

	<b>Corporate Policies and Procedures Manual for Internal Control</b>				
	<b>Manual No.</b>	<b>Department</b>	<b>Issued</b>	<b>Revision</b>	<b>Total Number of Pages</b>
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## Code of Business Ethics

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Developed/Updated by	Revised by	Authorized by
Eng. Andrés Degollado	Eng. Manuel Quintero / Lic. Gerardo Meza	Eng. José G. Garza M./Eng. Jorge E. Garza M.
<b>Business Process Analyst</b>	<b>Internal Control / Training &amp; Development</b>	<b>Group Management / PROLAMSA General Management</b>



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### Code of Business Ethics

#### 1. Objective

To establish and communicate the ethical values on which our business relationships should be based on within PROLAMSA Group's companies.

#### 2. Scope and Authority

- 2.1 The Code of Business Ethics applies to all the Personnel that work in and collaborate with PROLAMSA Group's companies.
- 2.2 This Code of Business Ethics does NOT intend to include all potential situations that may occur in ethical conflicts, decisions must be made following the values and concepts described in this document.
- 2.3 Training & Development and Internal Control are the entities responsible for this policy, therefore, any amendment, revision or renewal must be considered by these entities. Likewise, both departments are responsible for assuring compliance of this policy.



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## 3. Prolamsa Group's Code of Business Ethics

### 3.1 Basic Concepts

**3.1.1** The success and reputation of PROLAMSA Group are based on solid ethical values whose compliance requires the highest level of INTEGRITY by all Personnel.

**3.1.2** PROLAMSA Group's values are part of the daily culture we have in our organization, in the dealings between Personnel and Team Members, as well as the business carried out within the Group.

### 3.2 Responsibilities

**3.2.1** In PROLAMSA Group, all personnel are guided to have the highest, most professional, responsible and mature standard of conduct, aimed at preserving and strengthening the Personnel and Group's development in the long term.

**3.2.2** All Personnel must behave in such a way to safeguard:

- The best service for our Customers and Suppliers.
- Safety and respect for other colleagues.
- The protection of our assets.
- INTEGRITY in our business relationships.
- Responsibility with our community and society.

The application of Values of the Group's companies

**3.2.3** Common sense, logic and basic standards of an ethical behavior expected in our community, **should** guide us in our daily tasks and decisions.

**3.2.4** Each of the companies **must** be honorably represented before the community.

### 3.3 Regulatory Compliance

**3.3.1** All Personnel of PROLAMSA Group are responsible for complying with the different laws applicable to all the Group's companies.

**3.3.2** We are aware of the legal obligations of the Company we work in, and that should any doubtful situation arise during the tasks we carry out, that may be deemed to have legal consequences, we **must** consult it with the General Management.

### 3.4 Control Environment

**3.4.1** All PROLAMSA Group's Personnel are responsible for complying with the Group's policies and procedures, ensuring proper control of our processes.

**3.4.2** We announce and promote published policies with our colleagues, which establish an environment of safety and control within the companies of the Group.



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**3.4.3** The Management department along with all the Personnel are responsible for protecting the assets of the company.

**3.4.4** The Internal Control department aims to reduce any risk that could cause loss of value in the management and operation of companies.

### 3.5 Top-Quality Products

**3.5.1** Compliance with our QUALITY policy is the responsibility of all the Group's Personnel  
PROLAMSA Our Companies are committed to offering the highest QUALITY in what we do.

**3.5.2** This is why, our QUALITY Policy has been defined in order to offer the highest quality in the market, committing ourselves to:

*"Satisfying our Clients' expectations by generating products and services of excellent QUALITY, through a QUALITY management system, based on a teamwork culture and continuous improvement."*

### 3.6 Safety and respect to our Staff

**3.6.1** Staff is the most valuable resource PROLAMSA Group has.

**3.6.2** Our bodily INTEGRITY is uppermost, we must all safeguard it and we make sure we also take care of our co-workers.

**3.6.3** That is why we observe and promote the values of PROLAMSA Group:

- **TEAMWORK.** Reach supportive agreements through excellent communication, reflected in achievements and success for the Group
- **ENTHUSIASM.** Self-motivation, being passionate on what we do and achieving high goals
- **INTEGRITY.** Being honest in our behavior, conducting ourselves with honesty and consistent in our actions.

**3.6.4** PROLAMSA Group encourages respectful interactions among our team members at all times. contempt, harassment, discrimination and negative comments of any kind are against our values.

### 3.7 Use of information

**3.7.1** Information is an essential part of our work, therefore:

- All the information internally handled in PROLAMSA Group's companies is considered confidential, this is why we do NOT disclose it to people alien to the Group (family or social media).



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- We keep collected information solely for our Customers and Suppliers' benefit, and NOT for personal reasons.
- We respect the privacy of the information available to us, and we only share it with those involved within the company.
- We provide clear, complete, objective, relevant, accurate and timely information.
- In case of irregularities or insecurity in the use of information within the Company we inform and/or report them through our reporting lines.

