

## CODE OF ETHICS

### COMPANY'S GENERAL ETHICS STANDARDS

- We recognize every person's dignity and respect their liberty and privacy.
- We have the commitment to provide and maintain healthy work places –with a proper environment–, to provide necessary training to update our working fields, and to supply work tools for their correct performance.
- Within the Company and in any relations with clients and suppliers, no person must be discriminated against for reasons such as: gender, marital status, age, religion, race, politic opinion, social or economic class, pregnancy, language, dialect, ethnic origin, nationality, sexual preference or disability.
- COPAVISA's members are obliged to comply with regulations and bylaws that rule or limit their respective responsibility areas, and to know and act according to the Company's policies and procedures.
- Members of the Board, directors and employees will always behave loyal, respectful, upright and honestly, as well as with a service spirit towards all other employees, clients, suppliers and business partners, aiming for excellence in all their functions.
- Prepare and maintain succession plans for the Company's key positions, so that its continuity does not depend on any director or administrator's permanence.
- Employees with people under their charge have the moral obligation to respect and protect them. Likewise, they must monitor their performance and report any deviation to the corresponding direction, and if necessary, to the upper management.
- Financial information must be truthful and enough for the users purposes.
- Members of the Board, directors and employees will maintain confidentiality regarding their activities within the Company, therefore, they will abstain from commenting –in family or social events– about activities such as: processes, methods, strategies, plans, projects, technic or market data, billing, current and potential clients' portfolio, current or future projects, the Company's direction, personnel turnover, internal environment or any other matter concerning the Company or could be detrimental to it.
- No Member of the Board, director or employee can use the Company's name, nor its resources, for personal gain activities.
- All activities and contact with dishonest or damaging people must be avoided.
- All the Company's staff must maintain an ethical behavior personally and towards their peers, thus, it is forbidden to use attitudes like language and/or written or verbal communication to discredit others or superiors. They must prove their honest conduct while complying with their responsibilities, according to all policies, bylaws, standards, regulations and this Code of Ethics and Conduct.
- All staff is obliged to comply with their contracts, internal regulation and Company's confidentiality.
- Directors and employees will attend promptly to the office, meetings with clients or suppliers. Also, they will hand in reports requested by their superiors in time and properly, with omitting information.
- Those employees who have company's equipment (cell phone, electronic, of communication, etc.) shall use it appropriately according to their functions and stipulated guidelines, giving it proper maintenance and reporting failures or anomalies to the responsible party.

- All employees must respect religion and traditions of all workers within and outside the Company, always remaining distant from any activity that could be defined as a community celebration.
- It is forbidden to establish any type of commitments when these involve the Company, either directly or indirectly, in any sort of situation.

#### **WITH CLIENTS**

- We will strive for the clients' total satisfaction.
- Directors and employees that assist clients shall offer at all times a professional treatment (competent client service and according to the company's values defined in this Code), polite, fair and honest, providing products and services with the highest quality, efficiency and opportunity possible.
- Any complaints and doubts from clients will be resolved in a timely manner, responding as quickly as possible.
- All information handled with clients is strictly confidential. Any relevant information discussed in meeting shall be delivered to the upper management for its correct purpose.

#### **WITH SUPPLIERS**

- When possible, those who share the Company's ethical values will be considered for the suppliers' portfolio.
- Only suppliers who offer their products and services legally and ethically will be selected. We seek and select only suppliers whose business practices respect human dignity, comply with the law and do not endanger the Company's reputation.
- All directors and employees who negotiate products and services' procurement will aim for a fair and honest treatment from their suppliers, as well as the greatest benefit for the Company with the least cost.
- Products and services' procurement will be carried out through transparent processes that ensure an equal selection of suppliers, based on quality, profitability and service criteria.
- Directors and employees will abstain from commenting with suppliers or unaffiliated people all problems or weaknesses observed in other suppliers or within the Company.

#### **WITH THE COMPETITION**

- Members of the Board, directors and employees who maintain contact with competitors' representatives will maintain a professional attitude, according to the Company's principles and values and will protect the portrayed image, both personal and the Company's.
- Members of the Board, directors and employees will avoid commenting or declaring regarding competition; if necessary, these shall be fair, unbiased and complete.
- The competition with other companies must be loyal, abstaining from disloyal practices.

#### **WITH THE COMPANY'S PERSONNEL**

- It is paramount to broadcast the Code amongst all personnel –old and new–. A copy of it will be handed to each employee, collecting acknowledgment and consent receipt.
- COPAVISA strives to create a work team comprised of people of excellence, attract talent and encourage all our employees' personal and professional development.
- All work relations within the Company must be respectful, polite, with a sense of collaboration and comradeship, avoiding any language that divides.

- All workers of companies, who for any reason end their relation with COPAVISA, are committed to be discreet with all the Company's activities, information and dealings they knew while working with it.

#### **RELATION WITH GENERAL GOVERNMENTAL AUTHORITIES**

- Members of the Board, directors and employees shall comply with all applicable laws and regulations in their activities' development.
- Treatments, processes and relations with government departments or officers on behalf of **the Company, must be held according to all applicable laws.**

#### **ENVIRONMENT (ECOLOGY)**

- The Company recognizes, as part of its social responsibility, the environment's protection.
- We will aim to optimize all the Company's material resources, as well as to work with suppliers whose processes and environmental friendly.
- Any campaign in favor of the environment will be spread to all personnel, who shall comply, maintain and communicate it to the rest of the staff.
- It is forbidden any inappropriate use of equipment, personnel and/or assigned activities that affects the environment, as well as any alteration to the flora and fauna in the place where the staff works.

#### **INFORMATION HANDLING**

- It is forbidden to distort accounting records and/or information, or falsify operations, whether to simulate goals or objectives compliance or to attain any personal gain.
- All information generated in financial, billing, costs and clients portfolio records is confidential and can only be handed to properly authorized users.
- It is forbidden to use the Company's information, strategies and procedures for personal or third parties gain.
- Members of the Board, directors and employees shall refrain from any actions that may influence, intimidate, manipulate or deceive any internal or external auditor or any officer who is performing its activities.
- Members of the Board, directors and employees will take all necessary precautions to protect confidential information they access in order to avoid that unauthorized people find it.
- All information is the Company's property, so no one, without distinction, will use it for its benefit and/or mishandle it. Any information omission will be considered a serious offence.