



"Transforming the local economy with sustainable practices"

# CODE OF ETHICS OF GRUPO OCHO SUR



2020

## CODE OF ETHICS AND CONDUCT

"All employees of Grupo Ocho Sur must strive to behave in an exemplary manner and must abide by this Code of Ethics and Conduct under all circumstances." References to "Grupo Ocho Sur" or "the Group" include the companies Ocho Sur P S.A.C., Ocho Sur U S.A.C., and Servicios Agrarios de Pucallpa, S.A.C.

### INTRODUCTION

The Code of Ethics and Conduct of Grupo Ocho Sur describes the minimum standards of conduct that all employees (regardless of their position in the organization) of the group and its subsidiaries must comply with, wherever they are, since their behavior, both inside and outside the scope of their work responsibilities, is directly linked to the image of Grupo Ocho Sur.

Therefore, each member of our team must take special care in their conduct, both professionally and personally. Likewise, Grupo Ocho Sur is concerned that all its external advisors are also aware of the principles that guide this Code of Ethics and Conduct and are committed to its compliance.

For a better performance of our responsibilities, we must know and make known, comply with and defend the provisions of this Code of Ethics and Conduct.

The Chief Executive Officer is responsible for ensuring that these standards of conduct are complied with throughout the Group and will report to the Board of Directors. The Ethics Committee will ensure compliance with the Code of Ethics and Conduct. Therefore, by signing this Code of Ethics and Conduct, you acknowledge and agree to comply with it.

Any breach of Grupo Ocho Sur's Code of Ethics and Conduct is considered serious misconduct and may result in disciplinary action up to and including termination of employment of the person involved.

## MESSAGE FROM OUR CEO

Since its founding in 2016, Grupo Ocho Sur has focused on developing a Sustainable and model agricultural and industrial activity for the region and the world.

The commitment of Grupo Ocho Sur and its shareholders is primarily with the protection of life, both of our employees, neighbors, their families, society and all natural life in general, including all Amazonian flora and fauna.

Thus, our commitment to excellence is integral to our employees, our neighbors, our suppliers, our customers, society, the authorities, the environment, and our shareholders and investors.

We are characterized not only by seeking the highest standards of safety and efficiency in our operations, but mainly by achieving the excellence of the human group that makes up our company and its commitment to society.

As members of this group, we have a duty to contribute to maintaining the confidence of our neighbors and society in general in our ability, honesty and integrity. Our reputation is very important and our commitment to it cannot remain only in words, but we must demonstrate it with our actions. At Grupo Ocho Sur we do not compromise or negotiate our ethics and safety for the achievement of other goals.

Grupo Ocho Sur's Code of Ethics and Conduct is of fundamental importance for those of us who are part of it. This Code of Ethics and Conduct is applicable to all employees of Grupo Ocho Sur, without exception.

This Code of Ethics and Business Conduct describes the basic rules and principles regarding ethical behavior and our values. While this Code of Ethics and Business Conduct addresses a range of circumstances that any of us may face at any given time, it is impossible to cover every situation that may arise. If you are unsure about the proper course of action, first consult with your Immediate Management or use the ethics hotline to inquire about any questions or uncertain situations you may encounter.

We must all be faithful to the established principles, both in the letter and in the spirit of the document, in order to transmit trust, transparency and build a reputation as an agribusiness group that transforms the regional economy and the lives of our collaborators and neighbors with sustainable practices.

Best regards,

Michael Spoor  
CEO Ocho Sur

## OUR BASIC PRINCIPLES

1. Treat correctly and fairly all persons who have relations with Grupo Ocho Sur, whether they are customers, suppliers, employees or other persons
2. Strictly comply with the laws in force in the country.
3. Respect and treat the community and our neighbors well.
4. Avoid putting yourself or the Group in a conflict of interest situation.
5. Conduct yourself with honesty, integrity and professional ethics.
6. Commitment to safety, health and environmental protection
7. Maintain the accuracy, confidentiality and security of information, operations and communications and ensure the protection of the Group's assets.
8. Always act with professionalism and responsibility

## DEVELOPMENT OF PRINCIPLES

### **1. TREAT CORRECTLY AND FAIRLY ALL PERSONS WHO HAVE RELATIONS WITH GRUPO OCHO SUR, WHETHER THEY ARE CUSTOMERS, SUPPLIERS, EMPLOYEES OR OTHER PERSONS**

Grupo Ocho Sur supports and promotes a work environment in which all employees are treated fairly and with respect, have equal opportunities and are not affected by any type of discrimination.

