



MAKING THE  
**+DIFFERENCE**



**IT'S PART OF ME**  
Ethics define us

SUPPLIERS CODE OF  
**ETHICS**



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# A Message from the Procurement Director

For several years, Arca Continental has been developing and implementing a Code of Ethics and a Sustainability Policy that has allowed us to align our objectives, strategies, and in general, our daily operation under a scope of ethics and respect for communities and the environment in the places where we have activity.

In this context, we are advancing in the monitoring of the social and environmental performance, as well as in a complete scope of ethical behavior of our supply chain.

The relevance of the commercial activity that we have with different companies is key to our operation. With this spirit, we developed this Code of Ethic for Suppliers.

We are confident that working within the parameters of this code will be beneficial for yours and our operation.

Sharing value by protecting the environment and supporting our community is not only something that we are required to do, but it is also the right thing to do.

I thank you in advance for your support and commitment to this initiative, which contributes to fulfilling our organization's long-term strategy.

Sincerely

**Jose Ignacio Etchegaray Ceron**

Procurement Director

Arca Continental



# Our Suppliers Code

## CODE IN BRIEF

This Code of Ethics states what we expect from our suppliers as a Company. It communicates how our suppliers should act in alignment with our Code of Ethics.

The Code is divided into focus areas we may encounter in our work.

## FOLLOWING THE SUPPLIERS CODE OF ETHICS

All of **Arca Continental**' suppliers are responsible for knowing and following this Code. Upholding it strengthens the companies' culture of ethics and demonstrate the shared commitment to acting in the right way.

This Code is the guide on how to interact as business partners and part of the community. Suppliers can access it easily and are encouraged to consult and use it frequently.





## FULFILLING THE RESPONSIBILITIES

This Code of Ethics applies to **Arca Continental's** suppliers

### RESPONSIBILITIES

**Arca Continental's** suppliers have the responsibility to:

- Read, understand and follow the Code.
- Use good judgment in all actions and decisions.
- Ask for help, or when in doubt seek advice.
- Report concerns.
- Comply with the law.

## UNDERSTANDING CONSEQUENCES

Violations of this Code, policies or the law may lead to serious consequences, up to and including termination of commercial relationship. Certain violations may result in civil, administrative, and/or criminal penalties.





# WE PUT PEOPLE AT THE CENTER

- WE RESPECT HUMAN RIGHTS
- WE BUILD SAFE, HEALTHY AND SECURE WORKPLACES
- WE VALUE RESPECT IN THE WORKPLACE



# We Respect Human Rights

We expect our suppliers to respect the human rights of all people. Protecting the fundamental dignity of people is at the center of our values and commitments.

Suppliers must adhere to and follow international human rights principles, including: the International Bill of Human Rights, the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights.

- Provide a safe and healthy workplace that respects the rights of individuals and communities.
- Perform due diligence to monitor human rights in their operations and supply chain.

## WHAT WE EXPECT

- Respect freedom of association and the effective recognition of the right to collective bargaining.
- Never use any form of forced labor, human trafficking or child labor.
- Provide fair working conditions, proper wages, and salaries.
- Apply a human rights lens to their relationships when dealing with customers and suppliers and when considering acquisitions or partnerships.



# We Build Safe, Healthy and Secure Workplaces

We expect our suppliers to ensure workplace safety and health for associates and third parties, and make sure people feel safe and secure in any facility and function.

## WHAT WE EXPECT

- Never skip a safety protocol or procedure, even to meet a production or financial goal.
- Ensure that associates and third parties have the right training, qualification and skills.
- Develop, know and follow Safety and Occupational Health (SOH) policies and guidelines.
- Ensure everyone's safety before starting any work.





# We Value Respect in the Workplace

We expect our suppliers to care for, respect, value and treat people equally and fairly and to take any form of disrespect, including but not limited to harassment, discrimination or retaliation, seriously and take action accordingly.

