



HOTEL
SAINT GEORGE
★★★★
IGUAZÚ

CODE OF ETHICS

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DOCUMENT DESCRIPTION

This document aims to determine the values, principles and standards which are to govern the behavior and performance of each interest group as well as the commitments taken on by the Hotel Saint George (HSG) towards them.

It applies to Collaborators, Clients, Suppliers, and it will also list all commitments taken on regarding Competitors, the Community and the Environment, insofar as it might be applicable to them and as long as HSG has the capacity to enforce it.

The Board of HSG commits to:

- Communicating and circulating the Code of Ethics among its groups of interest.
 - Leading compliance by example.
- Correcting detected deviations in the compliance with the Code of Conduct.
- Answering reports of breach of the Code of Ethics, ensuring confidentiality.
 - Periodically revising the Code of Ethics.



PRINCIPLES OF THE CODE OF ETHICS

HSG'S Code of Ethics is fundamentally based on the Hotel's principles, which guide the company's performance and behavior. Such principles are:



HUMAN WARMTH

We care about people.
We fulfill ourselves by serving others.
Giving is our nurture, providing is our richness.
We protect children.
We are naturally optimistic.
We trust human nature.



HONESTY AND COMMITMENT

We honor our words.
We say what we do, we do what we say.
We get involved.
We put our soul in every endeavor we make.



SELF-IMPROVEMENT ATTITUDE

We are open to dialogue.
We welcome change.
We build a collaborative working culture.
We celebrate challenges.
We aspire to make improvement our constant type of behavior.



SOCIAL AND ENVIRONMENTAL AWARENESS

We know we are part of an ecosystem.
We build awareness.
We encourage the image of the conscious traveler.
We promote respect for the local culture and love for nature.
We are convinced that every contribution counts.

Hotel Saint George adhere to the 10 principles of conduct and action of the UN Global Compact (<https://www.unglobalcompact.org/>) which, together with the values asserted by HSG, create the framework for its business management:

The 10 Principles of the UN Global Compact



HUMAN RIGHTS

- 1- Within their scope of influence, businesses should support and respect the protection of internationally proclaimed human rights; and
- 2- Businesses should make sure that they are not complicit in human rights abuses



LABOUR

- 3- Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4- Businesses should eliminate all forms of forced and compulsory labour;
- 5- Businesses should effectively abolish child labour; and
- 6- Businesses should eliminate discrimination in respect of employment and occupation.



ENVIRONMENT

- 7- Businesses should support a precautionary approach to environmental challenges;
- 8- Businesses should undertake initiatives to promote greater environmental responsibility; and
- 9- Businesses should encourage the development and diffusion of environmentally friendly technologies.



ANTI-CORRUPTION

- 10- Businesses should work against corruption in all its forms, including extortion and bribery.



INTEREST GROUPS: COMMITMENTS AND REGULATIONS

CLIENTS

HSG'S COMMITMENTS

- **CUSTOMER ORIENTATION**

HSG's essential objective is customer satisfaction. Therefore, the company is ruled by a culture of quality and constant improvement with the aim of ensuring that the customer receives and enjoys all the quality and warmth of the offered services.

HSG provides all means necessary to guarantee that the offered products and services do not entail health risks.

- **COMMUNICATIONS AND MARKETING**

HSG assumes the obligation of being honest with its customers, always providing truthful, clear, useful and accurate information when marketing products and services through its official communication channels.

Should customers be dissatisfied with the services offered, all due channels to state the necessary claims will be made available.

- **CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA**

HSG commits not to disclose any personal data from its clients without their consent or unless required by a legal obligation or to fulfill a legal or administrative ruling. Under no circumstances should personal data be handled for purposes other than those either established by law or agreed upon by the parties.

HSG agrees to use the clients' image in social networks, audiovisual media and other formats if and when all involved parties have provided their express consent and authorization for the use of said image.

