



CODE OF ETHICS AND CONDUCT

1. OBJECTIVE.

Establish the virtues to which the entire **Finmec Group** team must aspire as well as determine and affirm the fundamental principles that will govern the will, thinking and acting of all people who have a direct or indirect relationship with the company.

2. SCOPE.

The Code of Ethics is applicable to all persons, business partners, subsidiaries and customers that make up **Finmec Group**, regardless of where they are located.

3. REFERENCE DOCUMENTS.

- NMX-CC-9001-IMNC-2015 – Quality Management Systems, Requirements.
- M-CC-01 Quality, Safety, Health and Environmental Management System Manual
- DO-DG-02 Privacy Policy.
- DO-DG-04 Privacy Policy.

4. DEFINITIONS.

Act: Perform a person voluntary acts or own of his position or office.

Ethics: Discipline that is responsible for formulating what are the values, principles and norms that guarantee that both the human being and the organizations in which he works, manage to produce the maximum possible good and minimize any damage that may be caused to the person, organizations or society as a whole.

Ethical values: These are those behaviors that perfect the individual as a person, the company as an organization of people and society as a community of people.

Virtue: A personal quality that is considered good and correct. Good conduct, behavior that conforms to moral norms or laws.

Will: The intention or desire to do one thing. Free will or determination.

5. RESPONSIBLE.

It is the obligation of all staff to understand and apply the information contained in this Code of Ethics and Conduct.

6. DEVELOPMENT.

6.1 Background and explanatory memorandum

At **Finmec Group**, it is a priority that both growth and leadership go hand in hand with the principles of legality, honesty, loyalty, efficiency, economy and above all the moral quality of the company in relation to its social responsibility towards humanity.

To guarantee these **Finmec Group** principles , it has been given the task of elaborating a Code of Ethics and Conduct that establishes the guidelines that will direct and focus the actions of the workers, partners and commercial subsidiaries of **Finmec Group**, which lead to a dignified conduct that responds to social, cultural and business needs; as well as that guides performance in specific situations that are present all the people related to the company, with which it is intended to maintain, develop and create the fertile ground to promote a full vocation of work and constant effort for the benefit of society, our workers and our customers and business partners.

6.2 Principles

The principles and values on which the decisions of **Finmec Group** must be supported are the following:

- I. **Common Good:** All the decisions and actions of the members of **Finmec Group**, must be aimed at overcoming and creating new standards of quality and satisfaction of the needs of our customers, positively impacting society and the environment, above the particular interests outside the well-being of the community.
- II. **Legality:** This implies that all people who are in direct or indirect contact with the company must adhere to national and international legislation that regulates their external actions. Avoiding engaging in conduct and / or omissions that typify as crimes and / or infractions punishable by legislation
- III. **Integrity:** You must act honestly, always attending to the truth. Conducting oneself in this way is the only way to foster the credibility of society and customers at **Finmec Group** and at the same time will contribute to generating a culture of trust and attachment to the truth.
- IV. **Honesty:** No member of **Finmec Group** at any level shall use his position to obtain any personal benefit or advantage or in favor of third parties. Nor should you seek or accept compensation or benefits from any type of person or organization that may compromise your performance by negatively

impacting the company, the environment and / or society. Each member shall observe moral, upright and honest behavior.

- V. Loyalty:** Those of us who make up **Finmec Group** must assume a commitment to society, to our customers and above all to ourselves to ensure the common good.
- VI. Respect:** People should be given dignified, courteous, cordial and tolerant treatment, refraining from harming the rights and dignity of others.
- VII. Confidentiality:** It is to respect the data, documentation and facts that by their nature must be kept in secrecy, so as not to affect the interests of **Finmec Group** of its customers and business partners.
- VIII. Sobriety:** It is to keep the right middle between the extremes and avoid acts of ostentation that go in demerit of the respectability of his office.

6.3 General considerations.

The activities of the members of **Finmec Group** must be exercised with strict adherence and respect for the ethical principles and moral and social values of which this Code accounts, as well as the uses, customs and historical traditions that do not oppose human rights, taking into account the adaptation and evolution that these concepts experience in society.

6.4 Of the relationship between employees of Finmec Group

Every employee of **Finmec Group** must recognize their colleagues as equals, respecting their integrity and dignity, so mutual respect, cordiality and tolerance must prevail in the face of differences and conflicts that may arise.

The personnel of the company must enjoy a work and organizational environment of human quality that allows the permanent development of their professional capacity and their personal fulfillment, trying to establish, for this, conditions of training, collaboration and participation.

The resolution of conflicts and differences between all those who form **Finmec Group** must be resolved through dialogue and persuasion. Any form of discrimination, intimidation or blackmail shall be prohibited.

Professional confidentiality is a duty and a right of every member of **Finmec Group**. The obligation to maintain professional secrecy includes confidential information, known personally or in work meetings (advice, consultations, etc.), related to the

activities of **Finmec Group** whose disclosure could cause harm to any member of the institution, customers and / or business partners.

6.5 From Finmec Group's relationships with business partners, customers and the public.

Any active member of **the Finmec Group** whose work demands direct and permanent attention with business partners, customers, subsidiaries and with the public, must conduct themselves with diligence and sensitivity, in an informed and professional manner, with strict adherence to the principles of honesty and responsibility.

