



MAKING THE
DIFFERENCE



IT'S PART OF ME
Ethics define us

CODE OF
ETHICS



Contents

3 A MESSAGE FROM THE CHAIRMAN OF THE BOARD AND THE CEO

4 OUR VISION, MISSION AND VALUES

- 4 OUR VISION
- 4 OUR MISSION
- 4 OUR VALUES
- 4 OUR CULTURAL PRINCIPLES

5 OUR CODE, OUR RESPONSIBILITIES

- 5 OUR CODE IN BRIEF
- 6 FOLLOWING OUR CODE OF ETHICS
- 6 FULFILLING OUR RESPONSIBILITIES
- 7 MAKING ETHICAL DECISIONS
- 7 UNDERSTANDING CONSEQUENCES

8 WE PUT PEOPLE AT THE CENTER

- 9 WE RESPECT HUMAN RIGHTS
- 10 WE BUILD SAFE, HEALTHY AND SECURE WORKPLACES
- 11 WE VALUE RESPECT IN THE WORKPLACE

12 WE CREATE SHARED VALUE

- 13 WE PROTECT OUR PLANET
- 14 WE SUPPORT OUR COMMUNITIES

15 WE MANAGE BUSINESS WITH INTEGRITY

- 16 WE PROVIDE SAFE AND HIGH-QUALITY PRODUCTS
- 17 WE AVOID CONFLICTS OF INTEREST
- 18 WE PREVENT BRIBERY AND CORRUPTION
- 19 WE PROMOTE FAIR COMPETITION
- 20 WE BUILD STRONG CUSTOMER AND SUPPLIER RELATIONSHIPS
- 21 WE FOLLOW TRADE LAW

22 WE SAFEGUARD COMPANY ASSETS

- 23 WE PROTECT COMPANY RESOURCES
- 24 WE HANDLE BUSINESS AND FINANCIAL INFORMATION RESPONSIBLY
- 25 WE PROTECT CONFIDENTIAL AND BUSINESS INFORMATION
- 26 WE PREVENT INSIDER TRADING

27 SPEAKING UP AND SEEKING HELP

29 A FOUNTAIN OF RESOURCES

- 30 GLOSSARY

A Message from the Chairman of the Board and the CEO

Since 1926, Arca Continental has worked in all aspects of its everyday activities to become a successful business and positive agent of change.

We are convinced that, on the path to making a positive difference, we must rely on a team committed to building a sustainable organization powered by the will to create shared value.

This is why our ethical behavior has always been the cornerstone of our mission, vision, values and cultural principles.

We work to have these foundations present in all Arca Continental activities, putting people at the center of our efforts, respecting everyone's human rights throughout our value chain, and achieving a safe, healthy and secure workplace.

With this, we ensure that our products are made with highest quality ingredients and standards, sustained by the exemplary behavior of our team and that of our partners, suppliers and customers under a framework of transparency.

However, none of this matters if we do not take part in our common responsibilities as part of our society. Sharing value by protecting the environment and supporting our community is not only something that we are required to do, but it is also the right thing to do.

This set of principles, which we at Arca Continental live by, aims to strengthen our sustainable business model that allows us to endure over time.



Arturo Gutiérrez Hernández
Chief Executive Officer

Jorge Humberto Santos Reyna
Chairman of the Board of Directors

Our Vision, Mission and Values

OUR VISION

To be leaders in beverages and snack food consumption for every occasion in all the markets in which we participate, focusing on profitability and sustainability.

OUR MISSION

To generate maximum value for our customers, associates, communities and stockholders, satisfying our consumers' expectations at all times with the highest quality products and services.

OUR VALUES

- Focus on customer service
- Integrity based on respect
- Comprehensive associate development
- Sustainability

OUR CULTURAL PRINCIPLES

- People focused
- Transparency
- Change & innovation
- Focus on results
- Customer centric

LEARN MORE

Leadership Code

Our Code, Our Responsibilities

OUR CODE IN BRIEF

Our Code of Ethics states what we stand for as a **Company**. It communicates how we pursue our mission, realize our vision, and live our values and principles.

The Code is divided into focus areas we may encounter in our work.