HSG will guarantee the **Protection of all Personal Data** stored and exchanged during the daily activities of the social business insofar as said protection is critical to achieve the highest quality level in the fulfillment of the corporate purpose.



HOUSE RULES

In order to ensure a harmonious stay for all HSG guests and visitors, compliance is required with the following house rules in all areas of the Hotel facilities (the following rules do not exclude other similar misbehaviors not mentioned herein):

- 1.** For protecting your belongings, the Hotel has put an individual safe at your disposal in your room. Therefore, the Hotel will not assume responsibility for any valuables not stored in the safe. The liability amount is limited by the law.
- 2.** HSG works towards the Prevention of the Commercial Sexual Exploitation of Girls, Boys and Adolescents and is committed to the development of a healthier and safer tourism for everyone. Therefore, if you come to our premises with a minor, please do not forget to bring the following documents:
 - Should the minor be your son or daughter, you will be asked to prove filiation by showing their ID or PASSPORT (only valid if containing proof of filiation). Should the ID or PASSPORT fail to contain said information, you will be required to show the minor's birth certificate.
 - Should the minor not be your son or daughter, you will be asked to show an authorization signed by their parent(s) or tutor(s) and certified by a competent authority. Should you not have it, you will be asked for the minor's Birth Certificate and a signed authorization from the child's parents and/or tutors (said authorization does not need to be certified by a notary or public authority).

In line with this policy, children under the age of 16 cannot stay anywhere in the Hotel without the constant company of a responsible adult.
- 3.** HSG does not allow pets.
- 4.** HSG is firmly against human trafficking, the use of illegal drugs and manifestations of disrespect towards native cultures. Therefore, such behaviors are not allowed in the Hotel.
- 5.** It is forbidden, without exceptions, to enter the Hotel premises with fire weapons or of any other type, or with any kind of explosives, without our express authorization or without declaring the possession of such items.
- 6.** Selling food and drinks is an exclusive privilege of HSG. Therefore, bringing food and beverages from suppliers other than the Hotel's points of sale is not allowed. Furthermore, the Hotel will not take responsibility for any goods entered into the premises.
- 7.** HSG reserves the right to refuse admission.
- 8.** Anyone entering the premises as a guest must register first at the Reception Desk. It is forbidden to enter the rooms with escorts who had not been properly registered in the Hotel Reception Desk.



- 9.** Any total or partial damage inflicted to the Hotel premises, facilities, property, services or supplies, and/or of any other addressee of these Rules due to ill-use or negligence by the guest or anyone connected to them will be charged to the guest's bill.
- 10.** Access to the swimming pool and recreation area is exclusive for registered guests at the Hotel.
- 11.** HSG only keeps luggage in the storage office and is not responsible for items not withdrawn and/or claimed after 30 days, nor for any damage caused by fire, theft and other causes not attributable to the hotel. Furthermore, the owner must expressly state that the stored luggage does not contain money, jewelry, or flammable or explosive items. Should this be a false statement, the Hotel accepts no responsibility for it.
- 12.** HSG has joined the 'Smoke Free' campaign, in line with the National Act N° 26,687, by means of which all closed areas are smoke-free spaces. Therefore, smoking is only allowed in open spaces, such as the pool and the garden. If you smoke in the room, an additional fee will be charged to your room for in-depth cleaning.
- 13.** Within the Hotel premises, all guests as well as any person(s) for whom they are responsible must refrain from causing discomfort to other guests, visitors or third parties. This includes any commotion, vandalism, hostile behavior, disturbance, prominent misconduct, disorderly conduct, or any behavior which may alter the tranquility, silence, rest and privacy of the guests. The same applies to inappropriate behavior and producing any type of noticeably loud noises which may bother other guests or disrupt the Hotel's tranquility. Any rude or aggressive behavior towards other guests, companions, visitors, Hotel employees -irrespective of their hierarchy-, or even the guest's own companions must also be avoided.
- 14.** Any violent behavior, moral or psychological intimidation, harassment of any sort, justified or unjustified threats, and any act, utterance or expression in detriment of the honor, prestige or physical and psychological integrity of all guests, employees, directors or third parties is absolutely forbidden and even subject to criminal liability.

