**BASIC PRINCIPLES OF BEHAVIOR**

COMPANY NAME is a company committed to sustainability, so it applies quality criteria and processes in its products and services to promote social welfare, economic growth, and environmental balance. The Company assumes as basic behavioral guidelines, among others, the Universal Declaration of Human Rights, Declaration of Fundamental Principles and Rights at Work, and the Ethical Trade Initiative. Therefore, all persons and entities to whom this Code of Conduct applies must comply with the following basic principles of behavior:

* Comply with and abide by applicable national and international laws.
* Respect human rights and public freedoms, contribute to the preservation of the natural environment, and collaborate with the development and well-being of communities.
* Promote honesty, fairness, truthfulness, compliance with commitments, free competition, and transparency.
* Provide good working conditions, respecting labor rights.
* Contribute to social and economic development through innovation, technological development, and the effective and responsible use of resources.
* Actively contribute to the environmental balance and drive of a low-carbon economy.

**CODE OF CONDUCT**

**1) Respect for legality and ethical values**

COMPANY NAME develops its business and professional activities in accordance with the legislation in force in each of the places where they are developed, observing ethical behavior and following national, and where appropriate, international best practices.

Likewise, all workers of Company Name must comply with the current laws where they carry out their activity and observe ethical behavior. They should also avoid any conduct that, without violating the law, may damage the Company's Name reputation and adversely affect your interests. Workers should be aware of laws affecting their work, requesting accurate information through their superior or appropriate instances.

**2) Commitment to human rights**

COMPANY NAME is committed to respecting the human rights and public freedoms recognized in the United Nations Universal Declaration of Human Rights. All workers of the company must follow this commitment, carrying out their professional activities considering respect for human rights and public freedoms.

**3) Respect for people**

COMPANY NAME rejects any manifestation of physical, psychological, moral or abuse of authority harassment, as well as any other conduct that may create an environment of intimidation or offensive to people's rights, and promotes working conditions that prevent harassment in all its forms, including sexual harassment. Workers should be treated with respect, fostering a pleasant, healthy and safe working environment. All professionals have an obligation to treat their peers, their superiors, and their subordinates in a fair and respectful manner.

COMPANY NAME promotes and respects the right of freedom of association and collective bargaining in the field of work. Company name does not support any type of child labor.

**4) Effective equality**

Company name promotes gender diversity, as well as professional and personal development

of all its employees, ensuring equal opportunities. The company does not accept any type of discrimination in the professional field on the basis of age, race, color, sex, religion, political opinion, national ancestry, sexual orientation, social origin, or disability.

The selection and promotion of employees is based on the competencies and performance of their functions, as well as the criteria of merit and capacity defined in the requirements of the job. The company seeks the stability of employees, their development, and their motivation. Persons with management or command positions should act as facilitators of the professional development of their employees.

**5) Cooperation and dedication**

Company name promotes an environment of cooperation and teamwork for better use of all capacities and resources. Workers must act in a spirit of collaboration, efficiently during the working day, monetizing the time and resources of the company. The company fosters the feeling and pride of belonging among its employees.

**6) Occupational safety and health**

Company name follows occupational safety and health policies and adopts preventive measures established in current legislation. The company provides its workers with the guidance and resources necessary for them to carry out their activities in a safe and healthy way.

All workers must be aware of and comply with occupational health and safety standards and ensure their own safety, as well as that of other employees, customers, suppliers, visitors, and, in general, all persons who may be affected.

**7) Use and protection of assets**

Company name makes available to its workers the resources necessary for the performance of its work activities. Workers should use these resources in a responsible, appropriate manner. They must also protect them and preserve them from any misuse or damage to the interests of the company.

Computer equipment and systems must be for professional use only. However, in cases where these tools are used for personal purposes, their use must be minimal, reasonable, appropriate and in accordance with the principle of good contractual faith. Technological resources cannot be used to:

* Issue personal opinions on behalf of the company or access forums or social networks for equal objectives, unless expressly consented to this purpose.
* Store or distribute, nor visit Internet sites with inappropriate material that violates human rights, privacy, honor, one's image, religious freedom; or against the dignity of people such as racism, xenophobia, apology for violence or terrorism, and pornographic or sexist apology material.
* Use, enter, download, copy, transmit, reproduce, distribute, or store any type of software, work edited, or invention protected by intellectual or industrial property without the corresponding license or authorization.
* Perform or participate in mass mailings with message chains, jokes, or inappropriate images.

**8) Corporate image and reputation**

Company name considers its corporate image and reputation as a valuable asset to preserve the trust of its customers, employees, suppliers, authorities, and society at large. Workers should be especially careful in any public intervention, having the appropriate authorizations to intervene before the media and social networks, publish and share opinions, participate in professional conferences or seminars, and in any other situation that may be publicly broadcast, provided that they participate as employees of the company.

**9) Loyalty to the company and conflicts of interest**

Workers will not participate in processes or decisions in which it could be understood that there is a conflict between their own interest and that of the Company. Conflicts of interest appear in situations where the personal interests of professionals, directly or indirectly, are contrary to the interests of the company.

In this sense, the company respects the participation of its workers in other financial or business activities, provided that they are legal and do not enter into unfair concurrence or collision with its responsibilities as employees of Company name.

