



Smart Decarbonization

The first Carbon Neutrality Advisory Company
with integrated Human and Artificial Intelligence

ENERGY PATAGONIA
COMPLIANCE POLICY
REV.1

Effective Date: 01/01/2015

ENERGY PATAGONIA LLC ("we" or "us") is committed to complying with all applicable laws, regulations, and ethical standards in our business operations. This Compliance Policy outlines our commitment to compliance and the responsibilities of our employees, contractors, and partners.

1. **Compliance with Laws and Regulations**

We comply with all applicable laws and regulations governing our business operations, including but not limited to labor laws, environmental laws, and data privacy laws. We also comply with any applicable industry standards and best practices.

2. **Ethical Conduct**

We conduct our business with integrity, honesty, and transparency. We prohibit any form of bribery, corruption, or unethical behavior. We also respect the rights of our employees, contractors, and partners and provide a safe and healthy work environment.

3. **Information Security and Privacy**

We protect the privacy and confidentiality of our customers, employees, and partners' information. We comply with all applicable data privacy laws and regulations and implement appropriate security measures to safeguard information from unauthorized access, use, or disclosure.

4. **Anti-Money Laundering and Counter-Terrorism Financing**

We have policies and procedures in place to prevent money laundering and financing of terrorist activities. We conduct due diligence on our customers, employees, and partners and monitor transactions for any suspicious activity.

5. **Reporting and Investigation of Compliance Issues**

We encourage all employees, contractors, and partners to report any compliance issues or concerns. We investigate all reports promptly and take appropriate action to address any compliance issues.

6. **Training and Communication**

We provide regular training and communication to our employees, contractors, and partners on our compliance policies and procedures. We also ensure that our policies and procedures are accessible and understandable to all stakeholders.

7. **Compliance Monitoring and Review**

We regularly monitor and review our compliance policies and procedures to ensure their effectiveness and relevance. We also conduct periodic risk assessments to identify and mitigate any potential compliance risks.

8. **Non-Retaliation**

We prohibit any retaliation against employees, contractors, or partners who report compliance concerns or participate in compliance investigations.

9. **Compliance Accountability**

All employees, contractors, and partners are responsible for complying with this Compliance Policy and any applicable laws, regulations, and ethical standards. Failure to comply may result in disciplinary action, up to and including termination.

By complying with this policy, we ensure that we operate our business with the highest ethical and legal standards, and we maintain the trust and confidence of our customers, employees, and partners.