



REIR

OUR CODE OF ETHICS



RESPONSIBILITY · EXCELLENCE · INTEGRITY · RESPECT

REIR

REIR, our Ethics Code, is inspired by the values left by our founder Don Juan Bautista Gutiérrez, through his legacy left by how he lived his life.

In CMI we are convinced that an inspiring point of view is the best motivation for all of us who are part of this organization, to stand close to our ethical and moral principles by our own conviction, with the certainty that doing what is right, will help us find the path of goodness, peace and happiness.

We give privilege to the inspiration based on example, personal motivation and convincing, so our conduct is attached to our values, besides favoring the existence of a healthy and pleasant organizational climate.

Staying close to living our own REIR values, gives us the certainty of complying with the code of ethics, and consequently, in addition to being part of better companies, communities and countries.

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I. OUR HISTORY.

From CMI's beginning to this day.

In the 1920s decade, with a small store located in San Cristóbal, Totonicapán (Guatemala), Don Juan Bautista Gutiérrez began what today is known as CMI. From this moment on, we can identify the importance that the founder gave to our values and the concept that nothing is above family.

In 1936, Don Juan Bautista founded Molino Excelsior, and began what is known today as the corporation's milling Business Unit, unit which currently has modern and big manufacturing wheat and corn plants, and also of cookies and pastas both in Central America and in the Dominican Republic.

The Business Unit Industrial Livestock begins in the 1960 decade with the opening of Avícola Villalobos, S.A. This company grew rapidly in feed mills, poultry and pig farms and processing plants, and modern downstream plants. Currently this unit has presence in Guatemala, El Salvador, Honduras, and Costa Rica.

Soon, in 1971 Pollo Campero was born, entity which together with Café Barista, Bendito Café, Don Pollo and Pollo Granjero form the Restaurant Business Unit. In 1972, the corporation began expanding to Central America, beginning with El Salvador.

CMI begins operations in the construction sector in the year 1988, with the purpose of developing urbanization and housing projects, shopping centers and office complexes in various areas of Guatemala.

In this same decade, the social branch of CMI was created, Fundación Juan Bautista Gutiérrez. Through this branch we contribute to sustainable development, by training young people committed to being the executives of the future and supporting community social development projects.

After more than 20 years of growth in Guatemala and El Salvador, in 1994 Pollo Campero launched a franchise program in Central America. In the decade of the year 2000, the Pollo Campero franchises left the Central American territory and in the year 2002 the franchise program was consolidated in the United States of America.

Also, in the 1990 decade, the Financial Business Unit was born, with the purpose of satisfying the need of financing in the corporation's entities.

In this new century, in the year 2004, the Power Business Unit of the corporation was born, which had a significant growth in the 2010 decade.

In the year 2013, CMI participated in the telecommunications business by acquiring 40% of the assets of Telefónica in Central America.



II. MESSAGE FROM OUR CHAIRMEN.

Dear CMI team:

It was our grandfather, Don Juan Bautista Gutiérrez, who in 1920 started the first businesses that gave way to what is now known as CMI. He was always concerned for his businesses to be grounded on the highest personal ethic rules and responsibility. He applied these practices through a series of personal actions searching to benefit the communities who saw him become an entrepreneur, always leading by example, always acting like a family and treating everyone as he liked to be treated.

As the years went by, the corporation's businesses began to grow and have expanded through various countries in different continents. Therefore, maintaining the principles intact which Don Juanito impregnated to start this successful group of entities, is a key purpose for the foundation to remain intact.

One of the ways to accomplish this purpose being fulfilled is to always have the strength that high level collaborators have provided to the organization, both professionally as personal, that have accompanied us in shaping and keeping these principles alive.

REIR, our Code of Ethics is a tool which will help us to continue transmitting our principles, with spirit, strength and the conviction we need to accomplish the desired culture, becoming a guide to know what is expected of all of us, the collaborators from the Business Units of the corporation, in any part of the world where we are, providing us with guidelines for making decisions, in any moment of our daily activities.

In this way we will strengthen and preserve the culture that, since the time of our founder, has been oriented to the attachment of the highest ideals of the human being, thus achieving an effort to have better people, better families, better businesses and consequently, better countries where we develop.

We invite you to keep this effort, always basing our actions on our values and ethical principles.

Very truly yours,



Juan Luis Bosch Gutiérrez
Chairman



Juan José Gutiérrez Mayorga
Chairman

III. INTRODUCTION

Ethics and Business

The purpose of ethics is to establish the way of life of the human being, establishing a distinction between good and bad from a moral point of view. In CMI we believe that business ethics is a requirement and a personal obligation, acknowledging this as a rule, not for passive observation, but as an ensemble of dynamic principles that guide our conduct and way of life. It is our commitment that our personal and professional life, agrees with such ethic rules.

Who are we?