Those employees of **Finmec Group** assigned to the personal attention of business partners, customers, subsidiaries and the public, must avoid all forms of discrimination, humiliation, distancing or rejection of the people served, bearing in mind, at all times, that each human being is worthy of the most absolute respect.

The **Finmec Group** Collaborator must keep scrupulous confidentiality about the nature and circumstances, as well as all the information of which he knows or becomes aware by reason of his position, position, work or relations either with the public, with customers, with business partners, subsidiaries or with his colleagues, attend strictly adhering to the provisions of the applicable legislation, the internal work regulations, the stipulations of the contracts that **Finmec Group** subscribes, as well as the provisions and / or orders of its hierarchical superiors.

Each of us who make up **Finmec Group** must always ensure the full autonomy and independence of the company, establishing frank, direct and respectful communication, based on the interests of the **Finmec Group** as long as these are not contrary to the common good, with the state authorities that have a relationship with it.

With regard to the various commercial organizations or partners, clients and subsidiaries of Finmechanical, each employee must observe a conduct of respect and collaboration in terms of advice, guidance or any other service provided or contracted by the company, endorsing the leadership capacity and commitment of the Finmec community.

No member of **Finmec Group** shall prevent or recriminate in any way the legitimate right of individuals and institutions to exercise criticism, to express their differences or to express the plurality of their doctrines and opinions.

6.6 Personal commitment to Finmec Group

Each of the individuals who make up **Finmec Group** must conduct themselves, at all times, with respect and rectitude, always observing a conduct worthy of the company they represent and their ethical, business and social responsibility.

Each member of the **Finmec Group** community in the performance of their responsibility, must refrain from tilting their decisions according to their political, family, gender, religious or any other affinities or differences, always looking after the interests of the **Finmec Group**

Employees who occupy so-called command positions must assume and exercise their functions with a high degree of responsibility and dedication to the institution and the personnel in their charge, defending the prestige, dignity and mission of **Finmec Group**

Each member of **Finmec Group** who knows of criminal conduct or violations of the Law and its Regulations or the Code of Ethics, or any other that causes damage to the institution, must do so with the knowledge, with due reservations, of the competent bodies.

The unity of common purposes and congruence in the application of ethical principles and values make the moral strength of the company. Each member of **Finmec Group** must know in depth and practice the provisions contained in this code.

Those who make up the **Finmec Group** community will refrain, at all times, from accommodating insidiousness, personal attacks or any other expression that seeks to break or violate the unity and institutional mystique of service. Any conduct of this nature will be qualified as unethical.

6.7 Of material, financial, technological and workplace resources.

The employees of **Finmec Group** must preserve and protect the assets of the company and use those assigned to them for the performance of their functions in a rational manner, avoiding their abuse, waste or waste.

Members of the **Finmec Group** community shall perform their duties honestly and responsibly. It shall be aware of the use and good administration of the material, financial and technological resources under its responsibility or responsibility, as well as of the knowledge and experience acquired.

Employees of managerial level and with command capacity, has the obligation to grant the maximum facilities, to all those under their command, for the best performance of their functions.

6.8 Respect for the environment.

Each of **Finmec Group's employees** will promote respect for the environment, in the field of sustainable development.

The right to enjoy a healthy environment. It must be assumed by each member of the company, as an inescapable task and a permanent commitment to society, in accordance with the spirit of solidarity with the present and future generations.

6.9 Anticorruption.

All **employees of Finmec Group** have as their primary obligation to refuse any type of consideration of any kind, whether from a simple invitation to eat for business matters, to give and receive gifts, to bribery, because we recognize the damages that corruption causes not only to the **Finmec Group** community but also to society itself.

Finmec Group expresses its commitment against corruption by punishing conduct and/or omissions that may be considered corruption, and the consequences of engaging in corruption will be severely punished.

6.10 Finmec Group's lines of action

The business strategy of **Finmec Group** and its subsidiaries establishes 4 lines of actions that group 15 strategic objectives, which are those that allow achieving the operational and financial sustainability of the organization in the medium and long term.

Operational efficiency:

- Obtain efficiency levels above international standards, taking advantage of opportunities and optimizing operating costs.
- Achieve an operational performance above the industry average in the various branches in which **Finmec Group** ventures.
- Strengthen customer orientation.

Growth:

- Increase the client portfolio, find new business opportunities and classify business partners making them grow together with us.
- Increase business and revenue.
- Increase and adapt the capacity for industrial transformation to ensure the satisfaction of customers, business partners and collaborators maximizing economic value as well as positive impact on society.
- Promote the development of **Finmec Group** within all branches of industry and services it provides.
- Optimize the logistics capacity and improve the various services it provides.

Management modernization:

- Develop and provide specialized human resources and improve labor productivity.
- Increase the generation of value and the efficiency of the supply process and strengthen local supply.
- Support the growth and improvement of the business through technological development.
- Strengthen process management and project execution.
- Maximize the value of international opportunities.

Corporate Responsibility.

- Ensure safe and reliable operation.
- Improve environmental performance, business sustainability and relationship with communities.