

Code of Ethics for Suppliers

Grupo ClarkeModet (hereinafter, ClarkeModet or the Company), comprising the parent company and its subsidiaries, has a regulatory compliance system that promotes and ensures compliance with applicable law, internal regulations, and internationally accepted ethical standards among its employees and business partners.

ClarkeModet requires its suppliers to adhere to this Code of Ethics to collaborate with us in applying a culture of ethics and compliance in their professional performance.

The ClarkeModet supplier commits to complying with the following ethical principles in its professional performance.

1 Protection and Defense of Human Rights and Fundamental Freedoms

Suppliers should act at any moment respecting and guaranteeing Fundamental Rights, and Civil Liberties recognized internationally.

2 Labor Rights

+ Respecting Workers' Rights

Suppliers should comply with labor and occupational risk prevention legislation, respecting the right of association, collective bargaining, and freedom of association of their workers.

Likewise, they commit to observe the provisions of the International Labor Organization, especially those related to child labor, prohibiting any child labor and forced labor.

+ Equality and non-discrimination. Diversity and inclusion

Suppliers should promote the principles of equality, diversity, and inclusion by ensuring a respectful work environment, free of violence and free of any discrimination based on gender, race, religion, culture, age, disability, or any other.

+ Occupational health and safety

Suppliers commit to comply with applicable occupational health and safety legislation and should have occupational risk prevention programs appropriate to their business and legislation.

3 Transparency and Good Governance

+ Action in case of conflict of interest

ClarkeModet suppliers should not have common economic or personal interests with the Company's employees that could imply or conflict with the Company's interests and do not guarantee objectivity and impartiality in their activities.

Suppliers are committed to informing the Company of any potential conflict of interest.

+ Gifts, presents, and hospitality

ClarkeModet has an invitation and gift policy that aims to contribute transparency and integrity in its relations with third parties.

Under this policy, employees and collaborators may only accept gifts, invitations, or presents from private entities as long as they are reasonable, proportionate, transparent, and based on good faith.

Therefore, the Company's suppliers may only offer or accept gifts or entertainment under our gift policy, and under any circumstances shall gifts or entertainment that may influence business relationships to be accepted or offered.

+ Prevention of corruption and bribery

ClarkeModet has a zero-tolerance policy regarding the offering and acceptance of bribes and corporate corruption.

Suppliers should ensure compliance with applicable legislation in this matter and adopt internal measures to prevent and detect bribery and corporate corruption in developing their activities.

Suppliers commit not to make or offer, directly or indirectly, any benefit to any person in the service of a public or semi-public company or any public entity to obtain or maintain business or advantages unlawfully.

Likewise, they also commit to facilitate and support cooperation and assistance in the prevention and fight against corporate corruption, promoting integrity and proper management of the Company's property and assets.

+ Prevention of money laundering and terrorist financing

Suppliers should comply with the regulations for the prevention of money laundering and the financing of terrorism in force at any given time.

Suppliers should monitor and take measures, if necessary, on those cases or situations that may indicate a lack of integrity of persons or entities with whom they are doing business, whether customers, suppliers, or collaborators.

To facilitate the collection of information by the Company, suppliers should send information regarding their identity, ultimate owners, and activity and any other information that should be legally collected to prevent money laundering and financing of terrorism.

+ Transparency and integrity of financial information

Suppliers commit to comply with tax and accounting legislation, ensuring the timely payment of taxes, fees, and public prices.

Likewise, they commit to verifying that all economic operations generated are recorded according to the established accounting rules or policies and not to consent or authorize false or misleading entries.

+ Respecting industrial property rights

ClarkeModet respects industrial property rights and is committed to their protection.

Suppliers should guarantee that goods or services they are going to provide do not infringe the industrial property rights or trade secrets of third parties and have all the rights and permits where applicable.

Likewise, they commit to adopting the necessary measures to inform their employees and, where appropriate, outsourcings about the obligation to protect and respect third parties' industrial property rights and trade secrets.

+ Environment

Suppliers should encourage a sustainable economy and promote the reduction of harmful materials and any negative impact their activity may have on the ecosystem.

+ Compliance with standards of ethics

The Company requires its suppliers to observe the standards of ethics of their professional activity.

The execution of the work entrusted should be carried out with diligence and professionalism, faithfully informing the Company on the status of the matters managed, avoiding conflicts of interest and conduct that may damage the good name and reputation of ClarkeModet.

+ Compliance with current legislation and regulations

Suppliers should comply with the current legislation at all times during the development of their professional activity.

4 Information Protection

ClarkeModet is committed to protecting confidential information and personal data. Likewise, we have an information security management system that guarantees its safeguarding.

The Company's suppliers should maintain absolute confidentiality on all "confidential data" to which they have access of any kind, both of the Company and Third Parties, with at least the same diligence as if it were their information. They commit to enforcing the same terms in outsourcing or sharing information with their advisors and auditors.

Likewise, suppliers commit to comply and respect at all times the applicable legislation on Personal Data Protection, about all personal data they manage or to which they have access in the course of their work.

Suppliers should adopt internal measures to ensure the integrity, confidentiality, and availability of the data they manage, which may not be less than those adopted for their information.

5 Relations with Third Parties

ClarkeModet respects and encourages free competition and participation, as well as loyal competition.

Suppliers should ensure fair and free competition by avoiding unfair acts or behaviors and always act under fair and loyal competition criteria, respecting the rules established in the market.

6 Use of the Ethical Channel

ClarkeModet has a channel through which suppliers can raise doubts or concerns about compliance with the Code of Ethics and our Company's regulations and report any irregularities detected in this regard.

This channel is available on the Company's website and has all the guarantees of confidentiality and protection of the informant.

The supplier commits to inform the channel of any circumstance he/she detects.

I have read and understood the contents of the Code of Ethics of ClarkeModet and agree to comply with the obligations set forth therein.