We are a multinational family corporation formed with more than thirty six thousand collaborators. We began our operations in 1920 in Guatemala, Central America, having a growth since then founded from its roots, with the example of living ethical principles, legacy of our founder:

- Benefit the communities with our own business success and always preach by example.
- Always treat everyone as family and treat everyone as you would like to be treated.
- We grow with the support of collaborators who reinforced these principles, to become today one of the most important business groups in Latin America.

Corporate Mission:

To be an international corporation, leader of relevant businesses and selectively diversified that sustainably generate value for its shareholders, consumers, clients, suppliers, collaborators, and the community.

Corporate Vision:

Be a world class organization in products, processes, and human capital, significantly participating in multiple markets and growing strategically with a sustainable and outstanding rentability.

Corporate Values:

Our values are directly reflected not only on attitudes and conduct, but also on motivation and results, influencing organizational behavior, being our only source of sustainable success.

To provide solidity and consistency to the practice of our values, we believe that their experience must be both at family and work level.

IV. REIR, OUR CODE OF ETHICS FROM CMI

All members of CMI, notwithstanding their position or title, of the working time in the corporation or of the daily work that they perform, carry out all our actions, freely and voluntarily, in full adherence to the following values:



1) Responsibility

It is assuming and complying with our individual commitment and responding for our actions and their consequences.

We are a jointly responsible corporation, which is committed to the interest groups with whom we have a relationship, seeking the common good. Credibility is based on the real history of meeting commitments. CMI, over many years, has earned its high credibility with deeds and CMI collaborators must carefully analyze the commitments that are acquired on behalf of the corporation, act responsibly and faithfully to fulfill them. Only in this way will we be able to count on the indispensable trust of others in the future.

Therefore, we form a dynamic, efficient, modern organization that guarantees the obligation acquired with the vision, mission, values, and principles of CMI. To comply before our shareholders, clients, suppliers, collaborators, creditors is to live the responsibility.



2) *Excellence*

It is to search for superiority and approaching perfection in what we do. For this, we seek to make continuous improvements, give exceptional good results and be efficient.

With our work, we accomplish results dignified with appreciation and admiration, seeking excellence through constant and tenacious effort, teamwork, and communion of interests. The search for excellence is an attitude in life and in CMI it is a permanent challenge and an inescapable compromise.

In addition, we ensure that all levels of the corporation maintain the excellence of systems, products and services that drive us as an economically competent, significant and solvent entity, which continues to be a source of work and prosperity for its collaborators and the communities in which we operate.



3) Integrity

It is the congruence of our actions and words with our values.

Our conduct is guided by ethical values and principles which are the basis for building and preserving the corporation to contribute efficiently with the development of the countries where we operate.



4) Respect

It is the consideration we pay to the rights of others and to the legal system that supports those rights.

Respect implies understanding that everyone has intrinsic dignity, regardless of circumstances such as socioeconomic status, individual preferences, ethnic origin, educational level, or location in or outside the organizational structure. The applicability of this principle includes customers, suppliers, community members, and others with whom we interact. In the same way, all our activities must be carried out within a framework of absolute respect for the law.

V. SYNTHESIS
OF ATTITUDES
AND BEHAVIORS
THAT REFLECT
ATTACHMENT TO
THE EXPERIENCE
OF OUR REIR
VALUES

RESPONSIBILITY

- Encourage, with all the stakeholders related to our corporation, that the decision-making that refers to its own interests, are based on the best interest of the corporation and its various Business Units, without favoring each other personally, thus avoiding conflicts of interest influenced by business relationships, kinship or affectivity, towards himself or someone other than the corporation.

If as collaborators we are subject or are exposed to a relationship of this nature, we must talk to our immediate boss regarding such situation and with the defined contact in the work area to allow assistance in finding the best option to eliminate the conflict.

- Safeguard the environment with which we interact in our operations, complying with the environmental and health laws in force in the countries in which we operate. In this way we contribute to sustainable development through the efficient use of resources.

- Comply with the commitments that have been made, strengthening the credibility of people and our corporation, since it is based on the real history of fulfilling its commitments.

- Strictly and constantly comply with all the safety rules in their respective job, for their personal benefit and for the benefit of their colleagues and the corporation in general.

EXCELLENCE

- Act diligently to identify signs of any conduct not in accordance with this code and promote its correction by reporting it to the corresponding authorities.
- Live the commitment to be permanent agents of change, seeking continuous improvement to get closer to perfection, living our REIR values.
- Maintain the excellence of systems, products and services that promote us as an economically competent, significant, and solvent entity that can continue to be a source of work and prosperity for its collaborators.

INTEGRITY

- Our commitment at CMI is leading according to living our REIR values expressed in this Code of Ethics, both in words and in actions.
- To be role models for the respect and consideration that we show towards each one of our collaborators.
- Maintain the experience of our values above personal interests. REIR values are guidelines and actions that go against them are rejected and evidenced. In the same way, we do not allow other people to carry out activities under our name that do not reflect the experience of our values.
- Prioritize the well-being of our collaborators and co-workers, creating a healthy and pleasant environment that encourages personal development and the permanence of collaborators in the organization.
- Maintaining the health of our collaborators is beneficial to all, both them and the corporation.

