



CODE OF BUSSINES

Conduct and Ethics for Employees

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: Will this build trust and credibility for MIEEX? Will it help create a working environment in which MIEEX can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. MIEEX is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success.

MIEEX is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

All MIEEX employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Treat others with dignity and respect at all times.
- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive or unwelcome.
- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Seek out insights from employees with different experiences, perspectives and backgrounds.
- Avoid slang or idioms that might not translate across cultures.
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations.
- Confront the decisions or behaviors of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.



MIEX will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive or unwelcome.

Create a Culture of Open and Honest Communication

At MIEX everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

MIEX will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Set Tone at the Top

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At MIEX, we want the ethics dialogue to become a natural part of daily work.

Uphold the Law

MIEX's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or MIEX policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.



Competition

We are dedicated to ethical, fair and vigorous competition. We will sell MIEX services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for MIEX or the sales of its services, nor will we engage or assist in unlawful boycotts of particular customers.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to MIEX, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

Health and Safety

MIEX is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please see the HR department.

Avoid Conflicts of Interest

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of MIEX may conflict with our own personal or family interests. We owe a duty to MIEX to advance its legitimate interests when the opportunity to do so arises. We must never use MIEX property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with MIEX.



Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with MIEX.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any MIEX transaction.
6. Placing company business with a firm owned or controlled by a MIEX employee or his or her family.
7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all MIEX employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

Gifts, Gratuities and Business Courtesies

MIEX is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by MIEX was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom MIEX does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of MIEX or customers, or would cause embarrassment or reflect negatively on MIEX's reputation.

Approved by:

FRANKLIN R. MARTINEZ CEO





FCPA

Policy

This Policy is incorporated into the Company's Code of Business Conduct and Ethics and applies to the Company and all of its employees, directors, officers, as well as its agents and persons performing similar functions, including for the avoidance of doubt any employees, officers or directors of the Company's manager, MIEX., wherever located (the "Employees") as well as to all of its subsidiaries and other business entities controlled by it worldwide.

We also seek to work with third parties who operate under principles of the same high standard as ours. We will consider terminating contracts where we believe they have not met our standards or their contractual obligations. "Third Parties" includes agents, brokers, partners, consultants, contractors, joint venture partners and other representatives while performing services or engaging in business for the benefit of the Company, whether individuals or organizations.

We do not engage in bribery or corruption in any form, whether in the private or public sector. Compliance with anti-bribery legislation is an ongoing responsibility of each individual Employee. No Employee of the Company shall have authority to engage in conduct or activities that do not comport with policies described in this Policy, or to authorize, direct, approve, or condone any such conduct by any other Employee. It is very important that all Employees understand what anti-bribery legislation mandates and forbids in order to ensure the Company's compliance with the law.

"Knowledge" is not limited to actual knowledge of a particular fact, circumstance or event. Rather, a person is deemed to "know" about an improper payment or other violation of anti-bribery legislation if he or she is merely aware of a probability of its existence.

Willful blindness, deliberately insulating yourself from or consciously disregarding suspicious actions or circumstances, is strictly forbidden by this Policy.

ZERO TOLERANCE ON RETALIATION

We believe that speaking up is always the right thing to do. No Employee shall be subject to any reprisal or adverse personnel action by reason of having made such a report in good faith. All such reports shall be treated confidentially to the extent permitted by law and can be made anonymously.

Any acts of reprisal or retaliation will be considered acts of gross misconduct and if substantiated, will result in disciplinary action, which may include immediate termination of the Employee's employment.



This Policy shall be distributed to each new Employee upon commencement of his or her employment or other relationship with the Company together with the Code.

ANTI-BRIBERY

Anti-bribery legislation makes it a crime for any Employee or Third Party to pay or accept a Bribe.

A “Bribe” is defined as:

- a) Offering, promising or giving anything of value to improperly influence another in order to obtain or retain business for the Company or to gain an advantage for an individual; or
- b) Requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the obtaining or retaining of business by the Company.

There is no minimum monetary threshold that defines a Bribe; “anything of value” includes both monetary and non-monetary payments, such as gifts, stock interests, contractual rights, real estate, debt forgiveness, personal property, product or service discounts, loans, meals, entertainment, travel expenditures, political and charitable contributions, and other interests arising from business relationships.

There is no need for a Bribe to be successful for a Bribe to be viewed as a violation of law; the offering of a Bribe is enough to constitute a criminal offense.

ENFORCEMENT AND PENALTIES

Anti-bribery legislation provides for both criminal and civil enforcement.

