

Code of Ethics

Principles and guidelines

This Code of Ethics is a document that outlines the values we adhere to and provides guidelines regarding the behavior we expect from our employees and collaborators in three areas:

- I. Ethics and Anti-Corruption,
- II. Labor Standards and Human Rights, and
- III. Environment.

The Code of Ethics applies to all employees and associates of the Company, including management, executive directors, and board members. We expect everyone to comply with the provisions of the Code of Ethics, legal regulations and internal regulations applicable to the Company. It is the responsibility of management to create a work environment in which ethical behavior is rewarded and potential irregularities are reported without fear. In line with the principles articulated in the Code of Ethics, the Company has described in detail the ways to counteract violations of laws, internal regulations, and ethical standards in the Internal Reporting and Follow-Up Procedure. The purpose of the Procedure is to establish safe channels for reporting violations, determine the rules for making and receiving reports, establish transparent and reliable follow-up actions, including verifying the legitimacy of reports, and protecting individuals who may be victims of retaliatory actions related to the report. We believe that adherence to the Code of Ethics is crucial for the continued success of the company.

I. Ethics and Anti-Corruption

We have zero tolerance for any actions and behaviors that have the characteristics of bullying and discrimination, inappropriate verbal and physical behavior, especially those that violate personal dignity and freedom. We conduct an active policy against bullying and discrimination in the workplace, which involves taking preventive measures to counteract bullying and discrimination, particularly through information policy, disseminating knowledge about the phenomena of bullying, discrimination, and unequal treatment. All forms of mental or physical abuse or punishment, threats of physical abuse, sexual harassment or other harassment, and verbal abuse, as well as other forms of intimidation are prohibited. We are committed to taking intervention actions in the event of manifestations of bullying and discrimination, as well as other prohibited behaviors, aimed at immediately eliminating these behaviors and applying appropriate sanctions to those responsible for such actions.

The company has a zero-tolerance policy for all forms of corruption. We do not offer or accept, directly or indirectly money or other valuable items in order to improperly influence the recipient. It is forbidden to accept any valuable items from individuals that may be used to

exert influence on the Company. The Company and management are obliged to prevent, identify, respond to, and penalize improper conduct, including corruption and conflicts of interest, and to monitor corruption risk and take appropriate actions to mitigate it.

II. Human Rights and Labor Standards

We adhere to the principles set out in national and international law regarding employee safety and human rights. In the workplace, there shall be no discrimination in employment, remuneration, access to training, promotion, termination of employment, or retirement due to ethnic origin, gender, marital status, pregnancy, religion, social or ethnic origin, nationality, physical ability, political views, union membership, gender identity or expression, age, health status, sexual orientation, or other characteristics. We have zero tolerance for any form of forced labor, corporal punishment, psychological and physical coercion, as well as harassment, discrimination, and intimidation. We comply with applicable occupational health and safety laws. We ensure that the work environment is safe, healthy, and hygienic, considering industry knowledge and any specific hazards. We take appropriate steps to prevent accidents and injuries resulting from work, related to it, or occurring during it, by minimizing, as far as possible, the causes of hazards inherently associated with the work environment. We adhere to the prohibition of alcohol and drugs in the workplace. Salary and benefits meet national legal standards. Employees and associates are provided with a written and understandable contract specifying the terms of compensation and method of payment before employment begins. We respect worker's right to free association. The company does not use, directly or indirectly, forced labor or other forms of involuntary work. The company recognizes and respects every child's right to protection from economic exploitation and from performing any work that may be hazardous. The company complies with applicable laws and international standards concerning child labor.

III. Environment

The company complies with all applicable environmental protection laws and regulations. Environmental resources are used responsibly and cautiously, and the company continually strives to conduct business in an environmentally sustainable manner.

Monitoring Compliance and Enforcement

Understanding and complying with the Code of Ethics is a personal obligation of every employee and collaborator. Problems encountered in enforcing the Code of Ethics, as well as comments or suggestions for improvements, should be escalated in accordance with standard reporting procedures.