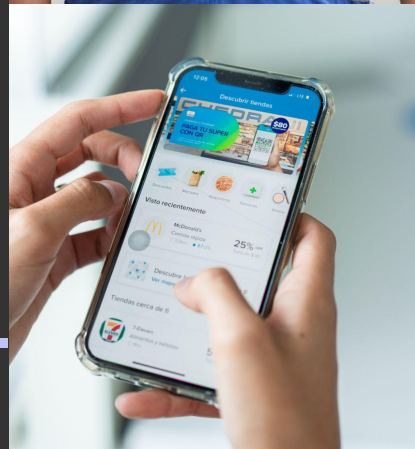




Mercado Libre Code of Ethics for suppliers and business partners.

This is who we are, what we believe in,
and how we connect.

MELI CODE



Mercado Libre code of ethics for suppliers and business partners



This code of ethics (MELI CODE †) applies to all suppliers of goods and services and business partners of MercadoLibre Inc. and all its subsidiaries and companies (hereinafter "Mercado Libre" or "MELI"), including contractors, subcontractors, agents, and representatives (hereinafter "Suppliers" or "Third Parties").

The signing of the contract, and/or the acceptance of a purchase order, and/or the supply of goods/services to Mercado Libre constitute the acceptance of the MELI CODE †

If any part of this code conflicts with local laws or regulations, only the sections of this code permitted by those laws shall apply.





Because this is who we are

And this is what we

believe in

this is how

we connect



MELI CODE ⁺

We are a committed team, united by a great purpose.

We innovate, make an impact, and pursue major transformations, guided by ethical values that define who we are and how we operate.

We always choose the correct way, without shortcuts, to achieve our purpose:

“Democratize commerce and financial services to transform the lives of millions of people in Latin America.”

We operate with suppliers and business partners, key links in our value chain, to foster a virtuous network.

Together we create new solutions that multiply the opportunities for growth and development for all parties.

Creating value together

MELI CODE + encompasses the ethical, operational and environmental standards we expect our Suppliers and Business Partners to comply with.

Our goal is to establish transparent and meaningful relationships in every interaction with Mercado Libre.

By connecting under these standards, we build a network of ethical conduct.

Consequently, compliance with this code absolutely conditions the selection of our Suppliers, the possibility of initiating any type of business or operation together, and its sustainability over time.



If you are reading this, you are part of the Mercado Libre's value chain



Your behavior defines us.

Your actions impact.

Your ethical commitment counts.



Minimum standards of business conduct we expect from all our Third Parties.

MELI CODE ⁺ regulates the relationships we establish with people and companies operating in the value chain of our ecosystem.

01

INTEGRITY IN HOW WE DO BUSINESS

Anti-corruption.

Financial integrity

Protection of information

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Prevention of money laundering, combating terrorism financing, and compliance with sanctions programs.

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Reporting and communication.

Integrity in our way of doing business

We act with integrity across the different markets and countries we operate in, with committed teams that grow and diversify to generate a positive impact, overcoming geographical, cultural, and financial barriers in the region.

This dynamic approach demands an ethical framework that is always updated, with clear, specific, and transparent guidelines that align with our purpose and encompass our entire value chain.



We invite you to continue growing alongside us with integrity, and to expand our impact, values, and commitments to transform the lives of millions of people in Latin America.

Discover MELI CODE ⁺ and integrate its standards into your business practices.





Anti-corruption

We do not tolerate corruption in any of its forms.

We have a risk-based Anti-corruption Program designed to prevent, detect and remedy actions contrary to existing regulations. We also require our employees and Suppliers to comply with the applicable regulations in every country we operate in.

We strictly prohibit requesting, giving or receiving, directly or through third parties, money or anything of value intended to influence the decisions of other people to obtain undue advantages or benefits.

This restriction applies to the relationship between Mercado Libre's Suppliers and employees, as well as to any relationship between Suppliers and other third before whom we are represented, particularly if it involves public officials.

