



**CODE OF CONDUCT**  
MASTELLONE HNOS. S.A.





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We are convinced that a high level of values-based performance is key to the sustainable success of all companies in general and the Mastellone Group in particular.



Acting in accordance with our values of **quality, respect, responsibility, integrity and commitment** generates trust, protects our reputation, allows us to make efficient use of our resources when doing business and strengthens the relationship with our collaborators, shareholders, clients, suppliers and the society.



The Code of Conduct is our compass for daily work and for doing business correctly and responsibly.



## 06 MESSAGE FROM THE CHAIRMAN

## 08 INTRODUCTION

1. Scope of application
2. Personal responsibility
3. Leaders' responsibility
4. Continuous training
5. Sanctions
6. Queries and concerns
7. Complaints
8. Whistleblower protection

## 13 OUR VALUES

### 14 QUALITY

1. Our quality
2. Defense of competition

### 17 RESPECT

1. Respect for people
2. Discrimination
3. Harassment

20

**RESPONSIBILITY**

1. Protection of our Company's assets
2. Use of insider information
3. Data about collaborators and third parties
4. Information systems, e-mail and social media

24

**INTEGRITY**

1. Anti-corruption
2. Gifts and hospitality
3. Conflicts of interest
4. Money laundering prevention
5. Accuracy of records and reports

30

**COMMITMENT**

1. Health, safety and environment
2. Communities and human rights

34

**GUIDE TO MAKING THE RIGHT DECISIONS**

35

**COMPLAINTS AND INQUIRIES CHANNEL  
COOPERATION WITH INVESTIGATIONS  
AND AUDITS**



## **MESSAGE FROM THE CHAIRMAN • Carlos Agote**

Day after day we work as a team with the objective of innovating, growing and providing our society with dairy products that stand out for their highest quality. We are proud of our achievements, because we achieved them by putting each of our values into practice. Values that we have chosen among all of us, that represent us and make us who we ARE; that guide our daily actions and decisions and are reflected in our Code of Conduct. There they come to life and remind us why they are important, and help us understand their meaning as compasses for action.



Our Code shows us how we should behave towards others and how they should behave towards us. It strengthens our relationships, increases trust between the communities where we operate and protects us as a company.

As a company, we cannot ignore non-compliance with the Code under any circumstances. All of us who are part of this community and the entire value chain have channels that will allow us to communicate any faults or non-compliance with this Code.

Our Code is not only for our collaborators. We want all our stakeholders to know our way of acting, to trust that this company will always seek to magnify its positive impacts and develop continuous improvement in all its processes, products and services in a sustainable way.

Our Code is and will continue to be our guide, accompanying our history of growth and enhancing our identity, because THAT IS WHO WE ARE.

Thank you for continuing to work together to strengthen our Code and our values.

Greetings,

Carlos Agote • *Chairman*



## INTRODUCTION

Our Code of Conduct contains the principles under which all Mastellone Group companies conduct their business. It is the fundamental pillar of internal behavior among those of us who are part of the organization and, in turn, of external behavior towards shareholders, clients, suppliers and the general public.

This Code offers guidance and examples to help you face challenging situations in your daily work. It also contains reference to our Company's internal policies and current legislation.

It is the fundamental pillar of our Integrity Program, which consists of the set of policies, procedures and actions aimed at preventing, detecting and correcting irregularities and illegal acts.

The Program promotes an ethical and transparent culture and encourages compliance with internal policies and procedures and the laws in force in the countries where we do business.

### ► 1. SCOPE OF APPLICATION

The Code of Conduct applies to all members of the Board of Directors

and employees (hereinafter collaborators) of all Mastellone Group companies and related companies.

In companies over which we have no control, we promote the adoption of the standards of conduct reflected in this Code. All persons, including suppliers, subcontractors, customers and business partners, shall act consistently with our Code, especially when acting on our behalf.