RESPECT

- Recognize and grant the rights of all the people with whom we interact, without distinction within the organizational structure or outside it. It includes our interaction with clients, suppliers, and other people with whom we interact.
- Develop all our activities and businesses within a framework in respect of the law.
- Provide trust within the work teams, sharing information relevant to our sphere of influence and, at the same time, be ethically reciprocated with the proper handling of information.
- Promote work environments free of threats or violence in any of its forms, whether of inappropriate language, gestures, threats or physical or psychological violence.
- Prevent actions related to verbal, physical harassment, intimidation, hostility, requests for favors or sexual behaviors from taking place in our work environments, as these diminish the dignity of our collaborators and create an intimidating, hostile and offensive work environment.

CMI and those of us who adhere to its companies accept that joining as a team in living out our REIR values is something we wish to do for mutual convenience, exercising the principle of loyalty, complying with the conditions previously agreed upon, seeking that the work environment is positive and that the treatment is respectful and correct.

VI. APPLYING THE REIR VALUES TO OUR STAKEHOLDERS RELATED WITH THE COMPANY

WITH OUR SHAREHOLDERS

We are engaged with:

- Representing worthily our corporation anywhere and in any circumstance
- Accomplish and increase the value of the investment made by our shareholders





WITH OUR CLIENTS:

The success of our businesses depends on our ability to create solutions that satisfy the human needs and improve the quality of life.

We are engaged and offer our clients, products of high quality and services with competitive prices. We do it cordially and professionally, without any discriminations, pursuant to applicable laws and regulations, high rules, and standards in raw materials, processes, and products.

The needs of our clients are constantly changing. Therefore, we are alert to the demands of the market and use our creativity to satisfy those changing needs. We protect the information of our clients as cautiously as if they were our own.

WITH OUR COLLABORATORS

The exceptional quality of our human resources, capable, engaged and with a high performance is one of our priorities. In CMI, we always seek to make of our collaborators, better people. We are engaged in hiring, developing, and retaining the most qualified people. We aim to maximize the results through the provision of training and development opportunity. We keep a healthy, open, and honest relationship with our collaborators, providing them with a fair and dignified treatment.



WITH OUR SUPPLIERS:

We evaluate, select, and maintain the relationships with our suppliers, aiming to have a long-term bond where mutual economic interests prevail. We treat our suppliers with objectivity and honesty. We inform our suppliers about our Corporate Code of Ethics, making it clear that it includes the existing relationships with them. This way, we encourage a deal based on the same ethical path.

WITH THE STATE:

We are committed to complying with and respecting the laws and regulations established by the governments of the countries where we operate.

WITH THE COMMUNITIES:

We are good corporate citizens in all the communities where we have presence, acting in the spirit of “good neighbors”. In addition, we are committed to respecting local laws, rules and regulations, culture, and idiosyncrasies of the towns where we operate. This way, we demonstrate our commitment to neighboring communities, contributing responsibly to the effort to achieve developed communities that are respectful of their environment.



WITH THE ENVIRONMENT:

We are committed to safeguard the environment with which we interact in our operations, complying with the environmental and health laws in force in the countries in which we operate. This way we contribute to sustainable development through the efficient use of resources.

VII. APPLICATION GUIDELINES OF THE CODE OF ETHICS

All the collaborators must actively promote the Code with our coworkers to generate ethical work environments.

We must, with the periodicity determined by the Corporation, attend and participate in a participatory manner in activities related to Corporate Ethics and its Values, thus achieving knowledge of the subject to apply it in our daily lives.

If we see a collaborator violating the law or the Code, or if we are asked to do something that may violate them, we must immediately notify an authority in our Business Unit who will lead us to report it to the Ethics Committee in our country.

A. RESPONSIBLE PARTIES

The responsibility and strict compliance with this Code is of general observance and applies to everyone equally. At CMI we all live the responsibility and commitment to be an example of compliance with this Corporate Code of Ethics, complying with the ethical standards, practices and behaviors established in it and in other associated or complementary policies.

Business Unit Presidents

Each Presidency of the different Business Units of CMI promotes the participation of its collaborators in the activities related with the Corporate Code of Ethics, It seeks to make it known to all its staff, it facilitates it to become a daily practice manifested in their activities, conduct and behavior before the different interest groups.

Each Presidency receives annually from the Corporate Ethics Management, a report of the relevant activities made, including statistics over the participation of the collaborators of their corresponding Business Units.



The Ethics Corporate Committee

The Corporate Ethics Committee attends to queries and suggestions regarding this code and is responsible for its dissemination and updating, through the channels established for this purpose.

It is also responsible for knowing and disclosing the extraordinary behaviors of compliance and experience of our Code, as well as the adequate monitoring of the complaints presented for non-compliance with it, with the purpose of establishing its legitimacy and reasonableness. It is also in charge of approving the methodology that facilitates the dissemination, understanding and application of the Code.

