

SUPPLIER CODE OF CONDUCT

Date updated: 2023

Importaco's Supplier Code of Conduct establishes minimum standards to be assumed and respected by suppliers, their employees, agents and subcontracted personnel when carrying out their commercial activities and business actions.

1. LABOR STANDARDS AND HUMAN RIGHTS

- Legality and subcontracting

Suppliers shall comply with the laws in force in the country in all their operations and at all times. Workers must be hired on the basis of documented and understandable contracts, in accordance with the law and international standards.

In case of any subcontracting for the products and services offered to Importaco, they must communicate it to the company and will be responsible for the subcontracted companies to work under the rules promoted by the present document and within the corresponding legal framework.

- Employee health and safety

Importaco's suppliers will have a safe and healthy workplace, ensuring minimum conditions of light, ventilation, hygiene, safety and security measures and access to drinking water. In addition, they shall ensure that the necessary preventive measures are taken to minimize risks and shall train workers in safety and hygiene. Sleeping quarters, if provided, shall be hygienic and safe.

- Social dialogue and trade union freedom

Employees shall have the right to organize, to join and to bargain collectively, as well as to enjoy adequate protection against anti-union discrimination. These organizations must be independent and in no case be dominated by the employer. ¹

- Emergency preparedness

The supplier shall prepare its workforce to deal with emergency situations. This involves establishing and maintaining clear evacuation or confinement and communication procedures for workers, conducting drills, and providing regular emergency response

¹ OIT ILO Conventions Nos. 87 and 98 on Freedom of Association and the Right to Collective Bargaining

training. It must ensure the availability of adequate first aid supplies and have appropriate fire detection and extinguishing equipment. In addition, it must ensure that the facilities have safe and properly marked emergency exits. Regular training of employees in emergency planning, response and medical care is also mandatory.

- *Decent hours and fair wages*

Importaco's suppliers will adjust their working hours and salary to the legislation in force or to the established agreement, if the latter is more favorable to the worker. Likewise, they will work a maximum of 8 hours a day and 48 hours a week, with at least 24 hours of uninterrupted rest in each seven-day period. ²

The supplier must ensure that overtime is voluntary and agreed in advance and in writing with the worker. In addition, a clear and reasonable limit must be established for the amount of overtime allowed per week, as well as the amount of pay in excess of the normal hourly rate. The objective is to ensure that employees are compensated fairly and in accordance with current legislation. Key to this process is consultation and collective bargaining between employers and workers to determine in a fair and equitable manner the amount of overtime allowed, ensuring that overtime does not adversely affect the health and welfare of employees.

It also promotes transparency in the recording and payment of overtime, ensuring that it is carried out in a timely and appropriate manner, respecting the rights and integrity of workers.

- *Diversity, equity and inclusion*

The supplier must cultivate a diverse and inclusive workplace, rooted in ethical behavior, with respect for people of all backgrounds, abilities and opinions. The prohibition of discrimination of any kind is fundamental to this commitment. It is explicitly prohibited to discriminate against employees or applicants on the basis of race, ethnicity, gender, sexual orientation, religion, national origin, age, disability, marital status or any other characteristic protected by applicable law.

To measure the effectiveness of this policy, the supplier shall establish monitoring and evaluation mechanisms to identify possible cases of discrimination and act immediately and appropriately in the event that violations are detected. In addition, an environment

² ILO Weekly Rest Convention No. 1/47,14 and No. 106

will be fostered in which employees feel safe and comfortable to report any incident of discrimination or inappropriate behavior, ensuring that complaints are treated confidentially and with the seriousness necessary for resolution. Transparency and open communication will be key to promoting diversity, equity and inclusion in the corporate culture.

- *Child labor*

Suppliers shall not hire minors. Importaco sets the general minimum age for employment at 16 years and the minimum age for hazardous work at 18 years.³

Suppliers must comply with local laws and regulations regarding minimum age for employment and not employ persons under the legal age for employment. This includes respecting laws related to minimum age for employment and restrictions on night work and work in hazardous conditions for young workers.⁴ It is also important to ensure that, where youth workers are employed in accordance with local law, their rights are respected, including providing a safe and age-appropriate work environment and ensuring that they receive adequate training and are given the opportunity to learn and develop.

- *Forced or coerced labor*

Workers are treated with dignity and respect. Employment shall be freely chosen. They are not subjected to inhuman or degrading treatment, corporal punishment, physical or physical coercion and/or verbal abuse, including any form of harassment. Importaco suppliers shall not permit any form of forced labor, defined as any work or service exacted from an individual under the threat of any penalty and for which the individual does not volunteer.⁵

They shall not require any financial deposit from their employees, nor shall they withhold any documentation proving their identity.

³ ILO Minimum Age Convention No. 138

⁴ ILO Convention No. 182 on the Worst Forms of Child Labor

⁵ ILO Conventions Nos. 29 and 125 on forced labor

- *Discrimination*

Importaco's suppliers shall ensure that any person, regardless of race, color, sex, religion, political opinion, national extraction, or social origin, enjoys equality of opportunity and treatment in employment and occupation. ⁶

In addition, any form of harassment, whether sexual, racial, gender, religious or sexual orientation, within the work environment is strictly prohibited. Harassment includes, but is not limited to, offensive behavior, inappropriate comments, intimidating gestures, taunts, insults or any action intended to belittle, humiliate or create a hostile environment for an individual or group of people. A work environment that promotes mutual respect, tolerance and diversity will be fostered, where all personnel feel safe and free from any form of harassment. Complaints of harassment will be treated seriously, confidentially and appropriate disciplinary action will be taken against offenders.

