



**Code of Ethics for Vendors
Procurement
Code**

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| Last Amendment: October, 2012 | Código COD-COM-005 |
| Last Amended: October 2021 | |
| Review No. Three | Next Review: October 2023 |

**Code of Ethics for Vendors of Becele
and its Affiliate Companies**

Becele, S.A.B. de C.V. and its subsidiary companies, hereinafter “Becele” generated a Code of Ethics for Vendors, which details the way of doing business that it considers correct and adequate. All vendors must be familiarized with this Code and govern their conduct by the guidelines arising from it and provided herein.

This document is provided to the vendor: **(vendor name)** for the purpose of complying with and applying the principles, and encouraging them to adhere to the values mentioned herein that are practiced in Becele, S.A.B. de C.V. Observing and complying with these rules will enable us to share the best global business practices.

I. BUSINESS INTEGRITY

HONESTY:

All information provided to us must be precise, true, and complete, abstaining from sending deceitful messages and communications, omitting important information, or making misrepresentations.

CONFIDENTIALITY:

Protecting as if it were of its own, all information that Becele and its affiliate companies, its business partners, and clients entrust to the vendor, on the understanding that such information is provided on a confidential basis and to be shared on a restricted basis, therefore, the vendor commits to safeguard all kinds of information, such as designs, developments, promotions, amounts, manufacturing, storage, security, transportation, sale prices, etc. of Becele and its affiliate companies that were disclosed to the vendor. Such information may not be disclosed to any third party without the prior written consent of Becele and its affiliate companies.

SERVICE:

- Our main interest is that vendor provides to us suitable products and services with excellent quality, delivery time, and a fair price, under the agreed terms and conditions.
- The vendor must comply with the policies and procedures that Becele and its affiliated companies inform to them and, as applicable, the vendor must request such information and documents in order not to breach these.
- All developments arising from work for hire that results in an invention, improvement, discovery, or work being made or created, will be the exclusive property of Becele and its affiliate companies, and its reproduction, use, or registration by the vendor is prohibited.
- It is the responsibility of the vendor to execute the work plans recommended by Becele and its affiliated companies based on the areas of opportunity detected in their “Performance Evaluation” or in any audit made by the relevant teams.



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CONFLICTS OF INTEREST:

Immediately reporting the existence of a family, friendly, or other relationship, whether prior or present, between: officers and employees, hired or outsourced personnel, or if the vendor has a business relationship with any officer or employee of Becele and its affiliated companies.

GIFTS AND/OR PREFERENTIAL TREATMENT:

For the purpose of maintaining full independence of the business and preventing our personnel from being compromised in any business relationship, vendors of Becele and its affiliate companies, their employees must comply with the following:

- Not to give: preferential treatment both inside and outside of the company, gifts, objects of value, entertainment, or recreational activities, favors, or other courtesies, discounts, loans, payments, goods and services to the personnel or to the officers of Becele and its affiliated companies, or allow any family member or friend to accept them on their behalf, in exchange for business relationships.
- Reject invitations for meals and/or courtesies that may have or have the intention of influencing decisions that put personal interests ahead of those of Becele and its affiliated companies and vendors.
- The employees of Becele and its affiliated companies are not allowed to personally hire vendors that the company hires, if such personnel directly participates in commercial, logistics, and/or business dealings with them. Such restriction is for the purpose of not obtaining personal benefits or exercising coercion upon the vendor, using their position in the organization, and leading to a relationship and conflict of interest between parties.

INTEGRITY:

- Reject businesses with third parties that may affect the image of Becele and its affiliated companies.
- Not to offer or give to the employees of Becele and its affiliated companies interests, fees, or any other similar thing, which may be considered payment of bribes that corrupts the personnel or third parties.
- Software licenses used for the exclusive use of Becele and its affiliated companies must comply with Mexican and international law and their reproduction or copy, or illegal installation is prohibited, as well as any violation of license agreements.

II. HUMAN RIGHTS AND LABOR CONDITIONS

Vendors of Becele and its affiliated companies shall support and respect the protection of fundamental human rights and not be complicit in violation of such rights.



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DISCRIMINATION:

- Vendors must not discriminate any employee based on their race, color, age, gender, sexual orientation, belonging to an ethnic group, disability, religion, political affiliation, union affiliation, and/or marital status.
- Vendors must not restrict employment opportunities due to pregnancy, viral diseases, or other similar circumstances unless it puts their health at risk.
- Vendors shall provide their employees adequate workplaces, and equality of opportunities to access promotions, prizes, benefits, training, and compensation.

