

# **Participation in Chambers and Business Associations Policy**



# Policy of Participation in Chambers and Business Associations

## 1. Objective:

The general objective of this policy is to ensure that the participation of the Company's associates in business chambers is aligned with the corporate interests and those of each business unit, protecting reputation, avoiding conflicts of interest and ensuring ethical and professional representation; and as particular objectives to establish the guidelines on (i) the responsibilities and obligations of the associates of Arca Continental and its subsidiaries in the participation they have on behalf of the Company before any chamber or business association, (ii) the departure or resignation of the membership, affiliation or association of Arca Continental to a chamber or business association, and (ii) the Company's entry into membership, affiliation or association with new chambers or business associations.

## 2. Scope:

This policy is generally applicable to all Arca Continental S.A.B. de C.V. associates and its subsidiaries that participate or seek to participate in Chambers or Business Associations either as members, alternates, or participants in any committee, board, or working group that exercises the Company's membership rights in such organizations are exercised, or waiver of such rights.

## 3. Definitions:

- a) **Paris Agreement:** Legally binding international climate change treaty adopted in Paris on 12 December 2015.
- b) **Arca Continental or the Company:** Arca Continental, S.A.B. de C.V., or any of its subsidiaries in the countries in which it operates.
- c) **Business Chamber or Association:** any legal entity constituted for the purpose of representing companies or entrepreneurs in their legitimate interests under certain industries, as well as those constituted for the purpose of promoting collective or social interests, whether these are related to the environment, sustainability, health, education, altruism and philanthropy, promotion of sports, vulnerable groups, etc., and for which Arca Continental accrues a contribution, donation or fee in exchange for a membership, association or affiliation to it.
- d) **Director or President of Business Unit:** Director at the head of any subsidiary belonging to the Company.
- e) **PACS Leader:** Director or PACS functional manager of each business unit or Corporate.

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- f) **PACS:** Public Affairs, Communication and Sustainability in the functional area of each business unit or at the corporate level.
- g) **Representative:** Any associate of Arca Continental or its subsidiaries who participates in any Chamber or Business Association on behalf of the Company, whether as members, alternates, or participants in any committee, board, or working group that exercises the Company's membership rights in such bodies are exercised.

## 4. Policy Guidelines:

It shall be the responsibility of any Representative who participates in any Chamber or Business Association to be subject, in addition to the provisions of this policy, to the provisions of national legislation and the guidelines on economic competition applicable in the country in which he or she participates; to the Cultural Principles; to the Code of Ethics; to the Policy on Events; Media and Social Media, and any applicable policies, present or future, that govern the conduct of employees, maintaining professional behavior and acting in the best interest of the company at all times.

In order to safeguard the integrity and reputation of the Company and the associates who participate, as well as the appropriate positioning in the face of union positions or positions of interest to Arca Continental, the current Representatives must inform the PACS Leader at the regional, national or corporate level, depending on the geographical area of influence of the Chamber or Business Association:

- 1) Of the Chamber or Business Association in which they participate, and the role they play internally, if applicable, to keep an updated record of the participation on behalf of the Company in this type of organization.
- 2) Any issue that arises as an internal discussion in the face of bills or regulations that have not yet been approved by the corresponding legislative branch, to coordinate the best way in which the Representative should address the issue.
- 3) Any position or communication that must be voted on or agreed upon within the Chamber or Business Association prior to its adoption as a position of said union body, to determine if it is a position to which Arca Continental will seek to adhere or not. In addition, if such position or communication could be considered contrary to the provisions of the Paris Agreement, the Corporate PACS Leader must be notified so that:
  - a. is reviewed and evaluated to determine the appropriateness of engaging in dialogue with the management team of that Chamber or Business Association to dissuade the adoption of such a position or statement, and
  - b. where appropriate, if it is considered serious, the Corporate PACS Leader will carry out the necessary evaluation together with the Director or President of the Business Unit on the permanence of the Company in the Chamber or Business Association in question.

