

# CODE OF ETHICS





# CODE OF ETHICS



**unicomer**  
Group

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# Letter from our CEO

Dear Colleagues:

In Unicomer Group we remain convinced that the success of our company is the result of the contribution of all the people who strive to make the most of each moment. Our great team allows us to offer our clients and communities the opportunities to achieve their greatest well-being. Through the strengthening of our ethical culture at all levels, we ensure our sustainable growth.

In recent years we have made a joint effort to extend our vision of ethical culture in each of our operations and continue to be an example in the industry. The value of our organization is in our reputation, from how we maintain transparent relationships with external entities, in the way we serve our customers and suppliers and how we interact between work teams in our day to day.

Our presence in 27 countries with different cultures, laws and contexts, drives us to give our best to provide all our staff members with the support and tools necessary to ensure our quality standard and clarity on the expected behaviors of each and everyone of us that forms part of our company. In this sense, we will continue to provide our staff members with the means to feel heard with our open door and non-retaliation policy, as well as have different channels of the Unicomer Ethics Line in which staff members can report cases related to deviations from our values and ethics.



Our Code of Ethics is our guide and serves as reference material for us to continue strengthening our culture. It is a pleasure to present this updated version so that we continue to ensure that our behaviors and our actions are in line with our shared vision and continue to be leaders in the region, adhering to the highest ethical standards in all the countries where we operate.

Each of you defines our culture and reputation and again, I thank you for being part of this organizational effort. Likewise, I invite you to continue being an example of our values experience in each of our operations.

**Sincerely,**  
**Mario Simán**  
**Chairman & CEO**

# I.MISSION, VISION, VALUES AND PRINCIPLES

## 1. MISSION:

To be the leader in the retailing of home appliances, electronics, furniture and other products, in the markets where we operate, by meeting our customers' needs, with the dedication and care that they deserve, through innovative products and financial services. We will promote a professional environment for the development of our associates and our suppliers, as well as serve our communities and achieve sustainable growth to meet shareholder expectations.

## 2. VISION:

To be a retail and financial services organization that achieves its business and social goals through exemplary industry leadership in a professional and diverse environment fostering integrity, honesty and respect for others.

## 3. VALUES:

In Unicomer Group we have six fundamental values in which the following behaviors are expected:

### 1 Integrity:

- We are congruent, so that our actions reflect our values
- We act with honesty and always tell the truth
- We behave in a straight and clear way

### 2 Loyalty:

- We defend our values at all times
- We respect and protect the general interests of the company
- We act in a committed and transparent way to avoid corruption and promote trust and loyalty among our clients, staff members, investors, suppliers and communities

### 3 Customer Service:

- We act generously and with a friendly attitude
- We give our best with energy and optimism
- We anticipate and respond to our customers' needs, offering the best products in a courteous and timely manner

### 4 Teamwork:

- We contribute our talent and effort to complement each other and thus achieve better results
- We listen, respect and take into account the ideas of our coworkers, cooperating to achieve a common purpose
- We are committed to collaborate with each other and feel collective responsibility for fulfilling our mission, vision and values

### 5 Responsibility:

- We assume responsibility for our actions and results
- We are aware of the impact of our activities on our staff members, customers, communities and the environment
- We encourage the growth and development of the community

### 6 Leadership:

- Promote self-management, assuming the commitment of our performance and its results
- Lead and develop work teams, guiding them according to our mission and vision
- Lead by example and value leaders for their ability to care for others, maintain clear communication and commitment to persevere





## 4. PRINCIPLES

Unicomer Group considers the following principles fundamental to our job performance:



Maintain the highest standard of integrity and honesty in all business transactions, ensuring adherence to local laws and good international practices (including laws against extortion, bribery and financial crimes).



Treat our staff members with equity in regards to recruitment, remuneration, promotion and working conditions; regardless of gender, race, color, nationality, language, political and religious beliefs, disability and social class.



Allow a work environment where staff members may share their ideas and points of view.



Take into consideration the impact of our operations in local communities and ensure that we act responsibly towards our society.



Provide safe working conditions to our staff members and contractors.