Each focus area is organized into two sections:

WHAT DEFINES US

Our approach to the key topic based on our set of principles reflected in binding policies and the law

OUR WAY OF WORKING

How we act according to our values and principles



FOLLOWING OUR CODE OF ETHICS

As part of **Arca Continental**, we are responsible for knowing and following our Code. Upholding it strengthens our culture of ethics. We also demonstrate our shared commitment to acting in the right way.

The Code is the guide on how to interact as an **associate**, business partner and part of the community. Everyone can access it easily, and we are encouraged to consult and use it frequently.

FULFILLING OUR RESPONSIBILITIES

Our Code of Ethics applies to all people, every company and each country where we operate, including all:

- Associates
- Managers
- Directors
- Board members

WE ARE ALL RESPONSIBLE

Everyone at Arca Continental has the responsibility to:

- Read, understand and follow the Code and Arca Continental policies.
- Use good judgment in all actions and decisions.
- Ask for help, or when in doubt seek advice.
- Report concerns.
- Comply with the law.



ADDITIONAL RESPONSIBILITIES OF LEADERS

Leaders have special responsibilities regarding our Code of Ethics. They must:

- Know and understand the Code in detail so they can follow it completely and guide associates.
- Act as role models of good conduct for their teams.
- Create an environment where all associates feel comfortable sharing their concerns.
- Seek advice from a superior when in doubt.
- Never tell associates to do something illegal or unethical for any reason.

RESPONSIBILITIES OF SUPPLIERS AND BUSINESS PARTNERS

We work only with companies that share our commitment to integrity. That's why we expect suppliers and business partners to uphold the same values and principles we do and encourage suppliers to follow our Code of Ethics.




MAKING ETHICAL DECISIONS

Ethics is about making the best decision based on doing what's right. **How will we know what's right in any given situation? We should use our own moral compass and the Code to guide us.**

UNDERSTANDING CONSEQUENCES

Violations of our Code, policies or the law may lead to serious consequences. These include discipline, up to and including termination of employment. Certain violations may result in civil, administrative, and/or criminal penalties for Arca Continental and/or the individuals involved.



WE PUT PEOPLE AT THE CENTER

- WE RESPECT HUMAN RIGHTS
- WE BUILD SAFE, HEALTHY AND SECURE WORKPLACES
- WE VALUE RESPECT IN THE WORKPLACE

We Respect Human Rights

WHAT DEFINES US

We respect the human rights of all people. Protecting the fundamental dignity of people is at the center of our values and commitments.

We adhere to and follow international human rights principles, including: the International Bill of Human Rights, the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights.

- Expect our suppliers and business partners to uphold human rights.
- Provide a safe and healthy workplace that respects the rights of individuals and communities.
- Perform **due diligence** to monitor human rights in our operations and supply chain.

LEARN MORE

[Human Rights Policy](#)

OUR WAY OF WORKING

- Respect freedom of association and the effective recognition of the right to collective bargaining.
- Never use any form of forced labor, **human trafficking** or **child labor**.
- Provide fair and proper wages, salaries and working conditions.
- Apply a human rights lens to our relationships when dealing with customers and suppliers and when considering acquisitions or partnerships.



We Build Safe, Healthy and Secure Workplaces

WHAT DEFINES US

We ensure workplace safety and health for associates and third parties. We have a duty to make sure people feel safe and secure in our facilities and functions.

OUR WAY OF WORKING

- Never skip a safety protocol or procedure, even to meet a production or financial goal.
- Ensure that associates and third parties have the right training, qualification and skills.
- Develop, know and follow Safety and Occupational Health (SOH) policies and guidelines.
- Ensure everyone's safety before starting any work.

All occupational health and safety incidents must be reported to the local SOH professional, the Technical and Supply Chain Department or the Transparency Mailbox.



LEARN MORE

[Safety and Well-being Policy](#)

[Human Rights Policy](#)

Human and Organizational Performance “HOP” Guide

We Value Respect in the Workplace

WHAT DEFINES US

We care for, respect, value and treat people equally and fairly. We take any form of disrespect, including but not limited to harassment, discrimination or **retaliation**, seriously and will take action accordingly.

