



MERCADO LIBRE'S CODE OF ETHICS

Because this is who
we are and this is
what we believe in,
this is how we
behave

MELI CODE



For this is who we are and this is what we believe in, here's how we behave.



This Code of Ethics (or "Code") applies to all Mercado Libre Inc.'s employees and directors, its subsidiaries or affiliates across the different countries in which it operates ("Employees" or "Individuals" working at MELI.) and, where applicable, suppliers, customers and business partners ("Value Chain").

Neither Mercado Libre's omission nor delay in exercising a right shall constitute a waiver of such right. Similarly, the partial exercise of a right shall not prevent the full exercise of such right or of any other right.

Employees will be informed of any amendments to this Code via e-mail or any other suitable means, and updated versions will be posted on Mercado Libre's website.

Compliance with the policies mentioned in this Code is mandatory for all employees. Such policies are neither part of the Code nor considered to be incorporated to it.



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For this is who we are and this is what we believe in,
here's how we behave.

This is who we are

01



→ 01

MELI CODE is part of our fundamentals: **our MELI DNA.**

As such, it mirrors our **essence** and manifests itself in our culture.



We are a diverse team united under one great purpose. We are innovators, we make an impact and we undertake great transformations following ethical values that define the way we are and act.

Fundamentals

PAGE 06

A commitment at the heart of everything we do, by Marcos Galperin.

PAGE 07



For this

is

who

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what we believe in



here's

how we behave

Fundamentals

MELI CODE is a collection of all the ethical values that we put into action at MELI. It is our commitment to integrity.

It is a way of being and acting that we measure with the highest ethical standards, and that we honor by complying with the regulations of each location in where we operate.

MELI CODE is very much alive in the MELI culture: it helps us put into practice the integrity that nurtures our MELI DNA. It encapsures who we are and shows how we seek to embody integrity in each and every one of our businesses.

We always choose the right path, avoiding shortcuts, to fulfill our purpose.

For this is who we are and this is what we believe in,
here's how we behave.

When we created Mercado Libre in 1999, we were convinced that Latin America was filled with talented people who could change reality through their efforts and perseverance. Our goal was to build innovative solutions that would improve the lives of millions of people, making it easier for them to shop, sell and pay anywhere. Today, we are proud to be the largest ecosystem serving e-commerce and digital finance solutions in the region, and to create hundreds of thousands of job opportunities and growth.

Mercado Libre's history reflects the entrepreneurial culture that drives us to take risks, make mistakes, learn, and try again, do our best and compete as a team, with a constant focus on our users.

At Mercado Libre we always choose the right path, without shortcuts. The road of hard work and dedication. The path of excellence and meritocracy. Acting with integrity, honesty and respect is at the core of our actions.

This Code of Ethics encapsulates who we are and how we behave every day to continue winning and achieving our purpose of democratizing commerce and financial services to transform the lives of millions of people in Latin America.

Marcos Galperin
Chairman & CEO





For this is who we are and this is what we believe in,
here's how we behave.

This is what we believe in

02



→ 02

**To inspire is to motivate
others to venture further.**

Integrity is part of our Cultural Principles
that guide us in everything we do at MELI
to achieve **our purpose.**

Democratizing commerce and financial services
to transform the lives of millions of people in Latin America.



Conducting ourselves in
accordance with our
MELI CODE steers the
course of our journey at
MELI.

**We are inspired by our Cultural
Principles**

PAGE 10

Why do we have a code of ethics?

PAGE 11

For this is who we are and this is what we believe in, here's how we behave.

We are inspired by our Cultural Principles

Our culture boosts us, gives us identity and guides our way of being and doing.

At MELI, we earn the trust of our users, teams, partners and the community by acting with integrity, transparency and ethical decision making.

We take responsibility for our own actions, and we empower ourselves by benchmarking our actions against this MELI CODE and our Cultural Principles.



CULTURAL PRINCIPLES



We create value for our users

We build impactful tools which democratize commerce, and offer an excellent experience that fosters entrepreneurship and digital development.



We undertake projects assuming taking

We think big and long term, we never give up and try to go beyond our own limits.



We execute with excellence

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



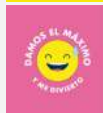
We are always on the go

We experience each change as an opportunity, we try and correct until we achieve our goal, and we learn from our mistakes.



We compete to win

We collaborate within Mercado Libre and compete outside our company, we create the best teams, trust their decisions and promote meritocracy.



We give our best and have fun

We work intensely and with dedication, acknowledging our achievements and promoting a healthy, comfortable and enjoyable environment.

For this is who we are and this is what we believe in,
here's how we behave.