In situations where there may be any doubt, the worker must inform the company through his hierarchical superior and avoid making a decision which may be suspected of having acted against the interests of the company.

**10) Measures against bribery, fraud and corruption**

Company name undertakes to conduct business with integrity, avoiding any form of corruption, and complying with applicable anti-bribery and anti-corruption regulations.

The company will not attempt to influence the will of people outside of it to obtain any benefit through the use of unethical practices. Nor will it allow other individuals or entities to use these practices with their employees.

Workers may not offer or accept gifts and attention to or from public officials or other third parties that may affect the impartiality of either party, influence a business decision, lead to misconduct of professional duty, or that break the provisions of the anti-bribery and anti-corruption rules applicable.

**11) Prevention of money laundering**

Company name avoids money laundering from criminal or illicit activities.

All workers shall comply with applicable legal provisions and pay particular attention to cases where there are indications of lack of integrity of persons or entities with which commercial relationships are maintained, such as, but not limited to, unusual payments, payments made to or by third parties not mentioned under the contract, payments to persons or entities residing in tax havens or to bank accounts opened in offices located in tax havens, payments to entities where it is not possible to identify partners or ultimate beneficiaries, or extraordinary payments not foreseen in contracts. Except for exceptional cases, expressly authorized and with traceable documentary support, the company does not allow cash payments.

**12) Processing information and knowledge**

The workers of the company must transmit all the information that has to be communicated, both internally and externally, truthfully, completely, and in no case will they knowingly provide incorrect or inaccurate information that may mislead the recipient. All professionals who enter any type of information into computer systems must ensure that it is rigorous and reliable. They must also maintain strict confidentiality about all information reserved that they access as a result of the performance of their work activity and must refrain from using it improperly for their own or third party's benefit.

The company complies with current data protection legislation, protecting the personal data entrusted by its customers, employees, candidates in selection processes, or other people. It also undertakes to request and use only those data that were necessary for the effective management of its businesses.

Persons who, because of the performance of their professional activity, have access to information from other employees will respect and promote the confidentiality of this information and make responsible and professional use of it.

**13) Customer relations**

All workers must take care of customer relationships, acting with integrity and aiming at the highest levels of quality and excellence in our products and services, seeking the development of long-term relationships based on trust and mutual respect.

**14) Relationships with suppliers, contractors, partners, and collaborators**

Company name considers issues of ethics and integrity and checks the professional solvency of its contractors, suppliers, partners, and collaborating companies with which commercial relationships will be established in order to prevent the operations that are carried out by our company from being used for money laundering or other illicit practices. It also includes clauses in contracts related to this Code of Conduct with the aim of shifting its position with regard to preventing irregular or unlawful conduct and to ensure adequate social and environmental performance on the part of the counterparty.

**15) Respect for the environment**

Conservation and respect for the environment is of great importance to company name, so it seeks compliance with best environmental practices in all its activities, through the prevention and minimization of adverse environmental impacts and the conservation of natural resources.

The environmental strategy is based on commitment to climate change, promotion of energy savings, rational use and management of water, responsible use of resources, effective waste management, pollution prevention, and protection of the natural environment and biodiversity. In accordance with this strategy, all workers must know and assume this policy and strive to minimize the environmental impact arising from their work activities and the use of the facilities, equipment and means of work made available to them.

**16) Commitment to society**

Company name seeks to align social collaboration and its business activity, reinforcing trust between the company and the society where it operates. Therefore, workers, in the exercise of their activities, must consider the interests of local communities, and comply with the procedures and policies of the company.

**17) Stock market**

Persons required to comply with this Code shall not carry out transactions with securities and financial products based on inside information to which they have access because of their professional activity. Nor may they communicate this information to third parties to buy or sell shares or any other financial instrument from it. They will only communicate this information to authorized persons who must know it because of their role or responsibilities.

**ACCEPTANCE, COMMUNICATION AND COMPLIANCE WITH THE CODE**

Company name will communicate and disseminate among all its workers, suppliers, contractors, and collaborators, the content of this Code of Conduct. All workers who join or become part of the company must accept the values, Principles, and Rules of Conduct set forth in the company. Company name expects from all its administrators, managers, and employees a high level of commitment in compliance with this Code of Conduct.

The company may formally and with documentary support, request its employees and third parties to periodically confirm compliance with this Code. Ethics and compliance issues may also be included in training programs, performance assessment processes, and/or assessments of potential candidates or third parties.

Failure to comply with any of the principles contained in this Code will be analyzed

in accordance with internal procedures, existing agreements, and legal regulations. When there is a breach, the Human Resources Directorate, or the director responsible for the human resources function will determine the application of disciplinary measures according to the regimen of faults and sanctions and whether action contrary to the principles of good contractual faith is considered.

No one, regardless of level or position, is authorized to request a worker to contravene the provisions of this Code. No worker may justify improper conduct on the cover of a higher order or the lack of knowledge of this Code.

Workers shall inform a hierarchical superior or the Human Resources Directorate of any breach of the conduct set out herein.

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Name of General Manager

GENERAL MANAGER

Company name   
Date MM/DD/YYYY