## ► 2. PERSONAL RESPONSIBILITY

The Code, by its nature, cannot describe all possible situations that may arise in our daily work, so if you cannot find the answer in this Code or if you have doubts about how to interpret it, ask for help by consulting your supervisor or the Integrity Officer.

### IT IS YOUR RESPONSIBILITY TO SEEK COLLABORATION

The **Integrity Officer** is the person within our Company in charge of the development, coordination and supervision of the Integrity Program. He/she is responsible for ensuring compliance with the policies and procedures related to the Company's culture.

THEY WILL BE AT YOUR DISPOSAL TO HELP YOU



## ► 3. LEADERS' RESPONSIBILITY

Although all employees have the responsibility to act with integrity, each leader has the great responsibility to lead by example. We expect our leaders to commit and act as an example and role model:



- *Inspiring others to adopt our Code.*



- *Making it your own, disseminating it and encouraging decision-making in an ethical and upright manner.*



- *Creating an open and respectful work environment in which team members feel comfortable sharing their concerns and asking questions.*



- *Seeking to resolve problems and report them to their superiors as they appear, being able to report the facts they understand to be relevant without fear of reprisals.*

## ► 4. CONTINUOUS TRAINING

All collaborators receive induction and continuous training on our values, ethics and integrity. They are mandatory and a perfect opportunity to raise questions and conversations with your peers and team on how to make this Code part of your daily work in practice.

## ► 5. SANCTIONS

Violations of our Code, policies, directives or legislation may have serious consequences, including disciplinary actions that could extend to the termination of employment, as well as possible civil or criminal sanctions for both the Company and the individuals and/or third parties involved.

## ► 6. QUERIES AND CONCERNS

If you have questions or need more information about any of the

topics raised in this Code, you can consult your superior, the Integrity Officer or the area of competence of the subject in question.

## ► 7. COMPLAINTS

All collaborators and third parties related to our Company who have knowledge or suspicion of any breach of this Code must resort to:



Your direct superior or



The Integrity Officer or



The Whistleblower Channel (personally or anonymously).

All complaints will be registered in the complaints reception and management system and will be dealt with in accordance with our Complaint Investigation Policy.



**ACCESS OUR WHISTLEBLOWER CHANNEL FROM OUR INTRANET.**

To give you peace of mind about the protection of your anonymity, our Whistleblower Channel is managed by an independent third party who will not be able to trace the progress of the complaint.



## ► 8. WHISTLEBLOWER PROTECTION

The Mastellone Group is committed to protecting the rights of people who report in good faith. Our Company will not retaliate against anyone who, in good faith, reports facts or concerns that constitute

violations of our Code, our policies or the law.

If you know or suspect the existence of, or are a victim of, retaliation, you should report it.

## ► WHAT DOES IT MEAN TO ME?

A co-worker tells you that they are aware of a situation that goes against the Code of Conduct, but since the situation does not concern their area, they prefer not to report it and not to expose themselves.

- *Should you tell them that they are right or encourage them to file a complaint?*



**Regardless of the area where the violation of the Code of Conduct is occurring, you must encourage your colleague to report it. If they do not want to expose themselves personally, explain that they can use the Whistleblower Channel anonymously and that they will not face any retaliation.**

You have just been appointed leader in a strategic project of the Company and when you send the invitation for the first work meeting, several people on the team inform you that the meeting overlaps with an Integrity Program training.

- *Should you confirm the meeting and ask them to attend on another training date or should you encourage them to attend the training by highlighting its importance?*



**As a leader you must set an example and encourage them to attend the training.**





## OUR VALUES

Values are our guide to conduct and define how people are expected to behave. They identify and distinguish us as a company. They are part of our culture and we must transmit them to the entire value chain (customers, collaborators, suppliers and business partners).

THEY REPRESENT  
**WHAT WE ARE.**



## QUALITY

### ► 1. OUR QUALITY

We are proud of our work, procedures, collaborators and value chain, which, thanks to their quality, allow us to produce food that makes our society grow and fosters our desire to be better every day.