Why do we have a Code of Ethics?

We believe that only by growing our business with integrity and transparency we can transform the lives of millions of people in Latin American



MELI CODE is the code that guides our behavior throughout our career at MELI.

This document guides the development of our team and our business ecosystem, which is increasingly challenging and diverse.

It is a framework that helps us make decisions and take risks consciously.

It is also an instrument that encourages us to put our Cultural Principles into practice, focusing on the responsibility and ethical commitment expected of each and every Individual working at MELI.

Day after day we make decisions, and it is not always clear what is the right thing to do. MELI CODE assists us in making the right decisions. It addresses the behaviors that are expected of us and provides us with information and support on each topic.





For this is who we are and this is what we believe in,
here's how we behave.

Here's how we behave 03



→ 03

Our continuously expanding dynamic business ecosystem, with operations across different markets and countries, and with growing and diverse teams, requires an **ethical framework** that is always **up to date and with specific, clear and transparent guidelines**.

In MELI there are teams dedicated to maintain this framework in force and accessible so that everyone, in any situation, may refer to it and have the certainty to conduct themselves as expected and in the right way.

With specific and updated regulations, so that the "this is how we behave" of our MELI CODE is as much an individual practice as a collective reality.

Respect@MELI

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For this is who we are and this is what we believe in,
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Respect@MELI

We believe in mutual respect and the dignity of all people.

We strive to maintain respectful environments, free of harassment, discrimination, abuse and violence.



#ActiveMELICODE

Zero Tolerance

- Avoid and report practices or situations that may affect your dignity, safety or integrity.
- Do not use language, clothing, signs, symbols, etc. that may be offensive.
- If you experience or witness **any form of disrespect**, do not condone it: [Report it here](#)

⚠ SITUATIONS INVOLVING DISRESPECT

Harassment, discrimination, humiliation, abuse, aggressions, mockery, bullying or violence in any form motivated due to ethnicity, gender, gender identity or expression, sex, sexual orientation, religion or beliefs, family status, nationality by origin or choice, marital status, age, disability, work or occupation, physical appearance, health status, socioeconomic status, social status, ideology, political or trade union opinion, or any physical characteristics, or any other reason.

For this is who we are and this is what we believe in,
here's how we behave.

Diversity, equity and inclusion as key drivers

We value the diversity that each person brings and their unique way of seeing the world.

- **We know our users and our teams, and we promote meritocracy.**
- **We guarantee our innovative potential by nurturing our e-commerce, payment and shipping platforms with a variety of insights and integrated experiences.**
- **We endeavor to have the same diversity inside that exists outside.**

To achieve this, we build representative teams that feed each other with different profiles, points of view, talents and life experiences.

This not only serves to enrich us, but also allows us to develop innovative products that anticipate the needs and expectations of millions of different users.



We drive our business purpose by democratizing opportunities, understanding and respecting each and every individual's uniqueness.

With achievement-based promotions, tailored learning, multiplying talent, recognizing exemplary attitudes, celebrating achievements and putting our Cultural Principles into practice by example.

SELF-CHECK

- | | |
|---|---|
| When I scout talent, do I reflect on the fit my team needs? Do I define any limiting requirements? Do I use sources that provide diversity? Am I aware of my biases? | ✓ |
| Does my team create a healthy and inclusive environment for everyone? Can all individuals be who they really are? | ✓ |
| Is everyone expressing themselves freely and respectfully in team meetings? Do I give everyone a voice and encourage them to participate? | ✓ |
| When I develop and promote someone and discuss my succession plan, do I provide equal opportunities for development? Do I nurture MELI's leadership pipeline with diversity? Am I aware of my biases? | ✓ |
| What am I doing towards equal opportunity?
Can I think of some concrete examples? | ✓ |
| How am I contributing to collective awareness? How am I helping others be aware and act responsibly and appropriately on the issue? | ✓ |

For this is who we are and this is what we believe in,
here's how we behave.

Transforming as a community

At MELI we work to capitalize on our scale to generate a positive and transformative impact on society.

We seek to be increasingly efficient in our operations to reduce the environmental impact across the Value Chain.

Sustainability is a cross-cutting business strategy involving three areas of action:



Management of our own environmental impact.



Financial inclusion and commercial development of entrepreneurs with positive socio-environmental effects.



Social empowerment of our communities, with a focus on education and digital inclusion.



Our commitment to Human Rights

We are committed to ensuring that people in our Value Chain are treated with dignity, fairness and respect. We work to ensure that internationally recognized human rights are upheld in all our relationships. Our commitment is based on the main international standards and frameworks developed by the United Nations (UN) and the International Labor Organization (ILO).

