

# Code of Ethics

**latamly**<sup>®</sup>  
Group

involve  
to evolve



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## Purpose, Mission and Vision

Having a clear understanding of these three key aspects of our culture helps us better align our objectives to grow where we want to grow.

### Sharing Goals!

#### *Why do we do what we do?*



##### **Purpose**

To evolve trade by developing successful businesses.

#### *What do we do to achieve our purpose?*



##### **Mission**

To provide quality consumer technological goods, developing relevant brands in the Latin American market.

#### *Where do we envision ourselves?*



##### **Vision**

To be leaders in market knowledge, finding the best products, and developing relationships, with efficient processes and a data-driven culture to innovate. To develop effective marketing so that our brands are relevant and profitable, and our company is sustainable and appealing.



## Values

Values are the set of ethical and professional principles that we commit to respecting in every activity. They are non-negotiable.

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- ***Synergy***

When we combine diverse and contrasting but convergent personal skills, we achieve our objectives efficiently. That's why at Latamly, we seek to create and maintain a conducive atmosphere where individual opinions, experiences, and strengths are valued. Team synergy makes us all better. By connecting, collaborating, and communicating effectively, we increase the value of the business.

- ***Innovation***

Since our inception, we have challenged the "typical predetermined model," "it's done this way," or "it can't be changed." Most of our growth has originated from critical thinking, new ideas, and creativity as one of the pillars. Continuously, we undertake the process of turning innovation into a solution to a problem or a need; innovation can be achieved through improvements and not just by creating something entirely new. Innovation is especially important for the development of new and better services that allow us to advance our purpose of evolution.

- ***Commitment***

Great achievements are made with a great team. We give our best, working with empathy and mutual trust. We take full responsibility for our commitments and empower ourselves as a team. We are proactive in always giving a little more. We are all Latamly.

- ***Transparency and Trust***

We relate to each other in an honest and transparent manner to build trust among our colleagues, clients, and suppliers. We ask for help when we need it, provide collaboration and feedback. We make mistakes, ask for and accept apologies. Latamly encourages spaces where it is possible and safe to always tell the truth; this allows us to be authentic and share our ideas and difficulties. On truth, we build together and achieve quality results.



## Values

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- **Positive Reinforcement**

We all need to feel valued for who we are and what we do. Receiving constructive feedback to improve is key. It is essential to highlight the strengths and successes of our colleagues by positively and frequently recognizing them.

- **Data-driven**

Data and objective information are at the heart of all decisions, strategies, and actions taken within the company. We instill training in data collection, analysis, and understanding; we provide transparency and communication channels so that knowledge can be used more effectively.

- **Agility**

We are agile because it allows us to adapt quickly and stay in motion. Our dynamism involves being able to anticipate and react promptly.

- **Audacity**

We dare to take risks. We intelligently and responsibly assume our decisions, actions, and results, which allows us to seize the opportunities that arise and make assertive decisions even in uncertain environments. Mistakes are a natural part of the learning process, and failing well is necessary for growth.



AGILITY



DATA DRIVEN



SYNERGY



POSITIVE REINFORCEMENT



COMMITMENT



AUDACITY



TRANSPARENCY AND TRUST



INNOVATION



## Code of Ethics and Corporate Governance

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### COMERCIALIZADORA LATAMLY CHILE SPA

#### I)- INTRODUCTION

The Management Committee of COMERCIALIZADORA LATAMLY CHILE SPA is responsible for determining the general policies and strategies of COMERCIALIZADORA LATAMLY CHILE SPA and the other companies that are part of the LATAMLY GROUP universe, and particularly for determining the corporate governance policy.