# II.INTRODUCTION TO THE CODE OF ETHICS

## 1. WHAT DO WE WANT TO ACHIEVE?

The objective of this Code is to establish a clear understanding of the standards we expect from our staff members, suppliers and stakeholders in the achievement of our vision. By doing this, we assure compliance with our regulations while we work to protect the good reputation of our Company.

## 2. WHO MUST FOLLOW IT?

Unicomer's Code of Ethics applies to all staff members in all areas of the organization, including permanent and temporary, as well as members of the Board and all persons providing services to our Company.

## 3. WHY IS THE CODE OF ETHICS IMPORTANT?

It is of great importance to all of us that all our actions go according to our values and principles, so that ethics must be reflected in our daily work. Ethics allows us to classify acts as good or bad, helping us to do the right thing in the right way, both in aspects of our personal lives and in business. The Code shows us the way through ethics, being a guide for our daily actions and behaviors to adhere to good.

In this sense, we seek to do business in the best possible way, not only doing what is legal in a given situation, but also considering what is ethically correct and thus applying responsible business practices.

We must act with integrity, honesty and fairness in all aspects of our business relationships, since this is the only way can we require the same from all those with whom we interact to achieve our vision and mission.

Likewise, our ethical behavior is essential in maintaining pleasant work environments and relationships based on respect with leaders who are an example of expected behaviors and the fulfillment of our responsibilities as Unicomer Group staff members.



# III. OUR COMMITMENT WITH...

## 1. OUR OWN INTEGRITY

Each one of the Unicomer Group staff members has the responsibility to demonstrate behavior in accordance with our corporate ethical guidelines. We must not forget to:

- Show our commitment and dedication with exemplary behavior.
- Act with individual and shared responsibility in our actions and decisions.
- Be consistent in fulfilling our obligations.
- Demonstrate congruence in a way that allows us to perform the company's activities with credibility, without tarnishing its reputation or affecting its financial well-being.
- Respect the confidentiality of the information.
- Be diligent in the interest of the company, preserving all the resources assigned to us in order to protect them from loss, theft or damage.
- Treat everybody fairly and in a consistent manner, respecting everyone's individual rights in acting sincerely at all times.
- Treat each person with dignity and respect, avoiding denigration, making derogatory comments or discriminating in any way.
- Avoid misuse of the power acquired by the position we obtain within the company.
- Act directly, clearly, truthfully and accurately in negotiations and declarations with and stakeholders.
- Be politically impartial; political activities should not be carried out during working hours and / or in our workplace.
- Be respectful and understanding with our customers and suppliers to promote lasting relationships.

## 2. OUR CO-WORKERS

Unicomer Group seeks to foster and promote work relationships that encourage collaboration and team participation. At the same time, we intend to live our values and promote clear and direct communication grounded in respect and professionalism in order to be successful in overcoming the challenges we face.





## 2.1. Work environment:

We recognize our staff members are our competitive advantage and we therefore promote the appropriate environment for their integral development. In this sense we care about:

- Complying with labor regulations and laws.
- Recruiting and retaining the best qualified personnel available and provide them with development opportunities.
- Maintaining a work environment based on respect, enriched by cultural diversity and recognized by its openness to communication, confidence and fair treatment.
- Providing equal opportunities to our staff members through clearly defined human capital management standards which are consistently implemented.
- Providing competitive compensation, based on the labor market and in line with the individual contribution of each staff member.
- Safeguarding our personnel and facilities with the appropriate equipment, devices, systems and security procedures.
- Protecting the environment and staff members' occupational health.
- Defining, communicating and enforcing Unicomer Group policies and internal regulations.

**All staff members are an important part of the work environment. We seek to provide support by providing each other with constructive feedback to improve and safeguard our business reputation by avoiding giving derogatory statements or comments about the company or staff members.**



## 2.2. Harassment:

Unicomer Group promotes an environment free from harassment in any form. Harassment refers to a persistent and demonstrable behavior made against a staff member by a colleague, regardless of their seniority in the company or by a third parties related to the Company, to instill anxiety, intimidation, lack of motivation or induce the person to resign.

Harassment of any kind, such as sexual, psychological, physical, cyber or third-party harassment, constitutes a psychosocial risk that can affect health and / or performance. Harassment can be verbal, visual, physical or otherwise hostile and offensive. This may include physical and / or verbal expressions

Any form of harassment done to staff members is totally unacceptable. It is the duty of the staff members who are affected or know of someone being affected by this situation, to report the incident.