*All rules stated above may not, in any way, be interpreted as discriminatory against any ethnicity, nationality, gender, religion, race, age or political ideology of the addressees, but as the most suitable medium to guarantee all guests, visitors, clients, employees or third parties the excellence and quality of all Hotel services. The Hotel's right to add rules complementary to those stated here may not, under any circumstance, be interpreted as limiting or restrictive of the individual rights of anyone voluntarily entering the premises, fully aware of the nature of this establishment. Such right stems naturally from the Hotel's proprietary right and responsibility regarding its functioning and the rights of its guests or clients.



COLLABORATORS

HSG'S COMMITMENTS

HSG believes employees are essential Collaborators for meeting business objectives and creating quality jobs in an environment committed to professional training and development, and for the promotion of the diversity of skills, cultures, faiths and nationalities, always on equal grounds and rights.

- **HUMAN RIGHTS**

HSG acknowledges that these are fundamental universal rights, which must be interpreted and acknowledged in accordance with international laws and practices, particularly with the Universal Declaration of Human Rights of the United Nations and the principles proclaimed by the International Labour Organization.

HSG believes in and promotes human relationships based on respect, diversity, and human dignity, and acknowledges the principle of equal treatment and opportunities for people, regardless of race, skin color, nationality, ethnic origin, religion, political or sexual orientation, marital status, age and disability. Said principle upholds the Hotel's Human Rights policies, which apply both during the Recruitment and Selection processes, the Promotion and Career Opportunities, as well as all other aspects of the working relationship among Collaborators.

The exercise of the rights of association, collective bargaining and unionization will not be prevented nor limited in any way within the frame of each of these fundamental rights.

- **PROFESSIONAL DEVELOPMENT**

HSG will promote its Collaborators' personal and professional development, encouraging their commitment to improving their own skills and competencies. HSG offers a HR area which contemplates the satisfaction, training and motivation of all Collaborators.

Whenever a job opening occurs, HSG commits to giving priority to internal candidates, especially anyone interested and qualified to assume a larger scope of responsibilities, before selecting external staff. All decisions to promote staff will be based on the Collaborator's merit, experience, working performance, attendance register, attitude and expressed interest.

Collaborators will be informed of the policy assessment of their work and will actively participate towards improving their work, initiative and dedication.

- **HEALTH AND SAFETY**

HSG will strive to ensure a safe and healthy work environment for Collaborators by adopting any such measures as are reasonable to maximize the prevention of occupational hazards. In addition, the means necessary for proper compliance with any necessary measures to prevent occupational hazards shall be provided.

- **COMPENSATION**

HSG strives for legality and working ethics. It offers its Collaborators a just and suitable compensation according to the labor market where it carries out its business operations and in compliance with the country's labor laws.

Besides, HSG will also seek to find a balance between work in the company and personal and family life.



CODE OF CONDUCT

1. HUMAN RIGHTS

HSG promotes human relationships based on respect, diversity and human dignity, and therefore expects its Collaborators to set the example.

HSG bans the abuse of authority and any form of harassment, whether physical or psychological, or any other conduct that may generate an intimidating, offensive or hostile work environment.

2. LAW OBSERVANCE

HSG is governed by the Observance of the Law while performing its professional duties, so no company Collaborator shall violate the law, both national and international, nor cooperate with third party acts or omissions which compromise the principle of legality or may damage the company's reputation. Besides, their professional performance must at all times excel in ethical behavior and they are to avoid all conducts which, even without infringing the law, may damage the company's reputation and negatively impact on its interest and public image.