In this framework, the Management Committee has approved this Code of Ethics and Corporate Governance (hereinafter, referred to interchangeably as the "Policy" and/or the "Code of Ethics and Corporate Governance" and/or simply the "Code"), which is based on the corporate values of COMERCIALIZADORA LATAMLY CHILE SPA and the other companies that are part of the LATAMLY GROUP universe, on the guidelines of good corporate governance of market supervisory bodies, as well as on the principles and goals in terms of governance and corporate sustainability established in national and international standards published by recognized standardization organizations. This Policy will be part of COMERCIALIZADORA LATAMLY CHILE SPA's internal corporate governance regulations and must be interpreted in coordination with other corporate policies. It is essential that each of us understands the importance of acting with honesty as an indispensable component of professionalism, following the policies that express the ethical principles of COMERCIALIZADORA LATAMLY CHILE SPA, and assuming the responsibility that corresponds to us in relation to them, from each of our positions. The different guidelines established in this Code should serve as a guide in our daily activities and reaffirm the ethical behavior guidelines of COMERCIALIZADORA LATAMLY CHILE SPA.

#### ***Objective and scope of application***

The purpose of this Policy is to establish the criteria and guidelines that must govern the organization and functioning of the governance bodies of COMERCIALIZADORA LATAMLY CHILE SPA. Furthermore, it ensures the reconciliation of COMERCIALIZADORA LATAMLY CHILE SPA's social interest with that of the other companies that are part of the LATAMLY GROUP universe, seeking to establish communication and information exchange mechanisms for the necessary strategic coordination in the interest of all. This Policy extends to COMERCIALIZADORA LATAMLY CHILE SPA and to the rest of the companies that are part of the LATAMLY GROUP universe, taking into account the particular scope of autonomy of each of them. In any event, COMERCIALIZADORA LATAMLY CHILE SPA also commits to promoting the



application of the principles of this Policy regarding the companies in which it participates and, where applicable, regarding temporary associations of companies, joint ventures, or other equivalent associations, whether national or international, in which it becomes involved.

The set of rules and ethical principles contained in this Code of Ethics and Corporate Governance should serve as a guide to behavior for all those associated with COMERCIALIZADORA LATAMLY CHILE SPA (hereinafter, the "Company"), and are therefore mandatory for all its employees, executives, members of the Management Committee, and members of the Board of Directors, as well as for any third party acting on its behalf (hereinafter, the "Person" or "Persons").

The rules of this Code complement, but do not replace, the provisions contained in other respective Regulations, Policies, and Procedures of the Company, which are equally applicable to all its collaborators and employees.

To the extent that they are compatible with the nature and modalities of each relationship, the principles contained in this Policy must be applied in COMERCIALIZADORA LATAMLY CHILE SPA's relationship with contracting companies, subcontractors, suppliers, and consultants, in accordance with the applicable regulations in each case, and always based on respect, integrity, responsibility, and dignity.

## **III)- INTEGRITY AND ETHICS IN CORPORATE GOVERNANCE**

The Company is a business whose mission is to provide quality consumer electronics to enhance consumers' lives.

We are committed to being leaders in understanding markets, finding the best products, and developing relationships, with efficient processes and a data-driven culture. We always seek to innovate, developing effective marketing so that our brands are relevant and profitable, and our company is sustainable and attractive; being a model of excellence, socially responsible, contributing to improving people's quality of life, business development, and the community at large.

We aspire to the growth of the company, our employees, and our shareholders. In particular, we aspire to the highest standards of corporate governance best practices, so we adopt various guidelines of conduct.

### *OVERSIGHT AND ACCOUNTABILITY*

The Company's Management Committee must engage in active, independent, and informed oversight of the Company's business.

As part of the responsibility to act with the duties of good faith, due care, and loyalty, it is expected that members of the Management Committee actively participate rather than assuming a passive role or abstaining from making decisions.

### **INDEPENDENCE**

Members of the Management Committee are selected based on their ability to exercise

independent judgment.

In accordance with applicable regulations, the Company will always seek to have its governing body composed of independent individuals who consistently pursue the long-term maximization of the Company's value and interests.

### *CORPORATE ETHICS*

The Company's Management Committee is responsible for overseeing corporate ethics. Ethical conduct, including compliance with legal requirements, is vital for the sustainability of a corporation and long-term success.