### 2.3. Discrimination:

Unicomer Group ensures that every staff member reaches his or her full potential. Therefore, we should treat everyone with the dignity they deserve, without discriminating against others based on race, sex, language, religion, disability or any other kind of discrimination.

It is imperative that each and every one of us to treat others with dignity, in an equitable and consistent manner, thus respecting individual rights and avoiding any form of discrimination.

### 2.4. Safety, health and environment:

We recognize the value of a healthy work environment to achieve its mission, therefore, Unicomer Group is committed to promoting a safe, healthy work environment without harming the environment and the communities in which we operate. That is why each one of our staff members is expected to comply with the laws and internal rules concerning these causes, taking the necessary measures to protect ourselves individually and other staff members against injuries or illnesses within our work environment.

Drugs and alcohol affect the safety of all members of the company. Working under the effect of any of them has a negative impact on the staff members health, productivity and the work environment in general. Recognizing that alcohol abuse and drug use represent a significant threat to the achievement of our objectives, we hope that our staff members will present themselves to work in a healthy state, free of any substance that could impair their performance and judgment at work. We all need to collaborate and support efforts to meet

the standards of occupational health, industrial and environmental safety required by law.



## 3.OUR COMPANY

### 3.1. Conflicts of interest:

There is a real or apparent conflict of interest when personal, family or third-party related interests interfere in the decision-making process or in the efficient and objective actions of our staff members. It is not forbidden to have conflicts of interest; however, it is the responsibility of the individual to declare the conflict in order to know how to manage and mitigate it according to each case.

Conflicts of interest, whether direct or indirect, may include:



Having a financial interest from a company supplier in the business.



Performing tasks or working for customers, suppliers and / or competitors.



Providing professional services to third parties as a staff member or consultant, sharing information owned by the company.



Using the time and resources of the Company for personal or external interests.



Being a member of a Board of Directors and / or shareholder with a relevant participation.



Personal or emotional involvement with co-workers.



Working in the same company, department or physical area with spouses, life partners or relatives of first and second degree of consanguinity or affinity.

Criteria for managing family-related conflict and / or emotional relationships have been defined:

- They may not report directly or indirectly.
- They must not have any part of the decision-making in the approval or authorization of any type of remuneration or compensation, be it salary, commissions or recognition of expenses.
- They should not be responsible for auditing or authorizing any of their processes.
- It must be ensured that there is physical separation, that is, that they do not work in the same place or department.

In the event that any of these forms of managing the conflict cannot be concluded, the case should be reviewed and approved by the corresponding Ethics Committee and submitted to the Corporate Ethics Committee for approval.





### **-Declaration of conflicts of interest:**

The company will annually update declarations of conflict of interests through the “Conflict of Interest Declaration Form” available on the intranet, or can be requested to the local Human Capital Department. It is expected that all our staff members report real or potential conflicts of interest through the annual declaration which will be filed in the staff member’s personnel file.

In the event of a conflict, the staff member must submit an action plan to mitigate the conflict, which must be approved and signed by his immediate line manager and endorsed by the second level line manager.

If there is a conflict of interest throughout the year, it must be reported in due time. It is a personal responsibility to report a conflict of interest, one cannot refrain from doing so and it cannot be delegated.

The conflicts of interest declared by staff members will be consolidated by local Human Capital teams in each country for resolution and presented to the Local Ethics Committee. Each quarter, the Local Ethics Committees will present the summary of the conflicts presented, with their appropriate resolution, to the Regional Ethics Committee and the Corporate Ethics Committee.

### **3.2. Bribery:**

Bribery is defined as the offering of gifts, loans, payments, awards or any kind of special consideration to any person, as an incentive to develop an act or to influence a final decision that is dishonest or implies a lack of confidence in the normal course of business activities. It is for this reason that the offering of bribes or allowing yourself to be bribed by someone else is a dishonest practice that will not be tolerated.

### **3.3. Gifts and hospitality**

To protect both our company and our staff members and to maintain an adequate ethical stance, it is necessary to avoid giving and receiving gifts and / or courtesies that may exert inappropriate influences on final decisions or business relationships.