All employees are guaranteed respect for their dignity and the protection of all their rights, so that their merits and work capacity contribute to their promotion and growth.

Grupo Ocho Sur does not discriminate on the basis of origin, age, race, sex, religion, language, economic condition, opinion or physical limitations.

When dealing with third parties, all members of Grupo Ocho Sur treat all persons, including customers and suppliers, correctly and fairly.

### **2. STRICTLY COMPLY WITH THE LAWS IN FORCE IN THE COUNTRY**

National laws regulate many aspects of the Group's activities. Compliance with these laws, regulations and other legal provisions is mandatory for all members of the Group.

Ignorance of them does not exempt from their compliance and, therefore, not complying with them is unacceptable. Grupo Ocho Sur and all its members must comply with the Law.

Grupo Ocho Sur does not permit any behavior that contravenes the spirit or intent of the constitutional norms and laws relating to human rights in the country.

You must also comply with the policies, procedures and standards of Grupo Ocho Sur, as these documents have been prepared taking into consideration the applicable legal requirements.

Any failure to comply with the law can have very serious consequences, both for the violator and for the Group, such as regulatory sanctions, loss of licenses or permits, legal action, fines and even imprisonment.

### **3. RESPECT AND TREAT THE COMMUNITY AND OUR NEIGHBORS WELL**

Grupo Ocho Sur, its directors, officers, employees and even its external advisors have a duty to respect the culture, customs and authorities of the communities in which they operate and with which they interact as part of the Group's activities.

The Group seeks to help these communities to achieve sustainable development consistent with their environment. This commitment also applies to all suppliers and contractors.

We must foster a climate of peace and rapprochement with the communities involved and the respective local authorities, respecting their culture, customs and identity at all times.

Likewise, we must always honor our commitments and agreements; only then will we be able to inspire confidence in our communities and in our environment.

### **4. AVOID PUTTING YOURSELF OR THE GROUP IN A CONFLICT OF INTEREST SITUATION**

There could be a conflict of interest if you are unable to fully and objectively perform your duties and obligations in a certain situation because your personal interests interfere with the interests of the Group.

Directors, officers, employees and external advisors of Grupo Ocho Sur shall avoid any situation in which their personal interests conflict or could conflict with their obligations to the Group.

No director, executive, collaborator or external advisor may use his or her authority or position, whether formal, directly or indirectly, to make decisions for personal gain or to benefit a specific group of people.

Likewise, no employee of the Group must abuse his or her position of advantage to unduly favor the Group to the detriment of third parties.

If you find yourself in a conflict of interest situation or in a situation that you believe others might interpret as such, you should notify the Ethics Committee or General Management directly so that steps can be taken to resolve the situation.

The relevant area will decide whether a conflict of interest exists or whether the alleged existence of such a conflict could damage the reputation of the Group.

In order to avoid conflict of interest situations, you should follow some basic rules:

#### **4.1 Relationship with Customers and Suppliers**

Do not misuse information you obtain in dealing with customers or suppliers. Often, you will receive confidential information that is not or should not be known publicly or by third parties outside the relationship.

It is a contravention of our Code of Ethics and Conduct for you to make use of such information before it is made public in order to benefit yourself personally or to further your own interests.

It is also wholly inappropriate to disclose such information to any other person unless it is necessary in the course of business.

#### **4.2 Don't let your personal relationships affect your ability to make good work decisions**

Family relationships and friendships must not influence your decisions at work. Decisions regarding the hiring of a supplier or employee must be made on a strictly professional basis. It is prohibited to make decisions in situations in which you are personally involved and you must refer them to another employee for attention with the knowledge of the Ethics Committee.

