

**OPERATIONAL  
EXCELLENCE**



**SPRADLING®**  
GROUP INC.

# Code of Ethics and Professional Conduct

7th Edition



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## ***MESSAGE FROM IVAN SEPULVEDA (CEO)***

At Spradling Group, we are known for conducting our business within an ethical environment, acting professionally and responsibly according to the standards established in this code.

All Spradling Group employees share the responsibility to work in compliance with the requirements of this code, because, this code represents the values that we hold as a group and our commitment to carry out business in a safe, ethical manner, socially and environmentally responsible with a culture of zero tolerance to fraud, corruption and money laundering and the financing of terrorism (ML/FT).

This code is our guide to act; therefore, it is important that all employees become familiar with it and be consulted when there are doubts about unethical behavior.

The Spradling Group Board and all members of the Management Committee endorse this code.

**Ivan Sepulveda**  
**CEO**  
**March 2019**

## INTRODUCTION

Spradling Group believes strongly in the defense of the highest standards of ethical behavior, and as a group, we intend that each one of its employees develop their activities, in such a way that they implement a series of principles based on integrity, responsibility, transparency and honesty.

The Vision, Mission and Corporate Values of the group are starting points of the present code, creating practical guides for ethical management of the organization and generating behavior guidelines that reflect the responsibilities that must be fulfilled within the group or in its relations with third parties (shareholders, employees, suppliers, customers, government entities and the community), promoting the development relationships based on mutual trust with the different interest groups.

For Spradling Group's directors, employees and its companies, ethical behavior is not an option, it is an integral part of their business duties. For the above, the employees of Spradling Group will sign their commitment with this code to confirm compliance with it.

Our business associates can also have an impact on our reputation through their behavior, this is why we expect and encourage them to act in a manner consistent with our code.

This code applies to all employees belonging to the Spradling Group and its companies, as well as to all third parties that we have contractual or legal relation.

## I. THE THREADS OF SPRADLING® CULTURE

### *1.1 Drive and Vitality*

#### **We act with energy that transforms**

At Spradling®, drive and vitality are the forces that move us to evolve, innovate, and create value. We act with energy, optimism, and purpose, turning challenges into opportunities to create value. We are inspired to move forward with agility, creativity, and a human-centered mindset, connecting our passion with the impact we want to make in the world.

You can see it when we:

- Take initiative without waiting for instructions.
- Seek fast and effective solutions.
- Maintain a positive attitude, even under pressure.
- Drive issues to completion and follow through on commitments.

### *1.2 Excellence*

#### **We act with integrity, sound judgment, and a commitment to continuous improvement**

At Spradling®, excellence is both our standard and our journey. It is our ongoing commitment to quality, learning, and continuous improvement. We value the process as much as the outcome, understanding that every experience, including mistakes, provides an opportunity to learn, grow, and improve. We act with integrity, sound judgment, and a passion for building solutions that create sustainable value.

You can see it when we:

- Meet and exceed technical and quality standards.
- Close out work thoroughly, leaving no loose ends.
- Learn from mistakes and adjust quickly.
- Make decisions with sound judgment and accountability.

### *1.3 Adaptability*

#### **We evolve with the world**

At Spradling®, adaptability is our ability to transform ourselves in order to continue creating value in a constantly changing environment. We approach new situations with openness, curiosity, and confidence, integrating learning and flexibility into every challenge. We see change as an opportunity to innovate, strengthen our capabilities, and move toward a better future.

You can see it when we:

- Adjust priorities based on new realities.
- Let go of practices that no longer add value.
- Explore new ways of working.

OPERATIONAL EXCELLENCE: We are efficient, simplify and prioritize

- Respond quickly without compromising quality.

## ***1.4 Collaborative Work***

### **We create, build, and celebrate together what inspires and unites us**

At Spradling®, we believe the best solutions emerge from genuine collaboration. We connect talents, ideas, and perspectives to learn, create, achieve, and recognize results that go beyond individual contributions. We value diversity as a source of strength and work through trust, respect, and shared purpose, knowing that our impact grows when we combine capabilities and collaborate effectively as individuals and teams.