- If the gift has a nominal value exceeding US \$ 100, or its equivalent in local currency, it must be reported to the respective Human Capital Department and inform the gift’s content as well as its estimated value. The Country Manager will decide whether the gift is raffled between team members or donated to an external entity. Any exception must be approved by the Regional and / or Corporate Ethics Committee.

- Staff members as well as their spouses, life partners or other members of their family cannot accept discounts on personal purchases from suppliers that may seem to be offered because of the supplier's relationship with the staff member; unless such discount is available to all staff members under the same terms and conditions and in the same time period.
- In the event that a gift from a supplier, customer (current or potential) involves a trip for the staff member, it must be channeled through the [suppliersinvitations@unicomer.com](mailto:suppliersinvitations@unicomer.com)
- Paid or provided meals by an individual from a company with which ours has or may have business with, may occasionally be accepted.
- Staff members cannot use their position in the Company to request favors, payments, discounts, gifts or loans from suppliers, clients or stakeholders.
- Commercial incentives to the sales force from suppliers are permissible under previously approved guidelines and are subject to approval by the Country's General Manager.



### 3.4. Safety and assets preservation:

#### - Responsibility and control of the company's resources

At Unicomer Group we believe that the proper use and safeguarding of assets are fundamental elements that contribute to the achievement of our vision. Assets include all tangible and intangible items owned by the company, such as facilities, equipment, inventory, cash, accounts receivable, stocks and bonds.

As well as information, innovation projects, business plans, patents and trademarks, trade names, corporate image and identity, information technology, among others.

We are all responsible for the company's resources, property and finances and we must protect them from any risk of loss or damage and prevent irresponsible handling of the same.

#### - Proper use of company assets:

Company assets and resources should be used strictly for its intended purposes; these assets should be used for legitimate and authorized business purposes.

#### - Internal controls, risk identification and management:

Strong corporate governance requires, among other things, the establishment of efficient and effective controls which must be complied at all times. In keeping with this effort, the Company must identify and manage risks, in order to avoid any adverse consequences and minimize their impact.

#### - Budget:

To ensure effective financial control over business expenses, company budgets are established and approved by the Directors, thereafter, revised and updated according to established procedures. In this regard, no expenses over the established budget will be accepted without its appropriate inclusion and authorization by the corresponding level.

#### - Travel expenses:

Assigned travel expenses, air tickets, accommodation, food and transportation or vehicle rental expenses must be within the parameters established by the company in its travel policies. Staff members must make reasonable and ethical use of these. Refer to the "Advance and Refund Expenses" policy.



### **- Expenses reimbursement:**

Reimbursement requests must be limited to legitimate and reasonable expenses incurred during the normal course of business and shall be accompanied by supporting documentation, including receipts and other proper documentation.

### **- Intellectual property and ownership:**

Trademarks, logos, trade names, computer applications among others, are for commercial and marketing use only. Our intellectual property policies do not authorize, under any circumstance, the use of such property without proper legal authority.



We respect, acknowledge, and comply with the licensing and copyright requirements of all purchased software and computer programs. Copying of programs purchased by the company is not authorized.

The intellectual copyrights and ownership of any program, information created, produced or written by any staff member, permanent or temporary, or a consultant hired by the Company, using its resources, belongs to the company whether developed on site or elsewhere, except when established otherwise in a written contract.

## **3.5. Payment authorizations**

Payment authorizations must be done within established parameters. Persons authorizing payments must always review to ensure that documents are properly signed and must consider the following:

- Acquisition of goods and services must be properly authorized according to established policies and procedures.
- An invoice or document supporting the payment must be presented.
- The products or services invoiced must be correct.

## **-Invoices, receipts and registration**

Invoices must reflect the nature of the services provided, or acquired goods, in accordance with applicable laws. No invoice will be issued under any circumstance when these requirements are not met.

Receipts and accounting records must correctly reflect supporting information. Falsification of records, distortion of facts and incorrect reporting are totally unacceptable. Additionally, all payments must clearly specify its reason for disbursement.

## **3.6. Company information:**

Unicomer Group considers that access to and proper usage of information is a competitive advantage; therefore, it must be handled in a responsible, safe, and objective manner and in accordance with the law.