Our products are consumed by millions of people, which is why quality is what defines us. We are aware of the impact that our food has on the health of our society and food safety, that is why we are committed to our quality standards that we achieve thanks to our responsibility and commitment that are present from the choice of raw materials to the final product.

## 2. DEFENSE OF COMPETITION

We are confident in the quality of our products and the work of our collaborators. We compete in the market in a healthy and independent manner, complying with all current legislation in general and antitrust laws in particular.

We believe that free and fair competition challenges us to seek constant improvement and permanent innovation.

That is why:

- *We do not comment on competitors' products or services in an inaccurate or untruthful manner.*

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- *We do not use illegitimate means to obtain information from competitors.*

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- *We respect the confidential information and intellectual property rights of our competitors and other third parties.*

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- *We always comply with antitrust and competition laws.*

All communications referring to our competitors must be commercially appropriate in tone, and must never contain language that could be interpreted as encouraging anti-competitive behavior.



IF YOU NEED MORE INFORMATION, YOU SHOULD CONSULT LEGAL DEPARTMENT OR THE INTEGRITY OFFICER.

If you suspect an antitrust violation, report it immediately.

## WHAT DOES IT MEAN TO ME?

You participate in a presentation of the Company's products in a supermarket chain, and a co-worker suggests you invent negative comments about the competition's products to improve the positioning of the products being offered.

- *Should you heed their recommendation?*



**You should not heed the recommendation since it implies a breach of fair competition. It is important that you discuss it with your colleague to make the presentation correctly.**

The Director of a competing company calls the Director of Mastellone in order to propose an agreement on retail prices.

- *Do you think the Director of Mastellone should accept the offer?*



**No, they should not, since it is a practice contrary to antitrust laws. Each company must act individually and independently regarding its prices and costs, ensuring the freedom of consumers to choose products or services based on their quality and price.**





## RESPECT

### 1. RESPECT FOR PEOPLE

One of our fundamental values is respect, which is why we have the responsibility and commitment to treat each other with dignity, which means appreciating diversity regardless of whether it exists for reasons of race, religion, gender, sexual orientation or any other difference. Differences bring out different points of view that enrich the perspective of the entire group, allowing us to learn and be better.

We value and promote an inclusive and fair workplace that fosters respect for all our collaborators, clients, business partners and our community.

We respect and promote fundamental and internationally declared Human Rights (HR). This commitment is not only part of our actions, but is also embodied in our Sustainability Policy.

## ▶ 2. DISCRIMINATION

We work with people of various religions, ages, nationalities, disabilities, health conditions, races, sexual identities, genders, ideologies and affiliations with political groups and union organizations.

Consistent with the mutual respect we promote and applicable labor laws, we do not tolerate discrimination based on any of these characteristics or any other comparable offensive behavior.

These principles apply to all employment decisions including recruitment, training, evaluation, career planning and compensation.

## ▶ 3. HARASSMENT

Harassment is a form of discrimination that constitutes offensive and disturbing behavior that generates anguish and discomfort in the people who suffer it, also generating a hostile work environment.

Harassment can take different forms, such as workplace and even sexual harassment, including physical actions, verbal or written comments, or visual representations.

The Mastellone Group rejects and prohibits any form of harassment by a collaborator or third party, expressly stating that any type of harassment is considered a serious offense that carries the maximum sanctions.

Within the concept of harassment there are different types, for example:

- *Bullying*
- *Labor or mobbing*
- *Sexual*
- *Physical*
- *Psychological*
- *Cyber-bullying*

## ▶ WHAT DOES IT MEAN TO ME?

A person on your team has the habit of making jokes and comments about other colleagues. Although there are people who have fun with these jokes, you notice that the tone is inappropriate and they make others uncomfortable.