3. ALCOHOL, TOBACCO AND DRUG CONSUMPTION AND/OR POSSESSION

Alcohol consumption is forbidden during working hours. Its intake may threaten the safety and productivity of the working environment.

Drug possession and/or consumption is absolutely forbidden in all Hotel premises and offices. Likewise and in line with the Policy of Prevention of Conducts of Social Damage, the Collaborators shall refrain from promoting consumption or facilitating information to customers and others.

Regarding tobacco consumption, even in areas where smoking is allowed, respect and consideration towards non-smokers or minors shall be observed.

Likewise, Collaborators shall refrain from smoking in their working place.

4. THEFT OR UNDUE APPROPRIATION OF ASSETS

HSG makes available for its Collaborators all necessary tools and means for the correct performance of their tasks and functions. Undue appropriation and improper use of such assets will be sanctioned by the company and criminally pursued.

Collaborators must leave their working place with the same number of personal objects they came to work in the first place, refraining from taking any company assets, as well as any objects left out by clients, even if they are considered as 'waste' (magazines, food, etc.).

5. TIPS, GIFTS AND PRIVILEGES

Under no circumstances should the Collaborators offer or accept gifts, invitations, privileges or other incentives to reward or influence a business decision, appealing to the integrity with which all tasks and operations should be performed.

The Collaborators shall not accept gifts for any reason from customers/guests for a value above US\$100.- They shall reject any gifts above said value and must inform the Operations Coordinator and/or Manager of the company about the incident.

Regarding their relationship with Suppliers, under no circumstance may the Collaborators accept gifts, invitations, money, privileges or incentives of any kind or value. Besides, Collaborators may not promise, offer or grant to executives, administrators, employees or collaborators of a business enterprise, any unjustified benefit or advantage of any kind favorable to themselves or a third party over others, in breach of their obligations in the acquisition or sale of goods or the contract of professional services.



6. BRIBERY, CORRUPTION, ILLEGAL COMMISSIONS, INFLUENCE PEDDLING

All types of corruption practices, bribery, or payment of commissions of any kind is strictly forbidden, whether by means of acts or omissions or through the creation or maintenance of favorable or irregular situations aimed at achieving some sort of benefit.

Collaborators undertake not to request, accept or offer any sort of payment, whether in cash or kind, or any sort of unjustified benefit or advantage of any kind favorable to themselves or a third party over others, in breach of their obligations in the acquisition or sale of goods or the contracting of professional services.

Furthermore, Collaborators shall refrain from making payments aimed at facilitating or accelerating the processing of paperwork or the performance before any legal body, public administration office or other official organism.

7. INFORMATION HANDLING

All Collaborators will protect the Confidentiality of any information entrusted to them by the company, as well as any data related to customers, employees or suppliers.

Collaborators shall keep the strictest professional secrecy and carefully safeguard all information handled during the fulfillment of their professional duties.

“Confidential Information” is defined as all information susceptible to be revealed in oral or written form, or through any other media or format, whether tangible or intangible, to which any Collaborator may have access during their professional activity. Such information includes, but is not limited to, all data related to: business plans, products, financial forecasts, passwords, source codes, budgets, procedure guidelines, labor contracts, information about guests/clients, their identity (their activities, location) as well as any information which the company deems confidential, which shall not be revealed to any person inside or outside of the company, including family members, friends, work colleagues, communication media or other people for whom the information is not necessary regarding the fulfillment of their obligations towards HSG. Breach of this rule is considered by the company to be a serious offence.

Under no circumstance shall Collaborators procure a personal benefit for themselves or through others as a result of any sort of profitable activity which becomes known to them during the performance of their duties.

Should the Collaborator have to carry information outside of the HSG premises and/or offices in fulfillment of their working duties or any activity pertaining to their relationship with the company, they will have to return said information upon finishing the task in question. The information shall not be copied, reproduced, duplicated, in full or in part, without the written authorization from HSG.