If you should represent Grupo Ocho Sur in a business deal with a family member, close friend or business associate, notify General Management immediately.

The selection of brokerage agents, lawyers, consultants and other professionals, as well as suppliers must be made in a transparent manner based on their qualifications, the quality of their products and services, the price, and the benefit to the Group. Never in exchange for any personal or friendly benefit.

#### **4.3 Relations between Group employees**

Managers, managers or supervisors should not become romantically involved with the employees they directly supervise, as this situation may create or appear to create a conflict of interest.

Any Manager, Boss or Supervisor who enters into a relationship with someone they directly supervise or enters into a relationship that may create an actual or perceived conflict of interest,

should report the relationship immediately to the Ethics Committee so that the most appropriate action can be taken.

#### **4.4 Commercial activities, financial interests or outside employment**

During working hours, you must not engage in activities other than those of the Group or use Group equipment or facilities for personal or outside business. Nor should you ask other employees to participate in such activities.

Although having permanent or temporary employment (including consulting or advisory services) outside of Grupo Ocho Sur's working hours is not prohibited, this should only be done if it does not create any conflict of interest and if the satisfactory performance of the employee's duties is not affected in any way.

Before commencing or continuing an outside business activity, acquiring or maintaining a financial or commercial interest with a supplier or any other entity that has close ties to the Group, or engaging in after-hours work, discuss it with your Area Manager and the Ethics Committee to ensure that these activities will not create any conflicts.

#### **4.5 Management Positions**

You may not hold an executive position in another company unless you have obtained the CEO's approval. This restriction applies even in the case of charitable organizations, public or private entities, non-profit entities, among others.

#### **4.6 Charitable and community activities**

Grupo Ocho Sur encourages its employees to participate in charitable, religious, educational, civic and community activities, including serving in civic or community institutions. However, the time and attention devoted to these activities should not affect their work or create any other type of conflict.

Before applying for a position or accepting an appointment, discuss your intentions with your management and the Ethics Committee to ensure that there will be no conflict.

#### **4.7 Public statements and contact with the media**

As a citizen, you have the right to express your personal opinions. However, do not speak on behalf of Grupo Ocho Sur or, if you disclose your dealings with the Group, do not disclose your personal views, unless you have obtained express authorization to do so.

This rule applies to all types of communication (e.g., statements, speeches, letters and articles) and to all types of media and communication channels (e.g., print, radio, television, e-mail or Internet).

If, because of your position in the Group or because of your recognized professional experience, you are invited to make a presentation or express an opinion on industry-related issues, you should begin your presentation by making it clear that the views you present are your personal views and do not necessarily represent those of Grupo Ocho Sur except, of course, when you are presenting a point of view approved by the Group.

Only the General Manager or the person he/she expressly designates in writing is authorized to speak to the media or give statements on behalf of Grupo Ocho Sur.

Be especially careful never to answer questions about matters in connection with which litigation is pending or in process, unless authorized to do so by your General Management.

#### **4.8 Political contributions and donations**

Grupo Ocho Sur does not make contributions to political parties. It only makes donations to public and/or private institutions for charitable purposes, in accordance with the provisions of the legal framework and local best practices. Grupo Ocho Sur does not offer or accept donations without the prior approval of the General Management.

#### **4.9 Misuse of your position or the name and/or resources of Grupo Ocho Sur**

Do not use Grupo Ocho Sur's name, assets or information for personal gain or to further your own interests or those of your friends. The name, property and information of Grupo Ocho Sur are part of its assets and must not be used for purposes other than the Group's business.

### **5. CONDUCT YOURSELF WITH HONESTY AND INTEGRITY AND PROFESSIONAL ETHICS**

The image and value of Grupo Ocho Sur depends on the honesty and integrity of its employees. Their conduct, both on and off the job, has a direct effect on the market's impression of the Group.



## 5.1 Gifts and invitations

Accepting gifts and invitations may give the impression that your decisions have been unduly influenced. In extreme cases (e.g., a lavish gift), your acceptance could be interpreted as a bribe.

You must not accept from any customer, supplier or other persons doing business with Grupo Ocho Sur, gifts consisting of cash, bonds, negotiable securities or other valuables such as use of a recreational property or expensive entertainment.