▶ *What should you do?*



**You should talk to your colleague and tell them that these jokes can make people uncomfortable and that in our work environment we must be cautious and respectful. If they continue with this behavior, you should talk to the Human Resources Representative or the Integrity Officer.**

You are looking for a candidate to fill a vacancy within your team. The people who have always occupied this position have been men. From Human Resources they present you with a shortlist where there is a woman as a possible candidate and you wonder if it is worth interviewing her or simply deciding between the two male candidates.

▶ *What should you do?*



**You should not discriminate against collaborators or candidates based on gender, which is why you should interview all three candidates and base your choice on the skills and abilities of the interviewees.**



## RESPONSIBILITY

### ► 1. PROTECTION OF OUR COMPANY'S ASSETS

We are all responsible for protecting our Company's tangible and intangible assets, and using them with good judgment.

#### Tangible assets

These are the assets that belong to the Company (machines, equipment, tools, buildings, furniture, vehicles, raw materials, products in process), which are physically perceived and are necessary for the operation of the different activities and to perform our work. We have the responsibility and duty to protect them from all theft, loss, misuse or waste. We should not use them for personal purposes.

## Intangible assets

They are those that have value but no physical presence (patents, registered trademarks, licenses and permits, franchises, copyrights). At Mastellone we are continually generating formulas, ideas, strategies and other types of valuable and private data about our business. We must be aware of how valuable this information is for our Company and protect it. Its improper disclosure is absolutely prohibited.



We should only store business-related information on the Company's devices, emails and systems and never personal information. The Company may conduct audits.

## ► 2. USE OF INSIDER INFORMATION

Trading activities using privileged information is strictly prohibited. Insider information is important information that can potentially affect the Company's share price, but which is not yet publicly known. Those collaborators who, due to their hierarchy or area of work, have access to privileged information must respect confidentiality. If you have any doubts about this topic, you can always consult the Legal Department or the Integrity Officer. Insider information includes:

- *Unpublished financial results.*
- *Changes in high-level management*
- *Information about acquisitions*
- *Divestments*

- *Remunerations*
- *Development of new products and/or formulas*
- *Strategic trade agreements.*
- *Others.*

### ▶ 3. DATA ABOUT COLLABORATORS AND THIRD PARTIES

The comprehensive protection of personal data (of Company personnel and third parties) recorded in files and records has the purpose of guaranteeing the integrity of individuals.

The processing of personal data contains the appropriate security levels established by relevant laws.

Access to records and personal data of collaborators and third parties is only permitted to those areas responsible for the information, which guarantee the security and confidentiality of the data.

The Mastellone Group guarantees the rights of the owner of the information stored in its databases.

It is prohibited to disclose information or internal communications of the Mastellone Group, its collaborators and/or third parties, or publish them on social media without authorization.



For more information, contact the Legal Department.

### ▶ 4. INFORMATION SYSTEMS, E-MAIL AND SOCIAL MEDIA

Access to the Internet, e-mail and other applications are tools granted for work purposes. All communication with other collaborators and third parties must be carried out through e-mail accounts or any other electronic means approved for such purpose by the Mastellone Group. You must not use computer systems, devices (cellular or portable), internet access, e-mail accounts and any other means of information or communication for illegal or unethical purposes.

Social networks are very useful and allow us to communicate instantly and globally. However, think carefully before spreading images or texts that involve your colleagues or your workplace. Doing so could have negative consequences for the reputation of individuals or our Company.

## ► WHAT DOES IT MEAN TO ME?

A personal video of a co-worker goes viral within the Company and you receive said video in your cell phone. Everyone who receives the video not only watches it, but also shares it again.

► *What should you do?*



**You must delete the video and report the situation to a Human Resources Representative and the Integrity Officer. Respect for people and the correct use of information and work resources are part of our Code and must be reflected in our daily actions.**

You come across a colleague who is chatting on a cell phone and you hear that he or she is talking openly about a new product that the Company is developing. You think about the confidentiality of that information.