To establish an ethical corporate culture, the Company's Management Committee should consider the following actions:

- Communicating to personnel at all levels of the corporation a strong commitment to ethics, demonstrating the "tone at the top," meaning the conviction that ethical commitment is a central pillar for the Company and is thus promoted from its highest levels, aiming to establish a culture of legal compliance and integrity.
- Serving as the decision-making body regarding the Company's Code of Ethics and Corporate Governance, with a prior support structure for receiving concerns, queries, and reports.

### *EVALUATION*

The Management Committee must develop and implement an annual evaluation process of the organizational and decision-making levels of the Company to measure its overall performance and that of each organizational level.

However, it is not enough to simply evaluate; appropriate measures must also be taken in response to the problems that may be discovered during the evaluation.

### *AUDIT*

The Company should be audited annually by an independent audit firm. Audit firms should be changed periodically.

### *FINANCE*

The Company's Management Committee should review financial information reports and other statements submitted to government agencies and bodies with a critical spirit and judgment, seeking continuous improvements.

### *DOCUMENTATION*

The Company must adopt a written policy that establishes standards for document integrity, retention, and destruction.

Meetings should be documented through minutes with an appropriate level of detail to



capture decisions.

#### *DIRECT AND OPEN REPORTING*

The Company must adopt a written policy to allow and encourage employees to alert management and the management committee about ethical issues and potential legal violations without fear of retaliation. In some jurisdictions, harassing an employee who provides law enforcement with accurate information about possible criminal activity is considered a serious offense.

The Company's Management Committee must acknowledge and fulfill the obligation to disclose to the relevant authorities relevant information and analysis for the Company's pertinent purposes, with due attention to governance and process, facilitating efforts to maintain tax benefits, in addition to being in a better position to make decisions and measures consistent with structural limitations.

#### *INFORMATION TRANSPARENCY*

Ensuring transparency and maximum information quality is a fundamental principle of good governance, so that the Company's public information is presented in a clear, comprehensive, simple, orderly, and understandable manner, whether for the general public, the Company's shareholders, or interest groups such as financial intermediaries, institutional investors, asset managers, voting advisors, credit rating agencies, and other market agents.

The Company aims to develop a strategy that facilitates communication, ensuring fair treatment to stakeholders and establishing both direct and indirect means of disclosing relevant economic, financial, non-financial, and corporate information.

#### *ETHICAL AND SUSTAINABLE PERFORMANCE*

The Company's activities only make sense within a framework of sustainability, prioritizing a long-term strategic vision. A constant commitment to sustainable development is maintained, efficiently and ethically responsible, contributing its ability to create value to the group and all its stakeholders.

### **III)- PRINCIPLES AND GUIDELINES OF BEHAVIOR**

The Company aims to have principles and guidelines of behavior, both within the Company and in its dealings with third parties, assuming the following standards.

#### *CONDUCT STANDARDS*

We should avoid all behaviors that could harm the Company's reputation and image in front of clients, suppliers, and the community in general, even if they do not violate legal

norms. Correct behavior involves professional, transparent, honest, and equitable treatment with employees, clients, suppliers, shareholders, business partners, public officials, members of the Company's Management Committee, members of the Company's corporate bodies, and the general public, inspired by respect for the individual and the society in which we operate.

When defending the interests of the Company, we must act with integrity, confidence, and always observing the highest ethical principles and respect for laws and regulations.

### *COMPLIANCE WITH APPLICABLE REGULATIONS*

In the performance of their duties, all Persons must comply with the legal and regulatory provisions applicable to them, as well as the internal Regulations, Policies, and Procedures of the Company.

Compliance with all laws and current regulations is one of the foundations upon which the Company's ethical standards are built. Thus, in conducting the Company's business, Persons must respect and comply with all applicable laws and regulations in the jurisdictions in which we operate, it being the priority duty of all who work in the Company to promptly alert our superiors to any transgression, error, or opportunity for improvement that arises.

### *PROHIBITION OF CORRUPT PRACTICES*

The Company rejects any corrupt act or behavior that could generate corruption in third parties. The Company commits to conduct its activities in accordance with the letter and spirit of all laws and regulations that sanction corruption in all countries in which it operates.