You may accept modest gifts and entertainment under the following circumstances:

- When there is no indication that the person offering the gift or invitation is trying to impose an obligation or unduly influence the person's decisions.
- When acceptance falls within "normal business practice" in order to be courteous and to promote good business relations.
- When the acceptance is legal and complies with generally recognized ethical standards.
- Provided that neither you nor the Group could be embarrassed or compromised if the circumstances became known to the public.

Acceptable gifts and invitations include:

- Occasional lunches or dinners, invitations to sporting events, plays or other similar events. Gifts or invitations whose estimated cost exceeds US\$100.00 (or its equivalent) must be reported to your immediate supervisor and approved by General Management.
- Invitations to the supplier's production plants or offices, subject to the authorization of the General Management.
- Travel to trade fairs, conferences and seminars, provided that prior authorization is obtained from the General Management, which must analyze the need for the business and/or training activity, its content and the scope of the invitation (whether it includes only the cost of registration to the event, or also tickets, lodging and other expenses). Only if the invitation is considered relevant and there is no risk of undue influence by the recipient (or perceived as such by a third party), the General Management will give its authorization.
- Advertising or promotional materials of little value, such as pens, diaries or key rings.
- Awards, trophies, medals and similar given in recognition of services rendered to civic, charitable, educational or religious organizations and provided they have only commemorative value.

If you are unsure whether it is appropriate to accept a gift, discuss it with your immediate supervisor, taking into consideration the above.

Regarding gifts and invitations granted by members of Grupo Ocho Sur, these must comply with the provisions contained in the Anti-Corruption Policy, the main ones being the following:

- It will not be possible to give gifts or invitations as an incentive in exchange for, or as a reward for granting any benefit or advantage to Grupo Ocho Sur.
- Gifts consisting of cash or cash equivalents (debit cards, gift certificates, among others) will not be accepted.
- Any gift intended to be given to a public official, regardless of its value, must be approved by the Compliance Department.
- A record must be kept of all gifts given, which must also be properly reflected in the accounting books and accounts.

The Anti-Corruption Policy regulates in detail the maximum amounts applicable to the giving and receiving of gifts and entertainment, as well as the authorizations required in both cases.

## **5.2 Bribery, Corruption and Commissions**

Grupo Ocho Sur has a zero tolerance policy for corruption. All directors, officers and employees of Grupo Ocho Sur must comply with international and national laws prohibiting corruption and bribery in all areas where business is conducted.

Thus, Grupo Ocho Sur strictly prohibits the acceptance of bribes, unauthorized kickbacks and any other type of illicit payment from suppliers or customers in exchange for favorable treatment or consideration.

If you receive any such offer or become aware that another person is making such an offer, inform or report it to the Ethics Committee, General Management or the Group's ethics line so that an investigation may be carried out.

Likewise, it is strictly forbidden to grant, offer or promise anything of value, payment, benefit, asset, donation to public officials or authorities of any kind (community, local, regional, national, etc.).

In general, any offer of bribes to obtain benefits for the Group in an unethical manner. The term "thing of value" includes not only cash and cash equivalents, but also gifts, entertainment, tickets, accommodation, per diems, job offers, loans, personal favors, among others.

For further details on this topic, please refer to the respective Anti-Corruption and Anti- Bribery Policy.

Such acts are grounds for dismissal and legal action, if appropriate.

## **5.3 Communications and statements**

Never give false impressions to the general public or other collaborators, making false or misleading statements. In accordance with Grupo Ocho Sur's policy, any communication or statement, verbal or written, must be truthful and authorized by the General Management.

#### **5.4 Embezzlement of funds**

An employee who steals funds or otherwise attempts to defraud the Group or knowingly assists others in doing so will be terminated and may be subject to appropriate legal action.

### **6. COMMITMENT TO SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION**

The life, health and safety of all employees of Grupo Ocho Sur is its main priority and comes before the achievement of any organizational and/or economic goal.

For this reason, compliance with all safety, occupational health and environmental standards and procedures established by the Group is a priority and mandatory for all employees without exception. This commitment also extends to all contractors and suppliers.

