

Anti-Corruption Policy



ARCACONTINENTAL

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Anti-Corruption Policy

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ANTI-CORRUPTION POLICY

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ANTI-CORRUPTION POLICY

ARCA CONTINENTAL PROHIBITS AND REJECTS ALL ACTS OF CORRUPTION

ANY PAYMENT, DELIVERY, OFFER, PROMISE, OR AUTHORIZATION IN THE NAME OR ON BEHALF OF THE COMPANY, DIRECTLY OR INDIRECTLY, OF ANYTHING OF VALUE TO ANY GOVERNMENT OFFICIAL, TO DO OR OMIT TO DO ANYTHING FOR THE PURPOSE OF OBTAINING OR RETAINING ANY UNDUE ADVANTAGE FOR ARCA CONTINENTAL OR ANY OTHER PERSON IS PROHIBITED.

1. Purpose of the Anti-Corruption Policy

The purpose of this Anti-Corruption Policy is to establish general principles, procedures, and standards when interacting with Government Officials in order to prevent acts of corruption and violations to our *Code of Ethics and Code of Conduct Policies*, other related policies, and applicable legislation.

Compliance with this policy will protect both the Associate and Arca Continental against risks of corruption and the possible legal consequences. It will also contribute to a positive impact on the communities in which we participate, live our organizational culture, and protect our reputation and business.

2. Scope and Application of the Anti-Corruption Policy

This document, as well as the related policies and protocols related to those are applicable to all Associates of the different subsidiaries, affiliates, and business units in every country and region where Arca Continental has operations, as well as to third parties authorized to interact with Government Officials on behalf of Arca Continental.

Any Arca Continental Associate who violates this Anti-Corruption Policy will be subject to disciplinary action under the terms of our *Code of Ethics and Code of Conduct Policies*. In addition, Arca Continental may file complaints and take other measures before the competent authorities to protect its interests, for which reason said Associate may be personally open to civil and criminal liability.

The foregoing also applies, as appropriate, to any Intermediary who breaches this Anti-Corruption Policy.

3. Definitions of the Terms

Lobbying is the process by which Arca Continental makes known its opinion or position on any government project or action, through legitimate channels and in accordance with applicable legal provisions, with the intention that the relevant Government Officials objectively consider it and make informed decisions.

An **Associate** is any person who is employed by Arca Continental or any of its member companies, temporarily or permanently, or who forms part of any of its boards or other administrative bodies.

Political Contribution is any monetary or in-kind contribution (e.g., resources, facilities, services, or products) to support political parties, political party officials, politicians, or candidates for elected office.

A thing of value is any object, service, rendering, benefit, favor, or anything else, whether tangible or intangible, that has value to a Public Official or to any relative, corporation, affiliate, friend, or other person or entity related to him/her. Among other things, this concept includes: cash, in-kind contributions, products, cash equivalents (such as gift cards and electronic purses), loans, gifts, prizes, food and beverages, travel, entertainment amenities (such as artistic, sporting, or recreational events), airline tickets, loan of automobiles or other goods, invitations to participate in travel, discounts granted on a selective basis, liquors, clothing, jewelry, political contributions, donations (including to charitable or non-profit organizations), offers, promises, or promotions of employment, any type of concession in an agreement, product or service, and stocks, shares, or securities of any company or entity.

Donation is any amount of money either in kind or in any other form, which is provided free of charge to support a specific legitimate purpose. A donation is usually support for community development, charitable purposes, or basic human needs (e.g., support for the population in a natural disaster).

Due Diligence is the investigation of relevant background and information (such as litigation, sanctions, public profile, positions and jobs, commercial activities, and policies) of a company or person, in the context of hiring or maintaining a business relationship or of any other nature to identify potential corruption or other risks.

Government Entities include (i) any power, level, or circumscription of government (including legislative, executive, or judicial powers, whether at the municipal, state, federal, or national level); (ii) an autonomous public body; (iii) a state-owned enterprise; (iv) an international public organization (e.g., UN, World Bank, OAS), or (v) a political party.

Government Official includes any person who holds a job, position, or commission in a Government Entity. The term also includes any candidate for public office, any person appointed by Government Entities or other institutions to perform administrative activities on their behalf, and employees of a supplier controlled by a Government Entity.

Entertainment Expenses are expenses related to invitations to restaurants or other similar commercial establishments, as well as to cultural, sporting, or entertainment events. Entertainment Expenses generally DO NOT include expenses in luxury or ostentatious establishments and under no circumstances do they include expenses at casinos or other gambling or similar establishments, discotheques or dance halls, or other establishments exclusively intended for adults.

Intermediary is any agent, manager, consultant, advisor, distributor, business partner, or service provider who in any way represents Arca Continental or its interests. Typical examples of intermediaries are: customs agents, attorneys, lobbying firms, marketing consultants, investigators, and intelligence service providers, among others.

Compliance Officer is the Arca Continental official in charge of the Ethics and Compliance System. You may contact the Compliance Officer by the following means: for Coca-Cola Southwest Beverages: COBC@cocacolaswb.com ; for Wise and any other operation: integridad.etica@arcacontal.com

Facilitation Payment is any undue payment made to a Government Official for the purpose of expediting a non-discretionary process.