It is not permitted to solicit or receive, as well as to give or offer, anything of value to any person, whether a public official or a private individual, with the aim of unduly influencing them or obtaining an undue advantage. For these purposes, the term "anything of value" should be understood broadly, and includes not only cash or cash equivalents (such as gift cards), but also loans, gifts, business opportunities, donations, meals and entertainment expenses, travel, and intangible benefits, such as job offers or professional practices.

As a result, the Company rejects and does not permit:

- Offering or accepting bribes to or from public officials, whether domestic or foreign.
- Offering or accepting bribes to or from private individuals.
- Offering or accepting facilitation payments to initiate or expedite administrative processes or procedures.
- Obtaining preferential treatment using sponsorship or donation as a means to achieve it.
- Using the Company's business relationships and contacts for one's own benefit or that of a third party.
- Establishing business relationships with third parties without fulfilling the minimum

duties of due diligence in understanding such third parties.

Payments made by the Company must:

- Have a reasonable relationship with the value of the services provided.
- Be fully and accurately documented.
- Be made through fund transfers, checks, or similar documents.
- Be properly, accurately, and promptly recorded in the Company's books and records.

### *FRAUD*

Any fraud committed by a Person will be considered a serious violation of this Code and must be severely punished.

"Fraud" shall be understood as any deception or abuse of trust employed in the pursuit of unfair, undue, or illegal gain, and/or that results in undue financial harm to the Company, its shareholders, or third parties in general.

Likewise, any violation of the obligations contained in this Code, even if such violation does not result in the aforementioned gain or harm, shall be considered fraud.

Using any information relating to the Company, its businesses, or its securities for one's own benefit or that of third parties, which has not been officially disclosed in the market and which, by its nature, may influence the quotation of its securities, shall also be considered fraud.

### *ACCOUNTING INFORMATION*

The Company's Financial Statements must accurately and reasonably present its financial and asset position. It is the duty of Persons to ensure the full and timely compliance with the Company's accounting policies and practices.

Transactions carried out by the Company must be accurately recorded in the correct account and in the corresponding accounting period, and must be supported by proper documentation.

No false or intentionally misleading entries are permitted or encouraged in the Company's Accounting Records.

The intentional misclassification of transactions between accounts, departments, or accounting periods constitutes a serious violation of this Code. If any Person becomes aware of any irregularity, error, or omission in the provision of information, they must promptly disclose this situation through the various communication channels provided by the Company, including the Anonymous Reporting Channel.

The accounting entries of the Company will be supported by adequate documentation and will be based on good faith estimates, in accordance with the Company's accounting policies. The intentional excess or deficiency of accounting provisions constitutes a violation of this Code.

It is the duty of Persons to always preserve the independence of the Company's external and internal auditors, both in administrative and technical matters, avoiding exerting any



improper influence on audit processes. It is also the obligation of Persons to ensure that internal and external auditors can examine the Company's books, records, documents, and background information, and to ensure that the Company provides auditors with the necessary facilities for the proper performance of their work.

### *CONFLICTS OF INTEREST*

A Conflict of Interest arises when, in an act, negotiation, or contract, the Person involved in decision-making has or could have interests that would affect their objectivity, potentially favoring their own or third-party interests over those of the Company. Persons must always be attentive and vigilant to situations that could compromise the trust placed in them by the Company and must avoid all types of Conflicts of Interest. In the presence or possibility of a conflict of interest, the following guidelines must be observed:

- Always prioritize the Company's interest.

Persons may not benefit by prioritizing their own interests over those of the Company. No natural or legal person associated with any Person may unduly benefit as a result of the position held by that Person in the Company.

No Person should use business opportunities of which they become aware due to their position for their own benefit.

No Person should favor any third party to the detriment of the Company's interest.

No individual shall engage in activities outside of the Company that would impair or adversely affect their proper performance of duties to the Company.

- Abstention from participating in decision-making.

Before engaging in any decision-making process in the course of their duties, the involved individual must ensure they do not face a Conflict of Interest. If such a conflict arises, they must refrain from participating in the discussion and decision-making and inform their superior, who should take necessary measures to address the conflict of interest and mitigate the risks stemming from it.

