



# Code of Ethics



Global  
Conformity  
Services

## **1. INTRODUCTION**

In GLOBAL CONFORMITY SERVICES, S.C. (hereinafter, "GLOBAL" or the "Company") we are aware that the distinguishing factor of the Company is our human capital value. Therefore, as GLOBAL we promote that all activities carried out by the Company keep the highest levels of ethics, are aligned with the current and applicable laws, and promote the social development of our country.

These commitments are fundamental for GLOBAL and are based on honesty, responsibility, integrity, confidentiality, professionalism, technical capability, among other values that we seek in our teamwork, collaborators, partners, and in general with all the people with whom we maintain operational or commercial relationships.

Ethics then, is one of the key parts for the Company, which is why it is a responsibility of the General Management to continue promoting actions that strengthen the structure of GLOBAL values, establishing objectives that allow us to become a benchmark of quality and trust for the people with whom we live.

This Code of Ethics is an effort to define the principles that must be observed and promoted in all our business operations, and that GLOBAL's Staff should replicate in their daily lives, in order to create a positive impact on Mexican society.

## **2. OBJECTIVE**

This Code of Ethics represents the commitment that we have in the Company to keep the highest ethical levels in our activities. Following the direction set forth in this document and in the rest of the regulatory guidelines that govern GLOBAL, we ensure our excellence and quality.

Standing out in this matter is not only a responsibility with our clients, but with all the people who are part of GLOBAL, directly or indirectly. In this way, we also promote business success and sustainable development, based on a trust policy.

Likewise, this Code recognizes the importance of adhering and complying with the laws, policies, and other applicable guidelines in the Company. For this reason, the Code must be reviewed and understood as a major part of GLOBAL's regulatory structure, where its key activities will be supported on its correct communication, interpretation, and implementation.

Consequently, it is the obligation and responsibility of all staff members, collaborators and third parties involved in activities related to GLOBAL, to be informed about the scope of this document, as well as to prevent and report any breach of it, and above all, to act and make decisions based on the ethical values established here.

## **3. SCOPE**

This Code will be mandatory for all staff members and collaborators of GLOBAL at all levels and charges, also including members of the board of directors, managers, executives, professionals or partners (hereinafter "Staff").

The aforementioned also includes suppliers, distributors, service providers, contractors, subcontractors, agents, representatives, advisors, intermediaries, and/or any other person who carries out any activity related to GLOBAL (jointly referred as “Business Partners”).

#### 4. VALUES

All GLOBAL’s Staff, as well as its Business Partners, share the following values and ethical principles, so they:

- Carry out their professional activities with integrity and responsibility.
- Respect the dignity, diversity, plurality, and rights of all people.
- Adhere to the provisions established by the rules, laws, regulations, policies, and procedures that govern GLOBAL, and its activities.
- Are committed to preserving the environment and promoting a culture of sustainability.
- Use the assets and resources of the Company in a careful and responsible manner.
- Maintain strict confidentiality about their activities and the information provided to them.
- Encourage the growth and development of the Company and the Staff.
- Are exemplary with their own actions, and assume the consequences of the decisions made.
- Respect the principles and guidelines established in this Code.

The application of this ethical values must be based on the rectitude and honesty of all those involved, in addition to the commitment to improve constantly that distinguishes GLOBAL.

#### 5. COMMITMENTS

GLOBAL’s Staff and Business Partners are aware, at all times, that the commitments acquired by this Code will be face to the following:

**a) EACH ONE OF US.** We must proceed with integrity, loyalty, responsibility, and professionalism in our activities, and avoid any conflict that may represent a breach of this Code of Ethics.

**b) OUR COLLABORATORS AND PARTNERS.** We are committed to respect the rights of each person who intervenes or interacts with the Company, as well as to make every possible effort to create a suitable and cordial work environment that promote the development of GLOBAL, its Staff and Business Partners.

**c) OUR CLIENTS.** We guarantee sincerity, safety, and quality in our services, so we dedicate the best of our professional activity to satisfy our clients and consumers. Our goal is to be up to the trust they place in GLOBAL, by complying with all the rules and guidelines established in this Code.

**d) OUR ENVIRONMENT.** We look for the preservation of the environment and the sustainable development of our activities. We respect the environment, complying with the laws on the matter, as well as reducing the impacts of our commercial and operational processes. All our activities seek to promote the rational use of natural resources.

**e) OUR PARTNERS.** The Company's management is based on the best standards and practices in the sector, nationally and internationally. We pursue to repay the trust of our partners by using the Company's

resources in a responsible and rational manner, and being transparent and timely in the financial and accounting information that is available to them.

**f) OUR BUSINESS PARTNERS AND COMPETING COMPANIES.** We try to encourage equity and loyalty in each of our business relationships. The foregoing is not limited to GLOBAL's Business Partners, but is applicable for competing companies in our sector, and is achieved by respecting, at all times, compliance with the applicable rules and regulations, and conducting ourselves in accordance with the highest ethical standards.

