



## Code of Conduct for Suppliers

VIAKEM S.A. de C.V.

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## 1. MAIN OBJECTIVE

This Code (The Code) is focused on reinforcing the provisions established in current internal and external regulations, with the purpose of establishing the ethical behaviors that are expected of our suppliers, contractors, consultants or intermediaries (the Suppliers) of goods or services of Viakem directly or indirectly and establish the guidelines that should govern the commercial relationship, the foregoing in accordance with the provisions of the Mexican regulations on Anti-Corruption (General Law of the National Anti-Corruption System and the General Law of Administrative Responsibilities) and international (FCPA and UK Bribery Act) as well as the Viakem Code of Ethics and Conduct.

Viakem distinguishes itself by adhering to the best business practices, therefore it expects the commitment of its Suppliers to share and adopt the spirit of our ethical commitment and integrity, as well as adhere to Viakem's Code of Ethics and Conduct, while conducting business with or on behalf of Viakem. Therefore, commercial operations with Suppliers must be established using selection criteria regarding quality, competence, impartiality, experience, and economic aspects.

## 2. SCOPE

Viakem's direct and indirect Suppliers (and their representatives) are obliged to carry out their commercial activities adhering to their conduct in accordance with the principles contained in this Code, for which reason it is also observant for the subcontractors with whom the Suppliers work and Suppliers in the provision of services to Viakem.

## 3. COMPLIANCE PRACTICES FOR SUPPLIERS

Suppliers during the term of the contract for the provision of services with Viakem, in addition to complying with their contractual obligations, must without any limitation:

- Know, respect, and adhere to the guidelines established in Viakem's Code of Ethics and Conduct.
- Comply with the anti-corruption laws of the countries in which they do business and not make payments or promises of payment, either directly or indirectly to public officials with the purpose of inducing people to misuse their position to obtain or retain business.
- Comply with all labor laws and regulations (minimum wages, working hours, salary, etc.), as well as those referring to guaranteeing the protection of internationally



proclaimed human rights, such as the prohibition of forced labor, human trafficking, decent work, unfair working hours and child employment.

- Have a work environment free of abuse or harassment in any of its forms, psychosocial risks, and discrimination.
- Provide a safe and healthy work environment and fully comply with all applicable health and safety laws, regulations, and practices. Appropriate measures must be taken to minimize the causes of danger inherent in the work environment.
- Prohibit the use, possession, distribution and/or sale of illegal drugs while on Viakem property or lease.
- Pay workers at least the minimum compensation required by law and provide all benefits required by law.
- Respect the rights of all employees to legally or not associate with groups of their choosing, provided such groups are permitted by law.
- Compliance with laws, regulations and special provisions regarding money laundering, intellectual property, extortion, terrorist financing, among other issues.
- Compliance with the law on the protection of personal data held by individuals.
- Comply with all applicable trade controls and laws, as well as export and import related requirements.
- At the business level, work in full compliance with the antitrust and fair competition laws that apply in the jurisdictions in which they do business.
- Comply with all environmental laws and regulations applicable to hazardous materials, gas emissions, waste dumping, and contaminated water, including the manufacture, transportation, storage, disposal, and release of these materials into the environment.
- Record and transmit honestly and accurately all commercial information and comply with current laws regarding the formalization and accuracy of this commercial information.
- Create, preserve, and keep available the business books and records related to Viakem, in full compliance with all legal and regulatory requirements in force.



- Avoid conflicts of interest. Suppliers will not deal directly with Viakem employees whose spouse, partner, or other family member or relative has a significant financial interest in the suppliers' business.
- Suppliers must have quality assurance processes to detect, communicate and correct defects in order to guarantee the delivery of products and services that meet contractual quality, as well as legal requirements.
- Prohibit illegal evictions and illegal occupation of land, forests, and water.
- Take reasonable steps not to supply products, materials or derivatives that are considered to be in conflict or from conflicting sources.
- Suppliers must not subcontract to third parties to perform the work or service for which they were contracted without Viakem's prior approval and when this subcontracting takes place (prior authorization) it must be limited to only one level ensuring that the subcontracted third party complies with all the aspects established in this Code of Conduct.
- Prohibit all types of illegal activity such as, but not limited to, bribery, corruption, fraud, money laundering, etc.
- Follow all applicable foreign laws to which Suppliers or Viakem may be subject.
- The supplier must ensure that its employees know and understand this Code of Conduct for Suppliers.
- Have a system and management control to promote and facilitate compliance with the provisions of this Code.
- Have an Ethics Line to be able to report violations or suspicions of conduct that goes against what is established in the Code. Any report received must be treated with absolute discretion and free of retaliations.