Confidential information is defined as any information regarding the organization, its affiliates, directors, stakeholders, operations, activities, investments plans and strategies which have not been officially published.

The information below is considered confidential or privileged information:

- Accounting information and financial projections
- Mergers, acquisitions, partnerships, expansion and business plans
- Security transactions and financing
- Commercial and operational policies and practices
- Judicial or administrative disputes
- Organizational changes
- New products research and development
- Staff members, customers and Unicomer Group suppliers personal information
- Intellectual property, such as trade secrets, registered trademarks, patents and copyrights
- Lists of customers and suppliers, structures, pricing and interest rates

When a third party, colleague or friend asks a staff member for information that is not considered confidential, but is neither public, one must obtain authorization to share this information from the appropriate Country Managing Director or Vice President or President, depending on the case.

Staff members obligations regarding Company's proprietary information and trade secrets include:

- Do not disclose information to individuals outside of the Company except when authorized in writing.
- Do not use this information for personal benefit/gain or for the benefit of individuals outside of the Company.
- Do not disclose this information to other staff members, except when strictly necessary.
- Do not negotiate with confidential information inside or outside the Company.

### **- Use of work application and tools:**

The company has enabled applications that promote collaborative work to facilitate the storage, organization and sharing of information. These are part of the work tools provided for staff members so appropriate use must be made, respecting the information's confidentiality.

### **- Third party information:**

Unicomer Group respects the intellectual and organizational property rights of other organizations and we require that our staff members respect such rights. Therefore, it is an obligation for all our staff members to respect the confidentiality of third parties' personal information.

### **- Duration of the obligation of confidentiality:**

Each of our staff members is under the obligation to protect the organization's confidential or privileged information even after leaving the organization.

## **3.7. Media**

It is important to recognize that the responsibility of our staff members with the company does not end when their workday ends; we hope that they continue to live ethical values and behaviors even outside of it. Therefore, it is necessary to take into account the following considerations regarding media, including social networks and personal environments:



- Unicomer Group has authorized spokespersons to issue communications and provide responses to clients on behalf of the company and its trademarks. Staff members must clarify that the points of view or opinions they express regarding the company are in their personal capacity.
- Staff members must refrain from responding directly to clients and suppliers on social networks, since we have a specialized team that provides answers and attends to the clients' doubts and / or suggestions.
- Financial and operational information should never be disclosed, including strategies, forecasts and basically any data related to the company's income / expenses.



## 4. OUR BUSINESS RELATIONSHIPS

### 4.1. Relationship with our clients:

One of our core values is to provide our customers with service that is distinguished by our integrity and professionalism in the attention provided, as well as anticipating their needs and being ready to provide such care in an attentive and innovating way so that we exceed their expectations and thereby ensure a long lasting, mutually beneficial relationship.

It is our responsibility to present our products and services in a true and correct way. We seek that the promotion and sales arguments that we implement are free of false information on aspects related to the availability, opportunity and / or quality of our products, as well as the sales terms.

### 4.2. Relationship with our suppliers:

Developing relationships of trust and mutual benefit with our suppliers has contributed to the success of our Company. For this reason, we seek to handle these relationships with transparency, so that we ensure equal opportunities as well as treatment based on respect and integrity.

Staff members who are in contact with suppliers must act professionally at all times, respecting the guidelines below:

- Respect suppliers and their employees.
- Ensure equity and impartiality during selection processes /tendering suppliers.
- Ensure that suppliers approved by the Company have a good reputation and provide equal competition opportunities for the acquired order.
- Negotiate based on quality, price, service and availability.
- Respect the suppliers' right to obtain reasonable earnings.
- Respect agreed terms.
- Provide purchase volume forecasts when applicable.
- Respect intellectual and industrial property rights, therefore no staff member should establish business relationships with contractors or suppliers without proof of authorization for use, marketing of products and services subject to payments, gifts and/or intellectual/industrial property rights of third parties as well as their authenticity, legality and permissibility.
- Registered Trademark information, registered logos and property of the Company cannot be revealed to current or potential suppliers without proper authorization under the premise that such information will be necessary to acquire goods or services.
- Information received from suppliers cannot be provided to their competitors without their previous written consent.
- No opinions should be expressed about a competitor of one of our suppliers that may generate doubts about its professionalism, honesty or reliability.