## 6. INTERESTS CONFLICT

GLOBAL's Staff and Business Partners will seek to avoid situations in which their own or close persons interests could be against those of the Company, or that could interfere with their judgment or professional integrity.

GLOBAL may require, in particular cases, that a commitment letter be signed in this regard, in accordance with the corresponding format and policy. In the event that any Staff or Business Partner find themselves in a situation that may be considered as an interest conflict, they must notify their immediate superior, the Human Resources area, or the General Management, in the case of the Staff, and at the email [globalcs@globalcs.mx](mailto:globalcs@globalcs.mx), for the Business Partners.

There will be an Interest Conflict when any of the following situations happens with the Staff or Business Partners (including but not limited to):

- **Personal benefits.** When a decision, directly or indirectly, may result in an undue benefit, either for themselves, a close family member, or a Business Partner.
- **Use of Authority.** If the direct or indirect pressure of any third party inhibits the entrusted functions from being carried out correctly and in a timely manner, through the imposition of the authority, charge, or influence in the Company.
- **Other activities.** When the development of activities unrelated to the tasks entrusted by the Company, negatively affect the obligations of the GLOBAL's Staff or the Business Partners. It is also prohibited to carry out other activities on behalf of the Company, for personal benefit.
- **Investments.** If there is an economic interest in any kind of business related to GLOBAL, or in commercial or professional relationships that are direct competing companies. Likewise, it will be an Interest Conflict if there is this type of intervention through relatives or friends, clients, distributors or suppliers, and this influences the decision-making that is carried out on behalf of GLOBAL.
- **Gifts and hospitality.** Gifts and hospitality may be an Interest Conflict, so the provisions of GLOBAL's Antibribery and Anticorruption Policy must be observed in order to receive or deliver them.

- **Business with family members or close personal relationships.** Any family member may work within the Company, as long as their relationship does not affect the performing of their respective work, nor GLOBAL's good relationships. It will be strictly prohibited to influence GLOBAL negotiations in favor of relatives or close people.

## 7. BUSINESS OPPORTUNITIES

The Staff must avoid advising or participating in investment decisions or any other related business, which may be exploited using the information to which they have access as part of their activities. It is the obligation of the Staff to present any information that represents an advantage or business opportunity for GLOBAL, to their immediate superior or to the General Management, and under no circumstances the Staff may exploit said information individually or personally.

## 8. PROTECTION AND CONFIDENTIALITY OF INFORMATION

The confidentiality and correct processing of information is a characteristic of the quality and trust of GLOBAL services, so it is an obligation of all the Staff to safeguard that it is kept safe, in accordance with the current protocols of the Company, and the applicable regulations.

For purposes of the aforementioned, Confidential Information is understood as:

- a) Personal data concerning an identified or identifiable person.
- b) Financial, banking, industrial, legal, commercial, fiscal, or any information that is not considered public.
- c) The information indicated as "confidential", "private", "for internal use" or with any similar legend.
- d) Information stated in the particular contracts or agreements that GLOBAL has entered into with a third party.
- e) Information that has been provided by GLOBAL's clients and Business Partners.
- f) Any other that could be considered industrial secret or intellectual property, in accordance with current laws.

The disclosure of Confidential Information is prohibited by any means, whether documentary, verbal, electronic, magnetic or of any other type. Confidential Information may only be reproduced and shared with the express written authorization of its holder or owner.

The Company has an adequate structure for the processing of Confidential Information, thus it guarantees that its management and control is carried out with the appropriate measures and with the highest standards required for this sort of responsibilities.

All the Staff who have access to Confidential Information must observe that its handling adheres to what is established in the current laws, as well as in the Company's Privacy Notice.

The Staff responsible for relations with Business Partners must ensure that they comply with the policies and procedures indicated by GLOBAL, through control measures that preserve the interests of the Company, such as signing Confidentiality agreements.

## **9. ANTIBRIBERY AND ANTICORRUPTION**

GLOBAL rejects all acts of corruption and bribery, and complies with all laws and regulations on the matter by its Staff and Business Partners. The latter, and in general all the people related to GLOBAL, are responsible for understanding the requirements contained in the corresponding Antibribery and Anticorruption Policy, in addition to being committed to promote its application in all the tasks and activities they perform.

## **10. ENVIRONMENT**

We respect the environment, complying with the laws on the matter, and promoting the responsible and sustainable use of resources among our Staff and Business Partners. Our commitment is based on reducing the impacts of our commercial and operational processes, such as the efficient use and energy saving, the permanent reduction of polluting emissions, the conservation and responsible use of water, among others.

GLOBAL's main commitments in this area focus on:

- Reduce the Company's CO2 emissions.
- The responsible use of water.
- The reduction of waste.
- Promote resources recycling.
- The electrical energy saving.
- Constant evaluation and improvement of the Company's environmental care protocols.
- Implement of sanitary measures and procedures in the Company's facilities.