## OUR WAY OF WORKING

- Respect and value differences in: individual races, color, religion, sex or gender, national origin, age, mental or physical disability, medical condition, military or veteran status, citizenship status, marital status, sexual orientation, gender identity and/or expression, or anything that identifies individuals.
- Promote respect for diversity, equity and inclusion.
- Investigate and discipline any disrespectful, bullying, harassing or discriminatory conduct.
- Enforce respect and fair treatment.



# WE CREATE SHARED VALUE

• WE PROTECT OUR PLANET





# We Protect Our Planet

We expect our suppliers to commit to a sustainable business model to deliver profitable growth, while protecting the planet, by minimizing and offsetting our environmental impacts.

## WHAT WE EXPECT

- Develop programs to:
  - Reduce water, energy and other resources consumption.
  - Reduce greenhouse gas emissions.
  - Improve their handling of waste and prevent pollution.
  - Promote circular economy.
  - Have efficient use of resources and raw materials.
  - Protect biodiversity and land usage.
- Follow environmental laws and policies.
- Maintain robust control of environmental metrics.





# WE MANAGE BUSINESS WITH INTEGRITY

- WE PROVIDE SAFE AND HIGH-QUALITY PRODUCTS
- WE PROMOTE FAIR COMPETITION
- WE AVOID CONFLICTS OF INTEREST
- WE FOLLOW TRADE LAW
- WE PREVENT BRIBERY AND CORRUPTION





# We Provide Safe and High-Quality Products

We expect our suppliers to satisfy their consumers' expectations at all times with the highest quality products and services, while ensuring their products are safe.

## WHAT WE EXPECT

- Inform consumers about the products or services with accurate, current and real information. Comply with applicable regulations.
- Care for the quality of raw materials.
- Ensure products are produced in facilities that prioritize quality and safety.
- Never skip quality controls or compromise product safety.
- Report and address any quality and safety issue or concern.



# We Avoid Conflicts of Interest

We expect our suppliers to avoid conflict of interest in every business decision. Our decisions are in the best interest of Arca Continental, without interference of personal interests.

## WHAT WE EXPECT

- Do not look for personal benefits through business operations.
- Report situations where personal interests could interfere with business objectivity.
- Do not offer gifts or entertainment invitations whenever they compromise objectivity and impartiality.





# We Prevent Bribery and Corruption

We expect our suppliers to be honest in all their business dealings, and not to offer or accept improper payments in exchange for business.

## WHAT WE EXPECT

- Do not offer or accept bribes, kickbacks or improper payments.
- Keep accurate and complete records of all payments.
- Follow applicable laws and policies when dealing with government agencies or officials.
- Follow applicable laws and policies when providing gifts or charitable donations.
- Comply with anti-bribery laws.



# We Promote Fair Competition

We expect our suppliers be committed to the principle of fair competition and to comply with the applicable competition laws.

## WHAT WE EXPECT

- Provide truthful and transparent information about products.
- Do not make false claims about competitors' products.
- Obtain competitive information ethically and lawfully.
- Do not share with competing companies sensitive information about future or current prices, commissions, discount policies, new products, sales or any other confidential information.
- Be careful at customer facilities, trade shows and other settings to avoid improper discussions with competitors or potential competitors.

- Do not force customers to buy something they do not want by tying it to the purchase of something they do want.
- Never enter into any agreement or understanding—even an informal understanding—with a competitor to:
  - Set prices for products and services.
  - Divide territories, markets or customers.
  - Prevent another company from entering the marketplace.
  - Participate in any form of bid rigging.
  - Refuse to deal with a customer or supplier for improper reasons.
  - Boycott another company.





# We Follow Trade Law

Ethics defines how we do business in the global market. We expect our suppliers to comply with all applicable trade laws.

## WHAT WE EXPECT

- Know and follow the applicable trade regulations.
- Conduct due diligence on new suppliers and business partners.
- Stay alert for signs of money laundering or terrorist financing



# WE SAFEGUARD COMPANY ASSETS

- WE PROTECT COMPANY RESOURCES
- WE PROTECT CONFIDENTIAL AND BUSINESS INFORMATION
- WE PREVENT INSIDER TRADING



# We Protect Company Resources

We expect our suppliers to handle assets with care and good sense.