Collaborators shall notify as soon as possible about any incorrect handling or use of confidential information, in cooperation with HSG, with the aim of protecting said information.

In case of doubt, and unless otherwise instructed, Collaborators shall consider all information they come to access during the performance of their professional activities as classified.

HSG will guarantee the Protection of all Personal Data stored and exchanged during the daily activities of the social business insofar as said protection is critical to achieve the highest quality level in the fulfillment of the corporate purpose. Therefore, all company Collaborators shall observe the pertinent legislation on the protection of personal data whenever they handle personal data from clients, suppliers or collaborators.



The forgery, tampering or deliberate use of false information constitutes fraud. HSG endorses to a behavioral principle of information transparency, understood as the commitment to spread trustworthy information. Collaborators shall pass on information in a trustworthy, comprehensive and understandable way.

In no case shall they knowingly provide incorrect, inaccurate or ambiguous information.

8. CONFLICT OF INTERESTS

Conflict of interests is considered to occur in any situation where HSG's interest and the personal interest of any of its Collaborators clash either directly or indirectly.

HSG respects the Collaborators' decision to participate in other business or financial activities, as long as these are legal and do not concur with or derive in possible conflicts of interests regarding their responsibilities as HSG employees.

All Collaborators shall avoid any situation which may entail a conflict between their personal interest and the company's interest, and therefore should abstain from representing HSG, intervening or participating in decision-making processes in which, directly or indirectly, either them or a Person Linked to Them has any personal interest.

To this effect, a Person linked to the Collaborator shall be understood as: their spouse or other person with an equivalent affective relationship; their ancestors, descendants and siblings (together with their own descendants); the spouse's ancestors, descendants and siblings (together with their own descendants).

Therefore, HSG refrains from employing any Person linked to the Collaborator in an effort to avoid any conflict of interests which may arise from this bond. A Person linked to a Collaborator may become a Supplier only in such cases where the company executives expressly authorize it.

9. ADEQUATE USE OF IT TOOLS

Collaborators shall use IT tools (e-mail, Internet, management system, telephone, fax, etc.) in all manners suitable for the performance of their duties. The tools shall not be misused or used in ways which may ultimately affect the reputation or image of HSG.

Collaborators may only access the IT systems authorized to them and with all pertinent licenses. The installation, use, or distribution of software which may compromise the system security, or the unauthorized copy or any other action which may allow the access of computer viruses is strictly forbidden.

No communication carried out through IT tools may contain any offensive or defamatory statement.

No user of any IT or communication media belonging to HSG may spread or circulate illegal, sexist, abusive, defamatory, obscene, racist, or pornographic information through photos, text, links to other sites, etc.



SUPPLIERS

HSG'S COMMITMENTS

- **HUMAN RIGHTS**

HSG acknowledges that these are fundamental universal rights, which must be interpreted and acknowledged in accordance with international laws and practices, particularly with the Universal Declaration of Human Rights of the United Nations and the principles proclaimed by the International Labour Organization.

HSG believes in and promotes human relationships based on respect, diversity, and human dignity, and acknowledges the principle of equal treatment and opportunities for people, regardless of race, skin color, nationality, ethnic origin, religion, political or sexual orientation, marital status, age and disability. The HSG Purchasing Policy works under this principle and is to be applied both during the Selection of Suppliers (among other criteria stated below) and throughout the working relationship with any Suppliers' employees who may be performing their duties in the premises of the HSG.

- **COMMUNICATION AND SUPPORT**

HSG commits to circulating this Code of Ethics among its Suppliers.

Likewise and in line with its Sustainability Policy, it commits to supporting its Suppliers, as much as possible, in the implementation of good business practices with the aim of helping them to improve their environmental, ethic and social standards.

- **PROFESSIONALISM**

HSG commits to forging ties with its Suppliers based on professionalism, justice and transparency.