► *What should you do?*



**You should talk to your colleague, commenting on what you heard and make them see that they may have leaked confidential information to internal collaborators and even visitors from outside the Company. Surely your colleague will thank you for your attitude.**





## INTEGRITY

### ▶ 1. ANTI-CORRUPTION

Those of us who are part of the Mastellone Group companies carry out our duties on the basis of integrity and never through illegal acts such as bribery, unfair practices or other acts contrary to the law. This culture of integrity allows us to internally build a work environment based on solid and trusting relationships, enhancing our performance and pride in belonging.

We are committed to promoting integrity and transparency, positively influencing the markets and communities where we operate, understanding that it is our duty and that it is part of the social license we need to do our business.

It is strictly forbidden to give, receive, offer, promise and/or authorize, directly or indirectly, through third parties, any form of bribery to public officials or persons in the private sector.

The term "third parties" includes consultants, subcontractors, sales agents, resellers, managers, custom brokers, business colleagues, law or accounting firms, companies that provide assistance in obtaining permits or inspection certificates, as well as any other business partners. For more information, see our Anti-Corruption Policy.



It is essential that all third parties that provide services for or on behalf of any Group company are selected and hired in compliance with the guidelines of the Third Party Due Diligence Policy.

## ▶ 2. GIFTS AND HOSPITALITY

Good business relationships are based on trust and goodwill with our business partners (customers and suppliers) and public officials. It may frequently happen that one of the parties wishes to recognize this relationship through gifts or another hospitality such as invitations to cultural, sporting, gastronomic and travel events, among others.

Gifts and hospitality should always be moderate and should never be used to inappropriately influence or create a real or perceived conflict of interest.

When making or authorizing a gift or any other hospitality, you should keep in mind:



- *When it comes to gifts or any hospitality for public officials, you should always consult our the policy of our Company and the Integrity Officer, as it may even be prohibited by law.*
- *You may not use your own money or resources to violate the rules of our policies and guidelines, or the provisions of this Code.*
- *Please review our Gifts and Hospitality Policy to know the criteria, limitations and required authorizations.*

When receiving a gift you must keep in mind that:



*It is prohibited to receive gifts of money or its equivalent such as gift cards or loans.*



*The value of the gift must not exceed the maximum allowed by our Gifts and Hospitality Policy.*



*If a gift exceeds the standards set forth in the policies or guidelines of the Group, discuss it with your manager, document its receipt in accordance with the applicable rules or directives, and politely return it explaining that our internal rules do not allow us to accept such gifts.*

*If returning the gift is truly unfeasible, then the gift should be donated anonymously to a charity or accepted on behalf of the Company and shared among collaborators, in which case the Integrity and Human Resources Manager will be responsible for defining the method to do so.*

**It is important that you are familiar with our Gifts and Hospitality Policy, as it explains more precisely how you should proceed.**

### ▶ 3. CONFLICTS OF INTEREST

All decisions regarding the business must be made objectively and

in the best interest of the Group companies, never based on our personal interests.

A conflict of interest arises when our personal interests interfere, or appear to interfere, with our ability to do our work effectively and impartially. This could occur, among other things, due to:

- *Personal ties between members of our organization or with third parties.*
- *The temptation to obtain personal profits or benefits.*
- *Additional work not related to our activity in the Mastellone Group.*



**Personal ties are defined as any relationship of kinship, friendship or closeness.**

We must always avoid any relationship or activity that could affect our ability to make objective and unbiased decisions on behalf of our Company's business.

When these relationships or activities cannot be avoided, our Conflict of Interest Policy will guide you on how you should report the situation to your manager, Human Resources and the Integrity Officer.

Reporting these types of relationships or activities is for your benefit since transparency always eliminates any inappropriate perception.

It is not wrong to have conflicts of interest, but you should report them so that the necessary measures can be taken so that you can continue to perform your daily tasks in the best way possible.



#### ▶ 4. MONEY LAUNDERING PREVENTION

Our goal is to do business with reputable partners who share our culture of integrity, conduct legal activities and whose resources have

legitimate origins.