Gifts are favors given as a courtesy or for promotional purposes, generally representative of Arca Continental's products, which do not compromise the independence, impartiality, or objectivity of the Government Official who receives them.

Bribery is any direct or indirect payment, delivery, offer, promise, or authorization, of anything of value to any Government Official to do or omit to do anything for the purpose of obtaining or retaining any improper advantage for the company or any other person.

4. General Principles

All interactions with Government Officials should have a business justification and be governed by professionalism, transparency, respect, and integrity, and in accordance with company regulations.

The provisions of this policy should be interpreted broadly. The Associates must comply with this policy not only to the letter, but also with Arca Continental's general principles in relation to the **prohibition and rejection of any act of corruption**.

The interactions with Government Officials must be properly documented, and once the necessary approvals have been obtained in accordance with our *Code of Ethics and Code of Conduct Policies*, as well as with the protocols identified in this policy, all relevant documentation must be retained.

5. Policies and Relevant Protocols

Arca Continental Associates and Intermediaries must strictly comply with the following policies and protocols:

5.1 Gifts and Entertainment Amenities

As a general rule, Gifts and Entertainment Expenses should not be granted to Government Officials. With the exception that when these Gifts or Entertainment Expenses are granted to said Government Officials, they are permitted by applicable law, and they comply with internal approvals.

5.2 Granting of Donations

Donations to Organizations or Individuals. Donations to any Government Official are prohibited, except for the Political Contributions as provided for in this Policy. Donations to persons, companies, associations, foundations, or other organizations in which a Government Official has a direct or indirect interest will only be permitted when there is no foreseeable relationship or interest between Arca Continental and the Government Official, and the Policy and internal approvals are complied with for Granting Donations.

Donations to Government Entities. Donations to government entities are permitted only if the following conditions are met:

- (a) The Donation is legitimate and permitted by applicable law
- (b) The Donation complies with the Policy for the Granting of Donations, and it is authorized in compliance to the same.
- (c) The Donation relates to Arca Continental's social responsibility or community development activities or that it is commercially justified (e.g., part of an authorized customer agreement with a government entity)..
- (d) The Donation is properly documented, auditable, and made in kind or through an official account of the government entity through the formal financial system. Donations in banknotes or coins or by any other means that is not readily auditable are prohibited. Donations made by checks or similar instruments should be made payable to the recipient government entity.
- (e) The Donation does not represent or give rise to an actual, potential, or apparent conflict of interest with the relevant government.

All expenses incurred by the Company for the concept of Donations must be clearly and accurately reflected in the accounting procedure corresponding to the nature of the transaction in Arca Continental's books and records, in accordance with applicable laws and regulations.

5.3 Sponsorships and other Promotional Activities

Sponsorships and Other Promotional Activities to Organizations or Individuals. Any sponsorship or delivery of free products within the framework of a promotional activity to any Government Official is prohibited. Sponsorships and other promotional activities to persons, companies, associations, foundations, or other organizations in which a Government Official has a direct or indirect interest will only be permitted when there is no relationship or foreseeable interest between Arca Continental and the Government Official, and the Policy and Manual of Sponsorships are complied with as well as internal approvals.

Sponsorships and Other Promotional Activities to Government Entities or Intermediaries. Sponsorships or delivery of free products within the framework of a promotional activity to government entities or their contractors or intermediaries will only be permitted if the following conditions are met:

- (a) They are permitted by applicable legislation.
- (b) There is a clear business justification (such as brand or product positioning, commercial promotion, and sales strategy).
- (c) They are properly documented, auditable, and comply with the official requirements of the governmental entity in question.
- (d) They do not represent or give rise to an actual, potential, or apparent conflict of interest with the relevant government entity.
- (e) They comply with all internal approvals

5.4 Trips

As a general rule, trips should not be paid for Government Officials. As an exception, trips may be paid to Government Officials, provided that there is a clear business justification, and they are permitted by applicable law and comply with the Travel Policy as well as the internal approvals.

5.5 Purchases

Purchases from Organizations or Individuals. Any purchase of products or services from any Government Official is prohibited. Purchases of products or services from persons, companies, associations, foundations, or other organizations in which a Government Official has a direct or indirect interest will only be permitted when there is no foreseeable relationship or conflict of interest between Arca Continental and the Government Official as well as complying with the Purchasing Policy, and and the internal approvals.

Purchases from Government Entities. Purchases from government entities will only be permitted if they are permitted by applicable law, there is a clear business justification, and under normal market conditions, there is no conflict of interest with the government officials involved in the operation, and furthermore complying with the Purchasing Policy and the internal approvals.

5.6 Political Contributions

Political Contributions from Arca Continental. Political contributions from Arca Continental must be carefully analyzed and must strictly comply with applicable laws and our *Code of Ethics and Code of Conduct Policies*, as well as the internal approvals.