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Members of the value chain may only give or receive gifts and courtesies as part of the occasional exchange that builds trusting and reliable business relationships.

If you are going to give a gift or courtesy to a third party on behalf of Mercado Libre, always consult our [Ethics and Compliance](#) team to confirm its feasibility and ensure that it is acceptable according to the requirements:

- They must be modest, traditional, and associated with industry practices and customs.
- They must not violate any law or regulation.
- They must not be perceived as a way to obtain an advantage.
- They must not be given in cash

Your responsibility is to act with absolute transparency and commitment to the standards presented here:

Supervise employee practices to ensure they are ethical and comply with these standards and applicable laws.

If you interact with government bodies and/or public officials on behalf of Mercado Libre, **it is essential to:**

- Comply with the financial controls required by Mercado Libre.
- Fully and transparently safeguard and store the documents that support transactions.
- Comply with the anti-corruption commitments undertaken.
- Request authorization from Mercado Libre if you need to subcontract third parties in connection with the services to be provided.

Financial integrity

The integrity of financial information is an essential condition for the development of our ecosystem.

We rely on our books and records to make business decisions and inform financial results, among other uses.

We disclose information to the U.S. Securities and Exchange Commission (hereinafter "SEC") in a complete, fair, accurate, updated, and understandable way, in accordance with the regulations established by SEC and by the corresponding regulatory authorities.



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As part of our value chain, you must:

- Maintain transparent books and records, documenting fully and accurately all transactions and operations. This includes records of financial and commercial operations, and interactions with public entities related to transactions made within the Mercado Libre ecosystem.
- Cooperate with any request of information that Mercado Libre may require as part of our commercial relationship in order to fulfill the responsibilities and obligations of disclosing or reporting to third parties or other government authorities.



Protection of information

At Mercado Libre, the protection of the information we handle and that is stored in our systems is of utmost importance. We understand the serious damage that could be caused if it was disclosed or shared with unauthorized third parties.

The proper treatment of the information we handle is a duty as well as an opportunity to generate trust in our value chain.

***Confidential information:** any data, document, record, memo, or content protected by industrial or intellectual property rights, as well as any information, in any format (oral or written, whether physical or digital) to which you have access and that is not publicly available.

****Personal data:** any type of information that may directly or indirectly identify a person.



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Take these precautions to protect confidential information and personal data:**

- Protect the personal data you receive from or collect on behalf of Mercado Libre, implementing the necessary security measures.
- Comply with applicable data protection legislation and internal Mercado Libre policies, ensuring responsible data processing.
- If you deliver packages sold through Mercado Libre, remember to safeguard the personal data of sellers and buyers you have access to.
- Adopt appropriate security measures and controls according to the sensitivity of the information you handle.
- Guarantee appropriate measures in order to promptly correct and report any information security violation and incident you detect.

ⓘ The Suppliers who access to confidential information of Mercado Libre during the commercial relationship are obligated to preserve it before, during, and after the relationship ends. It must not be used or disclosed to third parties without the prior authorization of Mercado Libre, except when authorized by law.

Insider trading. If you gain access to material non-public information related to Mercado Libre:

- You must not use it for your own direct or indirect benefit. Consequently, you must not trade securities or shares based on this kind of information, nor should you disclose or share it.

The information is considered material if it can be expected to affect the price of a company's shares, whether positively or negatively, and regardless of whether the change is large or small.



Intellectual property

At Mercado Libre we respect and protect our own and third parties' intellectual property rights, including trademarks, designs, domain names, software, knowhow, among others.

We ensure the authenticity, integrity and quality of the products offered on our platform.

#ExtiendeMELICODE+

- **If you are authorized by contract, you may use our intellectual property** responsibly and in accordance with the provisions of our [Legal Brandbook](#)
 - **While providing goods and services for Mercado Libre and/or its users**, you must guarantee you have all the necessary intellectual property rights and that you do not infringe upon third party rights.
- ⓘ The procurement of services or purchase of products by Mercado Libre does not imply an authorization of use or the assignment of its intellectual property rights, which are protected by local and international laws.