It is the obligation of all employees of Grupo Ocho Sur to actively participate in the training courses on Safety, Occupational Health and Environment organized by the Group.

Every employee has the right and authority to be able to say "NO" to a work order that implies a risk to their own or any other Group employee's Occupational Health and Safety.

In this case, the Employee shall immediately notify his or her immediate superior, or a superior, if the order was given by the immediate superior.

If you observe any unsafe condition that puts the health or life of any person at risk, you have an obligation to immediately notify your appropriate management or any member of the Group Safety Department.

Grupo Ocho Sur must conduct its activities within a framework of environmental protection. All employees must avoid the generation of waste and ensure its final disposal in accordance with the Group's policies and procedures.

If you are in any position within the Group whose duties may affect the environment in any way, it is your duty to prevent and permanently mitigate any negative effects on the environment.

### **7. MAINTAIN THE ACCURACY, CONFIDENTIALITY AND SECURITY OF INFORMATION, OPERATIONS AND COMMUNICATIONS, AND ENSURE THE PROTECTION OF THE GROUP'S ASSETS.**

## 7.1 Accuracy and Completeness of Accounting Information and Records

The Group's books and records must always be complete and accurate, in accordance with the Group's good business practices and regulations.

All employees are responsible for ensuring the accuracy and integrity of Grupo Ocho Sur's record keeping and reporting systems.

Follow the instructions in the Group's procedures manuals and other manuals to ensure that transactions are properly authorized, promptly recorded in the appropriate accounts and supported by the corresponding documents.

Under no circumstances should you overlook an internal control procedure, even if you consider it unimportant or believe it would save you time.

## 7.2 Confidentiality

You must protect the confidentiality and security of information that Grupo Ocho Sur obtains, uses or retains, as well as information that it discards or destroys because it is no longer needed. In most cases, the protection of confidentiality is also a legal obligation.

You also have an obligation to protect the privacy of other employees and the confidentiality of Grupo Ocho Sur's business. You will continue to have this obligation even after you leave the Group.

In order to ensure the appropriate confidentiality of the information:

- Control access to confidential information.
- Do not leave documents or any storage media (CDs, flash drives, etc.) containing confidential information exposed in such a way that they can be seen, lost or stolen.
- Do not inadvertently display confidential information.
- Do not discuss confidential information in public places.
- Do not transmit confidential information to persons outside the Group, including family members, associates or other collaborators who do not need the information for their work.
- Use only secure means of communication to transmit confidential information (e.g., be careful when using non-secure media, such as cell phones) and be sure of the identity of your interlocutor.

### 7.3 Group assets

Protect the Group's assets and information under your custody and control. Be alert to the possibility of damage, loss, alteration, misuse or theft of Grupo Ocho Sur assets. The Group's assets include:

- Funds and negotiable instruments.
- Physical assets, real estate, materials and equipment.
- Computer systems and other technologies, automated resources and network access (e.g., Internet).
- Intellectual property, including software, developed by collaborators or supplied by third parties.

### 7.3 Assets held by third parties

If you have authorized third parties to hold Group assets in your custody, you are responsible for knowing the relevant security procedures and for ensuring that those procedures are satisfactory and you are ultimately responsible for the proper use and maintenance of those assets.

### 7.4 Use of personal resources for work

You may use personal resources (e.g., your personal computer) when working at home, provided that all information relating to the Group is adequately protected against unauthorized access, theft, misuse, loss or alteration.

### 7.5 Copyright protection

Information, computer programs and systems and any intellectual property must be protected against theft or inappropriate use, as well as against loss or alteration, intentional or not.

Failure to comply with these rules could result in a violation of copyright laws for you or Grupo Ocho Sur and subject you and the Group to severe penalties. Report any weaknesses or deficiencies in security protection systems and procedures to your immediate supervisor or other appropriate Group body.

## **7.6 Use of social networks**

The Internet and social networks have changed the way we work, offering new ways to interact with other employees, customers, suppliers and third parties in general. However, the disclosure of confidential and/or inappropriate information through social networks also has the potential to damage the reputation of the Group and our members. In this regard, we appeal to the good judgment of each member of the Group, and ask them to be cautious in order to help protect the Group and their personal image.