## WHAT WE EXPECT

- Use assets responsibly.
- Maintain and repair the assets in their care.
- Protect assets from loss, theft or improper use.
- Use assets for Arca Continental's benefit and the purposes for which they are intended.



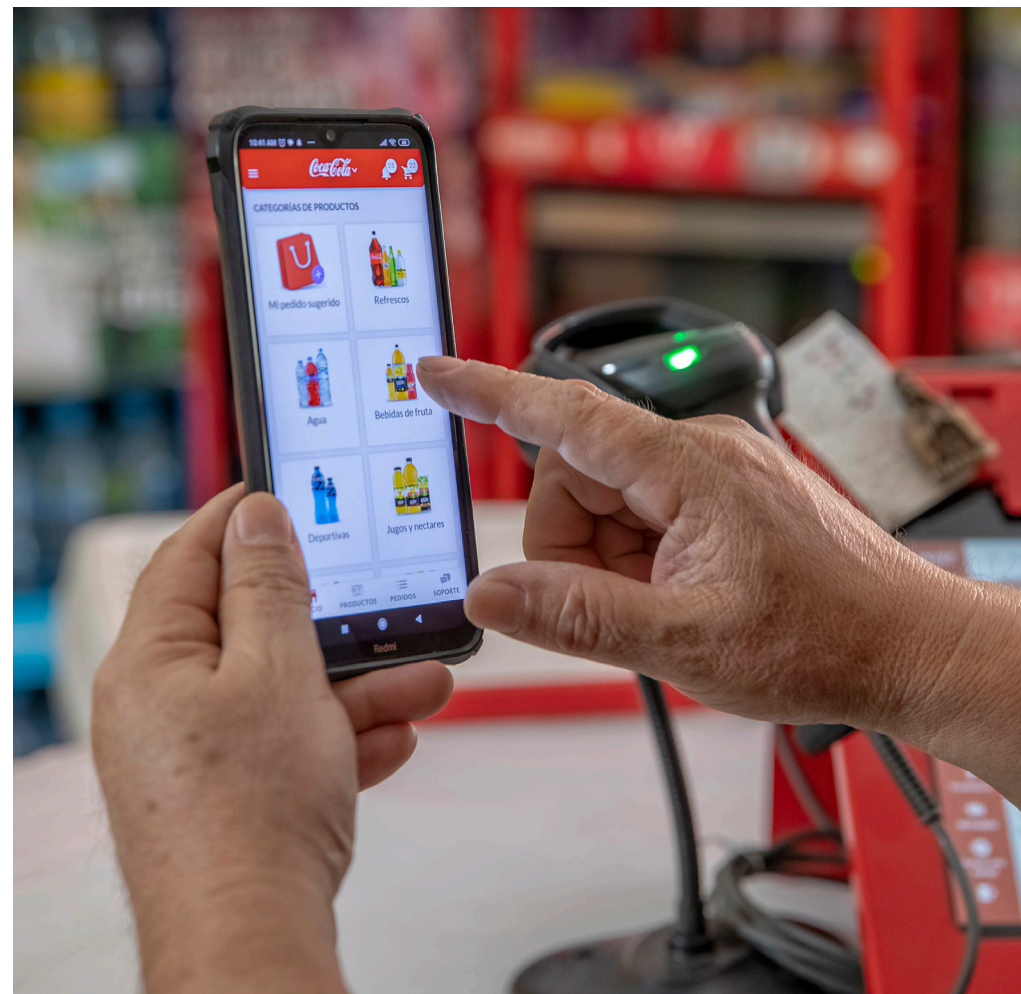


# We Protect Confidential and Business Information

We expect our suppliers to protect personal, confidential and proprietary information, and to protect the privacy of associates, consumers and business partners.