Responsible use of artificial intelligence

We are a native digital company with entrepreneurial DNA, always at the forefront of the innovation opportunities provided by technological progress, yet constantly aware of the new challenges these advances bring.

While the potential offered by the phenomenon of artificial intelligence (AI) excites us, inspires our entrepreneurial DNA, accelerates our innovative capabilities, and raises the bar for excellence in execution, it also leads us to responsibly address its impact.

This is why the responsible use of AI is integral to our ethical behavior and impact. Each time we develop, integrate, or use AI tools, we undertake to comply with and enforce current regulations, while incorporating global best practices in the field.



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Third Parties that develop, train or use AI must meet legal requirements and make every effort to follow best practices in the field to ensure that:

- They do not generate or reproduce discriminatory biases, and promote the inclusion of the diverse types of Mercado Libre users.
- They maintain the integrity and security of information through protection mechanisms that prevent both access and unauthorized use.
- They provide appropriate instances for stakeholders to give feedback to improve the systems.
- They incorporate and respect privacy standards and regulations at all stages of development.
- They comply with the contractual conditions associated with the use of Mercado Libre data to train their algorithms.

Conflict of interest

At Mercado Libre our decision are made objectively, transparently and with integrity, avoiding conflicts of interest.

Mercado Libre employees must formally declare any relationship they have with a Supplier and abstain from participating in any decision involving that Third Party.



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It is vital that you recognize and avoid real or apparent conflict of interest situations promptly. Here are some examples of situations that could create such conflicts:

- Providing any form of additional compensation, fees or commissions to Mercado Libre employees to do their job.
- Using confidential information obtained through your relationship with a Mercado Libre collaborator for your own business, which might provide you with an advantage other third parties.
- Having personal or family ties with a Mercado Libre employee, and requesting any kind of advantage for your business. For example, the assignment of preferential routes, prices and/or fees, or the manipulation of reputational information on our platforms.

Stay connected to Mercado Libre: Use these [Channels](#) to direct inquiries and promptly report any conflict of interest situations related to the business you conduct in our value chain.



Free competition and commerce

Free competition is part of the essence of Mercado Libre. It drives us to seek users' preference by offering more and better products and services, at the best possible price.

We comply with and demand compliance with antitrust regulations in every country where we operate, as well as with existing international standards.

#ExtiendeMELICODE+

Your collaboration is essential for maintaining the integrity, security, and safety of our entire value chain.

Comply with antitrust regulations applicable to your country and market

Comply with the regulations that protect consumers and good faith in commercial relations; ensuring that the advertising of products and services is truthful, that product labeling meets the minimum required information and that they comply with registration requirements, approvals and/or safety certifications..



Prevention of money laundering, combating terrorism financing and compliance with sanctions programs

At Mercado Libre we safeguard the integrity of the financial system and are actively committed to fighting these crimes.

Therefore, our Suppliers must not engage in any action that could facilitate or contribute to making assets derived from illegal activities appear legitimate.



- ⓘ Suppliers must be responsible for complying with the applicable regulations to foreign trade operations required by the authorities of countries where they provide services, including embargo and sanctions regulations as applicable to their businesses.

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To comply with the law and ensure the integrity of the financial system:

- Make sure you have suitable prevention systems in place to prevent and detect criminal activities such as drug trafficking, money laundering, human trafficking, or the financing of terrorism. Any tie to organized crime constitutes a serious violation of this code.
- Do not do business with countries, persons or organizations that have been included on international sanctions lists.
- Establish and maintain reasonable controls designed to avoid any of these criminal activities.

We believe in mutual respect and in the dignity of all individuals

At Mercado Libre we strive to maintain respectful, diverse and dignified environments that are free from harassment, discrimination, mistreatment, abuse and/or violence.

We seek to bring together and encourage diverse perspectives, ideas and experiences.