You can see it when we:

- Ask for and offer help without barriers.
- Share information openly, transparently, and at the right time.
- Co-create solutions with cross-functional teams and departments.
- Respect and value diverse opinions, styles, and cultures.

## ***1.5 Innovation***

### **We bring new possibilities to life**

At Spradling®, innovation is part of our DNA. It is our ability to imagine, challenge, and transform ideas into solutions that improve people's lives and the world around us. We are driven by curiosity and a commitment to a more sustainable future, acting with courage to anticipate change, experiment, and continuously evolve.

You can see it when we:

- Propose new ideas based on data and emerging trends.
- Experiment, prototype, and learn quickly.
- Challenge the status quo with respect.
- Seek more sustainable and efficient solutions.

## ***1.6 Communication***

### **We connect to build**

At Spradling®, communication is the bridge that allows us to move forward together. More than sharing information, we strive to create connection, clarity, and trust. We listen actively, communicate transparently, and express ourselves with respect and purpose, strengthening relationships that make it possible to build a shared future.

You can see it when we:

- Communicate clearly, directly, and in a timely manner.
- Listen actively before responding.
- Give and receive constructive feedback.
- Avoid rumors and promote transparency.

**A Spradling Leader leads by example and acts with integrity, energy, and purpose.**

Also a Spradling® leader connects people to our purpose, strategy, and the impact of our work. They are agile and adaptable, embracing change with intelligence and inspiring their teams through positive, contagious energy that drives action.

They make sound decisions, promote sustainability in every action, and align their teams with business priorities.

They build trusted relationships, foster collaboration, and create an environment where innovation, learning, and continuous improvement are part of everyday life.

They are visible, approachable, and consistent. Their behavior reflects the values that shape the culture we aspire to live every day.

**At Spradling®, leadership means building culture through every action, mobilizing others with humanity, and moving forward together toward a future that inspires the world to evolve.**

## 2. CONFLICT OF INTEREST

All employees must act based on corporate values according to the interests of Spradling Group and its companies, in other words, commercial or business decisions must be impartial and transparent.

Conflict of interest means any situation where one or more decisions that an employee must take in the performance of their duties may be affected in their impartiality because there is a personal interest (personal or of any of their family or relatives), which it can occur in any area, but it is usually of a financial nature. Any employee who participates or plans to participate in activities or businesses that could lead them to situations who could potentially constitute a conflict of interest must report immediately and in detail the potential conflict to their immediate boss or any of the established channels, which are defined in numeral 10 of this Code.

### 2.1 POTENTIAL CONFLICT OF INTEREST

- ❖ Participate directly or indirectly in the property (be a direct or indirect shareholder) of a business or company that competes with the group or acting as our distributor, sub-distributor, supplier of goods or services, contractor, subcontractor or customer.
- ❖ Keep labor, commercial or professional relationship with businesses or companies mentioned in the previous point.
- ❖ Accept payments, services, loans, rewards of any amount or attention from suppliers or customers
- ❖ Use the group's image, its reputation, its name or the information that is handled within its companies in order to obtain benefits or favors for itself or for a third party.
- ❖ Participate in any decision-making process, directly or indirectly related to any situation that may generate a conflict of interest, unless the Management of Human Resources or the boss expressly and formally authorized it.

- ❖ Failing to inform the employee's manager and Human Resources Department that there is a first-degree or second-degree relative working at the company, even by marriage.

All employees are responsible for reporting any potential conflict of interest, whether it involves themselves or a colleague (including supervisors or managers), to ensure that appropriate measures can be taken.

Any potential conflict must be reported immediately, regardless of whether the employee has received verbal or informal authorization. If the individual involved is a supervisor or manager, the matter may be reported directly to the Human Resources department or through the Company's Ethics Line. (See Section 10 of this Code.)