Money laundering is a crime that involves concealing the source of funds derived from criminal activities such as drug trafficking, human trafficking, bribery, etc., and it is committed when money derived from crime is integrated into the commercial flow so that it appears legitimate or so that its actual source or owner cannot be identified.

To prevent any Group company from being used as a means to launder money, we comply with current legislation on the prevention of money laundering by registering and reporting to the authorities of any suspicious transaction.

**If you suspect any irregularity or have questions about a transaction, share it with your manager and/or the Integrity Officer.**

## ▶ 5. ACCURACY OF RECORDS AND REPORTS

The integrity of our records, whether they are labor, environmental or financial records, among others, is essential to comply with current laws and to manage our business, helping us meet our obligations to our shareholders, collaborators and other partners.

All records must be completed in a timely manner, and must be maintained in accordance with applicable laws.

Collaborators who have control over the Company's assets and transactions must establish and/or maintain an internal control system in their area of responsibility that is designed to prevent unauthorized, unrecorded or inaccurately recorded transactions.

Falsification or inappropriate alteration of financial and nonfinancial records is prohibited as it would affect:

Our values.

Our credibility and transparency.

Our reputation.

Our legal obligations.

The ability to make decisions.

Valid projections.

## ▶ WHAT DOES IT MEAN TO ME?

We need a new qualification certificate in one of our plants and a supplier tells you that he has acquaintances who work within the office of the authority that must issue said authorization and that, if you give him an advance payment of his fees, he can obtain the certificate in a shorter period of time and avoid the procedure.

▶ *What should you do?*



**You must explain to the supplier that all the certificates and authorizations of our plants are carried out following the corresponding procedures and that you will proceed to the formal presentation before said authority. On the other hand, all payments to third parties must be made with supporting receipt. Inform the supplier about our Integrity Program and in turn inform the Integrity Officer about what happened.**

Your brother works for a Company supplier. To manage a new service, the provider presents a higher quote than the rest. When it is time to define it, you consider that he is the most suitable to provide the service due to his experience and quality.

▶ *Should you declare the conflict of interest? Should you make the decision or should you step back?*



**First, you must declare your conflict of interest as indicated in the Conflict of Interest Policy. Second, no matter the reasons you may have to justify your choice, you must step aside and the decision should be made by your supervisor.**



## COMMITMENT

### ► 1. HEALTH, SAFETY AND ENVIRONMENT

#### Occupational Health and Safety

The health and safety of our collaborators, visitors, contractors, suppliers, clients, consumers and communities is paramount. Our safety standards are designed to help you work safely, whether inside or outside our facilities, and compliance with them is a mandatory requirement to work inside or outside our premises.



Our safety standards are available in the Documentation Control System, on the Standards Site and on the Intranet.

If you are a Contractor, you will find the relevant manual on the Company's website.

If you have concerns, you should channel them to your superior or through the Environment, Hygiene and Industrial Protection (MAHPI) area, who will be able to guide you, especially if:

- *You are performing a task that you believe may be unsafe.*

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- *You are doing work for which you believe you are not properly trained and which may injure you or others.*

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- *You observe someone performing a task that you believe is unsafe or that the person is not properly trained to perform.*

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- *You consider that there is a potential risk to yourself or others.*

Safety is everyone's responsibility. Consider that there is always a basic measure that can be applied to avoid an accident. If you do not know them, consult with the MAHPI area. We have a working conditions management system throughout the Company to ensure that no accidents or illnesses are caused to our employees, third parties and the community in which we operate.

**It is strictly forbidden to work under the influence of drugs and alcohol as you can cause harm to yourself and those around you. Drugs include illegal drugs or the misuse of prescription medications.**

The possession, sale, use, transfer or distribution of drugs, alcohol or any other illegal substance in the workplace is strictly prohibited.