We choose to associate with Suppliers who adhere to our standards of respect, and we encourage them to adopt diversity and inclusion practices and policies.

#ExtiendeMELICODE+

It may be helpful to implement or promote preventive actions with your employees or colleagues, such as:

- Training and communication programs that encourage respectful relationships, diversity and inclusion.
- Secure channels for filing complaints or reports.
- Continuous evaluation and improvement of the company culture to foster dignified and healthy relationships.





Mistreatment and/or discrimination

We promote healthy bonds in all relationships within our ecosystem. We have a zero tolerance policy for situations of mistreatment and/or discrimination

We provide channels for consulting, alerting or reporting any inappropriate behavior. We expect our Suppliers to proactively commit to specific prevention and training measures.

These are some common situations of discrimination in which Suppliers must adopt preventive and/or corrective measures, as applicable:

- | | |
|---|---|
| → Ethnicity | → Age |
| → Gender, gender identity or expression | → Disability |
| → Sex | → Work or occupation |
| → Sexual orientation | → Physical aspect or features |
| → Religion or beliefs | → Health condition |
| → Family reality, civil status | → Socioeconomic state, social condition |
| → Nationality by origin or choice | → Ideology, opinion on politics or labor unions |

#ExtiendeMELICODE+

Fulfill your obligation to ensure respectful environments:

Practice zero tolerance towards any situation of discrimination and/or mistreatment: whether towards your own employees or colleagues, your suppliers, or Mercado Libre members. You must not engage in or tolerate acts of violence, harassment, abuse or coercion (whether physical, verbal, or psychological), nor any form of torture or cruel, inhuman or degrading treatment.



Child labor, forced labor and modern slavery

Forced labor, involuntary labor and/or any kind of modern slavery is strictly prohibited.

We actively comply with the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

Mercado Libre promotes the development of student learning programs, provided that they:

- Are carried out in compliance with local legislation and Mercado Libre policies.
- Have objectives related to achieving educational goals.
- Are managed responsibly, keeping proper student records and verifying program partners.
- Protect student rights, in accordance with current laws and regulations.

#ExtiendeMELICODE+

Ensure that in your work environment:

- Minimum ages established by local labor laws, regulations and standards are respected without exception.
- The duty to verify the age of all workers before employing them is met.
- The work is voluntary: your employees or colleagues must be free to leave the workplace at the end of their shift, dispose of their documents and personal belongings, and have the right to resign from their job without penalty (except as provided by local regulations).

Safe and healthy work environments

We create and promote safe and healthy work environments to protect people, resources and the spaces of our value chain.



#ExtiendeMELICODE+

Play your part by establishing safe, clean and healthy work environments in compliance with applicable industry standards. Ensure you comply with these health and safety practices:

- Ensure facilities are clean and structurally appropriate for their purpose. For example: hand washing stations, drinking water, enough garbage containers, and clean washrooms.
- Ensure effective machinery and equipment protection measures, implementing adequate maintenance routines and supervising their use.
- Establish proper procedures to prevent accidents and injuries among workers (provide appropriate safety equipment for each role, and clearly mark restricted or dangerous zones).
- Provide training on the subject during the onboarding of workers, and periodically throughout the employment relationship.
- Establish proper measures to protect workers from exposure to harmful substances, diseases and other similar risks.
- Have updated contingency and recovery protocols that establish how to act in emergencies, with evacuation procedures, drills, and emergency exit signage.
- If you are a transportation service provider, you must have safe transportation means that comply with the legal requirements of each locality, sector, and industry.

ⓘ When interacting in the same physical spaces as Mercado Libre employees, or rendering services in facilities operated by Mercado Libre, Suppliers must ensure that they do not put the safety of our employees, customers and/or third parties at risk.

Environmental impact

As our business grows and connects more people, we have designed a long-term strategy to ensure that our growth generates the least possible environmental impact.

We combine existing and innovative solutions to enhance this strategy, and prioritize hiring Suppliers committed to sustainable mobility, energy management and the circularity of materials.



