



## **APIB&IT CORPORATION**

### CODE OF ETHICS

#### Introduction:

This Code of Ethics is a document in which obligations and ethical responsibilities are indicated.

Following experiences gained over the decades in the financial sector we consider it primary to reaffirm that any decision made by us must be based on those ethical values which allow for definite social development, and for this reason we clearly indicate our principles and values in which we believe.

These principles and values guide our decisions, conduct and dealings with the financial market and investors, with the collaborators who invest their time, work and ideas to reach the aim, end and objectives.

#### 1 The Code of Ethics of the APIB&IT Corporation - Industry Group, Other Banking & Financial Services

##### 1.1 The Recipients of the Code of Ethics

This Code of Ethics is for administrators, collaborators, freelance professionals and/or consultants who carry out work in sensitive activities or for particular mandates, including whoever could be interested.

##### 1.2 The Task

An investment can be subject to risk of a loss or it can give an aspired fair profit. Therefore, dependent on the case, it can create emotions of bitterness and disappointment or enthusiasm and joy.

Our task is to offer investors, a management subject to inseparable and unchanging regulations and investments guaranteed by actual data proven over time by indisputable statistics as those summarized in each of our Offering Memorandum.

##### 1.3 Investment Sectors

The capital managed by us is principally invested in the following sectors:  
Gold, Silver, Numismatics 999,9 – Real Estate, Tourist complexes and Hotels both historical and modern, Businesses, Hospitals, Clinics private and/or affiliated Clinics, Retirement Homes, Medical Centers for particular pathologies with their own Research Laboratories, Centers for Pharmaceutical Studies and Research and Doctors, for Nutrition, Energetic and Technological,

##### 1.4 Safeguarding the investor's capital

Any assets bought using capital from the placement of our future bonds, by inseparable and unchanging regulations, cannot be ceded, in the case that the decision

to alienate could be placed solely if the asset to be alienated is substituted by an asset of equal value.

### 1.5 Respect for Regulations and Laws

APIB&IT Corporation and its recipients of this Code of Ethics commit themselves to respect all the Regulations and Law in force for each Country where their business is carried out.

## 2 PRINCIPLES AND ETHICS

Our aspiration is not to have a high profit to be competitive in the market, we believe it important to invest even in those sectors that represent concrete social aims that we believe essential in increasing the entire community's values, we are sure that this aspiration will represent a definite incentive to allow us to reach those social aims that represent the cultural and economic basis of our civilization.

Our ethics draws inspiration from the Universal Declaration of Human Rights, dedicating particular attention to dignity, to family, to study, to work, to health, an essential basis to peace and well-being that must be placed within easy reach of every human being without distinction of Race, Religion, Country or its social status. Primary attention is to be given to the effects of Down syndrome and to people with any type of handicap.

### 2.1 Honesty, correctness, loyalty, integrity.

APIB&IT Corporation asks each person who operates internally, independently of position or role, to abide by the principles of honesty, correctness, loyalty, integrity in carrying out the roles assigned to them internally and externally by assuming a correct and impartial attitude both in carrying out their work as in both relations internally and external relations.

Where it is necessary to give information that is complete clear and true, favoring the sharing of knowledge of data and statistics to enable the interlocutors to take independent and conscious decisions.

### 2.2 Safeguarding heritage

Each person independently from their position or role must be diligent in protecting resources and assets both material and intangible, to be custodians of the assets assigned to them to fulfill the job, to be aware that the assets assigned to them cannot be used for personal use or for third parties, which do not conform to the rules regarding correct usage.

### 2.3 Conflict of interest.

Each person independently from their role or job cannot pursue conflicting potential or partial interests and cannot carry out collateral activities which conflict with those of APIB&IT Corporation. Unknown persons who find themselves directly or indirectly in conflict, must abstain from any involvement in act or operation.

### 2.4 Professionality

APIB&IT Corporation can confirm based on the Curriculum Vita of each person on its staff is able and capable in executing his/her role with diligence, independence and professionalism.

