and healthy work environment.
5. The right to have decent working conditions, with adequate remuneration, and equal treatment, avoiding treating people differently or less favorably due to characteristics that are not related to their merit or the inherent requirements of the job.
6. The right to have a work environment free from harassment or contrary to respect for the rights and dignity of people, ensuring that, if such conduct occurs, appropriate procedures are in place to report it, deal with it and correct it with complete confidentiality and diligence, as well as with due consideration and promptness.

Acadia Global Corp will ensure that employees, within their scope of action and responsibility, respect Human Rights and contribute to the fulfillment of the commitment made by Acadia Global Corp through this policy.

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Anti-discrimination policy

For Acadia Global Corp., it is essential to guarantee a work environment free of discrimination and harassment for all employees.


- Guarantee, without any discrimination based on nationality, gender, economic, social, political, physical, religious, cultural, among others, the effective enjoyment of the rights established in the Constitution and in international instruments.
- Guarantee equality in access to employment, training and professional and labor promotion, fair remuneration, and the initiative of self-employment. All forms of discrimination, harassment or acts of violence of any kind, whether direct or indirect, that affect employees at work are prohibited.
- Inclusion, promoting a work environment of respectful and equal treatment.

At Acadia Global Corp., we promote an equal environment that improves the quality of life of employees, enhances talent and increases productivity rates.

Diversity and inclusion at Acadia Global Corp is based on:

- Building an inclusive culture and taking advantage of the differences of employees
- Acting in an inclusive manner with society and stakeholders.
- Respect and equality.

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Quality management policy

At Acadia Global Corp., quality includes each and every aspect of the business, from safety to the final destination of the product. To ensure that each employee performs their duties correctly and that our products and services meet the required quality standards, achieving total customer satisfaction, the following guidelines and procedures are established:

- Build a mutually profitable relationship with our customers, ensuring long-term success through understanding their needs.
- Achieve our quality, cost and schedule commitments.
- Improve systematic research and the use of best preventive practices at all levels and ensure reliable risk management.
- Drive continuous improvement and innovation based on efficient business processes, well-defined measurements, best practices and customer surveys.
- Develop staff competencies, creativity and empowerment and responsibility through appropriate development programs and show strong management involvement and commitment.
- Continuously trained and service-oriented staff.

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Environmental management and climate change policy

At Acadia Global Corp, our commitment includes complying with environmental regulations and promoting a culture of respect for the environment in each and every one of the operating and marketing processes, in addition to contributing to its preservation.


Climate change and the scarcity of natural resources are one of the greatest challenges facing society. ACADIA GLOBAL CORP has a strong commitment to protecting the environment and fighting climate change. ACADIA GLOBAL CORP causes direct impacts on the environment derived from the use of natural resources in its operations, both directly and indirectly.

We adopt the commitment to environmental responsibility in the offices and operational areas throughout the organization where we have a presence; generating trust with our employees, clients, suppliers and community (present and future generations). We respect the environment in each and every one of the operating and marketing processes, in addition to contributing to its preservation.

Guidelines and responsibilities: to have identified the environmental impacts of our business in order to minimize them and be in harmony with the environment and the community where we do business. Therefore, we have made the following commitments to protect our environment:

1. Comply with all environmental laws to which we are subject.
2. Conduct a study of each of our operations to identify our environmental impacts in order to mitigate them.
3. Purchases with a lower environmental impact.
4. We must establish guidelines with environmental criteria to ensure that the products and services used minimize the generation of pollutants and waste, thus reducing health risks.
5. Efficient use of water, soil, air and energy.
6. Implement strategies to maximize our energy efficiency and the use of resources such as electricity, water consumption and waste generation.
7. Verify that transportation assets, machinery, furniture and real estate adopt updated technologies to save water and energy.
8. Promote the use of efficient lighting systems and computer equipment, as well as monitoring, maintenance and awareness actions to ensure better consumption levels.
9. Promote responsible consumption of equipment and materials.
10. Encourage employees to carry out their activities with a culture of environmental responsibility and thus achieve efficient use of natural resources (air, water and soil).
11. Proper management of consumption and waste.
12. Promote the separation, reuse and recycling of materials in order to reduce the volume, as well as to ensure the proper management of hazardous and non-hazardous waste, thereby reducing the environmental impact and health risks.