The Corporate Ethics Committee ordinarily reports twice a year to the Corporate Presidents and the Executive Forum, extraordinarily the times it is called. Likewise, the committee will know of the monthly report of the Ethics Committees of each country.

Ethics Committees in each country or region

The Ethics Committees in each country or region will report ordinarily and monthly to the Corporate Ethics Committee and extraordinarily when it is considered necessary.

Managers, bosses, and supervisors

The managers, bosses and supervisors lead by the conduct standards expressed in this Code of Ethics, both in words as in actions. They are examples and models to follow, who show respect and consideration towards each one of our collaborators.

Acting with diligence to identify signs of any conduct not attached to this code and, if one is detected, acting correctly and discretely, informing opportunely to the area manager, the General Manager of the country or region Committee, or to the Corporate Ethics Committee.

Collaborators

All CMI collaborators live with the compromise of being permanent agents of change towards continuous improvement, living our REIR values.

We keep the experience of our values over our personal interests. Our REIR values are a guide, and the acts against such values are rejected and evidenced.

Likewise, we do not allow that under our name, other people make activities that do not reflect how we live our values.

B. LEADERSHIP BY EXAMPLE

All CMI Collaborators are agents of change, we promote and strengthen the ethic culture we want to promote through this Code, through practice and daily example.

C. ASPECTS NOT COVERED

The issues or situations which collaborators transmit to the consideration of the Corporate Ethics Committee, which are related with this Corporate Ethics Code and which are not established within its content, are analyzed and investigated and proceeds according to the criteria and the available elements, with the finality of taking a decision close to the spirit of living our REIR values.

D. REVIEWS AND UPDATES

The Corporate Ethics Committee reviews, adds, updates, and maintains the validity of the Corporate Ethics Code. These versions are made annually, and the modifications are incorporated with the periodicity which is considered necessary to accomplish consistency thereto.

E. DISCIPLINARY MEASURES

To live intensely through our values is beneficial both personally and to those surrounding us. Therefore, when a person has a prejudicial conduct for the corporation, these acts have consequences. The non-compliance of the Corporate Ethics Code is subject to the application of sanctions which go from a verbal or written notice, to dismissal or criminal or civil actions, according to the fault committed. The high impact will be evaluated by the Ethics Committee and will be elevated to the Corporate Presidents and/or the Boards of Directors for their knowledge and sanction, with the corresponding recommendation of the committee.

With the compromise of preserving our corporation with a culture where the REIR values are lived, it is our responsibility to inform of the faults observed which deteriorate the work environment.

F. BAD PRACTICES REPORT AND CONSULTATIONS

Reports on behalf of collaborators

All CMI collaborators have the right to report any contrary conduct to the content and/or spirit of this Code of Ethics, either as a witness or as an affected party. The personal and direct conversation is the privileged way and expected through which CMI Collaborators make reports of bad practices, since we are in an organization that, precisely in coherence with the Code of Ethics, favors the serious, respectful and trustable relationship between bosses and collaborators.

We exhort our collaborators to immediately report possible ethical problems so they may be resolved before more serious consequences develop.

Any person or authority in charge of a report made by a collaborator, must take care of it with readiness, handle it with discretion and canalize it towards the Ethics Committee of the Country or Region, always seeking the security, reliability and prestige both of collaborators as our organization.

Besides reporting bad practices, if our collaborators have a query or question over the application of this Code, they should also contact the manager of the area, the General Manager or the Ethics Corporate Manager to expose and resolve this matter.

In an exceptional manner, if conditions justify it, our collaborators may report bad practices anonymously, using the channels and formats established such as our email to report faults:

- **E-mail: communicate@cmihearsyou.com**
- **Telephone and voicemail: +1(214) 231-0066**
- **WhatsApp: (+51) 989-043-514**
- **Web: www.cmihearsyou.com**

Suppliers and Contractors Reports

On their behalf, we expect that suppliers, contractors, subcontractors and agents and its corresponding collaborators, also report as soon as possible, in a confidential or anonymous manner, any situation or behavior which, in its judgement, is in conflict with this code.

To report said faults it may be done directly or anonymous, making use of the channels established as the email mentioned above. In any case, the information will be handled in strictly confidence.

Exceptions

Our collaborators may request an exception to the sections of the Corporate Ethics Code. The requests must be presented in writing to the Corporate Ethics Committee on behalf of the collaborator and must contain the detail of all relevant facts and circumstances to support the exception requested. The Ethics Committee will respond in writing to the collaborator.