#### 2.5 Privacy.

APIB&IT Corporation requests that it's employees and investors the necessary information, excluding any study on ideas, preferences, private life or personal tastes. Such information, without prejudice according to the Laws, are not communicated or divulged to third parties.

### 3 CONDUCT REGULATIONS

#### 3.1 Safeguarding the individual.

APIB&IT Corporation is committed to safeguard the moral integrity of its skilled workers and its staff of external collaborators, guaranteeing the right to working conditions which respect the dignity of the individual, placing attention to the development of the sense of belonging by rejecting any form of discrimination and/or abuse of both internal and external relationships

#### 3.2 Safeguarding the Environment

Being that part of the investments aimed at Real Estate and/or Businesses, APIB&IT Corporation, in order to safeguard the environment and to contribute to the development of eco-compatibility of its own real estate heritage and businesses including its relative installations, commits to respect the Laws and current regulations of the corresponding Country.

#### 3.3 Safeguarding the value of the resources

APIB&IT Corporation and its staff including every collaborator both internally as well as externally, place their commitment to use each resource in the correct and responsible manner, affirming conduct marked as optimizing themselves by avoiding waste and/or ostentation, preferring choices with attention to sustainability in the future of the same.

#### 3.4 Relations with the investors

APIB&IT Corporation is committed to give a reply to any request from the investors whether they are private investors or institutions, including any recognized Protection Agency, the replies will be given quickly and timely through suitable systems.

#### 3.5 Relations with International Institutions, International Organizations, Public Administrations

APIB&IT Corporation and anyone from the Executive Committee will not put in place conduct which could give the impression of illicit pressure in order to influence decisions and contractual agreements or to acquire deals of favour for the management of any activity, including pursuing any purpose forbidden by the Law either by local or International Rights.

It being understood that it deals only out of an act of courtesy or gift of little monetary value, it is not allowed to offer, directly or indirectly, gifts or compensation to officials of Institutions, Organizations or Administrations mentioned.

It is not allowed to give or receive confidential information that could compromise or damage to the reputation of either party.

3.6 Information on origin or management of the capital, sectors of investment and their purpose.

APIB&IT Corporation, for transparency, Registers at the Department of the State of Florida U.S.A. the corresponding individuals \*Apostille each document inherent to the disposal or placement of any type of Bond Securities issued attaching, where deemed necessary, relevant contracts, agreements and purpose of the same with complete coherent and appropriate backup documentation.

#### 4 MANAGEMENT AND SAFEGUARD OF CAPITAL RULES FOR THE SECTORS OF INVESTMENT

4.1 Investments in Gold and/or Silver 999,9 including numismatics of the same 999,9. A minimum of twenty five percent percent of the capital originating from the placement of any kind of our future bonds, that has been made in a private and/or public offer that has been placed with private and/or institutional investors, must be invested mainly in precious metals, of the percentage mentioned a minimum of fifteen percent is invested in Gold 999,9 the remaining ten percent can be invested in Silver 999,9 or in numismatics both in Gold and Silver 999,9 Mostly the metal either of Gold or Silver is represented by bars with weights represented in Troy Ounces. The numismatics both of Gold and Silver are only Uncirculated Coins with Protected Custody and Certificate of Authenticity. Gold, Silver and Numismatics are bought only at wholesalers and or authorized dealers with specific Licences and Permits.

4.2 Safeguard of assets purchased.

Gold, Silver and Numismatics will be protected in appropriate Authorized Deposits or in Banks that are able to offer Safety Deposit Boxes, each purchase and deposit site will be communicated with appropriate documentation to the Department of the State of Florida U.S.A. for registration with the corresponding individual \*Apostille

4.3 Regulation on the disposal of the assets.

Gold, Silver and Numismatics can be disposed of only at the expiry of the nineteenth year and one day, counted from the date of acquisition. Where thought necessary the disposal of the assets will be placed and classified as Reserve Capital.