HARASSMENT:

- Vendors shall promote a harassment-free work environment for their employees.
- Vendors shall not threaten their employees, or submit them to inhumane conditions such as sexual abuse, physical and mental punishment, verbal abuse, or coercion of any kind.

VOLUNTARY WORK:

- Vendors must not force their employees to perform work that is not voluntarily accepted by them, and they shall also allow their employees the freedom to terminate their employment relationship voluntarily.
- Vendors must not condition the work of their employees to providing and withholding official documents such as passport, IDs, professional licenses, etc.

HIRING MINORS:

Vendors must not hire minors without the consent from their parents and they do, the shall respect the applicable labor law regarding hiring minors and the agreements of the International Labour Organization.

COMPENSATION:

- Vendors shall pay their employees wages, benefits, and overtime in accordance with applicable law, complying with the provisions on minimum wage and working hours.
- Vendors shall communicate and respect the conditions agreed with their employees regarding the payment bases, method, and times of payment.

FREEDOM OF ASSOCIATION:

- Vendors shall respect the right of employees to freely associate, to join labor associations that seek collective representation and bargaining in accordance with applicable local law.
- Vendors shall not discriminate their employees if they belong to any association, or require them to not belong to any union.



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III. HEALTH AND SAFETY

WORKING HOURS:

- Vendors must not require their employees to work more than 60 hours a week, including overtime, except in emergency situations, or exceed the work hours contemplated by applicable law.
- Vendors shall grant one free day per week to their employees, in addition to vacations, holidays, and absence permits in accordance with applicable laws.

IV. IMPACT ON THE ENVIRONMENT AND SUPPLY CHAIN SUSTAINABILITY

Vendors shall maintain a preventive focus for the benefit of the environment, promoting initiatives for promotion of greater environmental responsibility and must favor the development and dissemination of technologies that are respectful to the environment.

V. COMMUNICATION AND REPORTING OF INAPPROPRIATE CONDUCTS

Becle and its affiliated companies have as fundamental goals the ethics, the transparency, and the respect of its vendors. Therefore, it has the openness so you to have trust in reporting any incident or violation to the principles of this Code.

For such purpose, Becle and its affiliated companies will be responsible for addressing and investigating such cases with proper objectivity and depth, keeping discretion and confidentiality as required to obtain grounded evidence, not incurring in retaliation as a result for reporting of legitimate issues or concerns with respect to ethical problems or for reporting any suspicion or violation.

INFORMATION TO THIRD PARTIES:

Vendors of Becle and its affiliated companies are required to comply with all applicable legal, tax, and contractual law for the purpose of preserving ethical principles such as business philosophy. Therefore, they shall not do business in violation of the law, and use third parties to commit forbidden acts. The commitment is to maintain an open and ethical respectful relationship with the authorities.



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ETHICS HOTLINE

Nowadays, companies suffer from cases of inappropriate conducts, sometimes intentionally, and sometimes due to errors committed by persons.

If you find out something that does not seem correct or that violates our Values, report it to the Company. This is especially important if you believe that somebody is not complying with the law, our Code of conduct, or the policies of our Company.

Many times, timely reports help assist a colleague or the Company to resolve a problem quickly and minimize the consequences of an unethical or illegal conduct.

The Ethics Hotline is a communication channel that you may use to report a potential improper conduct or violation of the Code of Conduct, of our policies, or the law.

Below are some ways to contact the ethics hotline to receive any observation or comment in this respect:

1. Toll-Free Telephone Line: 800 523 8422
2. Website: <https://www.tipsanonimos.com/lineaetica>
3. Tips Mobile-App ID: 0936
4. Email: lineaetica@tipsanonimos.com
5. Fax: (55) 5255 1322
6. Postal Code: Galaz, Yamazaki, Ruiz Urquiza, S.C., A.P. (CON-080), Ciudad de México, C.P.06401

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I state that I have read each page contained in the Code of Ethics for Vendors, for the purpose of committing to compliance with and application of the principles, and adhering to the values, during the time that my relationship as a vendor of Becele, S.A.B. de C.V. and its affiliate companies lasts.

Vendor's Name
Name and Signature of the Legal Representative

Original: File of the vendor