



Pantaleón



CÓDIGO DE ÉTICA Y CONDUCTA

PARA TODOS UN FIRME COMPROMISO

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At Pantaleón we are committed with conducting our business responsibly and in compliance with the laws and regulations of the countries in which we operate. We strive to choose Third Party who share the same principles, apply them in their business activities and who are willing to extend them throughout their supply chain. To achieve this, we consider it appropriate to agree on a series of shared principles which we list below.

Our principles

- Act with integrity, honesty and respect in all work, business, and social relations.
- Fulfill our commitment to responsible development as a long-term business vision.
- Promote a safe and healthy work environment. Develop our operations in harmony with the environment and act responsibly in the communities in which we operate.
- Comply with the laws and regulations that apply to our business activities.
- Seek excellence in the performance of our responsibilities, celebrating our successes and learning from our mistakes, while promoting and acknowledging achievements and teamwork.
- Actively and consistently promote the personal and professional development of all members of our team, offering opportunities for participation and growth based on the effort and commitment of each of our employees.

Code of ethics and conduct Third Party*

*Third parties: Refers to any entity or person that is not part of the organization but interacts with it in the course of its commercial, operational and administrative activities. This includes, but is not limited to, customers, suppliers, business partners, governmental and non-governmental entities and organizations.

Values of Pantaleon

- Integrity and honesty.
- Improvement and permanent change with a long-term vision.
- Respect for connected people

Purpose of Pantaleon

Promote development, transforming resources responsibly.

What do we expect of the Third Party that work with Pantaleón?

We expect our Third Party to carry out their responsibilities with the expected quality, using resources responsibly and continuously adding value to the processes. We trust that their performance will be in complete compliance with the legal framework that applies to their activities. We promote acting with integrity, honesty and respect in all work, business, and social relations. We value our commercial relationship with our Third Party, and we expect you to provide us with the best commercial conditions in the market. At the same time, we request that all information about Pantaleón and its processes be handled confidentially. In particular, we expect you to adhere to the following principles.

Operate transparently and respect the commitments with Pantaleón.

Actively and consciously promote acting in an integral and transparent manner in the interactions with Pantaleón and with government entities. We expect you to respect the commitments made with Pantaleón through contracts, emails, verbal interactions, and others.

- Do not permit direct or indirect bribes on behalf of Pantaleón employees or from members of government. A bribe consists of giving or offering something of value to a person in order to obtain special benefits. Take special care in relationships with third parties or people who could interact with government on behalf of your company.
- We do not tolerate our employees receiving commissions for hiring or favoring a particular Third Party. If you are aware of this practice, please denounce it through the channels provided at the end of this document.
- Do not take any measure that goes against national or international regulations on matters related to money laundering and financing terrorism.

Promote safe and healthy work environments.



We hope that the safety of your employees is a priority for you and that you know the occupational safety and health regulations of the countries in which you operate. Safety is everyone's responsibility, and we expect you to train and update in or outside of Pantaleón, ensuring that your employees:

- Do not engage in work where you consider there is any potential or probability of an accident which may result in adverse human or material consequences; Use adequate personal protective equipment;
- Abstain from engaging in work in which the conditions are deemed unsafe and where there is the possibility of an accident with human or material consequences;
- Do not work (or allow your employees to work) under the effects of drugs or alcohol.

Show respect in work relationships with your employees.



Respect and promote compliance with work regulations in the countries in which you operate. These establish salaries, benefits, schedules, minimum working ages, and other conditions for just employment.

- Ensure that there are no children working in your company.
- Provide equal opportunities to all employees.
- Ensure the responsible hiring of your staff.
- Do not tolerate abuse or any type of offensive behavior.
- Do not tolerate sexual harassment or abuse, both with your employees and those of Pantaleón.

Conduct operations in harmony with the environment and act responsibly in the communities in which you operate.

Know and practice relevant regulations related to the conservation of the environment, by diminishing pollution and through the adequate management of the impact your operations have on your surroundings.

What can you do if you observe behavior that causes concern regarding these principles?

Notify Pantaleon about any behavior that concerns you and that in your opinion may be in violation of the Code. Notify if you have just cause to believe that any employee, agent or contractor of Pantaleon is causing financial irregularities or imprecisions, fraud, anticompetitive or corrupt practices or violations of regulations on health, safety, environment or work. By doing so you will provide Pantaleon the opportunity to address and solve the problem, preferably before it becomes a legal violation or a risk to the health and safety of an employee.

In the following page you will find the different communication channels established by Pantaleon so you can express your concerns. You may choose to remain anonymous, however we encourage you to identify yourself as this makes communication and follow-ups easier. If you do reveal your identity, the Compliance & Ethics Office and the investigators will take all reasonable precautions to maintain confidentiality and preserve your anonymity, conducting a thorough and just investigation.

Avoid and declare conflicts of interest

A conflict of interest arises when your activities and personal relationships interfere, or may interfere, for real or in a manner perceived by others, with your capacity to act in your best interest and that of Pantaleón. The Code cannot include all possible conflicts of interest, therefore you should use your good judgement and common sense. Please notify Pantaleon of any potential conflict of interest. Remember that having a conflict of interest does not necessarily constitute a violation to this Code, but not disclosing it does. Some examples of conflict of interest are:

- Having joint business ventures with a Pantaleón employee;
- Having one or more family member working for one of the companies of Grupo Pantaleón.

Pantaleón is committed to promoting an ethical environment in its commercial relationships of purchasing/sales of materials, raw materials, consumables and/or hiring of services; for this reason the following activities or conducts are forbidden:

- No Pantaleón employee may accept and/or request gifts, trips, food, invitations, commissions or other types of attention or favors from Third Party.
- No Pantaleón employee may accept or grant, without declaration, gifts with a value greater than US\$75.00. During any negotiation, receiving or granting gifts of any value is prohibited.
- No Pantaleón employee may request or accept trips for technical or work visits without previous authorization of the General Management of the Country or General Corporate Management. In any case, Pantaleón will cover all expenses of its representative.

We thank you for your consideration and support with this effort. You are an important Third Party for Pantaleón and we would like to continue to maintain a good relationship throughout time. We appreciate your adhesion and commitment by filling the attached form.

Adhesion and Commitment



Date

Through this letter I make it known that I have read and interpreted the entire content of the Code of Ethics and Conduct for Third Party of Pantaleón. Consequently, I express my commitment to these principles, holding myself responsible for their observance and compliance. In addition, I commit to communicating the content of the Code of Ethics and Conduct to our employees who are directly involved in the service we provide to Pantaleón.

Sincerely,

Name

Company

Position held

Signature



To raise your concern

 **Guatemala** External operator: **1-801-000-2424**

 **Nicaragua** External operator: **001-800-5020098**

 **Mexico** External operator: **800-1233422**

From any other country: **+502-2377-2424**

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Web: www.etictel.com/pantaleon

WhatsApp: +502 4128-7000