OUR WAY OF WORKING

- Respect and value our differences in: our individual races, color, religion, sex or gender, national origin, age, mental or physical disability, medical condition, military or veteran status, citizenship status, marital status, sexual orientation, gender identity and/or expression, or anything that identifies us as individuals.
- We promote the respect of diversity, equity and inclusion.
- Stand up for each other if we witness disrespectful, bullying, harassing or discriminatory conduct.
- Report suspected harassment, discrimination, bullying or other disrespectful behaviors.

- Expect our suppliers and business partners to share our values of respect and fair treatment.
- Managers must also:
 - Ensure equal employment opportunity for all associates.
 - Base employment decisions on qualifications and business needs.
 - Use words and actions to foster a work culture that respects and values the individuality of each associate, and avoid anything that weakens these commitments.
 - Recognize and promote respect.



LEARN MORE

[Inclusion and Diversity Policy](#)

[Total Respect Policy](#)

WE CREATE SHARED VALUE

- WE PROTECT OUR PLANET
- WE SUPPORT OUR COMMUNITIES



We Protect Our Planet

WHAT DEFINES US

We are committed to our **sustainable** business model to deliver profitable growth, while protecting the planet, by minimizing and offsetting our environmental impacts.

OUR WAY OF WORKING

- Develop programs to:
 - Reduce water consumption, energy and other resources.
 - Reduce **greenhouse gas** emissions.
 - Improve our handling of wastes.
 - Promote sustainable packaging, its reuse and a culture of recycling with our associates, communities and value chain.
- Follow environmental laws and policies.
- Maintain robust control of environmental metrics.



LEARN MORE

[Sustainability Policy](#)

[Environmental Policy](#)

We Support Our Communities

WHAT DEFINES US

As an agent of positive change, we respect, support and contribute to the development of our communities while we achieve profitable and sustainable growth.

OUR WAY OF WORKING

- Ensure operations are good neighbors and contribute to the well-being of our communities.
- Build and contribute to projects that create shared value.
- Measure and improve social impact as a performance metric.
- Respect our communities and celebrate local customs and cultures.
- Volunteer and participate in community initiatives.

LEARN MORE

[Sustainability Policy](#)



WE MANAGE BUSINESS WITH INTEGRITY

- WE PROVIDE SAFE AND HIGH-QUALITY PRODUCTS
- WE PROMOTE FAIR COMPETITION
- WE AVOID CONFLICTS OF INTEREST
- WE BUILD STRONG CUSTOMER AND SUPPLIER RELATIONSHIPS
- WE PREVENT BRIBERY AND CORRUPTION
- WE FOLLOW TRADE LAW



We Provide Safe and High-Quality Products

WHAT DEFINES US

We fulfill our mission to satisfy our consumers' expectations at all times with the highest quality products and services, while ensuring our products are safe.

OUR WAY OF WORKING

- Inform consumers about our products with accurate, current and real information.
- Label our products with truthful and clear information.
- Comply with applicable regulations in the countries where we operate.
- Care for the quality of our raw materials.
- Ensure our products are produced in facilities that prioritize quality and safety.



- Never skip quality controls or compromise product safety.
- Report and address any quality and safety issue or concern.

We Avoid Conflicts of Interest

WHAT DEFINES US

We avoid **conflicts of interest** in every business decision. Our decisions are in the best interest of Arca Continental, without interference of personal interests.

LEARN MORE

[Conflict of Interest Policy](#)

[Operations with Related Third Parties Policy](#)

[Conflict of Interest Statement Form](#)

OUR WAY OF WORKING

- Do not look for personal benefits through our positions at Arca Continental.
- Do not own or participate in businesses that supply or compete with Arca Continental, unless specifically authorized.
- Stay alert of situations where our personal interests could interfere with our objectivity.
- Reject gifts or entertainment invitations whenever they compromise objectivity and impartiality and declare them through the Conflict of Interest Statement Form.



We Prevent Bribery and Corruption

WHAT DEFINES US

We are honest in all our business dealings. We do not offer or accept improper payments in exchange for business.

OUR WAY OF WORKING

- Do not offer or accept **bribes**, **kickbacks** or improper payments.
- Keep accurate and complete records of all payments.
- Follow applicable laws and policies when dealing with government agencies or officials.
- Follow applicable laws and policies when providing gifts or charitable donations.
- Comply with anti-bribery laws.