#### 4. OCCUPATIONAL HEALTH AND SAFETY

Suppliers must comply with the regulations on Safety and Civil Protection, as well as have programs to guarantee that all activities are carried out with the necessary security measures, in addition to having established internal rules of conduct, facilitating healthy



work environments and promote that actions that put physical integrity at risk or that harm or affect people are not carried out.

We strive for healthy labor practices and fair treatment of employees, following the highest standards in accordance with local laws, maintaining working hours no longer than established.

Suppliers must pay each of their employees at least the minimum wage and provide them with the minimum benefits required by applicable law.

## 5. IMPORT AND EXPORT COMPLIANCE

Suppliers must conduct business in compliance with all applicable laws and regulations governing:

- (a) the export of goods, technical data, software, and services.
- (b) importation of goods.
- (c) economic sanctions and embargoes; and
- (d) US regulatory requirements.

Viakem may request evidence of compliance in accordance with the service contracts in place.

Viakem's position is emphasized against the practice of forced labor within any part of the supply chain and not having commercial relations with countries with full or partial sanctions (embargoes).

## 6. ENVIRONMENTAL COMPLIANCE

Viakem's policy in environmental matters is to provide security and reduce negative impacts on the earth, its waters and the atmosphere, using resources appropriately and following appropriate waste management practices, for which Suppliers must develop its operations without causing damage to nature, promoting prevention, care, control and reduction of direct and indirect impacts on the environment.

Viakem will favor those Suppliers who share its commitment to preserve the environment by reducing, reusing, and recycling, therefore Vendors are encouraged to reduce excess packaging, use non-toxic materials and, whenever possible, be respectful of environment.

Suppliers must measure the impact on the environment with respect to their normal operations to the extent that they are related to services provided to Viakem, establishing



objectives to identify and minimize it, in order to generate opportunities for improvement in the use of energy efficient sources.

## 7. CONFLICT OF INTEREST

Suppliers must avoid becoming involved in situations that may create an actual, potential, or apparent conflict of interest with Viakem. There is a conflict of interest when Suppliers perform any of the following actions or, knowing of their existence, do not report them:

- Carry out operations with clients, competitors, Suppliers or Viakem collaborators, outside of a healthy commercial relationship, with the purpose of obtaining a personal benefit for them, for a family member or for third parties.
- Possess shares belonging to Viakem, except in the cases in which they are acquired through the stock market.
- Perform functions of director, secretary, director in Viakem, without having the express authorization of Viakem.
- Grant or request loans from Viakem collaborators.
- Be aware of the existence of a family relationship between collaborators of both parties, and do not report it to Viakem before or during the business relationship.
- Any Supplier who discovers a situation of conflict of interest or a potential conflict of interest must notify Viakem.

## 8. ANTI-CORRUPTION COMPLIANCE

Viakem prides itself on conducting all its operations and business relationships ethically, therefore, all commercial operations carried out with its suppliers must adhere to current laws on bribery and corruption.

It is prohibited for suppliers on behalf of Viakem, or with the instruments, resources or tools provided, to carry out the following conduct:

- Bribe public officials, Viakem collaborators and/or any other third party or engage in acts of corruption (including the management of authorizations, permits and concessions to carry out projects or events, or in evaluation, inspection, or accountability activities of any type).



- They must not give economic gratuities or gifts, grant services or privileges, assume debts or obligations to any public or private official on behalf of Viakem, to obtain an improper advantage, an incorrect decision, or the evasion of compliance with a legal, administrative, or judicial.

The participation of the suppliers in acts of bribery or corruption will result in the termination of the commercial relationship with Viakem. In addition, of the measures that legally proceed.

Suppliers must refrain from offering a gift if there is a risk that it will be considered or perceived as a bribe. In accordance with our policies, Viakem employees must not request or accept hospitality, special treatment or gifts, discounts, bonuses, gratuities, meals, merchandise, trips, etc., and under no circumstances are they allowed to accept cash gifts.

It is also prohibited for Viakem Suppliers to accept invitations to shows, theater tickets or sporting events, as well as courtesies or compensation of any kind.

## 9. HANDLING AND CONFIDENTIALITY OF INFORMATION

Suppliers are expected to maintain the confidentiality of information shared with them, and to respect and protect the confidentiality of Viakem's trade secrets and other proprietary information, and to protect the reasonable expectations of privacy of all personal information. the people with whom they do business, including other business partners, suppliers, customers, consumers, and employees.