The U.S. Department of Justice (“DOJ”) and the Securities and Exchange Commission (“SEC”) have the responsibility of enforcing the FCPA and have the power to seek penalties for violations, including injunctions, the imposition of criminal fines or civil penalties on both the individuals involved as well as the Company, and could also suspend or revoke the Company’s privileges to conduct business with government agencies. In the event of a “willful” violation any penalties imposed would be significantly more onerous. The Company



cannot indemnify or pay criminal penalties imposed on any Employee. Employees are advised to regularly access the DOJ website for any updates.

Breaches of the Bribery Act also carry severe penalties. An Employee could be imprisoned for a period of years, disqualified from acting as a director and face significant monetary fines. Such fines will not be paid by the Company. In addition, the Company could face significant fines, lose the ability to trade in certain jurisdictions, lose business, face legal action by competitors, litigation and substantial investigation expenses as well as suffer damage to its corporate reputation.

The Company accordingly has a zero tolerance policy with regard to any actual or attempted act of corruption or Bribery (to include facilitation payments). A breach of this Policy will result in disciplinary action, which may include immediate termination of the Employee's employment. Where a case is referred to a law enforcement agency, the Company will cooperate fully with the criminal investigation which could lead to Employees being prosecuted and/or penalties being imposed on them.

PRIMARY AREAS OF RISK

In light of the severe consequences of Bribery or corruption violations, it is imperative that all Employees remain alert and cognizant of "red flags" of potential violations at all times. Such "red flags" may include, but are not limited to:

- Inflated or unusually large commissions or bonus payments
- Requests for inexplicably large payments in cash or in bearer instruments
- Payments through a third party or to an account in an off-shore or unrelated third country
- Requests that payments be made to an unknown third party, be split among multiple accounts, be made to an account other than where the Third Party or agent is located or business is to be performed or any other unusual financial arrangement
- False invoices or over-invoicing for Company or related services
- Lack of transparency in expenses and accounting records
- A Third Party whose qualifications include personal relationships with Public Officials



- A Third Party's apparent lack of qualifications or resources to perform services offered
- A Third Party who relies heavily on political or government contacts instead of technical skills or time invested
- Any refusal or hesitancy by a third party to enter into a written agreement containing representations and warranties to refrain from violations of the anti-bribery legislation or a refusal by any such party to explain or account for expenditures of Company funds entrusted to them
- Inadequate oversight over subsidiaries and personnel in any country
- A history or pattern of corruption in a country
- A Public Official recommends that the Company hire a specific third party
- Upon checking references, you find that a potential third party has an unsavory reputation or a criminal record or is not well known in the industry
- Repeated use of a third party for business without any reasonable justification for such repeated appointment.

Additional behavior may constitute a "red flag" and you should always remain alert to behavior that may raise questions. If you have any questions about actions that you feel might constitute a "red flag," please contact the Legal Department. It is always wise to err on the side of caution.

PUBLIC OFFICIALS

For purposes of anti-corruption and anti-bribery laws a "Public Official" includes any:

- a) official, employee or agent of a government, department or agency;
- b) official, employee or agent of a government-owned or controlled entity, business, or instrumentality (such as a doctor in a state-controlled hospital);
- c) political party;
- d) political party official;



- a) candidate for political office;
- b) employee or agent of a public international organization (such as the Red Cross, United Nations, or World Bank);
- c) anyone acting on behalf of any of these officials;
- d) an individual holding a legislative, administrative or judicial position (whether appointed or elected); or
- e) anyone exercising a public function.

Our Employees or any Third Party acting on our behalf must never offer, promise, authorize, or make an improper payment to, or otherwise confer any illicit benefit upon, a Public Official in any country, directly or indirectly, to obtain, retain, or direct business to anyone.

Any relationships with Public Officials in any country must be formed, maintained, and monitored with particular attention to this Policy and attention must be paid at all times to ensure that Employee actions do not create even an appearance of impropriety.

GIFTS, ENTERTAINMENT AND TRAVEL EXPENSES

It is never appropriate to attempt to influence a decision by offering personal benefits to a Public Official or any other person. Employees must never pay or receive a bribe or kickback, or accept anything that would or would make it appear that their judgment to act in the best interests of the Company could be compromised. It is Company policy to refrain from participation or involvement in activities that could create even an appearance of impropriety in its business activities.

Employees and Third Parties are permitted to pay business expenses of, or give gifts to third parties on behalf of the Company, only if they are reasonable, legal, customary, not frequent or lavish and permitted under the Company's policies and procedures, including this Policy and, where applicable, only when the appropriate approvals have been obtained in advance.

In all cases, the payment of such business expenses and the giving or receiving of gifts should be directly related to the promotion of the Company's business and free from the purpose, effect or appearance of causing the recipient to do business with the Company, abusing his/her position or to create a feeling of obligation, or compromise the judgment of the recipient or influence the



recipient to do or not do something in favor of the Company or an Employee or Third Party.

