

Integrity is the foundation of everything we build.

1. Commitment to Integrity: A Journey Without Concessions

Building a solid company is not just about raising walls — it is about building values. At 4U Homes, we believe integrity is not just a principle: it is the invisible foundation that sustains the trust of our clients, partners, employees, and the society in which we operate.

This policy was created with a clear and non-negotiable purpose: to prevent, identify, and combat any form of corruption, bribery, or undue favoritism in all 4U Homes' commercial, operational, and institutional relationships. Regardless of the circumstances, business volume, or position of the counterpart — our response will always be the same: **zero tolerance**.

This commitment is broad and unwavering. It applies to everyone who, in any way, represents or acts on behalf of 4U Homes: employees at all levels, legal representatives, suppliers, service providers, consultants, and business partners.

Adopting this policy is more than complying with rules — it is declaring, through daily actions, that at 4U Homes the right path is not a choice: it is the only possible path.

2. What Corruption and Bribery Are

Corruption does not start with a large scheme — it begins with small concessions, questionable choices, and timely silences. It is in this gray area between what is right and what is convenient that integrity is lost — and with it, the reputation of companies, careers, and legacies.

At 4U Homes, we call things by their name. Corruption is any act involving the use of power, influence, or position to obtain undue advantage, at the expense of collective interest, ethics, or justice. It is about breaking trust — whether in the name of profit, personal gain, or self-protection.

Bribery is the most direct and reprehensible form of this practice. It occurs when someone offers, promises, pays, or receives something of value with the intent to influence a decision or obtain an improper benefit. It can occur in private business or in dealings with the public sector — and it is always unacceptable.

Classic examples of corruption and bribery:

- Offering money, gifts, trips, benefits, or personal favors (to public or private employees) to gain advantage in negotiations, approvals, permits, or contracts.
- Accepting or requesting any type of personal advantage (off-the-book commissions, “favors,” family referrals, etc.) as a condition to close a deal, favor a supplier, or influence internal decisions.
- Improperly interfering in bidding, competition, price negotiations, or supplier selection through privileged information, manipulation of criteria, or undeclared alliances.
- Using third parties — such as consultants, commercial representatives, agents, or local partners — to mediate or conceal illicit acts, such as irregular payments or undocumented favors.

Subtle but equally illicit forms include:

- Gifts offered at strategic moments (e.g., before bids or contract closings).
- Payments disguised as “commissions” without clear service justification.
- Invitations to luxury events, resorts, or exclusive experiences without a legitimate professional reason.
- Use of company funds to support political campaigns, “grease” public processes, or hire relatives of authorities.

At 4U Homes, integrity is non-negotiable — and “shortcuts” are not part of our culture. Even practices considered “small” or culturally tolerated in some contexts are treated with rigor when they jeopardize the ethics of our operation.

The message is clear: **do not offer, do not accept, do not remain silent. If something seems wrong, it is your duty to report it.**

3. Conduct: Permitted vs. Prohibited

Anti-Corruption and Anti-Bribery Policy



Situation	✔ Permitted	✗ Prohibited
Gifts and presents	Institutional gifts of symbolic value (e.g., pen, planner, thermal mug); sending greeting cards.	High-value gifts, especially close to business decisions; jewelry, electronics, cash, luxury invitations.
Meals and hospitality	Moderate business lunches or dinners, with record and legitimate purpose.	Lavish dinners, resorts, or events unrelated to professional activity.
Payments and commissions	Contractually agreed payments, with invoice and clear service scope.	“Off-the-book” commissions, payments without invoices or real justification; transfers to third parties without contract.
Relations with the public sector	Transparent, formal, and documented contact with authorities for legal and regulatory matters.	Any attempt to “speed up” processes with favors, money, benefits, or future promises.
Use of intermediaries	Consultants hired with integrity clauses and defined scope.	Intermediaries used to “facilitate” something illegal or conceal suspicious payments.
Conflicts of interest	Declared family ties reviewed by Compliance.	Omission of family ties or favoritism without prior review.
Participation in events	Attendance at trade fairs, technical events, and training approved by leadership.	Leisure trips paid by suppliers or partners with business interests.

4. Expressly Prohibited Conduct: What Is Never Tolerated

Every ethical organization needs red lines — clear boundaries that must not be crossed. At 4U Homes, these lines are well-defined. If integrity is the ground on which we build our reputation, we must precisely identify the deviations that can damage it.

Strictly prohibited practices at 4U Homes include:

- Offering, promising, or authorizing illicit payments — whether to influence decisions, secure contracts, speed up processes, or gain business advantages of any kind.
- Giving or accepting gifts, presents, or hospitality that could, directly or indirectly, influence business decisions, create expectations of favoritism, or compromise impartiality.
- Favoring companies, suppliers, or individuals based on personal, family, or political ties, ignoring fair and technical criteria.
- Using company resources — financial, human, or material — for personal or political purposes, even under the pretense of “courtesy” or “adjustment.”
- Manipulating information, reports, or accounting records to conceal undue payments, create false justifications, or mask irregularities.
- Channeling payments through third parties (consultants, partners, representatives) to make tracing the origin, purpose, or value difficult.

Such practices violate not only 4U Homes’ principles — they also breach national and international laws, such as the **U.S. Foreign Corrupt Practices Act (FCPA)**, with severe consequences including administrative sanctions, contract termination, dismissal for cause, civil lawsuits, and even criminal prosecution.