Political Contributions by Associates. If any Arca Continental Associate wishes to make Political Contributions in his/her personal capacity, he/she must ensure that these do not interfere with his/her ability to fulfill his/her obligations as an Associate. Additionally, the Associate will be strictly prohibited from using the name of Arca Continental and in no way give the impression that Arca Continental has any type of direct link or interest in said Political Contributions with the exception of those disclosures required by law.

5.7 Processing of Permits and Licenses

The obtaining of licenses and permits corresponding to production facilities and plants, as well as vehicles, may be processed directly by Arca Continental's Associates or by Intermediaries who have satisfactorily passed through the process foreseen for Contracting Third Parties, the internal approvals, and who have signed an agreement in which they commit to comply with this Anti-Corruption Policy, the applicable anti-corruption laws, and with Arca Continental's *Code of Ethics and Code of Conduct Policies*.

5.8 Inspections and Visits to Plants, Distribution Centers, or Other Installations

Official visits or inspections to Arca Continental installations will be attended to by the persons in charge as identified in the internal protocols, always immediately notifying the legal area of the country or business unit concerned and by sending a copy of all the documentation generated or related to any visit or inspection.

It is strictly prohibited to give, offer, or promise Gifts, Entertainment Amenities, or any other kind of gratuity to Government Officials or other persons outside the Company during the inspection.

5.9 Bidding

Arca Continental will comply with all laws and other guidelines applicable to public bidding processes and government contracts.

In accordance with the general prohibition established at the beginning of this Anti-Corruption Policy, Arca Continental's Associates and Intermediaries are strictly prohibited from directly or indirectly giving, offering, or promising, money, or any other Asset of Value to a Government Official for the purpose of using their authority or influence to favor Arca Continental's interests during the course of a public bidding or contract award.

Without prejudice to the foregoing, all Arca Continental Associates must comply with the policy and relevant principles on the matter of the economic competency contained in our *Code of Ethics and Code of Conduct Policies*.

5.10 Traffic Incidents

In the event of a mishap, fault, or other road incident related to vehicle units owned by Arca Continental, the driver is prohibited from negotiating any type of arrangement with the authorities on behalf of Arca Continental. The only person with authority for managing the foregoing cases on behalf of Arca Continental will be the person designated by the company, who must operate at the direction of the Legal Department and inform the Legal Department when any of these cases occurs.

5.11 Arca Continental Intermediaries before Government Entities and Officials

All the Intermediaries who are legally authorized to interact with government entities on behalf of Arca Continental must satisfactorily complete the process set forth for Contracting with third parties, the internal approvals and sign an agreement in which they commit to comply with this Anti-Corruption Policy, applicable anti-corruption laws, and Arca Continental's *Code of Ethics and Code of Conduct Policies*.

5.12 Invitations to Events Organized by Arca Continental

Government Officials may be invited to corporate events such as plant openings, Distribution Centers, or other facilities, provided that they comply with the restrictions and limitations set forth in legislation, in this policy, and its protocols.

5.13 Lobbying

In appropriate circumstances, Arca Continental may participate with its own initiatives or those proposed by its guild to improve current laws or regulations or the legal projects or applicable regulations. Arca Continental believes that being involved in the public agenda is an appropriate and important role for companies in an open company, as long as it is done in a legal and transparent manner. At all times, the Associates or Intermediaries involved in the Company's lobbying actions must respect the legislative context, applicable legislation and other provisions, the customs of each country, as well as the provisions of this Anti-Corruption Policy, our *Code of Ethics and Code of Conduct Policies* and other related policies.

Only Associates and Intermediaries authorized by the Public Affairs Area may be involved in any Lobbying activity. Before participating in any of these activities, authorized Associates may seek advice from the Compliance Officer.

5.14 *Facilitation Payments*

Facilitation payments to a Government Official are prohibited at Arca Continental. No Arca Continental Associate may make facilitation payments.

6. *Diffusion and Training*

The company shall ensure that the principles mentioned in this Policy are duly communicated and understood by the Associates.

7. *Complaint*

If one wishes to report a deviation from this policy, an associate may do this before any superior by any other means, including the Transparency Mailbox. If any other person wishes to file a complaint, it can be directly presented through the Transparency Mailbox or through the following options:

- a) Enter into the complaints' platform from the company's internal network
- (b) Go to the external administrator's website: www.resguarda.com/arcacontinental
- c) Search for access to the Transparency Mailbox at www.arcacontal.com
- d) Send an email to buzondetransparencia@resguarda.com if the report is in Spanish or to ethicsarcacontal@resguarda.com for a report in English
- e) Call the charge-free telephone numbers listed below:
 - * In Argentina: 0-800-999-4636 and 0-800-122-7374
 - * In Ecuador: 1-800-000031
 - * In the United States: 1-800-921-2240
 - * In Mexico: 01-800-123312
 - * In Peru: 0-800-00932

The Transparency Mailbox is managed by an expert independent third party. Complaints received are investigated and decided by the Local Ethics Committees, protecting the identity of the of every complainant.

Arca Continental prohibits any retaliation against anyone who reports a misconduct in this Policy.