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13. Integrate a culture of environmental responsibility in our training programs and communication strategies with training content that encourages respect for the environment and care of natural resources.
14. Plan, review and evaluate our environmental performance through measurable objectives and best industry practices to promote continuous improvement.
15. Establish indicators that allow us to objectively evaluate our environmental impact (energy consumption vs. volume of work) year after year.
16. Each person who works in or for the company is responsible for displaying appropriate environmental behavior and reporting all potential environmental risks that they see within their reach.


Action to promote environmental protection is inspired by best practices or internationally recognised standards, such as:

- The United Nations Framework Convention on Climate Change (UNFCCC), which seeks to stabilise greenhouse gas concentrations to avoid the consequences of climate change.
- The Paris Agreement on climate change signed within the framework of the UNFCCC, which aims to keep the increase in the average global temperature well below 2°C compared to pre-industrial levels, and to continue to strive to limit the temperature increase to 1.5°C.
- The Vienna Convention for the Protection of the Ozone Layer.
- The Montreal Protocol and its amendments, which develop the Vienna Convention for the Protection of the Ozone Layer.

ACADIA GLOBAL CORP is committed to a set of initiatives for the protection of the environment and the reduction of the effects of climate change and the impacts derived from its activities, products and services, paying attention to the best international practices, in order to:

- Avoid or minimize the pollution generated by its activities.
- Consider and evaluate the impacts on climate change of its products and services and the measures to be adopted for the elimination or reduction of polluting emissions.
- Establish management mechanisms that allow objective measurement of the evolution of environmental performance and decision-making.
- Promote environmentally friendly products and services and accompany our clients in the transition to a low-carbon economy.
- Promote awareness among its employees to adopt measures to protect the environment.
- Promote actions aimed at raising awareness in society in actions for environmental protection.
- Participate in international and local initiatives related to sustainability and the environment.

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Hygiene, health and safety policy

Acadia Global Corp has a Hygiene, Health and Safety Manual that is mandatory reading and compliance for all company personnel.

It includes a legal framework with the laws of the Republic of Panama (and/or applicable, depending on the jurisdiction) that regulate the conditions of safety, hygiene and health at work. This includes the minimum legal obligation required of all employers, corporate responsibility in the prevention of work accidents and the obligations of employees in compliance with them.

It establishes the industrial safety and hygiene measures that must be complied with in order to protect the lives of employees, their health, their physical and mental integrity; it describes the obligations and prohibitions of employers in industrial safety and hygiene as well as the measures required in different work environments such as: buildings, surfaces, walls, doors, stairs, windows, openings and ditches, it regulates everything related to: lighting, cleaning, ventilation, temperature, humidity, etc.

It describes the obligations and prohibitions of employers and employees in compliance with the manual.

It details recommendations to avoid contamination of work environments and instruments during work days.

The process for maintaining facilities such as offices, general use areas, kitchen, toilets and others is described.

Regarding the protection of maintenance personnel, it describes what is appropriate to use for each function according to the possibility of injury.


There is a risk measurement that allows us to assess the vulnerability to which the company's workers may be subject, this with the purpose of having a plan that allows us to detect new risks to attend in a coordinated manner to the needs that arise.

We have a first aid kit provided with materials and medicines for first aid and non-serious emergency treatments.

We have an emergency plan in case of an earthquake, it describes what to do before, during and after.

Regarding fires, the elements that cause them, the types of fire and the extinguishing agents to be used according to each type are explained, as well as the general rules for fire prevention, the areas prone within the facilities and the emergency plan.