At Mercado Libre we adhere to the following:

- The Universal Declaration of Human Rights
- The United Nations Guiding Principles on Business and Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work



For this is who we are and this is what we believe in,
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Co-creating safe and healthy environments

It is our responsibility to maintain and preserve a safe and healthy work environment. That means taking care of ourselves and those who share our workplace.

To protect the individuals working at MELI, its resources and spaces, we adhere to safety, health and hygiene standards and practices in both on-site and remote environments.



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- Do not work under the influence of alcohol or drugs, as they may affect your work and the safety of those around you.
- Use the safety equipment and elements appropriate to your role.
- Do not access restricted and/or secluded areas.
- Protect and take care of Mercado Libre's assets: respect the site's and facilities' information protection and security policies.
- If you are assigned to an operations center, always keep in mind the MELI Golden Rules for Health & Safety.

After office → At times, MELI organizes after-hours events where alcohol is served. On these occasions, alcohol consumption should be on a conscious and non-excessive basis.

For this is who we are and this is what we believe in,
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Making decisions and relationships: Conflicts of interest

A conflict of interest exists when our personal interests collide or may collide with the interests of MELI, affecting our objectivity when making decisions, or when performing our duties.

At MELI, our decisions are made objectively, transparently and with integrity. We always place the interests of the company above any personal interest or benefit.

Identifying a conflict of interest is not always easy. We have designed a Conflict of Interest Policy to help us make decisions correctly and objectively.



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Avoid and manage conflict of interest situations with clarity and agility.

FACED WITH A CONFLICT...

Refrain from making decisions on the issue in question



Inform your leader and the Ethics and Compliance team.



Comply with the appropriate mitigation actions.

⚠ COMMON CONFLICT OF INTEREST SITUATIONS

- Having under one's supervision or evaluation a person with whom one has a personal and/or family relationship
- Making contracting decisions regarding a supplier with whom one has a personal relationship
- Making business decisions about a business partner or user with whom one has a personal relationship or a financial interest
- Using one's position at MELI or the information to which one has access to obtain business or commercial advantages: Do not exploit for yourself or your personal relationships any opportunities that you may have discovered through your role at MELI.

SELF-CHECK | To make correct and objective decisions

Could my decisions be perceived by my team, my leader or others as not being objective? ☒

Are my actions influenced by any personal interests and could they be benefiting certain suppliers, users or people in my team over others? ☒

How would my decision be viewed by our competitors or suppliers? ☒

For this is who we are and this is what we believe in,
here's how we behave.

Giving or receiving gifts and courtesies

Individuals and teams working at MELI may accept gifts and courtesies as part of the occasional exchange that builds trusting relationships with our Value Chain.

However, we must avoid creating the perception that MELI or any of its members has preferential treatment toward anyone in the Value Chain because they have given or received gifts and courtesies.

We never ask for or accept payments or gifts of a personal nature in exchange for MELI services or benefits.

We maintain a Gifts and Courtesies Policy for any questions that may arise regarding these practices.



#ActiveMELICODE

In giving or receiving corporate gifts or courtesies, please make sure that they meet all of these requirements:

- | | |
|--|--|
| ✗ Their value does not exceed USD 150 | ✓ They are modest |
| ✓ They are traditionally associated with industry customs and practices. | ✗ They are not used to seek competitive advantages |
| ✗ They do not infringe any law or regulation | ✗ They are neither cash nor gift cards |
| ✗ They do not and cannot affect objectivity in decision making. | ✗ They have not been requested by the recipient, nor can they be construed as bribes or payments |



Travel invitations are acceptable as long as they relate to conferences, seminars, or events relevant to MELI's business and are in compliance with our Guidelines for travel invitations

⚠ WARNING SITUATIONS

- Gifts and courtesies when dealing with public officials.
- When working in areas or operations with a higher risk of conflicts of interest, such as procurement or commercial sectors.

Consult directly with the [🔗 Ethics & Compliance team](#)

For this is who we are and this is what we believe in,
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MELI as our principal employer

Individuals working at MELI may not engage in outside employment or any income-generating activity if it competes with the Company's business or interferes with their employment obligations to MELI.

At all times, MELI will be considered our main employer.



ONE CANNOT ENGAGE IN ANY OUTSIDE EMPLOYMENT ACTIVITY THAT...

- ⊗ **Competes** ⓘ with any of Mercado Libre's businesses.
- ⊗ Causes or may cause conflicts with one's work obligations to Mercado Libre.
- ⊗ Affects one's ability to devote adequate time and attention to one's job responsibilities.
- ⊗ Interferes or may interfere with objective and transparent decision making.
- ⊗ Requires using information and/or resources that one accesses or is provided due to one's role at MELI.