LEARN MORE

[Anti-Corruption Policy](#)



We Promote Fair Competition

WHAT DEFINES US

We are committed to the principle of fair competition and to complying with the applicable competition laws.

OUR WAY OF WORKING

- Provide truthful and transparent information about our products.
- Do not make false claims about competitors' products.
- Obtain competitive information ethically and lawfully in accordance with our policy.
- Do not share with competing companies sensitive information about future or current prices, commissions, discount policies, new products, sales or any other confidential information.
- Be careful at customer facilities, trade shows and other settings to avoid improper discussions with competitors or potential competitors.
- Do not force customers to buy something they do not want by tying it to the purchase of something they do want.

- Never enter into any agreement or understanding—even an informal understanding—with a competitor to:
 - Set prices for our products and services.
 - Divide territories, markets or customers.
 - Prevent another company from entering the marketplace.
 - Participate in any form of **bid rigging**.
 - Refuse to deal with a customer or supplier for improper reasons.
 - Boycott another company.

LEARN MORE

[Antitrust Policy](#)

[Competitive Intelligence Policy](#)



We Build Strong Customer and Supplier Relationships

WHAT DEFINES US

We build business relationships based on win-win situations, mutual respect, trust and a shared commitment to integrity.

- Our suppliers and business partners know they can report any concerns or misconduct.

LEARN MORE

[Supplier Guiding Principles](#)

OUR WAY OF WORKING

- Treat all suppliers with fairness, honesty and courtesy.
- Ensure new suppliers align to our values and follow the law.
- Ensure that our suppliers follow our Code of Ethics and **Supplier Guiding Principles**.
- Base hiring decisions on business needs, objective criteria and ethical practices.
- Seek to understand issues when they arise and work together to find mutual solutions.
- Pay appropriately for any work or service provided to Arca Continental.



We Follow Trade Law

WHAT DEFINES US

Ethics defines how we do business in the global market. We comply with all applicable trade laws.

OUR WAY OF WORKING

- Know and follow the trade regulations of the countries in which we do business.
- Conduct due diligence on new suppliers and business partners, especially to identify entities on applicable sanctions lists.
- Stay alert for signs of money laundering or terrorist financing.

LEARN MORE

[Policy to Prevent Money Laundering](#)



WE SAFEGUARD COMPANY ASSETS

- WE PROTECT COMPANY RESOURCES
- WE PROTECT CONFIDENTIAL AND BUSINESS INFORMATION
- WE HANDLE BUSINESS AND FINANCIAL INFORMATION RESPONSIBLY
- WE PREVENT INSIDER TRADING

We Protect Company Resources

WHAT DEFINES US

We are responsible for handling **assets** with care and good sense. We are committed to care for the Company's resources entrusted to us.

OUR WAY OF WORKING

- Use assets responsibly.
- Maintain and repair the assets in our care.
- Protect assets from loss, theft or improper use.
- Use assets for Arca Continental's benefit and the purposes for which they are intended.
- Ensure third parties who use our assets handle them with the same level of care that we do.

LEARN MORE

[Assets Protection Policy](#)

[Policy to Prevent Money Laundering](#)

[Policy on Events, Media and Social Networks](#)

[Participation in Politics Policy](#)



We Handle Business and Financial Information Responsibly

WHAT DEFINES US

We focus on tangible results by ensuring our business and financial information, as well as any other record, is traceable, complete and correct.

OUR WAY OF WORKING

- Meet our special reporting obligations as a publicly traded Company.
- Follow internal controls, procedures, and relevant laws and regulations.
- Maintain business records that accurately reflect the nature and timing of the transactions.
- Record all assets, revenues and expenses in a precise and timely way.
- Submit accurate records to auditors promptly.
- Do not mislead anyone about our operations or finances.

LEARN MORE

[Assets Protection Policy](#)

[Policy to Prevent Money Laundering](#)



We Protect Confidential and Business Information

WHAT DEFINES US

We protect personal, confidential and **proprietary information**. We protect the privacy of associates, consumers and business partners.