While the case is under review and until a final decision is made, the employee involved must refrain from participating in any process or activity related to the potential conflict of interest

### **3. GIFTS, COURTESY, ENTERTAINMENT AND DONATIONS**

Gifts, courtesy and entertainment can promote good relations between the group and its customers, suppliers or third parties. However, it can interfere with the objectivity of group's employees. For these reasons, employees, suppliers and third parties acting on behalf of the group or its companies can only accept occasional gifts of reasonable value, which in any case may not exceed the amounts and conditions established in this section.

No gifts or benefits are allowed from customers, suppliers or third parties aimed to obtain advantages, privileges or assistance within the group or when a decision of hiring with that third party is in process. Any gift that could be consider as a commitment or obligation that may have influence on a business decision should not be received.

Therefore, it is not permitted to accept from a third party, supplier or client gifts that exceed the local currency equivalent to forty dollars (USD 40) per person or any invitation or courtesy that exceeds the equivalent in local currency a hundred dollars (USD 100). Those gifts must be reported to your superior and/or Human Resources Department.

Any gift in cash or in cash equivalents such as checks, investments, payment orders or personal expenses payments should not be accepted.

The company will make donations only to entities or natural persons allowed by the Law and will not exceed USD 20,000. Higher amounts must have the authorization by the board.

### **4. DUE DILIGENCE**

Employees must act responsibly and efficiently in their duties and activities, identifying potential risks and complying with the policies and regulations of the Spradling Group and its companies.

Employees should not allow violations or breaches of the law, policies or corporate procedures. Employees should not hide information regarding the processes and activities performed.

We encourage the commitment to integrity, ethics and transparency as the greatest value of the Spradling Group and its companies.

## **5. HUMAN RESOURCES**

People are the greatest asset of Spradling Group and its companies; therefore, the Group's commitment is to provide to all employees a reliable and pleasant work environment in accordance to the law, which makes them feel proud to be part of the group.

### **5.1 EQUAL OPPORTUNITIES OF EMPLOYMENT**

Spradling Group and its companies are firmly committed to guarantee equal opportunities for their employees in all aspects and provide a workplace free from discrimination based on race, color, sexual orientation, religion, national origin, age and disability.

All recruitment and selection decisions are based on compliance with the profile required for each position and the qualities of each candidate.

### **5.2 REJECTION OF WORKPLACE HARASSMENT**

All employees have the right to be treated fairly, with courtesy and respect. Spradling Group and its companies will not tolerate any form of abuse or harassment, whether verbal, physical or sexual against their employees. Any employee who feels that it is being harassed in any way or knows of possible harassment of another employee should report it immediately to the Human Resources Area or through the Ethics Line.

### **5.3 CONFIDENTIALITY AND NO RETALIATION POLICY**

Spradling Group and its companies will not accept any type of reprisal against employees or third parties who in good faith report possible violations of the Code of Ethics and Professional Conduct. There are mechanisms to guarantee confidentiality when such reports are being received.

Any employee who feels that is being subject to retaliation, separate this is the case with a colleague or a third party, you must report it through the Human Resources area or through the Ethics Line

### **5.4 MODERN SLAVERY COMPLIANCE STATEMENT**

Spradling Group is dedicated to eliminating modern slavery and forced labor in all forms possible. We would further affirm that we are not engaged in any activities of oppression, human trafficking, or coercive labor. We have developed and executed stringent policies in order to make sure that along with being in

conformity with the pertinent regulations, all of our practices are favorable and straightforward to workers.

Through regular inspections of our internal processes, we guarantee steady compliance with the relevant rules and laws on modern slavery. Our resolve to openness and accountability is also tied to the setting up of measures to identify and mitigate the risks related to modern slavery. Spradling Group is committed to a work environment which is free from human exploitation and promoting ethical and fair-trade practices across the supply chain.