ⓘ Competing means engaging in any activity equal or similar to those carried out by Mercado Libre, or owning a significant shareholding (more than 5% of the capital stock) or significant interest in a company that competes directly with the Company.

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If you have an employment or profitable activity outside of MELI:

- Refrain from making decisions related to such external activity that involve Mercado Libre's interests.
- Inform your leader and complete the Conflict Check Form.
- Comply with the appropriate mitigation actions.
- Do not use your position at MELI or images of the brand to obtain benefits in your external activity.

For this is who we are and this is what we believe in,
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Protecting intellectual property rights

At MELI we protect and respect intellectual property rights, not only our own, but also of third parties.

Intellectual property rights over our trademarks, domains, designs, technology, software, inventions, strategic information and know-how (among others) are one of our most important resources and are protected by national and international laws.

The emerging rights to any creation or work product that individuals who work at MELI develop in the course of their employment are owned by MELI. We are bound by our Intellectual Property Policy.

We have developed a set of solutions, grouped in (i) our Brand Protection Program, which allows holders of intellectual property rights, and/or their authorized representatives, to report infringing publications in any of the countries where we operate, and (ii) the Mercado Libre Anti-Counterfeiting Alliance, a regional alliance that seeks to counter the offer of fake products on our sites.



#ActiveMELICODE

→ Do not use third party **content** ① without prior authorization from their owners, except in the case of uses authorized by law.

→ Be mindful when authorizing third parties to use any material that is proprietary to MELI.

→ Consult with the Legal & Government Relations team to ensure that you are not in breach of any regulations.

① Articles, photos, graphs, sound files and other documents are generally protected by third-party intellectual property rights, in which case their unauthorized distribution may lead to some kind of liability for MELI.

Works published on the Internet are also protected. The fact that a work is on the Internet does not mean that its author or owner has waived the right to economically exploit his or her work.



For this is who we are and this is what we believe in,
here's how we behave.

Interacting on our ecosystems platforms

At MELI, we behave in an exemplary manner on the platforms of our ecosystem.

As part of our ethical commitment, we comply with the terms and conditions and with each of the policies that regulate our products, and we also ensure that the rest of the users comply with them.

Through our e-commerce and fintech ecosystem, we provide our users with solutions that not only contribute to the development of a large and growing e-commerce community in Latin America, but also foster entrepreneurship and social mobility.

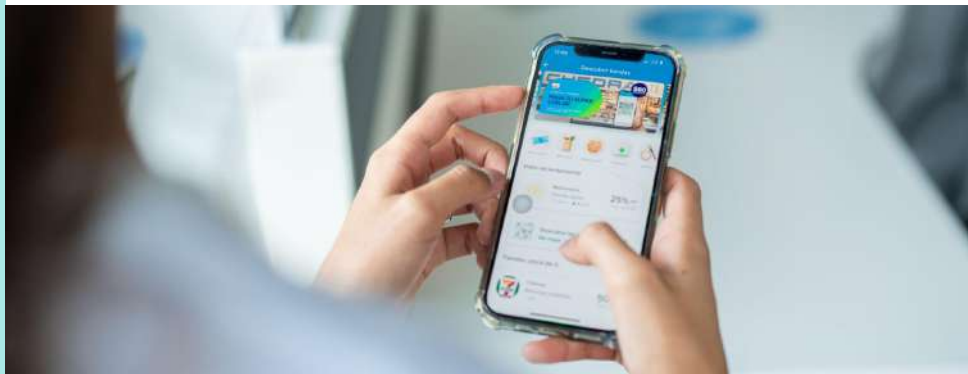


#ActiveMELICODE

If you have access to our platforms' systems or databases → **You must NOT use this information to contact users to offer them transactions outside Mercado Libre or for personal benefit.**

If you make any offer or transaction on our platforms → **Do it under your sole responsibility and for personal purposes. You must not imply that you are doing it on behalf of MELI.**

Use your e-mail, phone, and personal address to operate across the platforms
→ **Do not use Mercado Libre's mail or phone number.**



For this is who we are and this is what we believe in,
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Speaking on behalf of MELI

MELI's growth and the entrepreneurial spirit of those who are part of it increase the possibility of participating in external spaces dedicated to exchange and dissemination.

Our ecosystem's official spokespersons are authorized to speak and expose before the media or relevant forums in a public manner.

We are fully responsible for the comments or posts we make in print and digital media. It must always be clear that these publications reflect our personal point of view.



