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Anna Venture Capital Group of companies Code of Conduct and Ethics

March 2021

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Introduction

This Code of Business Conduct and Ethics (“Code”) establishes a framework to govern the a commitment by RESEARCH VENTURES INTERNATIONAL SL (“ANNA” or “us”) to conduct its business activities in the highest ethical and professional manner protecting client's interests first as well as to comply with the regulatory frameworks at any locations of interest. ANNA’s reputation for integrity is one of its core assets and is critical to its business success. While this Code covers a wide range of business activities, practices, and procedures, it does not cover every issue that may arise in the course of ANNA’s many business activities. However, it sets out a basic set of rules and principles designed to guide ANNA’s employees and directors, suppliers and stakeholders. Consultants and contingent, contract, or temporary workers are expected to comply with the principles of this Code and policies applicable to their location, function and status. Contingent personnel signs are mandatory.

Our ethics code has the following main items which are set out below:

Ethics and integrity

All our stakeholders, which include suppliers, partners, clients, shareholders have to comply with a set of principles that avoid issues as corruption, bribery, conflict of interest and integrity in business and across the conflicts that often personal life has with professional duties.

Stocks trading

Our shareholders, executives and employees have to comply with a set of principles that prevents the trading of shares of companies that have been subject of an assignment with our company or that our assignment provided our employees or shareholders with information that may be considered privileged or restricted or an unfair advantage compared to other investors, therefore they can’t buy shares of those companies, nor their relatives and close associates. Our stock purchasing policy is comprehensive in terms of covering different aspects of this issue. We have a mandatory conflict of interest and stock trading declaration filled up every three (3) months by all our employees and executives.

AML/CTF and International sanctions

We conduct KYC research and investigations on all our clients before engaging with them. We have a KYC database supplier partner to conduct quick but reliable KYC controls to avoid money laundering and terrorism financing activities to happen through our company, or as a “man in the middle” entity, as well as for international sanctions.

Compliance with local, regional and international regulations

As a global operator we take care and monitor our activities, furthermore those that affect local rules and regulations and the licenses of operation of partners an suppliers. For those professionals that

require a license as private investigators, lawyers, accountants, we conduct background checks and ensure that they meet the required license and that is current in the territories of operation.

Confidentiality and conflict of interest

Confidentiality

Confidentiality is part of our DNA as our work requires to keep all the information and data from our clients confidential and in a safe place. We trust in a global supplier of technology to secure our servers and don't provide work references to avoid misunderstandings and risks for information leakage on our side. Our partners and employees sign a confidentiality agreement that's restricts the disclosure and set up limits, except for competent authorities inquiries. We provide awareness training to our employees and those accessing our systems, keep a strong password policy in place, and provide training against social engineering attacks.

Conflict of interest

Conflicts of interest may arise for different reasons. We closely monitor any conflicts of interest that may arise due to two clients approaching us for the same matter, employee or partner conflicts of interest and interferences that may occur with our clients. In the event of a conflict of interest we don't reveal any of the involved parties the reason for the conflict.

Diversity and inclusion

We leverage the background, experience, origin and insights from our employees and partners and inspire innovation to produce better outcomes and better workplace environments. We won't tolerate discrimination of race, sex, age, origin, sexual orientation, pregnancy, citizenship, political affiliation, mental or physical disability or medical status, nor allow behaviors as harassment at work, sexual harassment or any misconduct related to discrimination at the work environment.

Environmental and sustainability

Our company complies with international, regional and local regulations on environment care and sustainability by enabling our employees and partners to operate in a paper free environment. Furthermore our servers and computing power relies on a global technology suppliers that has its own environmental and sustainability policy.

Human rights

We monitor all our activities to make sure we work with suppliers that respect human rights and provide a safety framework for compliance that ensures all our stakeholders respect human rights no matter where they are located. We monitor in particular:

- We don't work with companies that have been blacklisted for forced or child labor issues
- As we work on global basis we monitor blacklists and online human rights protection resources.

For more information, please ask for a copy of our Ethics Code send us a note

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