- ① Our Sustainable Procurement Policy seeks to increase the participation of companies with a positive impact on our value chain by offering special payment terms and promoting their training to continue improving the social and environmental impact of their businesses.

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Contribute according to your size, location, activity, and reach:

- Obtain and update the necessary environmental permits, approvals and registrations for your services.
- Comply with applicable environmental legislation and industry operating requirements, and submit any reports required.

We encourage Suppliers to measure and establish strategies to reduce environmental impact.



Together, we perform with excellence

We operate with integrity and excellence. We perform with quality, keep things simple and honor our commitments.

As a result, every day more users, suppliers and business partners trust Mercado Libre's value chain, choose our solutions, and contribute to its development.

#ExtiendeMELICODE+

Bring your talent, experience and ability to perform with excellence, and strengthen the confidence of our users. We expect you to:

- Offer quality services safely, meeting the delivery times and contractual obligations required by Mercado Libre.
- Maintain all necessary licenses, authorizations, and permits required for operation in a timely manner throughout the commercial relationship with Mercado Libre.
- Implement appropriate security and quality systems that enable the timely detection and remediation of any issues that may arise within the commercial relationship with Mercado Libre.
- Possess sufficient liquidity and adequate financial solvency to meet obligations and respond to unforeseen circumstances or complex situations.
- Implement effective management practices to ensure business continuity in order to guarantee the supply of goods and services.
- Depending on the type of activity you undertake with Mercado Libre, in certain cases we might suggest or require the development of your own risk identification processes. This helps to obtain information on opportunities for improvement and material for designing useful training sessions that address the problems affecting certain businesses or services.

We count on your commitment to continue transforming the lives of millions of people in Latin America, growing together and pushing our limits further.

Synergy and cooperation

Our commitment to this code, its complementary policies, and the regulations applicable to Mercado Libre is absolute.

We expect your cooperation in upholding this code and multiplying its standards, fostering a culture of integrity in every venture or action we undertake together.



#ExtiendeMELICODE+

Your cooperation makes the difference.

Make an impact by:

- Responding to our inquiries and requests for information with complete, clear, transparent, and honest documents.
- When applicable, making available the records of transactions associated with Mercado Libre for audits, inspections, and tests.
- Collaborating when Mercado Libre has to carry out on-site inspections within the framework of the commercial relationship.
- Performing your own internal audits, inspections and tests when Mercado Libre makes a reasonable request for them.

And most important by:

- Being a protagonist, and actively participating in the solution of problems Mercado Libre identifies in relation to the services you offer us.
- Requiring your own supply chain to comply with applicable laws and these standards, and working with them to adopt and communicate these practices.

What if this Code is not complied with?

Non-compliance with this code could result in, among other consequences: warnings, sanctions provided for in the respective contracts, withholding of payments, suspension, or, as a last resort, justified unilateral termination of the contractual relationship without any right to compensation or prior notice.

In addition, in the event of a legal infraction, Mercado Libre will cooperate with the corresponding authorities.

*Mercado Libre's omission or delay in exercising a right shall not be understood as a waiver thereof. In addition, the partial exercise of a right shall not prevent the total exercise thereof or of any other right. Updated versions shall be published on the Mercado Libre site, and on the platforms in which Mercado Libre is associated with Suppliers.



Reporting and communication

We believe it is only possible to transform the lives of millions of people in Latin America by making our business grow with integrity and transparency.


#ExtiendeMELICODE+

Every attitude counts. Do not hesitate to report any kind of violation of this code through our dedicated line. The sooner, the better!

🕒 This is our anonymous and confidential hotline to report non-compliance or irregularities, accessible via email or phone:





[Mercado Libre reporting hotline](#) anonymous and confidential

 0800 - 999 - 6354


 01800 - 954 - 6354


 833 - 980 - 6354


 0800 - 761 - 6354

 888 - 0020 - 6354

 800 - 738 - 6354

 0800 - 53368

 0004 - 054 - 6354

 0800 - 100 - 8610