## **6. RELATIONSHIP WITH STAKEHOLDERS (CUSTOMERS, SUPPLIERS, DEALERS AND AUTHORITIES)**

### **6.1 CUSTOMERS**

Customers are the companies' objective, therefore, the conduct with them should be ruled by seriousness, professionalism, fairness in the treatment and the strict fulfillment of the commitments that are acquired with them. The products or services must be presented as they are, without exaggerating their qualities and without misleading specifications, uses or characteristics that they do not possess.

This applies to the actions of employees in commercial department, advertising campaigns and any other type of commercial contact with the interest groups. Spradling Group and its companies seek the satisfaction of their needs and in case that they do not achieve it, their claims must be answered promptly, based on the particular study of each case and the general policies or specific guarantees that the group has on this aspect.

### **6.2 DEALERS**

Relations with distributors should always be framed by good faith and loyalty, as the basis for transparent market management. Discriminatory practices are reprehensible in which one is preferred over others without any objective reason. Information should not be communicated or disclosed in advance for some of them, which could give them an advantage and improper benefits in business.

### **6.3 SUPPLIERS**

Spradling Group and its companies select suppliers and contractors to satisfy the commercial needs of goods and services, following the principles of transparency and avoiding any prejudice or conflict of interest. The interests of third parties, which we have business relationships are respected and regulated according to fair contractual terms.

Suppliers and contractors must faithfully comply with the policies and procedures of Spradling Group and its companies, working under the principles of technical, administrative and managerial independence.

All employees must responsibly manage relationships with suppliers and contractors. Respecting the proper segregation of duties and responsibilities of each worker and area. Following the policies and procedures established by the group.

Spradling Group and its companies have clear contracting rules that prevent the agreement of indefinite contracts with suppliers in order to promote free competition with any supplier.

We require that suppliers of the Group comply with all applicable laws and regulations on labor and environmental matters in their respective countries where they carry out operations. We do not enter into business with suppliers which their obligations to respect employees' rights is not defined and we take measures in the cases in which a breach is detected.

## **6.4 GOVERNMENT RELATIONS**

The relations of Spradling Group and its companies with state organisms or public entities that perform official surveillance and control functions will be always governed by the rules and legal procedures. It is the group's interest to conduct the relationship within the strict framework of professionalism, seriousness and ethics.

Spradling Group and its companies respect the authorities and their decisions. When there are decisions of the authorities that negatively affect the interests of the Group, legal mechanisms defined by the regulations applicable in each country will be executed, under no circumstances pressure will be done to an official of an authority and use procedures that do not comply with the law.

## **6.5 FREE COMPETITION**

Spradling Group and its companies operate in a target market inspired by loyalty and respect towards their competitors. Therefore, they will refrain from carrying out actions that attempt against free competition and any breach of these laws will not be tolerated. Competition laws may vary from country to country and some laws may apply to businesses carried out outside the country of origin. The consequences of not complying with competition laws can be severe for the group, its companies and employees that are involved in behaviors that violate free competition.

Spradling Group and its companies only accept contracts that are awarded to them in transparent processes, where our offer has gone ahead due to better conditions compared to competitor's condition. Employees must never agree to offer or give undue or fraudulent compensation contrary to safe business practice, whether in cash or in kind, in exchange for such awards. Likewise, Spradling Group and its companies will abstain in all contact with their competitors, who have the object or effect of agree the conditions in a process.

As an employee of the group, never agree or discuss with competitors the prices which goods or services will be sold, do not indicate or impose to clients and distributors the price which they must sell goods or services purchased from the group and its companies and do not agree with other companies that limited production of goods or services

## **6.6 HUMAN RIGHTS – THE UNITED NATIONS GLOBAL COMPACT**

Spradling Group and its companies carry out activities in order to promote, protect and respect the dignity of people, human rights, labor and the environment, as well as promoting the fight against corruption.

Spradling Group and its companies are proactive to prevent and eliminate human rights abuses, such as forced labor and child labor, as well as acting in an environmentally responsible manner in all its business and daily activities.

## **7. OCCUPATIONAL HEALTH, INDUSTRIAL SECURITY AND THE ENVIRONMENT**

Spradling Group and its companies are committed to providing their employees with a workplace that is healthy, safe and in harmony with the environment. Given the characteristic of the business, industrial safety and occupational safety and health have great importance.

### **7.1 OCCUPATIONAL HEALTH, INDUSTRIAL SECURITY AND ENVIRONMENT**

An integral part of the Spradling Group and its companies, it is occupational health, industrial safety and environmental protection. Therefore, we establish our leadership in these areas, directing its resources and efforts to:

- ❖ Comply with any law, regulation, national standard applicable to Spradling Group and its companies in relation to occupational health, industrial safety and the environment in the places where we operate.
- ❖ Promptly and effectively disseminate the existence and nature of risks and apply necessary controls to avoid or mitigate risks in the workplace with the aim to prevent injuries, incidents and occupational diseases among its employees, minimizing environmental impact, damage to property and activities that are detrimental to the image of Spradling Group and its companies.
- ❖ Ensure that environmental management, guarantees the control and good use of natural resources and the sustainable development of the environment.
- ❖ Continuously improve the performance of the integrated management system through the development, communication and monitoring of the objectives for safe and clean operations, without work accidents, occupational diseases, property damage and prevention of environmental degradation.
- ❖ Ensure that all activities are carried out in a healthy and safe way to promote the care of all our community with a preventive and proactive attitude.
- ❖ The physical security and integrity of employees comes first, it is a commitment that belongs to all of us. Spradling Group and its companies promote a safety culture, oriented towards prevention and a personal commitment that goes beyond the advice of a group of specialists. For this reason,

reasonable measures are taken in the workplace; however, it is everyone's responsibility to follow the safety recommendations that are given to the employees by each company of the group.

## **7.2 ALCOHOLIC BEVERAGES, PSYCHOACTIVE SUBSTANCES AND ILLEGAL DRUGS**

Alcoholism and drug addiction affect performance of workers and have serious effects on safety, efficiency and worker productivity; therefore, the following actions are prohibited:

- ❖ The consumption, possession, distribution or sale of illegal drugs and/or alcoholic beverages used during the workday or inside the company's facilities (in the case of alcoholic beverages, are allowed during the companies' social events, while consumption is moderate.
- ❖ Go to work under the influence of alcoholic beverages and/or illegal drugs; encourage consumption to other people within the facilities of the group's companies; the consumption of illegal drugs in trips, meetings or activities in which you are representing the group or its companies.

## **8. ASSET PROTECTION AND INFORMATION INTEGRITY**

It is duty of all employees to adopt the necessary measures and observe the security and the internal control provisions established to protect assets and information of the group from criminal acts, unauthorized uses, losses or deterioration, taking into account the legislation applicable to each country where the group operates.

### **8.1 INFORMATION SECURITY**

One of the most important assets of Spradling Group and its companies is information who can be physical or digital. It is obligation of all employees to protect, save and share it only with authorized people and third parties that have signed confidentiality agreements and ensure its integrity and availability.

The unauthorized disclosure of confidential information to third parties, alteration of its integrity and restriction to people entitled to access it, could lead the group and its companies at risk and it could be fined with monetary penalties, as well as administrative measures. That is why we established the following requirements:

- ❖ The employees will maintain confidentiality and will protect work documents and confidential information during all the time that is in their care.
- ❖ Employees should not talk about issues related to the group's business with people outside the company, including friends and relatives.
- ❖ All employees that handle sensitive information from Spradling Group and its companies must sign a confidentiality agreement and comply with its obligations.

- ❖ To share information with third parties, employees must use media that have security systems required and approved by the group.
- ❖ Any personal data used for business purposes must be obtained legally, authorized by the owner and used for the purposes for which it was obtained. It should not be kept beyond the time necessary, be safely stored and not be delivered to another country without adequate protection.
- ❖ Employee's information must be handled in an ethical, legal and strictly confidential manner. All information related to work registers, medical records and salaries cannot be delivered to external entities unless it is required by law or with employee's consent. Spradling Group and its companies comply with laws of protection of personal data in the countries where it operates.