#ActiveMELICODE

- When posting your opinions and/or views regarding a topic, you should not comment or imply that you are doing so on behalf of MELI, unless you have express authorization to do so.
- If you make a post about any public aspect of MELI's business, or about any topic in which the company is involved, you must expressly state that the opinions are your own. Do not include MELI logos.
- **Before accepting any invitation** to participate in any type of event or public forum representing MELI, **talk to your leader** so that he or she can assess its impact and give you appropriate advice.

Get advice from the [PR](#) Public Relations team

For this is who we are and this is what we believe in,
here's how we behave.

Engaging in political participation or contributions

At MELI we are free to be who we are. Our culture encourages us to exercise our freedom of thought and choice.

Therefore, as long as it is done on a personal basis and as permitted by applicable laws, there are no restrictions or objections of any kind to joining, supporting, serving, contributing to, or promoting any political party or political candidacy.

Neither MELI nor its leaders may influence the exercise of employees' political rights.



#ActiveMELICODE

In case of conducting political contributions or activities, it must be clear that you are doing so on a personal basis and not as a representative of Mercado Libre.

DO NOT USE...

- ⊗ MELI resources and time
- ⊗ MELI logos
- ⊗ MELI e-mail address
- ⊗ Any reference to your position at MELI

Get advice from the [Legal & Government Relations area](#)



For this is who we are and this is what we believe in,
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Anti money laundering and terrorist financing prevention

We are committed to the fight against these crimes and to the enforcement of sanction programs that contribute to their prevention and punishment.

Money laundering is a crime in which the proceeds of criminal activities are moved through a series of financial transactions designed to conceal the true origin of the funds.

Terrorist financing consists of any economic action, aid or mediation that provides financial support to terrorist organizations, and these resources may come from both lawful and unlawful activities.

The individuals working at MELI and our Value Chain are required to comply with the Program for the Prevention of Money Laundering, Terrorist Financing and Sanctions. Any violation is considered a serious offense.



#ActiveMELICODE

- We know the warning signs and report any irregularities when detected. File your report [here](#)
- We develop controls, collaboration agreements and ongoing improvement processes to prevent our products and services from being used for these purposes, or by individuals on international sanctions lists.
- We actively collaborate with regulatory authorities and other companies to join efforts aimed at the prevention and detection of these types of crimes.



PAY ATTENTION TO THESE SIGNS

- A user, partner or supplier provides incomplete, false or suspicious information, refuses to answer questions or does not show his or her identification.
- Transactions are carried out in such a way as to evade controls (e.g. several transfers for amounts lower than those that should be reported to the authorities.)
- Large cash payments.
- Large purchases of prepaid products, such as gift cards.
- Purchases with gift cards for unknown persons or government entities.

The AML team [📧](#) is always available to advise you on these matters.

For this is who we are and this is what we believe in,
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Fighting corruption

At MELI we do not tolerate corruption in any form. We prevent and control anyone in our ecosystem from making or offering improper payments or anything of value that could be perceived as a bribe, or that is intended to obtain an improper benefit or preferential treatment for MELI.

We comply with the U.S. Foreign Corrupt Practices Act (FCPA) as well as the anti-corruption regulations applicable in each of the countries in which we operate or do business.

To fulfill our commitment in a sustainable and effective manner, we have a Anti Corruption Policy and a risk-based Anti-Corruption Program designed to prevent, detect and remedy acts of corruption.



#ActiveMELICODE

→ **If you have** information about any violation to this section, or believe that you have been offered or solicited for a bribe, **you must report it immediately** through the Whistleblower Hotline and to the Ethics & Compliance team.

→ **You should be especially careful if you interact with the public sector:**

If you require the services of third parties to represent MELI before public officials or government entities, please abide by the Third Party Risk Management Program.

→ Offering gifts and courtesies to government officials is especially risky because it could be perceived as a bribe. Before sending gifts and hospitality to public officials:

- Review the Corporate gifts and hospitality policy and be sure to comply with its requirements.
- Get advice from the Ethics and Compliance team.

→ When making donations, please comply with the MELI donations policy.

WARNING SIGNS

- Contracts with government entities
- Participation of third parties as intermediaries in the management of procedures before government entities
- Requests for donations in connection with obtaining permits, licenses or authorizations
- Hiring of third parties referred by public officials
- Offer of exceptions to the enforcement of regulations

Be on the alert for warning signs and consult with the [Ethics and Compliance team](#).

For this is who we are and this is what we believe in,
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Financial integrity: Record keeping

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

We have internal controls that reinforce legal, regulatory, accounting, tax and other compliance requirements applicable in the countries where we operate or do business.