OUR WAY OF WORKING¹

- Protect information confidentiality and avoid improper disclosure of specially privileged and **personal information**.
- Communicate transparently about the data we collect and why.
- Secure data and devices with physical measures, passwords and encryption.
- Follow all IT requirements to secure systems and report all suspicious electronic communication or activity.
- Do not discuss confidential matters in public places.
- Associates must report any data breach they are aware of, and we expect the same from clients and suppliers.

LEARN MORE

[Privacy and Personal Data Confidentiality Policy](#)

[Information Security Policy](#)

¹ For our associates in the United States, nothing in our Code of Ethics or other policies should be construed to prevent or discourage you from disclosing or sharing information related to your wages, benefits, or terms and conditions of employment to exercise your rights under applicable law, including for the purpose of engaging in protected concerted activity under the National Labor Relations Act. However, associates may not disclose sensitive employee information about others (such as medical information, government issued identification numbers, background check information and bank account information) entrusted to them in performing their job duties, except as may be required for legitimate business purposes.

We Prevent Insider Trading

WHAT DEFINES US

We prevent **insider trading** and any other forms of market abuse. We keep inside information confidential.

OUR WAY OF WORKING

- Never buy or sell shares in a publicly traded company based on material, **non-public (“inside”) information**.
- Do not buy or sell shares until the inside information becomes available publicly.

- Do not disclose inside or confidential information to anyone outside Arca Continental without proper authorization.
- Share inside and confidential information with associates on a “need-to-know” basis.
- Protect inside and confidential information from accidental disclosure.
- Warn others not to trade on inside information.
- Do not try to manipulate the price of publicly listed securities.

LEARN MORE

Guidelines Applicable to Securities Transactions
Conducted by Board Members, Directors and Employees



Speaking Up and Seeking Help

Associates have the duty to report any violation of this Code to Human Resources, their direct manager, the Ethics and Compliance Department or through the Transparency Mailbox.

The Transparency Mailbox is an anonymous, secure communication channel. It is managed by a third-party expert, which ensures impartiality and confidentiality. The Ethics and Compliance Department oversees the timely management and follow-up of reported cases.



Anyone can use the Transparency Mailbox to report any situation they believe may not meet our highest level of ethics. The Transparency Mailbox can be accessed through the following methods:

- The [Transparency Mailbox](#) on the corporate intranet or on the Arca Continental web page
- The email address:
 - informa@buzondetransparenciaac.com for Spanish complaints
 - report@transparencymailboxac.com for English complaints
- The toll-free phone lines:
 - In Argentina: 0-800-345-5478
 - In Ecuador: 1-800-001-135
 - In the USA: 1-888-876-7548 and 1-888-303-8442
 - In Mexico: 800 8228966
 - In Peru: 1-705-2233

When making a report, as much detail as possible should be provided, including any proof material. This ensures our report is addressed fully and appropriately. Every report is addressed and monitored in detail. All complainants will be able to know the status of their report at all times.

WHAT HAPPENS WITH THE CONCERNS REPORTED?

Arca Continental takes all reports seriously. Upon receipt of a report:

The Transparency Mailbox administrators will send it to the appropriate Ethics Committee for review. The Audit Committee from the Board of Directors approves the Ethics Committee's structure, and the members are appointed by the Executive Ethics Committee. They are responsible for undergoing a thorough investigation and making a decision for each case assigned to them.

These Ethics Committees work under common principles: objectivity, confidentiality, consistency, transparency and non-retaliation.

We must all cooperate with investigations carried out by the Ethics Committees. This includes providing accurate information.

ZERO TOLERANCE FOR RETALIATION

At Arca Continental, we expect everyone to be open and honest about the facts even when they are difficult to confront. To help us feel safe speaking our minds, Arca Continental prohibits retaliation for making a report in good faith. Any form of retaliation must be reported. Proven retaliation is itself a violation of our Code and will be treated as such.



A FOUNTAIN OF RESOURCES

Glossary

A thing of value

This concept includes cash, products, cash equivalents (such as gift cards), loans, gifts, prizes, food and beverages, travel, entertainment amenities (such as artistic, sporting or recreational events), airline tickets, loans, donations and employment.

Arca Continental or the Company

Arca Continental, S.A.B. de C.V. and its subsidiaries.