## WHAT WE EXPECT

- Protect information confidentiality and avoid improper disclosure of specially privileged and personal information.
- Communicate transparently about the data that is collected for our company.
- Secure data and devices with physical measures, passwords and encryption.
- Do not discuss confidential matters in public places.
- Report any possible data breaches.





# We Prevent Insider Trading

We expect our suppliers to keep inside information confidential.

## WHAT WE EXPECT

- Never buy or sell shares in a publicly traded company based on material, non-public (“inside”) information.
- Do not buy or sell shares until the inside information becomes available publicly.
- Do not disclose inside or confidential information to anyone outside Arca Continental without proper authorization.
- Protect inside and confidential information from accidental disclosure.
- Warn others not to trade on inside information.
- Do not try to manipulate the price of publicly listed securities.





A photograph of two men, Thomas and David, standing in front of a red truck in a factory setting. Thomas, on the left, is an older man with a grey beard and glasses, wearing a grey work shirt with reflective yellow stripes and a name tag that says "Thomas". David, on the right, is a younger man with glasses, wearing a grey work shirt with reflective yellow stripes and a name tag that says "David". Both shirts have a logo that says "ARC CENTRAL SOUTHWEST". They are both smiling at the camera. The background shows a large industrial facility with various pipes and equipment.

# Speaking Up and Seeking Help



Suppliers have the duty to report any violation of this Code through Arca Continental's Transparency Mailbox.

The Transparency Mailbox is an anonymous, secure communication channel. It is managed by a third-party expert, which ensures impartiality and confidentiality.

Anyone can use the Transparency Mailbox to report any situation they believe may not meet our highest level of ethics. The Transparency Mailbox can be accessed through the following methods:

- The **Transparency Mailbox** on the corporate intranet or on the Arca Continental web page
- The toll-free phone lines:
- Argentina: 0800-345-2036;
- Ecuador: 1-800-001-684;
- Estados Unidos: 1-833-761-8291;
- México: 800-880-0754; y
- Perú: 0800-74684.

When making a report, as much detail as possible should be provided, including any proof material. This ensures our report is addressed fully and appropriately. Every report is addressed and monitored in detail. All complainants will be able to know the status of their report at all times.

## WHAT HAPPENS WITH THE CONCERNS REPORTED?

**Arca Continental** takes all reports seriously. Upon receipt of a report:

The Transparency Mailbox administrators will send it to the appropriate Ethics Committee for review. The Audit Committee from the Board of Directors approves the Ethics Committee's structure, and the members are appointed by the Executive Ethics Committee. They are responsible for undergoing a thorough investigation and making a decision for each case assigned to them.

- These Ethics Committees work under common principles: objectivity, confidentiality, consistency, transparency and non-retaliation.

We must all cooperate with investigations carried out by the Ethics Committees. This includes providing accurate information.

## ZERO TOLERANCE FOR RETALIATION

At **Arca Continental**, we expect everyone to be open and honest about the facts even when they are difficult to confront. To help us feel safe speaking our minds, Arca Continental prohibits retaliation for making a report in good faith. Any form of retaliation must be reported. Proven retaliation is itself a violation of our Code and will be treated as such.





# A FOUNTAIN OF RESOURCES



# Glossary

**A thing of value:** This concept includes cash, products, cash equivalents (such as gift cards), loans, gifts, prizes, food and beverages, travel, entertainment amenities (such as artistic, sporting or recreational events), airline tickets, loans, donations and employment.