#### 3.7.2 We protect the organization's information by observing established information security guidelines:

- In order to protect electronic information, we use and change passwords.
- We clearly state documents that are confidential.
- We use non-disclosure agreements and assignment of rights in internal and external personnel.
- We reject and avoid the dissemination and spreading of inappropriate information such as pornography or market issues not related to the business in question.

### 3.8 Company's Resources

**3.8.1** All personnel use company's resources and assets in such a way that they make us more productive, we protect PROLAMSA Group's assets, we optimize goods and we generate greater profits that are translated into income and benefits for all Personnel, which drives us to achieve the generation of value that we have defined in each of the company's Vision, for this reason:

- We responsibly use all the assets and resources of the company.
- We understand that it is our obligation to protect the assets of the company that are within our scope and to ensure they are used efficiently and for the legitimate purposes of the Company.
- In all of our work tasks we only use what is necessary without compromising QUALITY and generating the highest possible return.
- We use information systems efficiently and only for business-related matters.



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#### 3.9 Service to our Customers and Suppliers

**3.9.1** Our business success depends on our Customers and Suppliers. All the Personnel are responsible for making sure that any contact with our Customers or Suppliers and the general public, reflects professionalism, efficiency, INTEGRITY, reciprocity and a constant effort to provide high quality and high value services and products for their best interest.

**3.9.2** By maintaining kind relationships with our Customers and Suppliers, we also encourage their development, committing ourselves to:

- Provide services and products to our Clients based on the highest standards of QUALITY in the industry.
- Develop win-win relationships with our Customers, Suppliers and Business Partners.
- Protect the information entrusted by our Clients, Suppliers and Commercial Partners to us.
- Ensure that Clients, Suppliers and Business Partners are aware of our Code of Business Ethics which we promote and make reference to within our contracts and agreements.
- Establish our Purchase decisions by choosing Suppliers that are well known for their ethical performance and competent products or services, at a fair price with delivery and QUALITY terms better than those in the market.
- Refuse to pay any concept that could be considered a bribe.
- Respect the requirements of our Clients: taking care of them and offering them reliability for favoring us with their choice.
- Respect our Customers and Suppliers' intellectual property rights, therefore, we do not use products or services illegally.

#### 3.10 INTEGRITY in our business relationships

**3.10.1** Our reputation not only depends on the high QUALITY of our products and service, but also on the way we conduct business relations with Suppliers, Customers and Business Partners. All Personnel must ensure that our conduct in business relationships is based on the interests of the entire Group, and NOT on personal gains at the expense of the Company or external contact with businesses.

**3.10.2** We use accurate information and transparent decision making within the business, based on the actual situation and values of the company.

**3.10.3** Giving and receiving any benefits, gifts and rewards (except for promotional and perishable products of low volume), by Suppliers, Clients or any third party that hold commercial or business relations with



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PROLAMSA Group, is absolutely PROHIBITED. This also applies to accepting gifts such as dinners and invitations to events that do NOT respond to a business need.

**3.10.4** Personnel, upon accepting an invitation, must report it to their direct manager and/or Training & Development with the purpose of clearing up any speculation about personal preference or involvement with the Client or Provider.

**3.10.5** Gifts that do not represent an obligation of acceptance, and that are not returned to the sender for such reason, including Christmas gifts, must be delivered to the Management department (with a signed receipt) which will find the best way to share them evenly among all personnel. This can be done through raffles at events.

### 3.11 Responsibility with the community and society

**3.11.1** We contribute to the social development in the communities where our Companies are located, and we take into account the impact of our actions that benefit the environment, for this reason we:

- Understand the importance of participating in the development of the community, so we comply with civic duty.
- We support programs aimed at integrating people with disabilities and we are empathic in our interaction with them.
- Support schools.
- Actively participate in campaigns defined by the Company as environmentally friendly.

### 3.12 Questions, grievances and claims

**3.12.1** The main objective is to provide a healthy and safe environment, as well as to maintain good practices, policies and ethical values within the companies of PROLAMSA Group.

**3.12.2** Questions:

- Any questions **must** be addressed with the immediate Superior.
- The immediate Superior **must** consult the company's Training & Development department to reach a common agreement and solve the issue.

**3.12.3** Before reaching an agreement, the company's frequently-asked-questions document **must** be consulted, by doing so, the same course of action is taken in similar issues.

**3.12.4** Grievances and claims will be handled confidentially through PROLAMSA's Line, **extension 1089**, which may be done anonymously.



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#### 3.12.5 Grievances and claims that must be reported:

- Breaches of PROLAMSA Group's Code of Business Ethics, policies and regulations of the Company.
- Situations that may generate accident risks.
- Behavioral problems
- Favoritism.
- Nonconformities
- Negligence
- Activities that suggest traffic, sale or consumption of drugs.
- Robberies.
- Frauds / Deception.
- Any situation that may generate losses of value to the companies of PROLAMSA Group.

#### 3.12.6 The information provided through the complaint line **must** answer the questions:

What?, how?, when?, where?, and involved parties.

#### 4. Track changes

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