## **8. ALWAYS ACT WITH PROFESSIONALISM AND RESPONSIBILITY**

All members of Grupo Ocho Sur must be characterized by a high degree of professionalism, basing their behavior on the following aspects:

### **8.1 Personnel supervision**

If you have employees in your charge, it is an essential part of your duties to pay special attention to their motivation and professional development, committing to provide them with development opportunities based on merit and professional performance. To this end, among other things, he/she will encourage their training and learning, recognize their efforts in a specific way and objectively assess their achievements.

### **8.2 Efficiency**

All members of Grupo Ocho Sur must aspire to achieve results in the most optimal and productive way possible in the performance of their duties.

### **8.3 Cooperation**

It is everyone's duty to cooperate personally and actively with other areas of the Group, as well as with their collaborators or other co-workers.

## **8.4 Information**

Provide your superiors with accurate, necessary, complete and timely information about the progress of your activities. Likewise, provide your collaborators and/or coworkers with the necessary information for the proper performance of their duties.

## **8.5 Internal and External Customer Orientation**

Our conduct must be based on efficiency, professionalism, service-oriented mentality and collaboration, seeking the maximum satisfaction of our internal and external customers, providing competitive and quality solutions. We must be friendly, courteous and with a service attitude.

## II. REPORT ON NON-COMPLIANCE OR IRREGULARITIES WITH THE CODE OF ETHICS AND CONDUCT

If you believe that you have violated Grupo Ocho Sur's Code of Ethics and Conduct or that an employee has done so; or you have observed a serious weakness or deficiency in the Group's policies, procedures or controls that could facilitate such violations occurring or going undetected.

You have the obligation to immediately communicate it to the General Management or to the Ethics Committee, or report it through the Ethics Line, as developed in III.

Grupo Ocho Sur's Code of Ethics and Conduct is based on a policy of non-retaliation, offering protection to those employees who report concerns in good faith.

However, in the case of malicious or false reports (i.e., reports whose falsity is known to the reporter), these may give rise to legal action by the person against whom the report is made, without prejudice to the corrective measures that Grupo Ocho Sur deems appropriate to apply.

The Group will treat all information confidentially, protecting the identity of the whistleblower at all times. The Code of Ethics and Conduct encourages Employees to put their names on any information they provide.

Complaints made anonymously may hinder an investigation procedure (since it will not be possible to request additional information and/or corroborate information with the complainant), and may even result in their being filed; however, they will be taken into account by the Group.

All employees are required to cooperate in any internal investigation of wrongdoing. No employee or other whistleblower will be punished or subjected to detrimental action as a result of having given information if the information has been given in good faith.



### III. ETHICS HOTLINE OPERATION

Any person, collaborator, company, community or interested party may file a complaint, denunciation or claim against Ocho Sur or any of its collaborators through the Ocho Sur Ethics Line, which operates independently, guaranteeing the confidentiality and anonymity of the person reporting an irregularity.

All reports communicated through the Ocho Sur Ethics Hotline will be received, registered and analyzed by an independent institution. The independent institution will then forward the reports to the Ethics Committee, which will evaluate whether they have sufficient elements to be considered.

Some reports, depending on the evidence received, the type of report and the levels of those involved, may be resolved without requiring further validation. However, others will require investigation under the supervision of the Ethics Committee.

It may, at its discretion, consult the case to any area or executive it deems convenient, or hire auditors to assist in the investigation and analysis of its results.

In conducting investigations, the Company will respect the confidentiality of the report and the request for anonymity of the person who provided the information, consistent with the need to conduct a thorough review. We remind you that you should also treat the report as confidential.

If, after due process of investigation, it is proven that irregular situations have occurred, appropriate measures will be taken in accordance with the provisions of current labor regulations and the Company's internal policies.