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- 4) Any donation or dispersal of funds made by the Chamber or Business Association on behalf of its membership to any social cause or governmental effort in order to validate alignment in accordance with the Company's positioning and reputation.
- 5) Any extraordinary representation that is requested from the Representative on behalf of the Chamber or Association before forums, public events, media interviews, meetings with authorities, or any publication, with the aim of coordinating positioning and, where appropriate, support in guidelines to be followed for the spokesperson, discursive lines, speech, positioning and key messages to be communicated.

Likewise, in the event that (i) any Representative deems it necessary for the Company to renounce membership, affiliation or association of any Chamber or Business Association, such intention must be previously consulted with the corresponding PACS Leader and, where appropriate, with the Director of the respective Business Unit in order to validate the relevance of such intention, or (ii) any collaborator deems it necessary for Arca Continental to join a Chamber or Business Association in which it does not yet have a stake, such collaborator must consult with the PACS Leader and, if needed, the Business Unit Director, to evaluate the relevance of joining the new organization whether this contributes to the business strategy and objectives, in general, and in particular to the national or corporate PACS strategy.

Each year, the PACS public affairs functional area at the regional, national or corporate level, as the case may be, will keep an updated record of the participation of Arca Continental's employees before Chambers or Business Associations that includes the information in paragraph 1) above, as well as the theme or theme of the chamber, committee, council, in which there is participation, among other concepts, for which the collaborator who participates in Chambers or Business Associations must support the PACS functional team to share said information truthfully and notify of any change or modification in the information provided when there is an update.

Likewise, this area will provide training on this policy and best practices for employees who participate in Chambers or Business Associations. If necessary, regular update sessions will be offered to ensure that employees are aware of any changes to the policy.

## **Expenses and reimbursements**

Expenses related to participation in chambers and associations, such as membership fees, travel expenses, among others, must be approved in advance and reimbursed in accordance with the company's expense policies issued by the Executive Directorate of Administration and Finance.

## **Conflict of interest**

Employees must avoid any situation that may create a conflict of interest between their work responsibilities and their activities in chambers or associations, for which they must observe and always adhere to the Conflict of Interest policy issued by the Ethics and Compliance Department.

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## **Privacy and confidentiality**

Employees must maintain the privacy and confidentiality of any information obtained through their participation in chambers and associations. They must not share confidential company information with people in accordance with the following policies: Information Classification and Handling Policy, Privacy Policy and Confidentiality of Personal Data, Information Security Policy, Information Confidentiality Policy.

## **5. Surveillance and Policy Enforcement:**

The monitoring and compliance with this policy will correspond in the first instance to the PACS functional teams of public affairs of each country and corporate, in coordination with the Executive Directorate of Public Affairs, Communication and Sustainability.

## **6. Consequences or Penalties for Failure to Comply with the Policy:**

In accordance with the employment relationship of the employee who has failed to comply with this policy, the respective Ethics Committee and/or the respective Human Capital Directorate will be responsible for issuing or taking the disciplinary measures, it deems appropriate for such non-compliance.

In addition, non-compliance with the provisions of this policy may be sanctioned in accordance with the provisions of the legal framework and legislation applicable to each country, the internal work regulations, the Code of Ethics of Arca Continental, or any other applicable policy or provision.

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## Policy Change Log POL-FU-APC-APS-003:

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Address responsible for the issuance or update:	Executive Directorate of Public Affairs, Communication and Sustainability

In the event of any conduct that deviates from this policy, any employee may file a complaint with any hierarchical superior or by any other means, including the Transparency Mailbox, through the following options:

Through the "Transparency Mailbox" link on the corporate intranet or on the Arca Continental website

Via email address: [informa@buzondetransparenciaac.com](mailto:informa@buzondetransparenciaac.com)

By toll-free telephone lines:

In Argentina: 0800-345-5478

In Ecuador: 1-800-001-135

In the United States: 1-888-303-8442

In Mexico: 800 8228966

In Peru: 1-705-2233