CONTRACTING AND PURCHASING RULES

In line with the Sustainable Purchasing and Procurement Policy, the HSG promotes among its Suppliers and expects of them the compliance to the following principles:

1. OBSERVANCE OF LAW

Each Supplier shall be operating in strict compliance with current regulations. Suppliers are responsible for ensuring that subcontractors work under the standards promoted herein and within the appropriate legal framework. Each Supplier shall promote and respect the established maximum working hours and minimum wage. Besides, they must guarantee that their employees work under safety and hygiene standards.

2. QUALITY

HSG demands that its Suppliers guarantee and be accountable for the quality of their goods and services.

3. HUMAN RIGHTS AND COMMUNITY

Suppliers must observe the compliance with internationally acknowledged Human Rights and ensure that they will not abuse or infringe such rights during their business operations. Therefore, each Supplier shall treat their employees/collaborators with dignity and respect.

Each Supplier must promote and honor the following principles:

- **Rejection of all forms of child labor.**
- **Eradication of all sorts of forced labor or work done under duress.**
- **Rejection of the Commercial Sexual Exploitation of Children and Adolescents as well as Human Trafficking in all its forms.**
- **Avoidance of discrimination and promotion of diversity and gender equality.**
- **Respect for the employees/collaborators' right to collectively assembly, organize or negotiate without suffering any type of sanction.**
- **Promotion and adoption of actions favorable for the development of the local community.**

4. ENVIRONMENT

Each Supplier must obtain and keep all pertinent environmental licenses for their company's operation. Suppliers must be oriented towards the protection of the environment, the adoption of methods favorable for the development and circulation of environment-friendly technologies, aligned with better practices in environmental management, including energy efficiency, biodiversity management, waste reduction and recycling. When purchasing products, HSG will give priority to goods and services which are local, organic, biodegradable, with returnable and minimal packaging and with recognized commitment with the environment.

Hotel Saint George reserves the right to dissolve its contractual relationship with Suppliers who repeatedly or severely fail to fulfill these rules, with the possibility of demanding compensation for damages.



COMMUNITY

HSG'S COMMITMENTS

The Hotel Saint George has a Sustainability Policy which provides the frame of reference stating its involvement with the community. By virtue of it, the HSG commits to:

- Giving priority when hiring Collaborators to local residents of Puerto Iguazú, offering quality job positions regulated by law.
- Giving priority when hiring Suppliers to local companies/businesses with the purpose of promoting the social and economic development of Puerto Iguazú and Misiones.
- Promoting Human Rights both within and outside of the company.
- Promoting diversity and gender equality.
- Rejecting the Commercial Sexual Exploitation of Children and Adolescents. Implementing the protocol designed for that purpose, training its Collaborators and honoring its commitment to inform all pertinent authorities in case of suspicion.
- Implementing the Policy of Prevention of Conducts of Social Damage, by means of which it rejects, within its premises, the consumption of illegal drugs, the lack of respect for local traditions, and discrimination and human trafficking in all its forms.
- Rejecting child labor.
- Sharing the local culture and the value of everything pertaining to the native cultures.
- Communicating the Code of Conduct for Visits to Native Communities, promoting a more responsible tourism.
- Listening and taking action, insofar as it is possible, in response to requests and necessities of the vulnerable local collectives in Puerto Iguazú.
- Spreading Sustainability values in the community of Puerto Iguazú.
- Participating in joint management initiatives with the aim of contributing towards the sustainable development of Puerto Iguazú.