Remember that it is impossible to establish in a document –in any– the infinite variety of situations which may be presented in business or in personal life. The Corporate Ethics Code is a live document which may be permanently improved and, therefore, the collaboration of all of us is indispensable

G. CRITERIA FOR ACTION OF THE ETHICS COMMITTEE

As a guarantee for those who report bad practices and for those who are the subject of any of these reports, it is important to know that the Ethics Committee will always act based on the following internal principles:

a. Dignity of the person: In respect for the intrinsic dignity of every person, cases will be analyzed and dealt with extreme confidentiality and with respect for good reputation and professional prestige.

b. Prudence and equity: The circumstances of the event and the people involved, with their respective aggravating and mitigating factors, will be considered to make a fair but also effective decision. Each case and each person will be evaluated in a serious and responsible way to distinguish the different degrees of responsibility.

c. Requirement: The severity of the offense increases considering that the greater the authority, the greater the responsibility.

d. Performance report: A record of the sanctions applied will be kept serving as guidance for the Committee's decisions in the future; and,

e. Legality: Every decision of the ethics committee will be based on the legal system of the country where the events occur and the applicable international laws, treaties, and agreements.

VIII. ANNEX

POLICIES FROM EACH REIR VALUE

The purpose of implementing policies is to guide compliance with work routines, avoiding discretionary and arbitrary judgments to achieve effectiveness and efficiency.

And each of these policies has a reason for being and a direct link with REIR values.

Below we show how each REIR value becomes concrete and objective through the application of each policy. Only a brief definition of each policy is presented here, in the Corporate Policies Manual the content of each one of them is found. It is suggested to consult that manual for specifics and details.

1. POLICIES FROM THE RESPONSIBILITY VALUE

The Responsibility value is manifested in specific practices, included in the following policies:

a. Commitment with the environment

We are committed to protecting the environment with which we interact in our operations, we respect the environmental and health laws in force in the countries in which we operate.

b. Company equity and use of assets

We have a responsibility to protect CMI assets entrusted to us against loss, misuse, theft, or any other foreseeable and avoidable damage. CMI assets may never be used for inappropriate, unauthorized, personal, or law-breaking purposes.

c. Investments

CMI collaborators must avoid conflicts of interest when acting on behalf of the company in investment matters. They must prioritize the profit of the corporation.

d. Secure and healthy working environment

We place a high priority on the well-being of our collaborators. We strive to eliminate potential hazards and to provide a safe, healthy, and productive work environment. We comply with and frequently exceed occupational health and safety laws and regulations.

e. Social participation of our collaborators

We must be active and responsible citizens in the communities where we live. But we must take care that social participation, always in a personal capacity, does not conflict with our responsibilities towards the corporation. We will be careful with the use of the image, brands and logos of our companies and under no excuse will we use resources of the corporation to support personal activities of a civil, political, religious or any other nature.

f. Fight against corruption and money laundering

We do not pay bribes or facilitate corruption. We express our repudiation of any act of corruption and entailment to money laundering practices in our operations around the world.

g. Policy regarding bribery and extortion

Bribery

In accordance with the highest ethical standards and regarding the laws in force in the different countries where we operate, we establish that it is never lawful or tolerable for any of our collaborators, of any hierarchical level, to offer a bribe to a public official or an executive from any company, under any circumstances, regardless of the end pursued. We recognize that bribery creates a vicious cycle of loss of competitiveness that becomes widespread and affects society. That is why we reject it.

Extortions

In accordance with the highest ethical standards and regarding the laws in force in the different countries where we operate, we establish that it is not lawful or tolerable to give in to extortion by public officials or companies if there are alternatives or courses of action that can avoid giving in to extortion.

In this sense, our duty as collaborators of the corporation is to prudently and proactively avoid placing ourselves in a situation of being extorted, fully complying with any situation that could induce a corrupt person to demand payment from us. On the other hand, if the case of being extorted is presented, we must take the following measures:

- Gain time before yielding, time that should be used to consult
- Consult with our immediate managers and with the Ethics Committee if appropriate
- Think alternatives and design different courses of action that allow us to avoid giving in to extortion

h. Possession of weapons

No collaborator may carry weapons of any kind within the work facilities. Employees who, for security reasons, are armed, must report it in the appropriate format and present a copy of their license to carry weapons, complying with the law of each country where we operate and following the procedures established by CMI.

i. Internal and External Communication

- Information classified as confidential should not be disclosed in the internal communication media.
- Access to and dissemination of pornography and offensive materials through the company's communication channels, whether physical or electronic, are prohibited.
- It is forbidden to send information outside the work activity, whatever its nature, through the company's communication channels, whether physical or electronic.
- Our collaborators must be careful not to comment or disclose confidential information in social or informal gatherings, in restaurants, elevators, airplanes or any other place not appropriate for it.

j. Know your collaborator

The Corporate Risks area will prepare, with the knowledge and support of each employee, management and Human Resources, a file and a profile of the employee's personal risks that imply any risk for the organization. In agreement with the collaborator, the necessary measures will be taken so that potential risks are reduced or eliminated.

2. POLICIES FROM EXCELLENCE VALUE

The Excellence value is manifested in specific practices, included in the following policies:

a. Quality Policy

All CMI collaborators, to maintain quality and efficiency standards, must apply and comply with the specific quality policies that each of the Business Units and/or companies of the corporation have.

b. Search for an ethical environment (sanctions for non-compliance)

Living our values and principles intensely benefits us personally and those around us. That is why when a person engages in conduct that is harmful to the corporation, contrary to the content and/or the spirit of this code, their actions will have consequences.