4.4 Investments in Real Estate

It is mostly aimed at real estate investments giving an income, each investment is done with reference the index value of the local market paying attention to the following factors; the history of the asset, maintenance status, location, and use. Where thought necessary additional costs will be calculated for restructuring and for change of use. Our interest is in the hotel sector and accommodation sector represented by; Agro Tourism, University Campuses, Retirement Homes for the Elderly.

Particular attention is paid to health facilities such as Private Clinics and/or Affiliated, Health Facilities for particular pathologies, to which, if not pre-existing are attached to Centers for Study and Research.

Each real estate purchase information on its use and future income is included and is communicated with appropriate documentation to the Department of the State of Florida U.S.A. for registration with the corresponding individuals \*Apostille

#### 4.5 Regulation on the disposal of assets.

Each real estate, independent of its final use, are property assets of APIB&IT Corporation, being real estate with income, its disposal is not foreseen. In the case that disposal of any real estate is thought to be opportune, that the same amount of the primary purchase cost must be reinvested in real estate of the same price and equal future income.

\* Apostille ( Convention de La Haye du 5 October 1961 )

### 5 BUSINESSES ACQUIRED AND RELATIONS WITH THE MINOR ASSOCIATES

5.1 Part of the existing capital or from the placement of the bonds can be invested in the business sector by the acquisition of all of the Shares or of a minimum of fifty one percent of the same, in this case APIB&IT Corporation require the assignor, as well as the recognition of this Code of Ethics to scrupulously follow the regulations indicated in paragraph 3 CONDUCT REGULATIONS, highlighted in points, 3.1-3.2-3.3

5.2 Management, the person with responsibility will remain or the previous proprietor or Minor Associate.

Existing personnel and or skilled workers, independent of their role or jobs both internally or externally, cannot be fired, unless its futility is proven or conduct does not correspond to the Principles of Ethics.

Where thought to be opportune or necessary to improve the progress and productivity of the Business, the Minor Associate can declare, according to his unquestionable judgement, to employ more workforce or personnel.

5.3 Being that the investment in Businesses is considered as an investment with Income, it will be the duty and due diligence of the Proprietor or Major Associate to propose each solution inherent to the strengthening of the brand name, using where necessary, production equipment and quality of the product to increase distribution nationally and internationally.

Where the Major Associate decides to increase the building, production or personnel, the Minor Associate will not be asked for a financial contribution or release of the remaining share in his/her possession.

5.4 The person to be responsible for managing the Business be it either the Proprietor, Major Associate or Minor Associate must respect the Laws inherent to Taxes, communicating precise and true data, expenses or passive losses to the competent authority, backing when requested each fact with important and pertinent documentation.

5.5 Relations with suppliers of products, services and/or third parties to which connected

The appointed person to manage the Business must use the information necessary to evaluate the economic status and reputation of the supplier, avoiding categorically

business relations with anyone involved in any illicit activity. To carry out choices on precise evaluation criteria on price and quality of the product or services offered. To prevent any conflict of interests as purely enunciative and not exhaustive; personal economic interests with suppliers or competition, working at suppliers or competition which are not foreseen or relevant to carrying out corporate tasks.

## 6 INVESTMENTS IN SOCIAL DEVELOPMENT

6.1 Alternative Energy, turbines as well as solar, including recycling solid urban waste for Waste to Energy.

6.2 Medical Research and Pharmacology for Cancer and Alzheimer pathologies. Laboratories for Research on Stem Cells.

6.3 APIB&IT Corporation and the Management Committee, according to relevant tasks, will promote, with the support of Bodies, appointed International Organizations, any initiative in support the growth of any Nation in its development. In particular necessary in the water supply sectors and food farming, medical, hospitals, schooling, roads, transport and energy.

6.4 The Management Committee, as decided that annually, on closure of the balance sheet, five percent of the net profit will go to sustain social projects paying close attention to child abandonment, people with handicap, and to the elderly who do not have any resources.

Miami April 16, 2019

**APIB&IT**  
**CORPORATION**