At MELI, we are aware that the budget and the money allocated to us to carry out our duties belong to MELI, and ultimately to our shareholders. Therefore, we play a leading role in ensuring that MELI's money is used properly, keeping transparent, complete and accurate accounting records.



PAY ATTENTION TO THESE SIGNS

- All records should disclose transactions with reasonable detail, accuracy and transparency.
- False or misleading records, unrecorded payments, concealment of accounts and any other action intended to evade or impede the operation of internal controls are prohibited.
- In order to avoid conflicts of interest between the execution and control of operations, a rigorous scheme of segregation of duties is followed, which includes stages of authorization, execution, recording, custody and review of transactions.
- The records must be kept in accordance with the laws and/or commercial standards and practices prevailing in each country where the parent company, subsidiaries or operations are located, or for a period of ten (10) years, whichever term is longer.

The [Finance Controlling](#) and/or [Ethics & Compliance](#) teams are available to advise you on this issue.

 Mercado Libre discloses information to the Securities and Exchange Commission ("SEC") in a full, fair, accurate, updated and understandable manner and in accordance with the regulations established by the SEC and the relevant regulatory authorities.

Any direct or indirect action aimed at influencing, coercing, manipulating or misleading external auditors in order to provide false information about Mercado Libre will be strictly sanctioned.

For this is who we are and this is what we believe in,
here's how we behave.

Engaging with third parties

Each member of our Value Chain plays an important role in the evolution of our ecosystem, in the achievement of our purpose and in our efficient growth.

Therefore, we encourage them to conduct themselves with the same ethical standards as we do.

We have tools in place to ensure that our business relationships with our third parties are conducted within a framework of integrity.



#ActiveMELICODE

If you require third-party services:

- Ensure compliance with internal contracting processes, which may include validations regarding reputation and qualifications for the service to be rendered.
- Pay attention to any illegal and/or unethical conduct that does not fall under our MELI CODE.
- When participating in the contracting process, make sure that you are not in a situation of real or apparent conflict of interest. Check our Conflict of Interest Policy
- Promote our [Whistleblower Hotline](#) to third parties with whom MELI has a business relationship so that they may report any illegal or unethical conduct by MELI employees.

If you are involved in any process of importing or exporting goods or contracting related services. Make sure you comply with applicable international trade and customs regulations.

For this is who we are and this is what we believe in,
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Antitrust

Free competition is part of our essence at MELI. It drives us to seek user preference through more and better products and services at the best possible price.

That is why we comply with the rules for the protection of free competition in all the countries where we operate.

We do not coordinate with our competitors on prices, quality or quantities of the goods and services we offer or on market sharing.

We do not exchange sensitive commercial information with our competitors (e.g. prices, costs, market distribution, etc.)

We identify practices that could be considered anti-competitive under certain circumstances, and we refrain from engaging in them.



PRACTICES THAT MAY BE CONSIDERED ANTI-COMPETITIVE

- Fixing the price or other commercial conditions to distributors or suppliers.
- Sale tied between different goods or services.
- Refusing to sell to specific persons products and/or services available and normally offered to third parties.
- Discriminating prices or conditions of sale or purchase among users placed on an equal footing.

#ActiveMELICODE

We should refrain from implementing these practices if:

- MELI has a **dominant** ⓘ position in the market where they are to be executed.
- Such practice has the sole object and/or effect of excluding competitors or creating barriers to competition.
- Such practice could not be justified by efficiencies and benefits accruing to users.

ⓘ A **dominant position** in a market is the ability of an economic agent to act, to a large extent, independently of the conduct and actions of its competitors, suppliers and users.

Any doubts or suspicions about anti-competitive behavior? The [Legal & Government Relations](#) team is available to advise you on this issue.

For this is who we are and this is what we believe in,
here's how we behave.

Protecting our information

As members of MELI, we are committed to preserving the confidentiality of the non-public information to which we have access due to our duties.

We must use this information only and exclusively for the performance of our duties, and adopt appropriate and reasonable security measures.

All documents, records, memos and any written material (and all copies thereof), whether in hard or digital format, are the exclusive property of Mercado Libre.

We have established Information Classification Rules to manage and classify information.




#ActiveMELICODE

- Do not disclose confidential information to competitors, suppliers or business partners, unless you have signed a non-disclosure agreement authorized by the Legal & Government Relations team.
- When you terminate your employment or business relationship with MELI, you must immediately return related information.
- Do not share, forward, sell, or rent confidential information to any unauthorized person or entity, or modify information for personal gain.