## Environmental Care

As a Company committed to the sustainable use of resources, we define policies and apply them to give a sustainable approach to our activity, focusing on the following topics:

- *Water conservation.*
- *Improving energy efficiency.*
- *Reduction, recovery and adequate disposal of waste, seeking to increase the recycling rate.*
- *Sustainable use of raw materials and implementation of practices.*
- *Reduction of greenhouse gas emissions.*

**The Mastellone Group complies with current laws regarding both Occupational Health and Safety and the Environment in all its plants.**

## ► 2. COMMUNITIES AND HUMAN RIGHTS

We demonstrate respect and commitment to the wellbeing of people and the planet through investments, thus achieving a genuine commitment to sustainable management that allows us to build relationships based on trust and transparency with all stakeholders in the community.

We make business decisions with a long-term vision, always considering the impact on the stakeholders related to our community. We conduct our business on an ethical basis and year after year we are committed to developing achievable objectives, always seeking

the best for present and future communities and the faithful respect for human rights.

## ▶ WHAT DOES IT MEAN TO ME?

You are carrying out a maintenance task wearing safety goggles and you see that your colleague is grinding a metal piece without wearing a face shield. When you ask him why he is not wearing it, he responds that he always does it that way and nothing has ever happened to him, and that there is also no one monitoring it, so there will be no problems.

▶ *What should you do?*



**You must tell your colleague that the safety equipment corresponds to the measures aimed at protecting them from injuries when there is a risk that they may cause them.**

While volunteering in a community near one of our plants, you are told that there is a Mastellone supplier who hires children to do work in the afternoons.



**You must notify the Integrity Officer who will take the corresponding actions. For our Company, it is important to respect Human Rights and take the necessary measures to generate that same respect in our value chain.**





## GUIDE TO MAKING THE RIGHT DECISIONS

When you face a situation that raises doubts about how to act, do the following exercise and ask yourself the following questions about that behavior:

**¿Is it in line with the Company's values?**

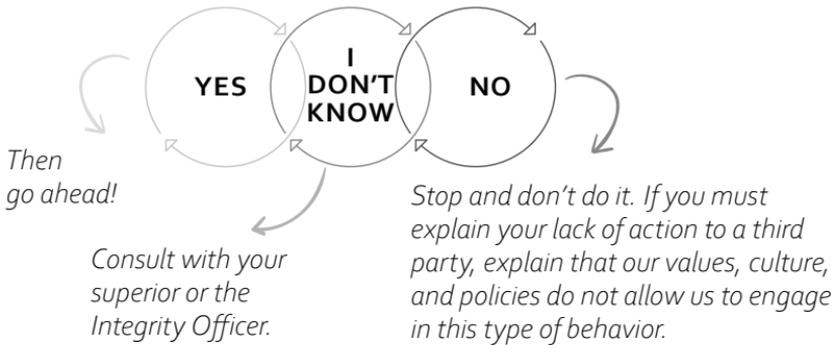
**¿Am I sure it is honest and legal?**

**¿Does it contribute favorably to the Company's reputation?**

**¿Am I sure I shouldn't consult someone else? If it were published in the press, would I feel comfortable?**

**¿Am I sure that my superior, the Directors and shareholders of the Company will be satisfied?**

## IF THE ANSWER IS:



## ► COMPLAINTS AND INQUIRIES CHANNEL

If you do not feel comfortable making inquiries or complaints in person with your superior or the Integrity Officer, you can do so through any of the available channels detailed on our Intranet. They are managed by an independent third party.

If you are aware that someone in our Group is engaging in conduct that is contrary to this Code, applicable laws or internal procedures, it is your obligation to report it. If you fail to do so, you are also responsible.

## ► COOPERATION WITH INVESTIGATIONS AND AUDITS

You must collaborate fully and honestly in the event that, having detected violations of our Code, laws in force or internal procedures, you are required to cooperate to clarify what happened.

No collaborator or third party reporting in good faith will suffer retaliation.





[www.laserenisima.com.ar](http://www.laserenisima.com.ar)