- Duty to report decisions or potential decisions against the interests of the Company.

It is the duty of individuals to communicate to their superior, or through appropriate reporting channels, any act, negotiation, or contract by any employee or third party that, in their view, undermines the interests of the Company.

### *RELATIONS WITH THE PUBLIC SECTOR AND PUBLIC OFFICIALS*

A public official, whether national or foreign, is understood to be (i) any person holding a legislative, executive, administrative, or judicial office at any level of the government, and (ii) any person performing a public function, including for a public agency or entity, or

providing a public service.

It is our responsibility and commitment to uphold honesty and integrity and adhere to the highest ethical standards in all dealings with public officials. Our standards go beyond mere compliance with the letter of the law: they require all our employees to conduct themselves with the highest ethical standards and avoid even the slightest appearance of misconduct.

Business dealings with governments impose unique requirements on procurement procedures, and the Company commits to strictly adhere to such procedures, ensuring that all communications and proposals are truthful, complete, and accurate.

The Company commits to complying with all legislation against corruption applicable to it (including the U.S. Foreign Corrupt Practices Act) and will have zero tolerance for bribery or improper payments made on behalf of or in the interest of the Company, as established in this Code.

Under no circumstances will a public official, whether national or foreign, be hired to provide a service with an illegitimate purpose or that conflicts in any way with the duties or obligations of said public official. In any case, the hiring of any public official by the Company will require prior written approval from the Company's Management Committee, which shall only give the approval if the services to be contracted are legal, have a legitimate purpose, and do not interfere with the duties and obligations of the public official.

It is expressly prohibited:

- (i) offering, giving, or receiving, directly or indirectly, anything of value to a public official, with the purpose of influencing any act or decision so that the Company obtains or retains a benefit or contract, or so that a contract or sale is channeled to any person;
- (ii) any conduct aimed at unduly influencing a public official or altering or interfering with their duties of impartiality and objectivity;
- (iii) seeking or exploiting privileged or confidential information;
- (iv) any participation or collaboration in directing or fraudulent acts conducted by public officials; and
- (v) any contributions to campaigns or political parties on behalf of the Company.

Gratuities or payments of a small amount of money to public officials to expedite a routine administrative action to which the Company is otherwise authorized (facilitation payments) are strictly prohibited.

Gifts to public officials are prohibited. Exceptionally, gifts may be allowed for courtesy or diplomatic purposes. In these exceptions, prior authorization from the Management Committee must be obtained.

If any employee has connections with high-ranking public officials, they must immediately inform the Director of Human Resources.

#### *RELATIONS WITH SUPPLIERS AND CONTRACTORS OF THE COMPANY*

We must maintain fair, harmonious, respectful, and courteous dealings with the

Company's suppliers and contractors. Consequently, under no circumstances should they be disrespected, insulted, or defamed.

We base our relationship with the Company's suppliers and contractors on legal, efficient, and fair practices.

The selection and hiring of suppliers and contractors must always be based on objective technical, professional, ethical, and economic criteria, and must be conducted through transparent and predetermined procurement processes.

Only suppliers who comply with local legislation regarding labor, environment, health, and safety, including fair and nondiscriminatory treatment of their employees and providing a safe working environment, will be contracted.

Employees in charge of suppliers should be alert to situations of non-compliance with the law.

There must be professional secrecy regarding contracts with third parties or suppliers, with offers submitted by the invited parties not disclosed to ensure equal opportunities in contracting. Suppliers should be chosen through an open and competitive procedure.

Employees must act with integrity and impartiality, maintaining the independence of opinion regarding price setting and purchasing of products and services. They should be vigilant for potential conflicts of interest in selecting suppliers due to familial or friendly relationships.

The Company will not engage companies or individuals with a history of directly or indirectly engaging in fraudulent conduct, money laundering, and/or financing terrorism.

Furthermore, employees commit to ensuring that suppliers and contractors of the Company adhere to the terms of this Code and observe the standards of conduct outlined therein.

### *COMPETITION AND FAIR DEALING*

The Company's policy and objective are to outperform our competitors fairly and honestly, seeking competitive advantages through better performance and never through unethical or illegal business practices.