## **11. NO DISCRIMINATION, SOCIAL DIVERSITY AND EQUAL OPPORTUNITIES**

We do not tolerate any kind of discrimination, so under any circumstances, aspects such as race, sex, religion, age, gender identity, disability, affiliation, among other factors, may determine the decision-making related to Staff (or applicants) to occupy a position within the Company.

We promote gender equity, which is why GLOBAL establishes a fair distribution of benefits, power, resources and responsibilities between women and men in the Company.

## **12. THREATS, VIOLENCE AND HARASSMENT**

Nor any type of intimidation, harassment, or any other attitude or action that may physically or emotionally harm any person, will be tolerated, accepted, or ignored (under any circumstances).

Abusive, hostile or offensive conduct is unacceptable, whether verbal, physical or visual. So, it will be inadmissible for the Staff in a higher charge or position to demand from any subordinate different actions for which they have been hired. Harassing any Staff within the Company to obtain a relationship or personal favor, is prohibited.

Any person who breaches the foregoing, must respond to the consequences of their actions, not only in their relationship with GLOBAL, but also before the authorities. It will be the responsibility of the Staff and/or Business Partners to report any act that violates or is suspected of affecting the dignity or integrity of any person.

### **13. HEALTH, SAFETY AND WORK ENVIRONMENT**

Promoting a healthy, safe and adequate work environment will depend on the support and collaboration of all GLOBAL's Staff and Business Partners.

GLOBAL promotes that all the people related with the Company will always be treated with respect, valuing the differences of the individuals who participate in it. Decisions such as hiring, remuneration, promotion and work distribution will be based on objective and measurable reasons, and will comply with internal policies and applicable labor laws.

Each Employee or Collaborator will be responsible for keeping their workplace safe and clean, strictly following the rules, protocols, and regulations on the matter. GLOBAL will provide facilities that are, at all times, in the best conditions for the performance of its activities, as well as guarantee the necessary services for people's use (bathrooms, areas for food consumption, drinking water or other common area, among others).

The Staff must use the protection equipment that has been provided by the Company, as well as they must be responsible for their own qualification and training for the correct and safe development of their professional activities. Likewise, the Staff must timely report any unsafe act, or that endangers their integrity, as well as situations that put the Company's assets at risk.

GLOBAL will provide its Staff with information regarding working health and safety. However, the Staff will be responsible for ensuring the best health conditions in their working area, and in the places where they attend or live, in order to avoid risks of contagion of diseases with the rest of the internal and external personnel.

If necessary, the Company may restrict access or request to do home office, upon detecting possible risks of contagion of diseases in its facilities. The Staff must be attentive and strictly abide by the indications that GLOBAL gives in this regard.

### **14. FAIR COMPETITION**

GLOBAL's competitiveness guidelines are based on the excellence and quality of its services, and in its personalized and timely attention. Due to the abovementioned, we will never use illegal or unethical methods to obtain information about the competing companies, or to discredit or damage their image and businesses.

If by mistake or error GLOBAL's Staff obtains information that could be a trade secret or confidential information of another business, or if they have doubts about the legality of any information obtained, they must immediately report it to their immediate superior or to the General Management.

At the same time, in GLOBAL we do not allow or tolerate unfair and illegal commercial practices, such as setting prices below or above the market, distribution of clients or territories, illegal use of a leading market position, or any other indicated by the competition laws.

## **15. INFORMATION AND CONTACT METHODS**

In the event that you know of a situation that is suspected to be illegal, unethical or that breaches this Code of Ethics, or GLOBAL's Antibribery and Anticorruption Policy, you should immediately contact your direct and/or area manager, Human Resources, or directly with the General Management.

Any breach of this Code or suspicion of such acts may also be reported directly at the telephone numbers +52 55 25893941 and 55 50889921 or at the email [globalcs@globalcs.mx](mailto:globalcs@globalcs.mx). Anonymous notifications or communications will not be accepted.

Such contact methods may also be used if there is any question about the best interpretation of this document.

## **16. NO RETALIATION**

Retaliation for any communication of a possible breach of GLOBAL's internal regulations or the law, is strictly prohibited.

GLOBAL encourages transparency and will support all the persons involved who raise genuine and in good faith concerns under the provisions of this Code, even if the claims are proved unfounded.

Any person who is aware of what they believe to be a form of retaliation must inform it to the General Manager at the email [globalcs@globalcs.mx](mailto:globalcs@globalcs.mx), for the specific investigation of the case.

Unless the law provides otherwise, GLOBAL guarantees the confidentiality of the information collected, including the identity of the person reporting the breach and the person accused in the report.

## **17. DISCIPLINARY MEASURES**

The Staff or Business Partners who breach this Code will be subject to the corresponding disciplinary measures, which may include dismissal or termination of the contractual or business relationship, as the case may be, notwithstanding the legal actions that may be applied, or that the investigations are initiated by the competent authorities.