



TRAVIESO EVANS
ARRIA & RENDEL

CODE OF ETHICS AND CONDUCT

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INTRODUCTION

In Travieso Evans Arria & Rengel (“Travieso Evans”), we believe that it is important for a law firm to have a clear, solid and rigorous code of ethics and conduct that serves as a guide in the conduct of its professionals and workers and assures trust and respect on the part of its clients. This Code of Ethics and Conduct is based on principles of integrity, honesty and transparency and on high ethical and professional standards.

This Code of Ethics and Conduct contains the policies and procedures to be followed in all places and at all times in order to assure transparency, legal compliance, prevention of corruption and bribery, and fair and just treatment to all employees, clients, and suppliers. Likewise, it contains the policies and procedures referred to confidentiality, conflict of interest, social responsibility, equality and diversity, among other issues, including conduct to be avoided and the power of the relevant authority to penalize the actions that are contrary to ethic and honesty.

This Code of Ethics and Conduct is applicable to all professionals and personnel of Travieso Evans and to any person working with our Firm in its different scopes of action. Compliance with the same will be mandatory for all members and personnel of Travieso Evans.

It is of vital importance for Travieso Evans to maintain integrity, honesty, loyalty to its clients, confidentiality, professional capability, diligence, respect for human rights and rule of law. These values are the base of our commitment to our clients and to society and they are an essential factor to continue to be leaders in the provision of legal services in Venezuela.

Travieso Evans will further the dissemination of this Code of Ethics and Conduct among all of its members and personnel by using diverse strategies to that end.

I. OUR MISSION

We provide high quality and efficient legal services, with an excellent team of professionals that works within an environment of harmony and respect. We keep the highest level of civic and professional ethics together with our profound commitment to social responsibility.

II. OUR VISION

We are the leading firm in Venezuela that abides by the highest international standards. We provide integral legal services to our clients nationwide, so that we may continue the legacy of institutionalism and professional excellence that has characterized us for almost 100 years.

III. PRINCIPLES

We provide our services according to the rules established in the Law of Lawyers[1] and the Code of Professional Ethics of Venezuelan Lawyers[2], which we apply with moral sense and diligence in the defense of our clients’ interests and for the sake of justice, always taking into consideration the following cardinal principles:

- **Integrity:** From the beginning, our Firm has been committed to keeping the highest professional and moral integrity standards. We always act with honesty, transparency and ethic evidencing the importance of respect for all of our clients, opposing parties, and persons related to the Firm.
- **Loyalty to clients:** Our Firm will always act in support of the interests of our clients, allowing them to know the risks, advantages, and best options to handle their interests.
- **Professional capability:** Our Firm is committed to maintaining a high level of

[1] Official Gazette No. 1.081 of January 23, 1967.

[2] Official Gazette No. 33.357 of November 25, 1985.

- professional capability in all of its areas of practice. Our lawyers must have the capability, education, and necessary knowledge to offer high quality legal services.
- **Excellence:** Excellence is the target of our Firm in all of the activities that it performs. Our lawyers must invest the necessary time in developing answers and works that fulfill the clients' necessities.
- **Confidentiality:** Our Firm is committed to keeping the confidentiality of the projects, consultations, advice, requests and information provided by our clients. At no time will we disclose confidential information without our clients' consent, except in the cases in which we are bound by the law to provide information, with the prior and proper consent of the client involved.
- **Compliance with the law:** Our Firm is committed to respect human rights and rule of law in all of its professional activities. At no time will we be associated with compromising, illegal or immoral activities that are outside the legal and ethical framework established by the Venezuelan legislation.

IV. LEGAL COMPLIANCE POLICIES

Our Firm is committed to complying with all applicable Venezuelan and international laws. The personal and professional duty of our members is to know and comply with the rules and the application of the same and advise our clients about complying with them. No member may offer any advice that is considered legally, morally or ethically objectionable.

Travieso Evans and its members must follow at all times the proper procedures for legal compliance,

prevention of corruption and bribery, integrity and transparency of their activities. Its members must refrain from executing acts that violate the law or ethic and negatively affect the Firm or its clients.

V. ANTI-CORRUPTION AND BRIBERY

Our Firm does not allow any kind of act of corruption or bribery. The members of the Firm are not allowed to provide services or perform activities involving acts of corruption or bribery or to become involved with clients or third parties that may be involved in unlawful activities.