As outlined in this Code, it is not permissible to take or obtain information exclusive to third parties, possess information on trade secrets obtained without the owner's consent, and/or induce such disclosures from past or present employees of other companies.

Furthermore, all individuals must strive to respect the rights of customers, suppliers, competitors, and employees of the Company, and to treat them fairly.

No individual shall or should unfairly take advantage of anyone through manipulation, concealment, misrepresentation of material facts, or any other practice contrary to fair dealing within the Company.

### *PROTECTION AND PROPER USE OF COMPANY ASSETS, PROPERTY, AND INFORMATION*

Company assets, property, and instruments must be used only for legitimate business

purposes, and individuals must take measures to ensure they are not stolen, damaged, or misused.

Company assets and instruments include tangible property, intellectual property, business information, salary information, and any unpublished financial data. Unauthorized use or distribution of this information is a violation of this Code.

Individuals with access to such confidential information are obliged to keep it secret and safeguard it from unauthorized access.

#### *RELATIONSHIPS WITH CLIENTS (EXTERNAL OR INTERNAL)*

Commitment to the satisfaction of our customers, both external and internal, should be reflected in respecting their rights and seeking solutions that address their interests, always in line with the Company's development and profitability objectives.

In this regard, we must provide customers with service characterized by courtesy, effectiveness, and efficiency, offering clear and transparent information. The customer should receive responses to their requests, even if they are negative, in an appropriate manner and within the expected timeframe.

Likewise, employees commit to and will seek to ensure that the Company's customers, as much as possible, adhere to the terms of this Code and comply with the standards of conduct outlined therein.

#### *RELATIONSHIPS WITH SHAREHOLDERS AND INVESTORS*

Relationships with the Company's shareholders will be based on truthful, complete, transparent, and timely communication of information that allows them to understand the Company's activities and performance, and on the pursuit of results that produce favorable impacts on the Company's value.

Shareholders will be provided with equal treatment, without any privileges of access to information of any kind.

We must protect information that has not yet been publicly disclosed and that may affect investment decisions. The use of confidential and privileged information that has not been publicly disclosed for financial gain constitutes a violation of this Code.

We commit to not buying, selling, recommending, or suggesting to another person to buy or sell shares of any company, including the Company, if we have insider information that has not been disclosed to the public.

Failure to comply with this regulation will be considered a serious offense.

#### *RELATIONSHIP WITH THE ENVIRONMENT*

The Company is committed to compliance with environmental regulations and the conservation of resources. For this reason, we will promote energy savings and proper water usage, as well as the reuse and recycling of waste.

#### *INTERPERSONAL RELATIONSHIPS AND WORK ENVIRONMENT*



We believe in each individual, and that is part of our essence. We work in an atmosphere of respect and closeness among people, seeking to strengthen our long-term relationships. We value our people, respecting their ideas and opinions.

We take a comprehensive view of individuals. Therefore, we promote actions that foster balance between personal and professional life, accompanying employees in different stages of life.

All individuals have the right to work in an environment where their dignity is respected. The Company's commitment is to create and maintain a safe, respectful, participative, honest, and responsible work environment.

The Company rejects any form of arbitrary discrimination based on gender, age, race, sexual orientation, ideology, religion, social origin, physical or mental conditions, or any other characteristic.

All individuals have the right to be treated fairly and equitably, without prejudice or external factors affecting professional quality.

We will promote instances of professional and personal growth for our employees, focusing on the development of necessary competencies to enhance their performance. We commit to conducting fair and transparent selection processes, seeking the most suitable individuals for each position based on experience, qualifications, and the value each person can bring to our company.

#### *RESPONSIBILITY OF LEADERS*

The leadership exercised by those in managerial, directive, or supervisory roles in the Company is fundamental in promoting a work culture of integrity and respect.

It is the duty of all members of the Company, especially those with others under their supervision, to promote high standards of behavior, disseminate the contents of this Code, and ensure its proper application.

Behaviors abusive toward subordinates are contrary to the values of the Company. Anyone with subordinates must promote respectful and fair treatment.