### 4.3. Relationship with our competitors:

Our staff members must ensure that all of our activities are in compliance with the law, local regulations and the Company's own policies, without engaging in any illegal or unethical activity when engaging in competition. We must always provide reliable and accurate information while respecting our competitors' confidential information and rights.

In addition to complying with the law, we recognize our social responsibility in advertising and subject to national legislation.



## 5. OUR REGULATORY FRAMEWORK

### 5.1. Compliance with the legal framework

It is our policy to understand, promote and comply with the laws, regulations, standards and other applicable legal provisions established by the countries governments in which we operate. We reject all criminal activity, including Money Laundering and Financing of Terrorism (LA / FT) activities. Our staff must not, for any reason, commit an illegal or improper act, or induce or instruct a third party to commit it. If a staff member is in doubt of the legal nature of a practice or has a query about any law, regulation or standard applied in the company, they should contact their line manager or the local Human Capital department to get advice on the subject, always complying with the regulatory framework.

### 5.2. Prevention and control of money laundering and financing of terrorism:

Money Laundering and Financing of Terrorism (ML / FT) is a crime that affects all levels of the economy, the laws rules, the financial system, economic liberalization and good governance of a country. For Unicomer Group, it is of utmost importance to establish and carry out the necessary actions in order to prevent that, during the development of its commercial activities, it is involved in criminal activities, as well as complying with the applicable legal framework of the countries where we operate.

If a staff member has concerns or doubts regarding ML / FT prevention situations or measures, they must ask for help from their line manager or the Local or Corporate Compliance Unit.

## 6. OUR COMMUNITY

At Unicomer Group, Corporate Social Responsibility is an essential component of the business. Our commitment is to improve our staff members quality of life as well as their families and the communities we serve, through programs that impact social, economic and environmental sectors. Among our greatest responsibilities are education, community development and the environment.



Through various internal and external programs, we have benefited thousands of children, young adults and adults to fulfil our commitment to contribute to the sustainable development of the countries in which we operate. We have implemented various practices and projects that strengthen hope in our future, and we are aware that the Social Responsibility strategy will change according to the needs of the different audiences.

Unicomer Group has guidelines and policies for each Social Responsibility program to be met in each country. If you have any questions or queries, you should contact the Local or Corporate Social Responsibility Committee.

# IV. CODE OF ETHICS ADMINISTRATION

## 1. ETHICS COMMITTEES

### 1.1. Local Ethics Committee

The Local Ethics Committee is the body responsible for ensuring that the countries where we operate comply with the Code of Ethics provision, which report to a Regional Ethics Committee.

The Local Ethics Committee will be made up of at least three staff members, with extensive business knowledge, and are recognized for their reputation, honorable behavior and respected within the company. Such members will be approved by the Regional Ethics Committee.

The Local Ethics Committee is responsible for the following functions:

- Supervise Code of Ethics compliance.
- Receive, review and conduct investigations and follow up regarding any complaints regarding unethical behavior within the Company.
- Advise the Administration about considerations and relevant measures referring to allegations of unethical conduct.
- Measure, evaluate and promote a culture of ethics in the country of operation.
- Promote regular ethics communication and functioning of the Ethics Line.
- Inform Regional Ethics Committee about reports received of unethical behavior, investigations performed, and recommendations made to the Regional and Corporate Ethics Committee regarding those cases.
- Quarterly report received cases and the resolution of these.
- Escalation of cases to the Regional or Corporate Ethics Committee when deemed necessary.

## 1.2. Regional Ethics Committee

At Unicomer Group we have two Regional Ethics Committees, one for each region. The Regional Ethics Committee is the body responsible for providing support and generating consistency in the implementation of strategies to strengthen ethics in the regions where we operate and that the operations of the countries comply with the Code of Ethics provisions. The Regional Ethics Committees report to the Corporate Ethics Committee.

The Regional Ethics Committee will be made up of at least three staff members, with extensive business knowledge, and who enjoy recognition and honor within the company, including the Regional Vice President and Regional Human Capital. The rest of the members will be approved by the Corporate Ethics Committee.