VI. HEALTHY AND SAFE WORK ENVIRONMENT

Our Firm has always maintained a healthy environment, based on respect, professionalism, comradeship and unity. Our policies do not permit verbal or physical harassment in any type of situation, nor is any conduct contrary to moral conventions permitted. Our workers are treated with dignity and courtesy and evaluated on the basis of their knowledge and capability. Travieso Evans will continue to adopt the necessary measures to maintain a healthy and safe work environment.

Based on the foregoing, Travieso has the following behavior guidelines and duties:

- To scrupulously respect the labor legislation in effect and favor a harmonious work environment that promote equalitarian and equitable relationships in which all parties have the opportunity to contribute, stand out, and grow without any discrimination whatsoever.
- To prevent any discrimination or exclusion on grounds of race, sex (sexual orientation), nationality, social status or belief, incapacity or functional diversity from occurring in its offices.
- Consistently with the principle of equal opportunities and treatment, Travieso Evans is

- committed to allow equal professional qualification to men and women in order to hold equal positions with equal salaries, abiding by the principle “equal pay for equal work”.
- To promote in-service training of the personnel and team of professionals in order to raise the response rate, quality of results, and achievement of goals. A performance evaluation process will be carried out to assess processes and results.

VII. ANTI-DISCRIMINATION POLICY

Our Firm respects and takes into consideration fairness and diversity, promotes a respectful, inclusive, and family environment, and provides its members with the best tools for personal and professional development.

No discrimination is allowed in Travieso Evans and we always act in compliance with the applicable legislation. The main factors to be considered for the entry of members and hiring of personnel are the skills, experience and knowledge required for the job. We do not make decisions on the basis of race, color, nationality, belief, social status, sex, sexual orientation, marital status, disability or physical characteristics, political position or any other characteristic or condition.

VIII. CLIENTS

In Travieso Evans, knowing our clients is of vital importance. Knowing the persons or companies with whom/which we are involved is significant to us. We follow the appropriate procedures to know our potential clients and request the necessary information and documentation to verify their activities.

Individuals/ entities breaking the law or the funds of whom/which are of doubtful origin are not accepted

by Travieso Evans. For such reason, we conduct a process of review of the client before accepting him/her/it as such.

Likewise, in case of potential clients, we verify that there exist no conflicts of interests and if they exist, we immediately notify the parties involved in order to obtain the relevant authorizations. In case of conflict of interests with existing clients, Travieso Evans will value the loyalty of its existing clients and favor them over potential new clients.

Our Firm provides its clients with a timely, detailed, clear and precise record of the works performed, in order for the client to be able to determine the work performed and the correct calculation of the relevant professional fees agreed.

IX. PROTECTION OF CONFIDENTIAL INFORMATION

Our Firm does not allow the use of privileged information for the obtainment of benefits, neither through third parties, nor through direct contact with the Firm’s clients. We protect and respect the information provided by the clients, regardless of the case, as a result of the professional relationship. We do not use confidential information for personal benefit.

Travieso Evans is committed not to disclose and to safeguard, protect, and preserve the information, records, corporate, financial, accounting, and administrative documentation provided by our clients, under the best technological and physical safety parameters. We keep the records in accordance with the legal and business requirements inherent in our profession under the Venezuelan legislation.

X. SOCIAL RESPONSIBILITY

In Travieso Evans, we assume our social responsibility commitment. We seek to serve the common good and provide our services in projects that inure to the benefit of individuals or communities in need or that are at the same time promoters of the common good. Therefore, we urge our members to accept pro bono cases that allow us to be an active part of the educational, economic, and social growth of the country.

XI. USE OF SOCIAL MEDIA

Our Firm will exercise prudence in the use of the social media, which will be used solely as a tool for institutional communication and information in order to strengthen our image and prestige. At no time will we publish images or information related to our clients without their authorization, nor will we make any publication that lessens our clients' or other legal professionals' reputation.

XII. REPORTING CHANNEL AND PENALTIES

In the event of any suspected contravention of the values prescribed in this Code or in the legislation, the type of breach or violation and the seriousness of its consequences are to be taken into consideration in order to file the relevant report, conduct an investigation, and apply the relevant corrective measures.

Reports will be filed through our electronic mail enabled to that end: denuncia.etica.tear@gmail.com. The breach of this Code of Ethics and Conduct because of duly proven ignorance, negligence, lack of skill, or bad faith will be penalized.

The treatment of the breaches of this Code will be determined by the Board of Administration of Travieso Evans, or else by the Ethics Committee that said Board may designate.

The Board of Administration holds the exclusive power to make observations, admonish, and penalize any member of the Firm who is liable for any breach of the provisions of this Code. This prerogative may be exercised directly or through the aforesaid ethics or disciplinary committee expressly designated to that end.



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