#### *OBLIGATION TO REPORT ANY ILLEGAL OR UNETHICAL BEHAVIOR IN THE COMPANY*

It is the responsibility of all individuals to promptly report, through established channels, any violation of this Code.

Any failure by any individual to report any violation of the Code that has come to their knowledge constitutes a violation of this Code itself.

Within the reporting channels established by the Company, an Anonymous Reporting Channel is highlighted, ensuring the anonymity of the reporter and available on the Company's website. The content of reports made through this Anonymous Reporting Channel will only be accessible to members of the Executive Committee and individuals designated by them for this purpose.

The Company will also make every effort to protect the identity of the individual against whom a report is made unless it is determined that a violation of this Code has occurred. Any individual participating in an investigation of potential misconduct must not discuss or disclose any information outside of the investigation unless required by law or by their

legal advisor.

Neither the Company nor individuals may dismiss, demote, suspend, threaten, or discriminate in any way, or retaliate against any person who, in good faith, makes a report or assists the Company, the Executive Committee, or any other person or group, including any governmental body, in the investigation of a report of illegal or unethical conduct or behavior.

Any individual who engages in any of these retaliatory actions will be subject to disciplinary measures, which may include termination of their employment relationship with the Company, and, if applicable, civil and/or criminal liability.

#### **IV)- HOW TO USE THIS CODE**

The intention of this Code is not to cover all topics in detail, but it should always be used as a reference guide in our dealings with the community, customers, suppliers, colleagues, and shareholders, guiding the actions of each individual based on respect, integrity, responsibility, and dignity. Therefore, at all times, we must use our common sense and good judgment when facing issues related to business conduct and interpersonal relationships within the Company, seeking guidance from the HR Manager if unsure how to proceed in a particular case.

What does the correct application of this Code imply?

- Become FAMILIAR with it and with the policies applicable to your specific tasks.
- PARTICIPATE, when appropriate, in training sessions related to the Code.
- RECOGNIZE the responsibility to manage and conduct our daily activities with integrity and in accordance with ethical behavior.
- COMMIT to complying with the Code by reading, interpreting, and formally signing the respective Acceptance Form.
- ACT RESPONSIBLY by reporting any concerns or suspicions of Code violations in good faith and as soon as possible.
- SEEK ADVICE or guidance in situations that may constitute or result in potential Code breaches.
- COOPERATE in cases related to integrity issues.
- UNAMBIGUOUSLY PROTECT whistleblowers by promoting sanctions in cases where there are retaliations for integrity reports.

How to proceed in a specific situation?

Whenever an employee has doubts, feels they are in a situation that may involve a conflict of interest, and/or has been a victim of discrimination or harassment, and/or suspects or has knowledge of facts that may harm the Company, and/or oppose or seem to contradict the principles of this Code or violate any applicable law, they must immediately report such situation through any of the reporting channels provided by the Company for this purpose:

- Email.
- Telephone.
- Anonymous Reporting Channel.
- Postal Mail.

Are there any reprisals?

The Company does not tolerate nor will it tolerate reprisals against anyone who raises a concern, doubt, question, or contribution, who makes a report of non-compliance, and/or who assists in any way in an investigation related to expected conduct under this Code of Ethics and Corporate Governance.

Anyone who takes reprisals, regardless of their position or role within the Company, will face the consequences outlined in this Code of Ethics and Corporate Governance.

What are the consequences of violating this Code and how are they resolved?

Failure by any individual to comply with the provisions of this Code may result in disciplinary action.

Such disciplinary action may also be applicable to any other individual who, with respect to one of their dependents, knows and/or becomes aware that conduct prohibited by the Code of Ethics and Corporate Governance has been carried out by said individual and fails to take appropriate corrective action.

The Company, through its Steering Committee, takes violations of the Code of Ethics and Corporate Governance seriously.

When appropriate, disciplinary measures will be taken, which could include termination of employment.

These measures will be taken and graduated regardless of the position or role that the individual who has committed the violation occupies within the Company, depending only on the nature, severity, and frequency of the inappropriate conduct.