Employees must immediately return any gift of cash or cash equivalent that you receive from a third party and notify the Legal Department that this has happened.

Employees should contact the Legal Department if there is any question, uncertainty or concern regarding whether:

- a) the business expense or gift is reasonable;
- b) the business expense or gift is legal in the relevant country;
- c) the business expense or gift is customary;
- d) refusing or returning a gift or refusing entertainment may be impractical, insulting or harmful;
- e) the business expense or gift is permitted under the Code or this Policy;
- f) any other question or concern arises which may require pre-approval.
- g) Any activity which the Employee or Third Party could reasonably be expected to know is not permitted under the rules of the recipient's employer, or the location where the recipient conducts business, shall be prohibited. In such event the Employee or Third Party should immediately disclose the concern to the Legal Department

Payments of any kind, whether directly or indirectly, to any Public Official on behalf of the Company are strictly prohibited. Gifts of any kind, whether directly or indirectly, to any Public Official on behalf of the Company are strictly prohibited unless prior written authorization by the Legal Department has been received.



THIRD-PARTY REPRESENTATIVES

We seek to work with third parties, whether entities or individuals, who operate under principles that are similar to ours. The Company can be held liable for violations of anti-bribery legislation by Third Parties acting on its behalf.

All business agreements with Third Parties must be in writing — never exclusively oral. All paperwork and records that document any due diligence checks and any written confirmation or agreement of engagement must be retained as per the Record Retention Schedule.

You must never engage a Third Party to act on the Company's behalf if you know or suspect that the person may use or offer all or a portion of the payment directly or indirectly as a Bribe. Conducting appropriate pre-retention due diligence of agents, consultants and business partners is crucial to ensuring that the Company does not hire Third Parties who may engage in bribery violations while acting on the Company's behalf. It is your responsibility to carry out such due diligence checks in accordance with accepted industry standards.

In addition, facilitation payments by sub-agents and sub-contractors are unacceptable and must not be made. Employees must remain alert and cognizant of any indications of potential violations, including any unusual or suspicious requests, actions or circumstances by any Third Parties on an ongoing basis. Please refer to the "Primary Areas of Risk" above for a non-exhaustive list of 'red flags'. If you have any questions or concerns about the engagement of any Third Parties please contact the Legal Department immediately. It is always wise to err on the side of caution.

The Company will take all the appropriate actions to ensure that the Code is acknowledged to all third parties doing business with us. Relevant reference, where appropriate, will be included in Company's written communications with third parties. In order to share our values and standards with any interested party, a copy of the Code and this Policy will be available and share for any party.

Approved by:

FRANKLIN R. MARTINEZ CEO





ANTI-MONEY LAUNDERING POLICY

POLICY STATEMENT

ANTI-MONEY LAUNDERING POLICY POLICY STATEMENT

MIEX is a legal, ethical and transparent company, and it takes the responsibility to ensure and maintain that its assets and resources are not being used for corruption, irregularities, or money laundering. The company has taken it upon itself to detect frauds, irregularities, abuse of position, and institutional gains.

Purpose

The purpose of this policy is to make that the company's financial processes and procedures are according to the anti-money laundering laws.

Scope

This policy applies to every entity related to MIEX and its employees, directors, officers, contractors, or any third party working on behalf of the company.

The policy is for internal use, and the administration is required to convey it to every concerned person or entity. Failure to comply with the policy will result in appropriate action.

Money Laundering

Money laundering refers to those assets that are money that is acquired in exchange for money or assets gained unlawfully. It also includes money spent for terror purposes, regardless of the means it was obtained.

Under this policy, money earned by using the following means is considered money laundering, and it is prohibited;

Money or assets received in exchange for criminal or unlawful acts. Money whose origin is not explicit or earned by assisting any activity in evading lawful means.

Property gained after any criminal activity and its origin, location, and disposition are not transparent.

Property which is promoting any unlawful activity

Terrorism financing

Compliance

The company will establish a body responsible for the implementation of this policy.

The company will carry out the procedure to identify any irregularity on behalf of any stakeholder under this policy. The company should; Identify all the financiers of the company and verify their identity Take special care where stakeholders want anonymity Maintain proper records of the stakeholders

If anyone in the company knows or suspects that a person is involved in money laundering or terror financing, it is their responsibility to report such person to the body established by the company.



In such a case, the company must take the details of the people involved

Verify the type of transactions

Reason for suspicion

The amount involved

The company must consult with the legal department before embarking on business with a third party and carefully screen such interactions.

The policy is subject to updates and amendments, which will be communicated to the stakeholder immediately.

Approved by:

FRANKLIN R. MARTINEZ CEO