Guiding principle: If you would not feel comfortable explaining your action to your leadership, colleagues, or family — you should not be doing it.

5. Relations with the Public Sector: Where Strictness Is Absolute

In a company that operates with integrity, there are no shortcuts — especially in dealings with the public sector. 4U Homes recognizes the strategic importance of maintaining legitimate, transparent, and responsible institutional relations with government bodies, public servants, and regulatory authorities.

However, these interactions require heightened attention and flawless conduct. Small gestures can have major legal consequences. An improper offer, a veiled favor, or an undue advantage can jeopardize not only contracts but also the reputation we have worked so hard to build.

Strictly prohibited practices include:

- Offering, promising, or delivering any type of advantage, benefit, gift, or favor to public officials — directly or through third parties.
- Making political donations or campaign contributions in the company's name or with corporate resources.
- Using personal relationships with public agents to obtain licenses, exemptions, approvals, or contracts.
- Promising jobs, positions, or future favors in exchange for decisions or business advantages.

These practices directly violate the **FCPA – Foreign Corrupt Practices Act**, subjecting companies and individuals to severe penalties, including multi-million-dollar fines and criminal liability.

When in doubt, always choose the safest path: act with full transparency and seek guidance from the Compliance Department.

6. Gifts, Hospitality, and Entertainment: The Line Between Courtesy and Ethical Compromise

In the corporate environment, gestures of courtesy are part of daily interactions. A symbolic gift, a lunch with partners, or an invitation to an event are legitimate practices — as long as they are guided by moderation, legality, and transparency.

Permitted, with common sense:

- Institutional gifts of low value and promotional character (e.g., pens, notepads, thermal bottles).
- Moderate meals during meetings or corporate events.
- Participation in events paid for by the company, with a clear professional purpose and prior leadership approval.

Prohibited, always:

- Offering or accepting gifts valued above **US\$ 50** without formal approval.
- Gifts that may be interpreted as an attempt to influence or exchange favors.
- Payment of trips, accommodations, or luxury events without legitimate professional justification.

In case of doubt: the employee must consult the Compliance Department beforehand. If you feel uncomfortable explaining the gesture, it is a sign that it probably should not happen.

7. Reporting Channels and Accountability: Because the Truth Needs a Voice

At 4U Homes, every employee is a guardian of integrity. This means that when identifying something that violates the principles of this policy, it is not only a right — it is a duty — to report it.

The **Ethics Channel** at 4U Homes is available 24/7, with the option of anonymity and complete confidentiality. Reports made in good faith will never be punished. On the contrary: they will be respected, analyzed seriously, and treated with confidentiality.

Confirmed acts of corruption or bribery — by action or omission — may result in:

- Formal warning.
- Termination for cause.
- Contract termination with third parties.
- Notification of competent authorities.

Doing the right thing protects not only the company — it protects everyone who is part of it.

8. Leadership Commitment: Integrity Is Taught by Example

Leadership is not measured only by results, targets, or indicators. It is revealed above all in silent choices and consistent behavior. Leading means influencing by example — and at 4U Homes, that example begins with integrity.

More than guiding, our leaders have the duty to embody the values we want reflected in every team, every jobsite, every business decision. This means not only talking about ethics, but practicing it firmly, visibly, and consistently.

Directors, managers, and supervisors are expected to:

- Reinforce this policy regularly — in meetings, training, and daily leadership interactions.
- Be open to listening, clarifying, and addressing questions about conduct or ethical dilemmas.
- Immediately report any signs of irregularities to the Compliance Department, without omissions or hesitation.
- Foster an environment of trust, where the prevention of ethical risks is a priority — not just a reaction when damage has already occurred.

Integrity is not a speech — it is daily practice. And in leadership, it begins when no one is watching.

9. Training and Commitment Acknowledgment: Knowing in Order to Comply

A policy is only effective when it stops being words on paper and becomes lived behavior. The first step is knowledge.

At 4U Homes, all employees — without exception — have the duty to know, understand, and take responsibility for the guidelines established here.

Two fundamental instruments are in place:

- **Mandatory participation in annual compliance training**, which includes a specific module on anti-corruption and anti-bribery, with practical examples, reflections, and knowledge tests.
- **Signing the Acknowledgment and Commitment Statement**, through which employees declare that they have read, understood, and commit to following this policy in the exercise of their duties.

More than a formal requirement, this process represents a clear expression of a collective pact for an ethical, solid, and trustworthy culture.

10. Review and Update: A Commitment That Evolves

Just like the sector in which we operate, **ethics is alive, dynamic, and time-sensitive**. What is sufficient today may not be tomorrow. What is permitted today may be prohibited tomorrow by new laws or higher social expectations.

That is why this policy is not written in stone — it is written in **commitment**. A commitment that will be reviewed annually or whenever there are:

- Relevant changes in anti-corruption legislation.
- Newly identified risks in company processes.
- Recommendations from internal or external audits.
- Developments in market best practices.

All changes will be communicated clearly and promptly, reinforcing transparency and the shared responsibility of all involved.

At 4U Homes, ethics is not an appendix to operations — it is the foundation on which we daily build reputation, trust, and future. Like our houses, it is built brick by brick — with technical rigor, social responsibility, and human commitment.