



# PROYTEC

## Capital Partner

GROUP OF COMPANIES



# TRANSPARENCY POLICY



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### INTRODUCTION

The PROYTEC Group companies offer high-quality services, including the implementation, promotion, and support of projects; advanced financial solutions; investment opportunities; company, foundation, and holding establishment; asset protection through trusts, funds, and foundations; company acquisition and sales; creation and transfer of business operations abroad; obtaining licenses and authorizations; foreign residency and dual citizenship; international representations; commodities trading and import-export operations, all tailored to the strategic, operational, and business development needs of their clients.

Every activity is designed with consideration for environmental impact, people's well-being, and the growth of the communities involved.

1. The PROYTEC Group supports, finances, and participates, either directly or indirectly, in the development of projects related to natural resources, ecosystems, and the protection of people, communities, and the environment.
2. The intervention areas include construction, energy, agriculture, waste management, recycling, water resources, air quality, health, food, culture, entertainment, tourism, and technology. The objective is to improve the quality of life for beneficiaries, also by securing financial resources from international capital markets.
3. The PROYTEC Group promotes, supports, and finances entrepreneurial initiatives by small business owners, women entrepreneurs, and young talents, without excluding investment opportunities, recognizing their central role in global economic development.
4. The PROYTEC Group also operates in emerging markets and developing countries, contributing to economic and social growth in diverse contexts.



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5. All projects must comply with ESG (Environmental, Social, and Governance) principles, with particular attention to the protection of workers' rights and beneficiaries.
6. The PROYTEC Group supports technological innovation and research, promoting sustainable and advanced solutions for business and community development.
7. The PROYTEC Group fosters international cooperation and strategic partnerships, facilitating synergies between businesses, institutions, and stakeholders for strategic expansion and access to markets, capital, and advanced governance instruments.
8. The PROYTEC Group companies develop tailored solutions for the establishment, management, and optimization of corporate structures, foundations, and holdings, ensuring operational efficiency and regulatory compliance.
9. They facilitate the creation, management, and transfer of business activities abroad, supporting international expansion and asset protection strategies.
10. PROYTEC Group guides entrepreneurs and investors through the processes of company acquisition and sale, obtaining licenses and authorizations, as well as structuring international operations.
11. It enables international trading and import-export transactions, ensuring access to raw materials, strategic assets, and global commercial opportunities through advanced operational frameworks.
12. The PROYTEC Group companies provides consultancy and support in wealth management and tax planning, ensuring efficient solutions that comply with the highest international regulatory standards.



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### STATEMENT OF PURPOSE AND SCOPE

1. The TRANSPARENCY POLICY of the PROYTEC Group establishes the principles that guide the public disclosure of information related to the activities of the Companies, as well as the scope and type of data that are regularly shared.
2. Information and disclosure of data related to cooperation with agencies and oversight of their activities do not fall within the scope of this policy.
3. Information and disclosure of data concerning services, investments, and financing (possibilities, terms, and conditions) fall within the scope of this policy.
4. Until the time of intervention, the personal data of clients, investors, and financiers, as well as any collaboration with other companies, cannot be made public.
5. The PROYTEC Group Companies will not disclose information that could compromise their fundamental commitment to protecting confidential corporate data.
6. This would be contrary to the legitimate expectations of clients, who must be able to share detailed and/or sensitive information with the PROYTEC Group without fear of compromising the confidentiality of their projects, requests, or other proprietary information that could limit competition in the market.
7. The PROYTEC Group Companies will not disclose information protected by law or that cannot be collected systematically and reliably.
8. It is essential to balance the benefits of transparency with those of safeguarding, promoting, and preserving internal processes of analysis, evaluation, and acceptance, which foster more informed, collaborative, and participatory decision-making, as well as more thoughtful policies.
9. The PROYTEC Group PANAMA discloses information related to the activities of the Group Companies and internal operations to contribute to the transparency of assistance flows.



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### IMPLEMENTATION AND OVERSIGHT

1. This policy is implemented and supervised by the Transparency Committee, composed of representatives from different areas of the Company.
2. The composition and membership of the Transparency Committee will always be publicly available on the website.
3. PROYTEC Group regularly makes the following information publicly available: a) details on the support provided to customers b) performance metrics used for the analysis, evaluation, and acceptance of intervention requests c) compliance of intervention requests with principles of human rights, environmental protection, labour policies, and social standards
4. The PROYTEC Group Companies provide information about their activities to an individual customer exclusively to the concerned customer, ensuring privacy protection.
5. The PROYTEC Group maintains a cloud-based database and stores data related to service, investment, or financing requests that have been accepted, provided the requests are successfully completed.
6. The PROYTEC Group also retains customer data that, for any reason, are deemed by one or more committees (Credit Committee, Ethics Committee, Transparency Committee, Scientific Committee) as non-compliant with the Principles, Rules, and Conditions communicated before and during the acceptance phase of the customer's intervention request.
7. In this latter case, depending on the severity of the non-compliance, the PROYTEC Group Companies reserve the right to notify the relevant international circuit of the customer's default.



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### CORPORATE INFORMATION

1. The policy of the Board of Directors is to ensure maximum public visibility of its strategies, evaluations, and decisions, while respecting information about individual customers, sensitive project data, and confidential company information.
2. Summaries of requests, acceptances, and successfully completed transactions are published on the website.
3. The Download section of the website contains all public documents of the Group of Companies, as well as information on its articles of association.

### FEEDBACK

1. The PROYTEC Group recognizes that meeting the reasonable information needs of the public is essential to ensuring transparency, efficiency, and trust.
2. To this end, the PROYTEC Group Companies are committed to being as transparent as possible while balancing the interests of all stakeholders.
3. Further suggestions on how the PROYTEC Group can improve its transparency can be sent to [proytec@proytec.group](mailto:proytec@proytec.group)