All sanctions must be proportional to the offense, in accordance with human rights, the laws of the country where it operates and consistent with the internal labor regulations in force and approved by the country's labor authorities. These sanctions can go from a verbal or written call for attention, to dismissal and this, depending on the case, accompanied by civil or criminal actions. The Ethics Committee will be the entity responsible for ruling on the sanction that belong to the cases it is aware of, although the execution of the sanctions will always be the authority of the area manager or direct boss of the sanctioned person.

c. Policy of non-retaliation for reports of malpractice

No CMI collaborator, regardless of their position or title, may retaliate against any collaborator who in good faith has reported a violation of the Code of Ethics, whether in their position as a witness or affected by it. Nor may they retaliate against a member of the organization who collaborates in the investigation of a case of violation of the code. Incurring retaliation, of any kind or by whatever means, will be considered a serious offense against the Code of Ethics. However, any collaborator who intentionally reports a false report on a violation of the code of ethics will be sanctioned for serious misconduct against it.

d. Efficient use of time (avoid distractions)

The general criteria on the use of mobile phones and personal social networks of the collaborators are the following:

- That its use does not put the safety of people or equipment at risk.
- That its use does not entail loss of time that should be dedicated to the company.
- That its use does not interrupt training or teamwork activities.

e. Protect the Corporation's image in personal social networks

The general criteria on the use of personal social networks of the collaborators are the following::

- That its use does not put the safety of people or equipment at risk.
- That its use does not entail loss of time dedicated to the corporation
- That what is published on social networks does not put the reputation of our companies at risk

- That denigrating or offensive comments are not published against the corporation's companies or its collaborators.
- That the images published by the collaborators in their personal social networks do not include logos of the corporation's companies, photos of facilities, territorial maps, process maps or any other image related to the companies, which is protected by the rights of intellectual property or by the confidentiality agreement that has been established with the collaborator or that is considered confidential information.

f. Policy to support the eradication of child labor

CMI companies are committed to complying with current national and international laws aimed at the eradication of child labor, consistent in turn with ILO Convention 182 on the worst forms of child labor and with Convention 138 of the ILO on the minimum age for admission to employment. Furthermore, our corporation invites its customers and suppliers to follow these good practices.

g. Fiscal Policy:

At CMI we fully, correctly, and timely comply with tax obligations through responsible and optimal fiscal management, respecting the laws and contributing to the social and economic development of the countries where we operate.

3. POLICIES FROM INTEGRITY VALUE

The Integrity value is manifested in concrete practices, included in the following policies:

a. Conflict of Interest Prevention Policy

We have the responsibility, with all interested parties in our company, to make decisions strictly based on the best interest of the corporation and its various Business Units, regardless of personal gain.

Our decisions will be based on objective criteria such as the suitability of the product or service, price, delivery terms and quality.

Marriage, personal relationships, and other type of kinship between collaborators

A conflict of interest could arise when a collaborator supervises their own spouse, boyfriend/girlfriend or other relative; when the decisions of one of them could discretionally benefit the other; or when the work decisions of one of them depends on critical information that is in the possession of the other and they would not have access to it, if it were not informally thanks to kinship. To prevent this conflict from arising, collaborators who find themselves in this situation must declare their relationship to their respective bosses, who in turn will make the necessary queries to the Ethics Committee. There it will be decided which options are viable and mutually beneficial to avoid conflict of interest. Failure to disclose this situation would be a lack of loyalty to the company and would be subject to the sanctions that the Committee decides in due course.

Business relationships, kinship, or personal relationships with suppliers

The purchasing process in all the companies that make up CMI is a strategic element for the business. For this reason, we always try to buy with the best price, the best quality, and the best service. To do this, we interact with our suppliers in an objective, standardized and measurable way, which allows long-term relationships, based on the benefit of both parties.

A conflict of interest is considered to exist when our collaborators have an interest in the business of a supplier or client. When we or our relatives of affinity and consanguinity have a commercial interest in any organization or are hired by any other company that does or seeks to do business with this corporation, we must disclose this information in writing to the Ethics Committee. This procedure is necessary to determine if there is a problem or if it could arise.

It is not allowed to have owned or joint businesses both inside and outside the corporation's facilities, the sale or service of which is intended for the collaborators themselves or third parties.

No collaborator may use for their benefit or that of third parties, discounts or special deals with suppliers of the corporation, as a consequence of their participation in the decision process to purchase goods, supplies, raw materials and/or services; or, for having favored or recommended the purchase of them.

Purchase contracts must be documented and must clearly identify the services or products to be provided, the terms of payment, and the rate or fees. The payment must be equitable with the services or products that are provided. Our purchase choice must not be influenced by reasons of friendship or kinship with the supplier or by the promise of commissions, bribes, or gifts of any kind.

Our collaborators are obliged to report any conflict, violation, lack, anomalous or irregular activity that any of our collaborators and/or suppliers exercise in contradiction with the spirit of this Code and/or of this policy.