Likewise, suppliers shall respect equal remuneration, understood as the basic or minimum wage or in kind paid by the employer, between male and female labor for work of equal value. ⁷

- *Career management and training*

Suppliers should identify, attract, mentor and nurture the growth of employees, seeking those whose skills and aspirations are in sync with the organization's goals and operations.

⁶ ILO Convention No. 111 concerning Discrimination in Employment

⁷ ILO Equal Remuneration Convention No. 100

2. ENVIRONMENTAL RESPONSIBILITY

- *Environmental permits*

Suppliers must obtain and maintain the necessary environmental permits for their business operations and comply with applicable environmental legislation in the country in which they operate. These permits must be legally in force at all times and must reflect the supplier's commitment to compliance with relevant environmental regulations.

- *Commitment to sustainability and environmental conservation*

It is the supplier's obligation to orient its environmental practices towards reducing the consumption of natural resources, minimizing waste, emissions and discharges, as well as preventing any environmental damage resulting from its activity. This implies the adoption of measures that contribute to a carbon-neutral and nature-positive world, achieving the following objectives.

- *Reduction of greenhouse gas emissions and energy efficiency*

Aware of climate urgency, we expect our suppliers to take responsibility for reducing greenhouse gas emissions throughout their value chain. This involves the implementation of practices and technologies that promote energy efficiency, the use of renewable energy sources and the adoption of innovative measures to minimize the environmental impact related to gas emissions.

To this end, we invite our suppliers to join the Science-Based Targets (SBTs) methodology. This initiative provides a solid framework for setting specific and measurable targets for reducing greenhouse gas emissions. Our shared goal is to actively contribute to building a sustainable and environmentally friendly environment.

- *Efficient waste management and pollution minimization*

Suppliers must work to reduce or eliminate waste at source, encourage recyclability, promote a circular economy, and adequately control and treat atmospheric emissions, hazardous substances, wastewater and solid waste prior to disposal.

Before proceeding with discharge or disposal, the supplier must properly define and treat wastewater and solid waste in accordance with applicable laws and regulations.

– *Positive contribution to biodiversity protection and regeneration*

Suppliers must commit to adopting sustainable agricultural practices that minimize their environmental impact in the field and promote biodiversity conservation. This implies adopting measures to reduce deforestation, promote sustainable natural resource management in the field and respect local ecosystems.

– *Reduction in consumption of water and other natural resources*

Suppliers are encouraged to implement specific measures to reduce the consumption of water and other natural resources in their operations. This includes adopting efficient technologies, reusing water and identifying practices that minimize the water footprint and impact on the natural environment.

3. BUSINESS CONDUCT

- *Integrity principle*

Importaco suppliers shall maintain the highest standards of integrity in all business interactions, with zero tolerance for any form of bribery, corruption, extortion and embezzlement. All Suppliers shall treat their employees with dignity and respect. Under no circumstances shall physical punishment, harassment of any kind and abuse of power be permitted.

- *Corruption, fraud, conflict of interest, money laundering and money laundering*

Suppliers must avoid conflicts of interest and ensure that their activities are not used to launder money derived from criminal activities. With regard to gifts and gratuities, they shall refrain from offering favors, payments in cash or in kind for the purpose of illicitly obtaining business, contracts or advantages.

- *Fair trade, advertising and competition*

Suppliers must respect the rules of fair dealing, advertising and competition.

- *Protection of intellectual property*

Respecting intellectual property rights, transferring technology and know-how, protecting intellectual property rights and safeguarding customer information are obligations for suppliers.

- *Privacy protection*

Suppliers shall protect the privacy of personal information in accordance with privacy and information security laws and international requirements. They shall be prudent and shall not disclose information of any nature to which they have access because of their business relationship with Importaco.

- *Transparency and disclosure of information*

The supplier must disclose information in accordance with current regulations and international practices. Falsification of records or misrepresentation of information shall not be permitted under any circumstances.

CODE IMPLEMENTATION

This code contains minimum standards and has been developed in accordance with the principles of the Ethical Trade Initiative Code of Ethics and the United Nations Guiding Principles on Business and Human Rights, as well as with the principles established by relevant international organizations, such as the Organisation for Economic Co-operation and Development (OECD) and the International Labour Organization (ILO). If legislation in the supplier's country is more favorable to workers or any other stakeholders, such legislation shall be complied with.

Importaco is committed to maintaining a dynamic and proactive approach to its Code of Conduct, recognizing the need to continually adapt to changes in international laws and regulations. In this regard, a comprehensive review of the Code of Conduct will be conducted annually to ensure its alignment with the latest regulatory requirements and international ethical standards. This review will not only seek to comply with evolving legal obligations, but also aims to maintain and enhance the highest standards of integrity and corporate responsibility.

Communication, compliance and monitoring

Importaco will communicate this code to all its suppliers, who will assign a person responsible for its compliance, who must communicate it to the subcontracted companies.

Suppliers commit to provide regular and transparent reports on their environmental and ethical practices, including natural resource management and environmental footprint reduction. These reports must accurately and completely reflect the actions taken to ensure compliance with legislation and commitments acquired in terms of sustainability, compliance with labor conditions and environmental conservation.

Suppliers will provide Importaco and/or third parties designated by the company with a visit to the facilities and the necessary documentation to verify compliance. Following these verifications, an action plan will be drawn up to ensure continuous improvement.

Importaco reserves the right to terminate the contractual relationship with suppliers who systematically breach the Code of Conduct.

Supplier

Company:

Name and position:

Signature and date: