

# ETHICS AND COMPLIANCE



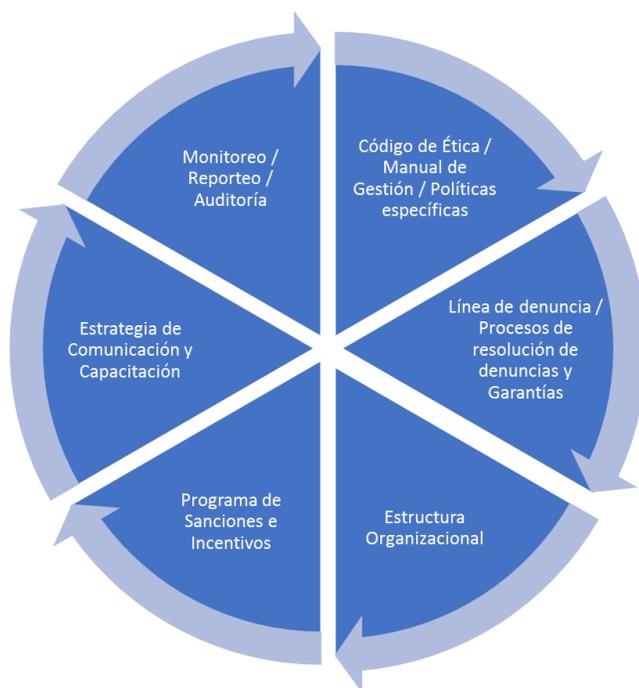
## Business Ethics

Arca Continental is a company focused on success and the generation of shared value. All our actions are guided by a set of principles and values that are the essence of our organizational culture. In particular, the 4 integral values that we live and promote are:

- a) Customer Orientation and Service Vocation
- b) Integrity Based on Respect and Justice
- c) Comprehensive Development of Human Capital
- d) Sustainability and Social Responsibility

In order to fulfill our vision and mission, while upholding our values, we have implemented an Ethics and Compliance System, incorporating it as an element of its organizational culture and strategy. The system derives directly from one of the company's Values, "Integrity Sustained by Respect and Justice", and is reflected in the Cultural Principles of "Transparency", "Focus on Results" and "Focus on People".

This system is applicable in all the territories and all the businesses of Arca Continental and is made up of the elements shown in the following table:



Our Code of Ethics and Conduct Policies apply and are known by our employees and the Board of Directors, as well as by third parties related to the company, such as customers, suppliers, and other community actors. In this document, the company starts from the basic principle of complying with the law and applicable regulations in all the countries where we operate and establishes more demanding parameters of behavior in some aspects. Among the main objectives they address are:

- Respect for internationally recognized human rights

- Anti-corruption and money laundering controls
- Non-discrimination, control of conflicts of interest
- Protection of the environment and health and safety conditions at work
- Respect for free competition and fair competition practices
- Confidentiality of information
- The promotion of practices that avoid conflicts of interest
- Reporting irregularities anonymously and free of reprisals

## Coverage of the Ethics and Compliance System

At Arca Continental we have proposed that our Policies and Code of Ethics be known and understood by all our collaborators in the different countries where we operate. To achieve this, we carry out dissemination activities through different internal means and training activities, for which a specific computer tool is used that allows us to monitor collaborators and analyze in detail the deployment of training modules.

These trainings are periodic, and their format is renewed periodically seeking to improve their effectiveness. They are focused on the audience, so the practical examples may vary, as well as the channel to deliver them. Many of them are mandatory for 100% of the collaborators and records of the completed modules are kept. We have measured the impact of these activities in massive internal surveys that include questions related to ethics and compliance issues, among others.

As an outstanding example of these trainings, in March 2021 the new e-learning module on the Code of Ethics and Conduct Policies was deployed on the Success Factors platform, with the aim of deepening the content of the Code, our Policies and System Complaints, having a result higher than 87% compliance. To find out the number of employees who have received training on the Code of Ethics and Conduct Policies, please consult the annexes to our integrated annual report.

Likewise, in 2021, the Complaints System was disseminated through other means of mass communication, such as email, to all employees. In addition to the above, it is necessary to mention that the training of the new e-learning module on the Code of Ethics and Conduct Policy will be extended in 2022 to all operational personnel, thus covering 100% of the employees of Arca Continental.

It is no less important to mention that we held webinars to deploy the Anti-Corruption Policy and the Conflict of Interest Policy for the Directorate, Management and Headquarters levels in the five countries where Arca Continental has operations.

Eventually, the rest of AC's audiences will be given both contents in e-learning format as the first two training modules of the Arca Continental Fraud and Corruption Prevention Program.

## Corruption and Bribery

Corruption affects the development of any organization, which is why the Code of Ethics of Arca Continental prohibits and sanctions the concealment or performance of any activity that implies (stipulated not restrictive) payment in cash or in kind, advantages, privileges, services or attention

excessive, either directly or by any of our audiences, in order to obtain or retain any improper advantage for the company or any other person.

In this way, associates, managing shareholders and any person representing the company are strictly prohibited from engaging in acts of corruption, bribery, collusion and, in general, any illicit activity in the exercise of their functions, and will refrain from participating directly or indirectly in any contest or bidding where there are indications of corruption. These guidelines extend to our business partners (suppliers and brokers). That said, we believe that the best way to combat corruption is to be honest, consistent and report any act.

Our commitment to the collaborators that make up and represent our organization is that they can exercise their political rights as citizens; however, the ideology of each one of them does not represent Arca Continental, since it is non-partisan and is governed by legitimate business interests aligned with this Code of Ethics. Therefore, it is not allowed to make any economic or in-kind contribution on behalf of the company to political parties or candidates for election, in the form of obtaining any benefit.

## Money Laundering

Within the conduct policies provided for in the Code of Ethics are: The Policy for the Protection of Corporate Assets (known as the Anti-Fraud Policy) and the Policy to Prevent Money Laundering. The first of these seeks to lay the foundations for a correct and responsible use of assets; the correct registration of accounting operations; dealing with customers, suppliers and other third parties and the existence of processes and controls to minimize risks in those areas responsible for managing the company's assets.

On a constant basis, a process of continuous improvement is carried out with the Policy and Manuals to Prevent Money Laundering, which are updated in relation to the changes in the different legislations, but above all based on the new business of the Company. The focus is aimed at raising awareness regarding the operations that may represent risk and the obligations to which we are subject; as well as regarding the risks inherent to new businesses that may be being explored. The policy was approved in December 2021. Likewise, the Manual will be consulted before the Ethics Steering Committee for its subsequent publication.

## Human Rights

In the case of respect for Human Rights, there is also an additional and specific instrument for our suppliers, such as the Guiding Principles for Suppliers of The Coca-Cola Company, this text and the Code of Ethics and Conduct Policies of Arca Continental they are signed by every provider that is registered in our portal.

In 2021, we began evaluating the sustainability performance of our critical suppliers, who account for the top 80% of global spend for our highest priority ingredients by volume.

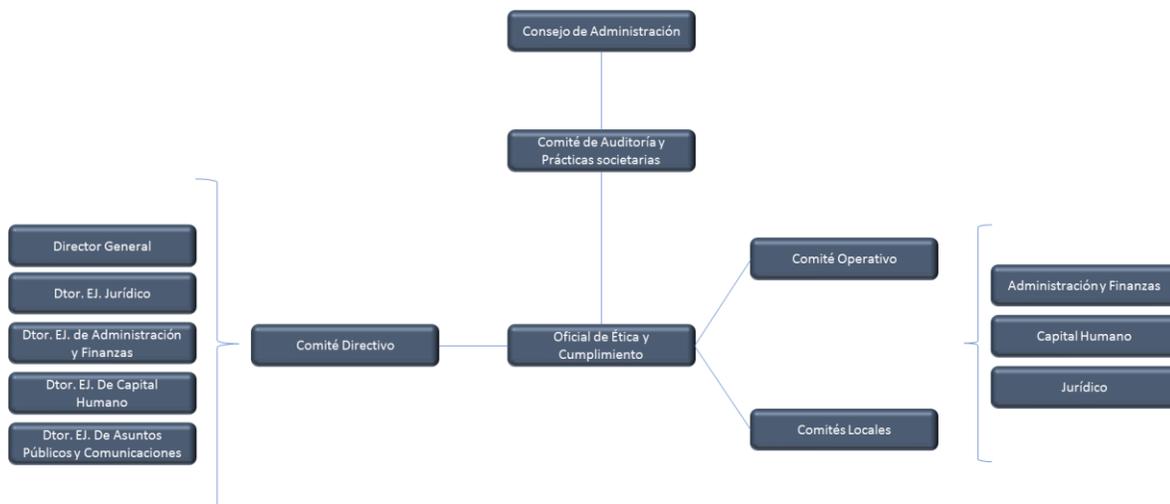
The sustainability performance evaluations of our critical suppliers allow us to identify risks in our supply chain and develop corrective plans for those suppliers that present a high-risk level in any of the topics shown in the following table.

Environment	Labor Practices and Human Rights	Ethics	Sustainable Supply
<i>Operations</i> <ul style="list-style-type: none"> <li>• Energy consumption and GHG</li> <li>• Water</li> <li>• Biodiversity</li> <li>• Local and accidental contamination</li> <li>• Materials, chemicals and waste</li> </ul> <i>Products</i> <ul style="list-style-type: none"> <li>• Use of products</li> <li>• End of product life cycle</li> <li>• Consumer health and safety</li> <li>• Environmental services and actions to promote env. protection</li> </ul>	<i>Labor Practices</i> <ul style="list-style-type: none"> <li>• Employee health and safety</li> <li>• Labor conditions</li> <li>• Social dialogue</li> <li>• Career and training management</li> </ul> <i>Human Rights</i> <ul style="list-style-type: none"> <li>• Child labor, forced labor and human trafficking</li> <li>• Diversity, discrimination and harassment</li> <li>• Human rights of external interest groups</li> </ul>	<ul style="list-style-type: none"> <li>• Corruption</li> <li>• Anti-competitive practices</li> <li>• Responsible information management</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental practices of suppliers</li> <li>• Social practices of suppliers</li> </ul>

To date, we have assessed the sustainability risks of 43% of our critical suppliers. Using the EcoVadis platform deployed for the evaluation of risks associated with sustainability and monitoring of our suppliers, we have not detected any supplier with significant risks in terms of human rights.

### Report on violations of the Ethics and Compliance System

The entire Ethics and Compliance System has its own structure and governance, the final responsibility falls on an Ethics and Compliance Steering Committee who reports the development and status of the system to the Audit Committee of the Board of Directors of Arca Continental, through the Ethics and Compliance Officer. In addition to this centralized structure, each territory and business has a Local Ethics and Compliance Committee.



The Steering Committee is chaired by the General Director of the company and directors of the highest rank within the organization, and its function is to update the Code and its Manual,

the dissemination and training strategy, the follow-up of the monitoring of the indicators and the administration of the code by the local committees and the appointment of these. The Local Committees, as well as the Operating Committee, are made up of four high-level directors, and are responsible for resolving all deviations from the Code and policies and executing the action plans decided on by the Steering Committee.

The Ethics and Compliance Officer links the local Committees with the Board of Directors, and the latter with the Board's Audit Committee; he oversees the administration of the code, monitors the work of the committees, supports the Steering Committee in its functions and reports on all of the above to the Steering Committee and the Board's Audit Committee.

The Ethics and Compliance System promotes that any unethical behavior be reported by anyone, even anonymously, through the Transparency Mailbox, which has been systematized and outsourced for greater transparency, it also provides for the obligation to preserve the confidentiality of the complainant and the prohibition to take retaliatory measures against it.

There are three formal ways to report a fact:

- i. Corporate Arca Continental's intranet or website.
- ii. E-mail; [informa@buzondetransparenciaac.com](mailto:informa@buzondetransparenciaac.com)
- iii. Free telephone lines in each of the territories.

Once a complaint is received, it is assigned to the respective Local Committee, which contacts the complainant at various times to inform them of the status. In 30 days the Committee investigates the case and makes a decision; If there is a violation of the Code, it determines the applicable consequence, which may vary from a reprimand to the termination of the relationship, as well as the root causes and remedial measures, and informs the responsible areas. Finally, each Committee reports to the country's leader statistical information from the complaint line so that high-level action plans can be formulated.

The Communication and Training strategy is another element of the Ethics and Compliance System. Awareness and dissemination activities have been carried out in all the territories and massive online training has been implemented, as well as face-to-face activities at the operating facilities. We are currently rolling out a new e-learning module on the Code of Ethics and the Transparency Mailbox, available to all employees in the five countries.

Within the framework of the 360° evaluation that is carried out annually on the positions of heads, managers and directors throughout the AC area, the alignment of the employee's performance with positive leadership, with the diversity strategy and inclusion and with the achievement of business strategies in compliance with the ethical principles established in our code.

In relation to the ethics and compliance risks that have been identified and assessed and on which prevention strategies are designed, they are monitored in various ways. For example, for the risks of corruption and fraud, analysis is made of alerts that our systems throw, from unusual or risky operations. The evolution of risks, their prevention and related strategies are periodically reported to the Board of Directors and the Audit Committee of the Board.

The Internal Audit Department carries out reviews of the AC Complaints System that have resulted in continuous improvement initiatives for the processes involved.

For statistical data on violations of the Code of Ethics and Conduct Policies, as well as the actions taken as a result, please consult the annexes to our integrated annual report.