**Arca Continental or the Company:** Arca Continental, S.A.B. de C.V. and its subsidiaries.

**Assets:** All the properties and resources of the Company.

**Assets come in many forms.**

**Physical:**

- Vehicles
- Uniforms
- Products, raw material and packaging
- Tools and machinery

**Electronic:**

- Computers and software
- Mobile devices
- Electronic files and other data

**Intangible:**

- Name, reputation and corporate image
- Personnel and working hours
- Ideas, inventions and designs
- Arca Continental brands
- Copyrights and trademarks
- Patents and trade secrets

**Financial:**

- Money or anything that can be converted into money
- Securities and bonds
- Loans and deposits



**Associate:** Every person employed by Arca Continental. This includes people on boards or in management.

**Bid rigging:** When competitors agree on the winner of a bidding process.

**Bribery:** Any direct or indirect payment, offer or promise of anything of value to another person to do or omit to do anything for the purpose of obtaining any improper benefit.

**Child labor:** Employing children. This often involves illegal, inhumane and harmful work.

**Conflict of interest:** Any situation in which the personal interest of an associate may affect the professional performance of his/her responsibilities or functions in the Company. This may arise, among other causes, from personal relationships, investments, or professional, economic, or social activities.

**Due diligence:** An investigation into the background of a company or person to identify potential risks of illegal activities. Background information may include litigations, sanctions, jobs and activities.

**Government official:** Includes any person who holds a job or position in a government entity. Examples include judges, politicians, candidates and employees of government agencies.



**Greenhouse gas (GHG):** Greenhouse gases are those gases in the atmosphere that have an influence on the Earth's energy balance. They cause the so-called greenhouse effect.

**Human trafficking:** Using coercion and fraud to benefit from peoples' work.

**Insider trading:** "Inside" information is material, non-public information that has not been released to the public. It is information an investor would consider important in deciding whether to buy or sell shares. Insider trading is when someone uses this information for personal gain. It is a serious crime. Examples could include:

- Significant business change.
- A significant merger or acquisition.
- Positive or negative earnings information.
- The gain or loss of a significant customer or supplier.
- A change in senior management.

**Kickback:** A type of bribe where money to be given to a company is provided back to a person to influence them.

**Market division:** When competitors agree to divide markets between their companies. This may involve allocating customers, areas or products.

**Money laundering:** The process through which the origin of funds or assets obtained through illegal activities is concealed, so that they appear as the result of legitimate activities and circulate without problem or suspicion in the financial system. If successful, it allows criminals to maintain control over such money and use the money in the regular economy.

**Non-public information:** Confidential information that has not been disclosed to the public.

**Person in a special situation:** Any person who, by virtue of his/her relationship with an associate, could create or be perceived as creating a conflict of interest for the associate.



**Personal data:** Information that identifies an individual. It can include:

- Name and government identification number
- Postal and email address
- Telephone number(s)
- Credit and debit card information
- Profile picture
- Social media account ID
- Country of residence
- Billing and banking information
- Information about computer hardware and software (e.g., IP address, URI, etc.)
- Medical information
- Names of family members
- Demographic and consumer habits

**Proprietary information:** Confidential information developed by Arca Continental that has commercial value. Examples include trade secrets, copyrights, ideas, designs, etc.



### Relatives:

1. The associate's spouse or significant other;
2. The associate's or the associate's spouse's significant other's children or grandchildren, as well as their spouses or significant others;
3. The associate's or the associate's spouse's significant other's father, mother, siblings or grandparents;
4. The associate's cousins, uncles or nephews; and
5. Any family member who lives in the same household as the associate.

**Retaliation:** When an employer punishes an employee for engaging in a protected activity. Retaliatory acts can include harassment, changes in employment, threats and bullying.

**Supplier Guiding Principles:** Vital pillar of the Coca-Cola Company's workplace accountability programs. They communicate our values and expectations and emphasize the importance of responsible workplace policies and practices that comply, at a minimum, with applicable environmental laws and with local labor laws and regulations.

**Sustainability:** Our mission at Arca Continental to:

- Work on the basis of ethical behavior and in compliance with the law.
- Create a world of shared prosperity.
- Guarantee our progress and permanence as a Company in the long term.
- Integrate our performance, growth, value chain, communities and environmental protection.

**Terrorist financing:** The methods terrorists use to collect funds for their activities.



[www.arcacontal.com](http://www.arcacontal.com)