If you receive legal or statutory complaints from third parties, related to personal data information, you must send it to your local legal department or whoever is locally responsible for managing the issues associated with data protection.

The records of Spradling Group and its companies must be stored for the period required by law and/or our policies. Information and records related to investigations or legal proceedings must be kept as long as necessary.

## **8.2 PROTECTION OF INTELLECTUAL PROPERTY, "KNOW HOW" AND BRAND**

Spradling Group and its companies strictly comply with the Copyright Laws. You cannot use the technical or commercial information of the group companies (data, design, drawings, developments or other confidential document), for personal use or unauthorized use by third parties. The obligation to safeguard confidential information, "know how" and brand must be maintained even if the employment contract has ended.

Information required by Spradling Group and its companies must be obtained in a transparent manner in accordance with law. Spradling Group and its companies agree to respect the intellectual property and protected information of others, as well as that information protected by law.

Remember to not sign agreements with third parties or clients where intellectual property rights of the group are going to be transferred to them, without previously consulting your legal department. Additionally, do not make agreements to share our intellectual property or confidential information without first ensuring that there is an approved confidentiality agreement between the concerned parties.

Never use confidential information or intellectual property of group companies to obtain personal benefits or other benefits that are not included in their common activities.

## **8.3 ASSURANCE OF FINANCIAL INFORMATION**

At the Spradling Group and its companies, all transactions are properly reflected in accounting books. Falsification or alteration of financial information of the group is strictly prohibited.

It is obligation of all employees to provide accurate, complete, objective, timely, relevant and comprehensible information. All transactions must be supported with appropriate documentation in accordance with legal requirements, company policies and international standards.

Integrity of financial information is very important for Spradling Group and its companies, so all economic facts must be accurately reflected. If you have doubts about the proper handling of financial process or have knowledge about fake or misleading records, you must report it to your superior, human resources department or the ethics line, according to your own convenience.

## **8.4 TECHNOLOGICAL RESOURCES**

The technological resources of the Spradling Group and its companies must be used responsibly according to established guidelines. They cannot be used to install programs, send mail chains or other uses that it is not authorized by our security policy.

Passwords are personal, confidential and non-transferable. It should not be exchanged and supplied between employees or disclosed to third parties. Personal computer systems should be protected with passwords to prevent unauthorized access.

The personal use of these resources by employees is allowed if it is for limited and occasional use, does not harm good conduct, ethics, morals and does not interfere with their responsibilities. But do not forget that what is saved in the corporate equipment will be considered as corporate information, therefore, the company will be able to access all the contents at any time without prior authorization from the employee. Be sure to save and regularly make a backup of any information or work that you have on your computer as established by the local IT policy.

## **8.5 PROPER USE OF ASSETS**

All employees must take care of assets, supplies, facilities and property of the companies and those belonging to third parties in their custody according to guidelines established by Spradling Group and its companies.

## **9. CORPORATE GOVERNANCE**

Giving institutional value to the corporate governance policies that should govern all of the group's actions with the aim of promote the development and progress in the geographies where our group operates, Spradling Group and its companies reject corruption and bribery in all its forms and promote acting with integrity, ethics, transparency, efficiency and equity, always developing its activities subject to the applicable legal regulations in order to avoid be part of fraud, corruption, bribery, money laundering and terrorist financing (ML/FT).

## **9.1 MONEY LAUNDERING AND FINANCING OF TERRORISM (ML/FT)**

Spradling Group and its companies comply with all laws on prevention of money laundering and financing of terrorism and it expects that its employees comply with them as it does it.

The top management, affiliates, contractors, suppliers and employees of Spradling Group and its companies must show their commitment to ensure compliance with internal and/or external regulations related to the management of the risk of money laundering and financing of terrorism.

To avoid the execution of actions that give the appearance of legality to resources of illicit origin and/or financial support to terrorist groups, Spradling Group and its companies through all its employees, develops and executes policies, methodologies and procedures to prevent and control the risk of money laundering and financing of terrorism, in order to prevent it and decrease the effects that this may bring in economic and reputational matters.