Kinship relationships with people who work in the competition

When some of our relatives of affinity or consanguinity work or are hired by companies that are in the same business line as the Business Unit to which the collaborator belongs, we must disclose this information in writing with Human Resources of our respective place of work. This procedure is necessary to determine if there is a problem or if one could arise.

Outside employment and property or participation of businesses

You must not own or participate in businesses that compete or create a conflict of interest with CMI's businesses. You must not engage in any outside employment that may interfere with your regular job performance. This can create a significant problem, create an unfair trade disadvantage, reflect unfavorably on the corporation, subject it to public criticism or put the corporation in trouble, except when it has previously been made known to the competent authority within our respective Unit of Business and has previously issued authorizations.

b. Policy on gifts, favors, payments, meals, entertainment

Request gifts and other benefits

Employees of CMI companies will not use their position or their influence to request from a client, supplier, or public official, cash, gifts, travel, courtesy passes, invitations to activities or services, in addition to those legally agreed upon, to a client, supplier or public official for the benefit of the company or for the benefit of himself, his family or a personal friend.

Receive gifts, meals, or invitations

Employees of CMI companies will not accept gifts or courtesies of a type, price, or magnitude that their acceptance could bias the employee's judgment to the detriment of the interests of the group companies

Gifts and courtesies of reasonable economic value, with the supplier's logo or even without a logo, will be tolerated, since the reception of these, do not mean for us that any commitment or bias of our criteria is established but, on the contrary, receiving them sends a message of cordiality and good manners.

Sharing the gifts received with the other colleagues of the work team to which one belongs, is a practice that contributes to strengthening relationships with the members of the teams that we are part of and interact with.

If a supplier offers some type of additional benefit explicitly, they will try not to accept it but if it were the case, they will be asked to deliver it, noting that the company will decide the use or destination in accordance with "Our Code of Ethics, REIR".

Reasonable invitations to business-related meetings, conventions, conferences, or product or service training seminars may be accepted by following the following guidelines:

The invitation and participation must be prior knowledge of the immediate superior and have their explicit approval.

The purpose pursued is concrete and directly linked to the business.

Attending or participating in these events does not jeopardize the fulfillment of work duties or reduce their quality at the time or after the event.

The event attended is of such a type or category that if it were published on the media or social networks, it would not jeopardize the reputation of CMI or the collaborator himself.

The CMI employee who attends will refrain from ingesting alcoholic beverages in amounts that put their self-control and ability to reason at risk, since they are representing the corporation.

It will be ensured that participation in these events is in the company of one more person from the group companies.

Invitations to social, cultural, or sporting events can be accepted if the following standards are met:

- That the total costs incurred (food, accommodation, transportation) will be covered by the inviting company or the guest's personal capacity.
- The invitation and participation must be prior knowledge of the immediate superior and have their explicit approval.
- The purpose pursued is concrete and directly linked to the business.
- Attending or participating in these events does not jeopardize the fulfillment of job duties or reduce their quality at the time or after the event.
- The event attended is of such a type or category that if it were published on the media or social networks, it would not jeopardize the reputation of CMI or the collaborator himself.
- The CMI employee who attends will refrain from ingesting alcoholic beverages in amounts that put their self-control and reasoning capacity at risk, since in any case they represent the corporation.
- It will be ensured that participation in these events is in the company of one more person from the group companies.
- It is allowed to accept invitations to activities, if they do not conflict with morals and good customs and promote good working relationships with clients, suppliers and contractors. Participation in these activities must be with the full knowledge and consent of their superiors.

Offering gifts, meals, or other benefits

CMI companies may offer gifts, meals or other benefits to employees, suppliers, clients, or public officials if the following standards are met:

- That the intention sought is to have a brand positioning using ethical and legal means.
- That the intention is neither in form nor in substance to bribe.
- That the delivery of the gift, meal or benefit does not generate any type of dependence on the recipient towards CMI companies or put into question their independence of criteria or freedom of decision.

- That the type or category of the gift, meal or benefit is fully known and approved by the management of the company in question.
- That the gift, food, or benefit is in accordance with the ethics of the Corporation and with good customs.
- That the quantity or frequency of delivery of these gifts, meals or benefits is within the strict limits of the approved budget.
- That the delivery of the gift, food, or benefit is of such a type that if it were published in the media or social networks, it would not put at risk the reputation of the corporation or the manager or collaborator involved.
- That the delivery of the gift, food or benefit does not go against the customs and laws of the country where it operates, nor against the ethical standards of the company for which the recipient works, nor against the religious or moral principles of the addressee.

ANY QUESTIONS OR CONCERNS REGARDING THE INTERPRETATION OF THIS POLICY AND ITS REQUIREMENTS SHOULD BE REFERRED TO THE ETHICS COMMITTEE.

c. Use of time, materials, and equipment from the corporation

We must prevent theft, fraudulent or negligent use of property, equipment, and materials of the Corporation, to keep costs low and be more competitive.

