

# Code of Ethics and Good Conduct



The Code of Ethics and Conduct is the guide for ethical and responsible behavior for those of us who work at Agefred, reinforcing our commitment to the society around us.

The Code translates the organization's values and ethical principles into behavioral guidelines, considering our activities and the applicable regulatory framework. At the same time, the Code expresses Agefred's commitment to its stakeholders (groups or individuals with whom we interact) regarding the ethical model that guides its management and efforts.

This Code applies to all individuals working at Agefred.

According to the provisions established in the entity's Business Plan, the organization's values are:

**A**ttention to customer: we are dedicated to caring for and supporting our clients.

**G**uarantee of quality and success: we are very demanding with every installation we perform.

**E**motion, commitment, and rigor are our standards of quality.

**F**idelity in every project we undertake: we are detail-oriented and serious

**R**esponsibility is the foundation of our work.

**E**xcellence in every detail.

**D**istinctiveness in service and execution

## **Art. 1 Legal Requirements**

We comply with regulations, both in the current state legislation and those governing the entire group at the international level.

In particular, regarding clients and suppliers (bidding processes, offers, contracts, and execution of projects or maintenance), we strictly adhere to laws, standards, and procedures, ensuring neutrality, objectivity, and non-discrimination.

## **Art. 2 Conflict of Interest**

### **What's best for Agefred**

A Conflict of Interest occurs when our personal interests or the interests of a third party compete with the interests of our company. Whenever possible, we should avoid any conflicts with the company's interests.



If a Conflict of Interest has occurred or we find ourselves in a situation that may involve or lead to a Conflict of Interest, we must report it to our immediate supervisor in order to resolve the situation.

### **Art. 3 Technical Rigor, Professionalism, and Objectivity**

We do not use the entity's funds and resources for personal gain. We abstain from matters in which we have a personal interest and where a conflict of interest may arise.

We do not accept preferential treatment or privileged situations arising from our professional position or role, offered by individuals or organizations, nor do we grant preferential treatment to individuals or entities within client-supplier relationships or any other type of relationship in which we participate as employees of the Entity

We reject any gifts, favors, services, or economic benefits from suppliers or subcontractors, and from any other sphere that go beyond customary social and courtesy practices, or that may influence our decisions, thereby avoiding any risk of bribery, corruption, or related offenses.

We do not make payments, gifts, or other offerings to clients or public entities that may influence their decisions, thereby avoiding any risk of bribery, corruption, or related offenses.

We reject favoritism based on family ties, friendship, or any other circumstance in hiring processes, promotion of individuals within the entity, and other actions we undertake in the performance of our duties. We avoid any practices that could be considered unethical and promote individual responsibility and personal example.

### **Art. 4 Corporate Image and Reputation**

We must all take the utmost care in preserving the company's image and reputation in all our professional activities, especially in relation to clients. We will also monitor respect for the image and reputation of the Group by clients, suppliers, and collaborating companies.

When we are on-site for projects or maintenance, we represent the



company's image, so our work must be carried out in accordance with the quality standards set by Agefred.

#### **Art. 5 Occupational Safety and Health**

We rigorously and effectively comply with safety standards and procedures. It is our duty to perform our work safely, being cautious in tasks, especially those that involve greater risk.

In our work, we take care of our safety, the safety of our colleagues, and the safety of individuals who collaborate and/or participate in our activities, promoting adherence to safety procedures and measures.

We will inform both the Risk Prevention Department and the Health and Safety Committee about any violations related to safety or potential risks from the improper use of preventive regulations.

Safety extends not only to company personnel but also to all neighboring companies working on a project or maintenance, as poor coordination can pose a risk of accidents.

We respect the current regulations on occupational safety and health, minimizing the risk of accidents as much as possible. Our goal is to minimize human error resulting from our work..

#### **Art. 6 Commercial Ethics**

We operate ethically and consistently in today's commercial world, always respecting the applicable laws regarding competition. Therefore, we must adhere at all times to the following rules:

1. The commercial policy and prices will be established independently and will never be agreed upon, formally or informally, with competitors or other unrelated parties, whether directly or indirectly.
2. Everyone, but particularly those involved in sales and purchasing activities, or those who frequently interact with competitors, must ensure they are familiar with the applicable competition laws.