## **9.2 CORRUPTION AND BRIBERY**

Corruption has known as abuse of power to obtain unjustified advantages. Bribery is the most common type of corruption and it is a way to offer, give or receive something (gift, payments or other benefits) in order to give or obtain an unjustified advantage. Corruption and bribery in any of its forms is unacceptable and we are committed to conducting our business in a transparent manner, which is why we promote a culture of zero tolerance for corruption and bribery.

At Spradling Group and its companies, we are committed to creating a work environment in which our employees maintain the highest standards of integrity and professionalism. This is more important when we do business with government entities in any of the countries where there are business relationships.

Likewise, Spradling Group companies and employees are prohibited from granting facilitation payments, even if this is considered normal practice in the country where the business is carried out. These payments are usually amounts of money offered to public officials or other persons in order to ensure that they develop their activities more quickly and in full.

Do not perform any activity that could be understood as direct offer, payment or receipt of bribes.

## **9.3 FRAUD**

Spradling Group and its companies do not tolerate fraud, dishonesty or deception. In order to protect our culture of teamwork, all possible measures will be taken according to regulations of each country to guarantee corresponding sanctions

The group is responsible for prevention and detection of theft or fraud and each of our employees have an important role to alert current and suspicious thefts or frauds. It should be understood that theft and fraud might include:

- ❖ Misappropriation of assets belonging to Spradling Group and its companies, employees, contractors, partners or suppliers, use of assets owned by group companies for undue personal benefit, specifically cash, inventories, equipment and others.
- ❖ Fraudulent financial information, which includes falsification or alteration of accounting documents, expenses or liabilities incurred not authorized, assets or income obtained fraudulently, costs or expenses avoided and others.
- ❖ Earn profits as a result of knowledge and management of confidential and privileged information of the company.

## 9.4 PARTICIPATION AND CONTRIBUTION IN POLITICS

Spradling Group and its companies recognize the right of their employees to participate in political affairs as individuals, but not on behalf of the group. As such, internal political participation is not allowed. Companies of the group do not participate or are in favor of any political activity. They will not make any financial contribution, in cash or in any kind, to parties or political campaigns, even in those countries where it is allowed by law.

## 9.5 EXTERNAL COMMUNICATIONS

As part of our daily work, we can be in contact with interest groups, which may include employees, business associates, shareholder clients, government, public, among others. As a Spradling Group employee, you should not talk to reporters or third parties about the business, formally or informally. Only staff at corporate levels is authorized to speak with external audiences including the press.

If a third party is requesting your information about our business, you should redirect the request to your superior and the Marketing & Strategy Manager

## 10. COMPLAINT CHANNELS

It is a commitment of all employees to act with integrity, transparency, responsibility and report immediately any concern or possible breach of the corporate guidelines using established channels.

All Spradling Group employees and their companies shall have right and duty to report any behavior that violates the rules established in this code. To make a report or solve doubts, the following channels exist:

- ❖ Superior
- ❖ Human Resources Department.
- ❖ The ethics line, which is a reporting mechanism where you can ask questions or report any ethical dilemma, situations related to work environment, fraud, corruption, money laundering and issues related to health and safety at work.
- ❖ The ethics line is available by email [eticayconducta@spradling.group](mailto:eticayconducta@spradling.group). The confidentiality of the information provided, proper and prudent management of the source and respect for integrity of the complainant collaborator are guaranteed, as well as non-retaliation.

## Code of Ethics and Professional Conduct

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Promote an environment of trust in order to report behaviors contrary to this code, is management's responsibility within Spradling Group. The key to achieve it, is having an open culture and honest communication where our employees can express to their superior's possible behaviors and activities that go against this code and potentially put themselves, their colleagues, customers, operations and reputation at risk.

Companies will take all possible actions in accordance with the local regulation of each country, in order to take the sanctions corresponding to breaches of this Code.