SELF-CHECK

- Is it necessary to share all the information I am about to send in order to achieve the purpose agreed with the third party? ☒
- Have I signed a non-disclosure agreement with the third party that protects the confidentiality of the information I am about to share? ☒
- Could the information I am about to share violate the trade secret and/or copyright of MELI or another third party because it is, for example, a code, design, software or invention? ☒

Get advice from the [Information Security](#) or [Legal & Government Relations](#) teams.

 The legal obligation of each member of MELI or of the Value Chain to maintain the confidentiality of the information is in force indefinitely from the beginning of the employment and/or commercial relationship and will survive its termination.

For this is who we are and this is what we believe in,
here's how we behave.

Insider trading

We make responsible use of corporate information. We only trade securities or shares in the manner permitted by law.

During your time at Mercado Libre, you may have access to material information that is not available to the public.

The trading of securities or shares on the basis of this type of information:

- Constitutes a violation to the Federal Securities Act in force in the United States
- Undermines our ethical commitment and financial integrity.
- Is contrary to our MELICODE.

❗ **Insider trading** is the practice of trading securities and/or shares based on relevant and privileged information that is not yet in the public domain, with the objective of obtaining a profit or taking advantage of the market.



#ActiveMELICODE

If you wish to buy or sell securities or shares in Mercado Libre:

- Learn and abide by the Insider trading policy.
- Contact the Legal & Government Relations teams to receive appropriate advice.



For this is who we are and this is what we believe in,
here's how we behave.

Preserving personal data

The protection of personal data is a duty and also an opportunity to generate trust and value in our relationships. The individuals working at MELI, as well as the members of the Value Chain, platform users and other third parties, provide MELI with personal data to operate and perform our tasks. At MELI we repay that trust by protecting that information with the highest standards of privacy and security.

We collect, use and access information as required by our policies and applicable data protection laws.

We have a Personal Data Protection Program that clearly, thoroughly and precisely outlines the principles and procedures we must follow when processing personal data.



We use personal information responsibly, protect the privacy of those who entrust us with their data, and enable them to operate securely in our ecosystem.



MELI PRINCIPLES OF PERSONAL DATA PROCESSING

- . We are transparent when processing data
- . We generate value through the responsible use of data
- . We strive to operate with minimal and quality data
- . We protect the data entrusted to us
- . We limit the processing of data

The [Legal & Government Relations](#) team is available to advise you on this issue.



For this is who we are and this is what we believe in,
here's how we behave.

Using MELI resources

Computers, telephones, e-mail addresses, network and systems access, spending money and corporate cards, among others, are resources and tools belonging to MELI that allow us to fulfill our work tasks and obligations.

It is also part of our starring attitude to treat these resources as if they were our own: that is, to keep them safe from loss, theft, damage and, when returning them, to deliver them complete and in good working order.

Our work and communication tools and access to network resources (including e-mails and chats) belong to MELI and may be monitored for duly justified reasons.



#ActiveMELICODE

Individuals working at MELI may occasionally use the Internet or MELI-owned devices for personal use as long as:

- Such use does not interfere with productivity or the achievement of work objectives.
- They are used in all cases for lawful activities.
- The use conforms at all times to all provisions of the MELICODE and MELI internal policies.

⚠ EXPENSES MADE OUT TO MELI FUNDS

if you incur expenditures with MELI resources, be sure to account for them fully and in a timely manner.

⚠ WARNING

It is forbidden to use Mercado Libre's network resources to send, receive, store or display communications or files that:

- Infringe intellectual property rights, privacy and/or any other rights.
- Disclose confidential information without proper authorization.
- Are defamatory, threatening, insulting, abusive or violent.
- Intentionally contain any virus, have the purpose of damaging, interfering, deleting, subtracting or modifying any system or information, as well as congesting or interfering with the work of others, including any action designed to generate losses or damages in the systems.
- May include advertising, religious or political messages, or those referring to external organizations or non-work related activities. Under no circumstances may an employee use Mercado Libre's network and resources to obtain unauthorized access to third party information.

For this is who we are and this is what we believe in,
here's how we behave.

Securing access to MELI systems

At MELI we understand how vital the information contained in our systems is and the serious damage that could ensue if it were to be disclosed or shared with unauthorized third parties.

We maintain a Cybersecurity Policy where we detail how to make careful use of our tools, systems and information.



#ActiveMELICODE

**You are responsible for all transactions made with your user account and password.
When accessing Mercado Libre's systems, remember this:**

- Your username, password or security key and access cards are personal, non-transferable and exclusively for your knowledge.
- Keep your data in the strictest confidence and confidentiality. Protect it from unauthorized use by third parties (including internal and external coworkers.)
- Notify the Information Security team immediately of any unauthorized use of your account and/or login by unauthorized third parties.