## **Art. 7 Confidentiality**

### **We preserve professional secrecy**

Confidential information is information that is not publicly known or not yet public. It includes trade secrets, business plans, marketing and service information, customer opinions, engineering ideas, facilities, designs, databases, records, salary information, and any other unpublished financial or non-financial information.”

One of Agefred's secrets lies in the proper use of its confidential information and its non-disclosure to third parties. Unless required by law or authorized by company management, we do not disclose confidential information or allow its disclosure. This obligation persists even after the employment relationship has ended. Additionally, we must use our best efforts to prevent unintentional disclosure of information, exercising special care when storing or transmitting confidential information.

The company respects the fact that third parties have a similar interest in protecting their confidential information. If third parties, such as suppliers or clients, share confidential information, that information will receive the same care as Agefred's confidential information. In this same vein, the company protects the confidential information obtained during our previous employments.

## **Art. 8 Fraud and Proper Use of Agefred's Assets**

We must never be involved in fraudulent acts or other dishonest conduct involving the company's assets or financial records and accounting. Such actions can lead not only to disciplinary sanctions but also to criminal charges.

Agefred's financial records are the foundation for managing the Company's business and fulfilling its obligations to various stakeholders. Therefore, all financial records must be accurate and comply with accounting principles. We must protect the company's assets and use them only in an appropriate and efficient manner.

We aim to safeguard the company's assets against loss, damage, misuse, theft, fraud, embezzlement, and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or privileged information, and computer systems.



To the extent permitted by applicable law, the Company reserves the right to monitor and inspect how employees use its assets, including the right to inspect all emails, data, and files maintained on the company's computer network.

#### **Art. 9 Respect for the environment**

We follow procedures and recommendations to mitigate the environmental impact of our activities on the surroundings, and we comply with all applicable environmental legislation.

We strive to reduce the use of toxic, polluting, or hazardous materials or products, replacing them with less harmful alternatives for the environment and people, especially in projects and/or maintenance. We avoid unnecessary consumption of energy and natural resources, using only what is necessary to carry out our work.

We reduce pollution by minimizing waste generation through reduction, reuse, and recycling systems. We contribute ideas and projects to improve our work from an environmental impact perspective, promoting awareness among our colleagues.

#### **Art. 10 Respect and no-discrimination**

Respect must be demonstrated daily with each of our superiors, colleagues, and clients. We always treat others with professionalism and tolerance, listen to them, and strive to understand their needs and goals, maintaining a discreet attitude and looking out for the company's interests. We must acknowledge the well-done work of our colleagues. We do not spread rumors about colleagues, collaborators, or superiors, nor do we make accusations without evidence.

We respect personal dignity, privacy, and personal rights, and we are committed to maintaining a workplace free from discrimination or harassment. Therefore, we do not discriminate based on origin, nationality, religion, race, gender, age, or sexual orientation, nor do we engage in any form of verbal or physical harassment based on the aforementioned or any other reason.

If we feel that the work environment does not meet the principles mentioned above, we can raise our concerns with the head of the Human Resources department.



### **Art. 11 Non-compliance with this Code**

We will consult the Code, comply with its provisions, and seek help if necessary.

It is the responsibility of everyone to ensure full compliance with all provisions of this Code and to seek assistance from our immediate supervisor or the Human Resources department if needed.

"Doing the right thing" and ensuring the highest standards of integrity is the personal responsibility of all of us and cannot be delegated. Any non-compliance with this Code may result in the application of disciplinary measures as legally deemed appropriate.

### **EFFECTIVE DATE AND COMPLIANCE**

Agefred will take the necessary actions to ensure awareness and application of the Code, which will take effect upon its approval by management and will be mandatory from that moment on.

The Code will be reviewed periodically, and various instruments will be implemented for its dissemination, application, management, and compliance, facilitated through the Human Resources Department.

# agefred

We are at your disposal for  
any inquiries.