1. Telephone line:

**0800 18 168 option 1 (toll free) or call (01) 219 71 68**

2. Entering the portal:

**[www.lineaeticaochosur.com](http://www.lineaeticaochosur.com)**

### IV. INQUIRY

You should be familiar with and fully understand Grupo Ocho Sur's Code of Ethics and Conduct. If you have any questions or concerns or need further guidance, please consult with the Ethics Committee ([comite.etica@ochosur.com](mailto:comite.etica@ochosur.com) or 998-672-375 Attention Walter Sono).

ANNEXES

**1. DECLARATION OF KNOWLEDGE AND COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT OF GRUPO OCHO SUR**

TO: ADMINISTRATION AND HUMAN RESOURCES MANAGEMENT OF:

FROM: Paternal surname: \_\_\_\_\_

Mother's last name: \_\_\_\_\_

First name(s): \_\_\_\_\_

Unit: \_\_\_\_\_

Work area: \_\_\_\_\_

DATE: \_\_/\_\_/\_\_

I hereby declare that I have read and fully understand the Code of Ethics and Conduct of Grupo Ocho Sur. Therefore, I agree to comply with the provisions and I declare to know that any attitude that is against the Code of Ethics and Conduct is subject to sanctions and disciplinary measures that may include separation from Grupo Ocho Sur, within the current legal framework. Likewise, I am aware of the obligation to report the identification of any non-compliance with the provisions of the Code of Ethics and Conduct, which must be communicated through the means authorized by the Group (to the General Management, the Ethics Committee or through the Ethics Line).

\_\_\_\_\_  
Name and signature of direct supervisor

\_\_\_\_\_  
Employee's signature as acknowledgement

**2. CONFLICT OF INTEREST STATEMENT**

TO: ADMINISTRATION AND HUMAN RESOURCES MANAGEMENT

FROM: Paternal surname: \_\_\_\_\_

Mother's last name: \_\_\_\_\_

First name(s): \_\_\_\_\_

Unit: \_\_\_\_\_

Work area: \_\_\_\_\_

DATE: \_\_/\_\_/\_\_

I declare that I have received and read the Conflicts of Interest Management Policy of Grupo Ocho Sur, therefore I declare to have knowledge of the same and of the situations that are considered Conflicts of Interest. I declare that neither I nor any member of my family has or has had any interest whatsoever, nor has performed any acts that could be contrary to this Code of Ethics and Conduct. Likewise, I hereby declare my commitment not to perform or allow any action or omission that has or may result in a conflict with the interests of Grupo Ocho Sur. Otherwise, if I have any doubt about a particular situation where my personal interests may be in apparent conflict with the interests of Grupo Ocho Sur, I inform it below:

\_\_\_\_\_  
Name and signature of direct supervisor

\_\_\_\_\_  
Employee's signature as acknowledgement

**3. STATEMENT OF KNOWLEDGE OF AND COMPLIANCE WITH GRUPO OCHO SUR'S ANTI-CORRUPTION POLICY**

TO: ADMINISTRATION AND HUMAN RESOURCES MANAGEMENT

FROM: Paternal surname: \_\_\_\_\_

Mother's last name: \_\_\_\_\_

First name(s): \_\_\_\_\_

Unit: \_\_\_\_\_

Work area: \_\_\_\_\_

DATE: \_\_/ \_\_/ \_\_

I hereby declare that I have read and fully understand the Anti-Corruption Policy of Grupo Ocho Sur. Therefore, I agree to comply with the provisions and I declare to know that any attitude or action that is against this Policy, is subject to sanctions and disciplinary measures that may include separation from Grupo Ocho Sur, within the current legal framework. Likewise, I am aware of the obligation to report the identification of any breach of the provisions of the Anti-Corruption Policy, which must be communicated to the General Management or the Ethics Committee or reported through the Ethics Line.) I also declare that I am aware of the provisions of the Group's Anti-Corruption Policy, and declare under oath that I am not a public official as defined therein, nor am I related to any public official up to the second degree of consanguinity, second degree of affinity or by reason of marriage or cohabitation, otherwise I will immediately inform Grupo Ocho Sur.

\_\_\_\_\_  
Name and signature of direct supervisor

\_\_\_\_\_  
Employee's signature as acknowledgement