In addition, Suppliers must consider the following:

- Those with access to restricted or confidential information and facilities are responsible for the consequences of granting access to unauthorized personnel.
- Any unauthorized access or attempt to access restricted or confidential information may result in termination of the contract.
- It is forbidden to take photographs or videos inside the Viakem facilities, except in cases authorized by the person in charge of the corresponding entity.
- Suppliers that carry out academic activities, such as exhibitors or students, may only make use of Viakem's public information.
- Suppliers will not spread rumors that directly or indirectly affect the reputation of Viakem's collaborators or third parties.



- They must not reveal information related to Viakem and even after the business relationship has ended, they have the responsibility to maintain the confidentiality of this information.

## 10. INTELLECTUAL PROPERTY

Suppliers are expected to respect Viakem's legitimate industrial and intellectual property rights and must refrain from using them in an unauthorized manner.

Any logo, brand, slogan, registered patent, and design, including programs developed and methods of doing business, created, and related to Viakem are intellectual property belonging to Viakem, therefore, the Suppliers will refrain from any conduct that may constitute usurpation, modification, or falsification. In case you need to use them as part of the commercial relationship, it must be supported by the respective contract.

## 11. PROTECTION AND USE OF ASSETS

The assets owned by Viakem or those leased by them, whether they are tangible assets (cash, securities, furniture, real estate, machinery, equipment, vehicles, etc.) or intangible assets (brands, patents, logos, concessions, etc.), may be used by authorized third parties, solely to carry out Viakem's operations and not for their personal use.

The Suppliers may use the services, resources, and tools available (email, computer, cell phone, telephone, internet, utility vehicle, offices, among others), exclusively for the fulfillment of the functions they are authorized to perform. In addition, they must comply with the specific policies for the use of electronic services and devices, as well as other policies related to the protection of information and data privacy. Likewise, they are strictly prohibited from using the Viakem name to create accounts, groups, or profiles on social networks (Facebook, Twitter, Instagram, LinkedIn, etc.) other than institutional ones.

## 12. RECRUITMENT AND MANAGEMENT OF SUPPLIERS

Contracts with Suppliers may include important financial aspects, as well as legal, regulatory, compliance and reputational risks for Viakem, therefore, these risks must be adequately reviewed, managed, and accepted.

Viakem may only have interactions with providers that have not been sanctioned, disabled or are in a judicial or administrative process due to the commission, acts of serious violation (bribery, influence peddling, collusion, improper contracting of servers, money laundering and financing of terrorism, violation of human rights, among others). It is prohibited to have commercial relations with clients that are included in any international or national blacklist





(SAT, OFAC, SDN, among others), or that fail to comply with any export control requirement.

Due to the foregoing, it is necessary to carry out due diligence (due diligence or screening) on Viakem's potential and current Suppliers (including its shareholders) to check if there are risks in terms of compliance, likewise it must be carried out periodically in order to know the status current.

Payments made to Suppliers must be duly supported in the corresponding purchase order or contract, and the delivery of any payment made outside of the contract or made to a third party other than Viakem is prohibited.

Viakem's position is emphasized in not having commercial relations within any part of the supply chain with:

- a) Suppliers and/or Persons who provide assistance, finance, work, support and/or approve activities of third parties that involve or reside in countries in a sanctioned or embargoed Country.
- b) Suppliers and/or people related to or residing in geographic regions that represent a risk of marketing merchandise made totally or partially through Forced Labor.

Suppliers will have the appropriate systems and controls in place to promote compliance with the principles of this Code of Conduct for Suppliers within their supply chain. Suppliers will ensure that any subcontractors involved in connection with the provision of services or products also comply with this Code of Conduct for Suppliers.

## 13. ETHICS LINE

Suppliers must report non-compliance regarding the observance or non-observance of this Code, inappropriate conduct, or illegal practices by Viakem employees or their representatives. These complaints may in all cases be treated with absolute confidentiality, reserve and without retaliations.

Any genuine concern that prevents a supplier from objectively fulfilling its responsibilities due to the pressure exerted by a Viakem collaborator as a result of their position, authority, or influence, must be reported to the Compliance Committee, to the General Management or through the ethics line.

If you have any question about this Code of Conduct for Suppliers, you can contact Viakem's Compliance area or General Management by phone: [800-04-38-422](tel:800-04-38-422) or our page [viakem.lineaetica.com.mx](http://viakem.lineaetica.com.mx).