Assets

All the properties and resources of the Company. Assets come in many forms.

• Physical:

- Vehicles
- Uniforms
- Products, raw material and packaging
- Tools and machinery

• Electronic:

- Computers and software
- Mobile devices
- Electronic files and other data

• Intangible:

- Name, reputation and corporate image
- Personnel and working hours
- Ideas, inventions and designs
- Arca Continental brands
- Copyrights and trademarks
- Patents and trade secrets



• Financial:

- Money or anything that can be converted into money
- Securities and bonds
- Loans and deposits

Associate

Every person employed by Arca Continental. This includes people on boards or in management.

Bid rigging

When competitors agree on the winner of a bidding process.

Bribery

Any direct or indirect payment, offer or promise of anything of value to another person to do or omit to do anything for the purpose of obtaining any improper benefit.

Child labor

Employing children. This often involves illegal, inhumane and harmful work.

Conflict of interest

Any situation in which the personal interest of an associate may affect the professional performance of his/her responsibilities or functions in the Company. This may arise, among other causes, from personal relationships, investments, or professional, economic, or social activities.



Due diligence

An investigation into the background of a company or person to identify potential risks of illegal activities. Background information may include litigations, sanctions, jobs and activities.

Government official

Includes any person who holds a job or position in a government entity. Examples include judges, politicians, candidates and employees of government agencies.

Greenhouse gas (GHG)

Greenhouse gases are those gases in the atmosphere that have an influence on the Earth's energy balance. They cause the so-called greenhouse effect.

Human trafficking

Using coercion and fraud to benefit from peoples' work.

Insider trading

"Inside" information is material, non-public information that has not been released to the public. It is information an investor would consider important in deciding whether to buy or sell shares. Insider trading is when someone uses this information for personal gain. It is a serious crime. Examples could include:

- Significant business change.
- A significant merger or acquisition.
- Positive or negative earnings information.
- The gain or loss of a significant customer or supplier.
- A change in senior management.

Kickback

A type of bribe where money to be given to a company is provided back to a person to influence them.

Market division

When competitors agree to divide markets between their companies. This may involve allocating customers, areas or products.

Money laundering

The process through which the origin of funds or assets obtained through illegal activities is concealed, so that they appear as the result of legitimate activities and circulate without problem or suspicion in the financial system. If successful, it allows criminals to maintain control over such money and use the money in the regular economy.

Non-public information

Confidential information that has not been disclosed to the public.

Person in a special situation

Any person who, by virtue of his/her relationship with an associate, could create or be perceived as creating a conflict of interest for the associate.



Personal data/information

Information that identifies an individual. It can include:

- Name and government identification number
- Postal and email address
- Telephone number(s)
- Credit and debit card information
- Profile picture
- Social media account ID
- Country of residence
- Billing and banking information
- Information about computer hardware and software (e.g., IP address, URI, etc.)
- Medical information
- Names of family members
- Demographic and consumer habits

Proprietary information

Confidential information developed by Arca Continental that has commercial value. Examples include trade secrets, copyrights, ideas, designs, etc.

Relatives

1. The associate's spouse or significant other;
2. The associate's or the associate's spouse's or significant other's children or grandchildren, as well as their spouses or significant others;
3. The associate's or the associate's spouse's or significant other's father, mother, siblings or grandparents;
4. The associate's cousins, uncles or nephews; and
5. Any family member who lives in the same household as the associate.



Retaliation

When an employer punishes an employee for engaging in a protected activity. Retaliatory acts can include harassment, changes in employment, threats and bullying.

Supplier Guiding Principles

Vital pillar of the Coca-Cola Company's workplace accountability programs. They communicate our values and expectations and emphasize the importance of responsible workplace policies and practices that comply, at a minimum, with applicable environmental laws and with local labor laws and regulations.

Sustainability

Our mission at Arca Continental to:

- Work on the basis of ethical behavior and in compliance with the law.
- Create a world of shared prosperity.
- Guarantee our progress and permanence as a Company in the long term.
- Integrate our performance, growth, value chain, communities and environmental protection.

Terrorist financing

The methods terrorists use to collect funds for their activities.



ARCACONTINENTAL

www.arcacontal.com