ENVIRONMENT

HSG'S COMMITMENTS

The Hotel Saint George upholds a Sustainability Policy which provides the frame of reference stating and revising the environmental objectives which rule its professional activity. Said Policy provides for:

- The rational use of resources, minimizing water, energy and paper consumption. Monthly measurements of all consumptions and the establishment of annual curtailment goals.
- The reduction of waste generation by means of the Policy of Sustainable Purchasing, which gives priority to the acquisition of products in returnable, refillable and reduced packaging.
- Waste segregation in order to facilitate recycling.
- The implementation of all necessary tools to prevent pollution.
- The measurement and reduction of CO2 emissions generated by its operation. The compensation of all released emissions and the facilitation of concrete ways in which guests may compensate the emissions caused by their trip to Iguazú.
- The involvement of all Collaborators in achieving the proposed environmental goals by means of training programs. Raising awareness regarding climate change and the encouragement of its mitigation.
- The preference for local suppliers who apply environmental friendly practices. Supporting suppliers while they implement these practices and yearly assessing their operation. The promotion of good environmental practices among clients, inviting them to participate in taking care of the environment and in the rational use of resources. The promotion of the Code of Conduct for Visits to Natural Sites, promoting thus a more responsible tourism.
- The contribution to the conservation of the Atlantic Forest by means of alliances with several expert NGOs and Foundations.
- The implementation of all conditions for the development of sustainable tourism in collaboration with public administration offices and other entities in the field.
- The promotion in the community of Sustainability values and raising awareness about climate change.



INCIDENT REPORTING PROCEDURE

The Hotel Saint George has established a procedure for the notification of any breach of the principles contained in this Code in a confidential way and without fear of retaliation. All addressees of this document may report alleged breaches and lack of compliance of the Code of Ethics.

The reports shall be filed electronically or by means of a mailbox which will be placed in the staff room. The report manager will be the company's Operation Manager.

The report manager will evaluate the submitted information and request all pertinent evidence. Ideally, every report should contain the following elements:

- Name, last name and ID of the complainant.
- Arguments or truthful and accurate evidence supporting the report.
- Accused person or group.

All reports failing to include the name of the complainant will be assessed and processed using the submitted evidence and later investigations as long as they demonstrate a real and objectively provable breach.

All addressees of this document may ask questions, seek advice, and raise issues related to the compliance with the Code of Ethics and may do so before the Operation Manager and/or Administrative Manager and Executives of the company.

All Collaborators, Suppliers and groups of interest may communicate alleged irregularities concerning the Code of Ethics by sending an e-mail to this address: rrhh@hotelsaintgeorge.com

The incidents may be reported anonymously or personally.

Nonetheless, the complainant's identity and as much information as may be provided by them will allow the HSG to carry out a better and more thorough investigation and increase the possibility to adequately respond to the report, question or suggestion made.

The HSG ensures that everyone seeking for advice or willing to inform about an incident will be treated with all due respect and dignity.

All data and statements made will be examined in the strictest confidentiality.

All information received about potential breaches of the Code of Ethics will be thoroughly investigated in detail in order to determine the truthfulness of the informed situation.

The rights of all persons involved in potential breaches will be taken into consideration at all times before assessing the declared incidents, and the affected persons and/or employees will be entitled to expose any reasons and explanations deem necessary by them.

Likewise, all decisions to be made will be adopted in a reasonable, proportionate, and adequate way, with consideration of the circumstances and context of the events.

We expect our Collaborators and Executives to behave in a professional way and in accordance with the highest standards of integrity.



ENFORCEMENT

Any breach of the present Code, insofar as possible, must be addressed immediately and will be sanctioned, if applicable, in pursuit of current labor regulations, regardless of any other liabilities in which the offender may have incurred and all suitable legal actions which may be taken.

AGREEMENT

All relevant subjects must agree with and adopt this Code. The company shall enable all procedures aimed at ensuring the circulation, full knowledge of and agreement to this Code of Ethics.

By agreeing to this Code, the Addressees are herein automatically bound to later adaptations or updates of the present document, as long as said revisions are triggered by modifications in relevant regulations, unless otherwise stated. The Addressees will be duly informed of any such updates.

All relevant subjects and suppliers, after being recruited into the company or included in the suppliers' register, as applicable, will sign the Code of Ethics in such a manner that it will constitute an integral part of the employment, supply or service contract, as applicable.