We encourage the diligent use of time and that all collaborators carry out their work efficiently and with their best effort.

d. Ownership of the information resources of the corporation

The information resources, including without restriction its computer system, hardware, software use licenses and data stored on devices or disks and all other publications created in the corporation and multimedia products are the exclusive property of CMI. These systems and digital content must be protected by their direct users, always and with proactive and preventive measures, against intentional damage, theft, fraudulent manipulation, unauthorized access and against foreseeable and avoidable deterioration.

The software should only be used in accordance with the terms of its license. Any duplication of protected software, except for backup and filing purposes, is a violation of copyright law and is contrary to the standards of our corporation.

e. Truthfulness in registries and information

All our records, accounting and financial reports must be audited and must reflect the reality of our operations. Altering, manipulating, falsifying, making fraudulent records or hiding information of this type will be considered a crime and, therefore, a serious breach of this Code.

We are committed to offering communications about this information that are complete, reasonable, timely and understandable, strictly directed only to those who have a legitimate right to know them, using common sense and good judgment when preparing said reports.

4. POLICIES FROM RESPECT VALUE

The Respect value is expressed in concrete practices, included in the following policies:

a. Respect to people and their rights

Respect for the person and their rights is the first principle that we must observe. At CMI, the rights of all people are deeply respected, regardless of their location in the organizational structure or outside of it. Any member of the corporation will be treated as an equal and as a worthy representative of the same. We give a similar and supportive treatment to all people, under equal conditions, without arbitrary discrimination based on ethnic origin, social position, sex, or religion. This equality in treatment should not be confused with equality in working conditions, as these will be delimited by the position for which each collaborator has been hired. The applicability of this principle includes our interaction with customers, suppliers, communities, and other people with whom we interact.

b. Respect to individual Liberty

CMI is a corporation of free people, who fight for personal and collective improvement and excellence, in an environment of freedom and respect, where we also respect creeds and political affiliations, which we consider an expression of said freedom. Individual freedom is the basic right to fight for the overcoming of the moral and material conditions of the individuals that make up the corporation. At CMI we respect all individual freedom that does not contravene the law and that does not affect the individual freedom of others.

c. Policy against abuse and sexual harassment

We promote work environments free of violence and threats in any of its forms. Inappropriate language, gestures, threats of violence, or physical violence will not be tolerated.

Under no circumstances do we accept sexual harassment, harassment or abuse in any of its expressions or forms: verbal harassment, physical harassment, intimidation, hostility, request for favors or sexual conduct conditional on employment, performance evaluations, promotions, or other conduct that interfere with the work performance of employees, offend their dignity or create an intimidating, hostile or offensive work environment.

d. Policy regarding Confidentiality

We must safeguard all information that is not public knowledge, limiting access to it only to people who must know of it for work reasons. It is proprietary information that is not public knowledge, that is useful to CMI and that could be of use to the competition. This includes information that has been entrusted to us by suppliers, customers or third parties. The obligation to protect proprietary information subsists even when the employment relationship has ended, within the term established in the confidentiality agreement with each collaborator.

When a collaborator is required, regardless of their level or position, they must sign a confidentiality agreement for the information to which they have access.

Any supplier of goods or services must sign, prior to hiring, a confidentiality agreement, by means of which they undertake to keep all the information we provide them as professional secret.

Particularly, confidential information includes:

- Accounting, financial and budget information
- Negotiations with suppliers and customers
- Organizational systems, goals, and strategic objectives
- Information on planning, strategic plans, mergers, acquisitions, associations, comprehensive improvement projects, organizational changes, expansion, or growth projects.
- Marketing strategies, costs, and marketing of our products
- Manuals, compendia and material that are part of information policies, processes, and systems.
- Production formulations
- Training or training manuals
- Personal information of collaborators
- Other documents or information classified as confidential

IX. GLOSSARY

Applicability: quality of applicable.

Apply: Employ, manage or put into practice a knowledge, measure, or principle, to obtain a certain effect or performance in someone or something.

Coherence: logical attitude and consistent with the principles that are professed

Confidential: What is done or said in the confidence that what is done or said will be kept confidential.

Congruence: Convenience, coherence, logical relationship.

Everyday: Daily

Diligence: Care and activity in executing something

Environment: Environment, which surrounds you

Show evidence: Make patent and manifest the certainty of something; try and show that it is not only true, but clear

Exhort: Encourage someone with words to do or stop doing something.

Rationale: Main reason or motive with which it is intended to consolidate and secure something.

Suitable: Appropriate for something

Inescapable: That cannot be avoided

Intrinsic: intimate, essential

Legacy: That which is left or transmitted to the successors, whether material or immaterial

Objectivity: Belonging to or relating to the object itself, regardless of one's own way of thinking or feeling

Plasma: Mold a matter to give it a certain shape, figuratively.

Reasoning: action and effect of using reason to know and judge

Protect: Defend, protect.

Safeguard: Defend, protect, protect something or someone