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In order for the Manual to achieve its objectives, each worker, manager, associate and/or contractor is given a manual (in electronic format) so that they are fully informed and can review at any time the hygiene and safety standards, which are always at their disposal for the purpose of preserving their health and safety while they are carrying out their activities within the facilities.

The faults, infractions or violations committed against the provisions of this Occupational Safety and Hygiene Manual constitute work and social security faults and may be sanctioned in accordance with the Disciplinary Regime of the Internal Work Regulations.

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Policy on prevention of sexual harassment


Acadia Global Corp has among its internal manuals, the one that details the policies and procedures for prevention and attention in case of sexual harassment (or bullying).

Said manual and/or procedure aims to establish measures to prevent and sanction sexual harassment of which any worker of Acadia Global Corp may be a victim.

It also establishes the Procedure for the Prevention, Investigation and Sanction of Sexual Harassment. This procedure ensures a reserved, confidential, impartial, effective and rapid investigation, which allows the harasser to be sanctioned and the harassed to be protected, respecting due process and the corresponding regulations that are in force.

Also included is the Protocol for attention and sanction of sexual harassment, formats and models for the presentation of complaints or grievances in Acadia Global Corp.

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SUSTAINABILITY PRINCIPLES

Acadia Global Corp is committed to maintain practices compatible with human development, understanding that future generations depend on our current behavior.

As such, we adhere to the The Ten Principles of the UN Global Compact which can be found at:

<https://unglobalcompact.org/what-is-gc/mission/principles>

where we can find the following Environment principles:

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Since we focus our business towards Panama Republic, we specifically adhere to the local Sustainability Principles for State Suppliers of the Republic of Panama, not only for the acts where this document is required, but as a general policy for all our processes as a business commitment and for our collaborators, having the conviction to conduct ourselves, in our professional and work performance, in accordance with these principles.


We recognize that the Sustainability Principles for State Suppliers constitute not only a way to correctly carry out our business activities, but they constitute a means to improve the living and working conditions of people throughout the supply chain, contributing to achieving the Sustainable Development Goals (SDG).

These principles are available at the following address:

<https://ww.panamacompra.gob.pa/Documentos/PRINCIPIOS%20DE%20%20SOSTENIBILIDAD%20PARA%20PROVEEDORES%20DEL%20ESTADO%20-%20DGCP%20%20Final.pdf>

If the link is incorrect, please notify management to update it.

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ANTI-CORRUPTION PRACTICES

ACADIA GLOBAL CORP supports the actions carried out by the Panamanian State, the General Directorate of Public Procurement and any other government actor to strengthen the transparency and accountability of public administration.

Therefore, ACADIA GLOBAL CORP undertakes to:

- Not offer and not give gifts, bribes or any form of benefit, remuneration or perk to public servants who work in bidding and/or contracting entities, suppliers, clients or any party involved in any commercial process, directly or through their dependents, contractors or third parties.
- Not make agreements or perform acts or conduct that have as their object collusion, conspiracy, collusion or complicity with evident or apparent bad faith, in any contractor selection procedure, or any other commercial process or activity that it develops, in any of its stages.
- Disclose the information requested by the competent authorities of the Republic of Panama and/or any other authority in the area of prosecution of crimes and/or supervision, regulation and control of the movement of public funds and assets, as well as the examination, intervention, maturity and judgment of the accounts related to them.
- Communicate to its employees, contractors, subcontractors and advisors the content of this anti-corruption commitment, explain its importance and the consequences of non-compliance on its part and that of these.
- Our contractors and/or related parties accept and are obliged to comply with these anti-corruption practices.

All employees, managers, directors, collaborators, contractors, shareholders, clients, suppliers and/or related parties must immediately inform the company management when there is any potential conflict of interest, and/or suspect or exist any act that may be considered as corruption or in contravention of the laws.

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