For this is who we are and this is what we believe in,
here's how we behave.

Starring Attitude

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As members of MELI, we have an obligation to know, abide by, and enforce compliance with this Code of Ethics and the policies supplementing it.

And we all have an open invitation to live and multiply our ethical commitment to the fullest, spreading a culture of integrity in everything we do.

Let's live the culture of integrity with a starring attitude.

Knowing the resources available to us and how to **use them to activate an ethical commitment** with a starring attitude.

EFFECTIVE TOOLS

Identifying when a situation is contrary to our ethical commitment
PAGE 37

Ever-present channels
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If MELI CODE is not complied with
PAGE 39

For this is who we are and this is what we believe in,
here's how we behave.

Consistency

This is how we use our MELI CODE to make ethical decisions.

All of us who are part of MELI are responsible for knowing and putting into practice the MELI CODE and the guidelines supplementing it.

It is important to reflect on our behavior and make sure we are doing the right thing.



These questions operate as a check to make the right decisions and to identify behaviors that are contradictory to our ethical commitment.

These may be used individually, as a team, or in conversations with leaders. If the answer to any of these questions is “no,” then don’t pursue the action and seek counseling.

SELF - CHECK

- | | |
|--|-------------------------------------|
| Why am I doing this? Is it legal? Am I doing the right thing? | <input checked="" type="checkbox"/> |
| Did I follow the correct processes, and did I consult with expert teams? | <input checked="" type="checkbox"/> |
| Is it something I would like to take responsibility for? | <input checked="" type="checkbox"/> |
| How would users, regulatory authorities, leaders or work teams view it? | <input checked="" type="checkbox"/> |
| How would I feel if I made the news for this? | <input checked="" type="checkbox"/> |



For this is who we are and this is what we believe in,
here's how we behave.

Ever-present channels

We use our MELI CODE to talk, consult and report.

We can always talk to our leader or any other MELI **leader** ⓘ about any issue, especially if we are concerned about something. We can also do it directly with the People team or the Ethics & Compliance team.

Any violation of the MELI CODE must be reported. For this purpose, we have a Whistleblower Hotline available to any individual working at MELI and also to those who are part of our Value Chain.

ⓘ If you are a leader, you should also practice active listening, intervene in time and get advice from the Ethics & Compliance team.



- **Whistleblower Hotline:** This channel is confidential and allows anonymous reporting. It is available 24 hours a day in all the countries in which we operate and offers different means of contact. All reports received are investigated by a specialized team within MELI.
- **Good Faith Reporting:** Because we trust people, it is a natural part of MELI to communicate openly and horizontally. If we see or suspect that any conduct or activity is against the MELI CODE, we must report it. If we must file a report, we do so in good faith, with a genuine interest in providing honest and accurate information about the situation that has occurred, even if it is a mistake.
- **Non-Retaliation:** MELI guarantees a safe environment in which a person can discuss, consult and report in complete confidence and without fear of retaliation. It is expressly prohibited to take or imply any retaliatory action against anyone who has made a report in good faith. Any retaliatory action will be investigated and punished. Therefore, if you believe you are being retaliated against, you may also report it through any of these channels. If you are involved in an investigation, in any role, you must cooperate, provide complete and honest information, and respect confidentiality.



At Mercado Libre we maintain an anonymous and confidential whistleblower hotline.

🔗 WEB 🔗 TELEPHONE 🔗 E-MAIL

For this is who we are and this is what we believe in,
here's how we behave.

What if this Code is not complied with?

Our commitment to compliance with the MELI CODE, the policies supplementing it and the regulations applicable to MELI is total and absolute.

Any violation to the MELI CODE will be investigated by the company's Internal Investigations team, according to the Protocol for Reports Management; always respecting the principles of confidentiality, legality, independence, objectivity and non-retaliation.



Any non-compliance with our MELI CODE will be treated as a serious offense, and sanctions will be applied in accordance with the applicable laws.

- In the case of **MELI employees**, it could include, among others, warnings, suspensions and/or employment terminations.
- In the case of **Value Chain members**, this could include warnings, penalties provided for in the respective contracts, suspension or justified unilateral termination of the contract relationship, without the right to compensation or notice.
- Should any of these parties violate the law, we will cooperate with the appropriate authorities.
- Exceptions to the provisions of this code may only be approved by Mercado Libre's Ethics Committee and/or in accordance with the applicable regulations (if any.)