The Regional Ethics Committee is responsible for the following functions:

- Provide feedback to Local Ethics Committees in each country.
- Promote consistency in the Code of Ethics interpretation and application.
- Inform the Corporate Ethics Committee about unethical behavior received reports, investigations performed, and recommendations made to the Administration regarding those cases.
- Quarterly report received cases and the resolution of these.
- Escalation of cases to the Corporate Ethics Committee when deemed necessary.

## 1.3. Corporate Ethics Committee

The Corporate Ethics Committee is the body responsible for providing the Code of Ethics guidelines to the Regional Ethics Committees and the Local Ethics Committee and ensuring that they comply with it.

The Corporate Ethics Committee will be made up of staff members, with extensive business knowledge, and who are recognized and honored within the company. Such members will be approved by the Board of Directors of the company.

The Corporate Ethics Committee is responsible for the following functions:

- Promote consistency at Corporate Level in the interpretation and application of the Code of Ethics.
- Inform the Board of Directors about unethical behavior received report, investigations performed, and recommendations made to the Administration regarding those cases.

**The Corporate, Regional and Local Ethics Committees must fulfil their functions in accordance with the guidelines and competencies established by the company.**

## 2. REPORTING MECHANISMS

The Code of Ethics serves as a guide presenting the most common examples and therefore does not describe all possible situations that occur in day to day work activities. All reports will be handled under the Principle of Good Faith, therefore sending reports to harm another person is not in keeping with the values and principles of the company.



If you cannot find an answer in the Code of Ethics, or if you have questions about how to interpret it, ask for help. Similarly, if you are aware of a situation that could be contrary to what the Code of Ethics, policies or the law dictates, you should report it.

There are several options available for obtaining help or reporting irregularities:



**A. Human capital team:** Contact the immediate person of the Human Capital team to handle specific situations or any queries



**B. Website form:** <http://www.ethics-unicomer.com>



**C. Email:** [reports@ethics-unicomer.com](mailto:reports@ethics-unicomer.com)



**D. Telephone line:** Consult with a Human Capital representative for the internal and external numbers of your country:

- I. Professional attention: You will be able to speak with a representative experienced in handling ethics cases and file your complaint.
- II. Voicemail: You can leave a voice message detailing the description of the case or your query and the means for maintaining communication if necessary.



**E. WhatsApp:** +51 9890 4351 4

Our Unicomer Ethics Line is managed by a third party. Any report that is made through these means will be treated with complete confidentiality and responsibility.

### 3. NON-RETALIATION POLICY

All company staff members are obliged to cooperate with the investigations carried out or ordered by the Local, Regional or Corporate Ethics Committee. Failure to cooperate in a procedure, as well as intentionally providing false or incomplete information, will be evaluated in a timely manner to determine the seriousness of the case and should be sent to the Corporate Ethics Committee for the corresponding investigation.

Our ethical culture is based on our values and therefore we assume that the complaints received have been honestly reported. This means that the staff member, in good faith, believes that the Code of Ethics has been violated. Reporting a complaint against another person for retaliation, to gain advantage on personal conflicts, or to intimidate is not honest reporting. Dishonest reporting under the Code of Ethics itself is a violation of that Code.

Our company is committed to protecting the rights of those who, in good faith, report matters related to the Code of Ethics. It should be clarified to the parties involved that no type of retaliation is allowed. Likewise, whoever made the report will be reminded that he / she must notify them of any threat or recrimination received as a consequence of the report of unethical conduct presented.

### 4. SUGGESTIONS, DEMANDS AND COMPLAINTS

Staff members may submit suggestions, requests and complaints through the different Ethics Line's channels to improve procedures or requests concerning this Code. If complaints are received, of merely an administrative nature, these should be handled by the Human Capital Department and sent to the person responsible for the procedure and the applicant must be informed.

The Code of Ethics is available electronically via Intranet, the Human Capital Vice President and Regional and Local Human Capital Departments.



## V. CONCLUSION

- We trust that our staff members will use both the Code of Ethics and good judgment to guide their behavior.
- If you face any difficulty in determining how to handle specific situations, Human Capital is available for any questions about how these cases should be resolved.
- The Ethics Committees have the responsibility to promote, monitor and enforce the Code, but the responsibility to follow and act according to our values and principles rests with each and every one of us.



