



ARCACONTINENTAL

**Ethics and Integrity
Management**

Arca Continental has implemented an Ethics and Compliance System, incorporating it as an element of its organizational culture and strategy. The system is based in one of the company's Values, "Integrity Based on Respect and Justice", and is reflected in the Cultural Principles of "Transparency", "Focus on Results" and "People Focused".

The system applies to all territories and business of Arca Continental and it is composed of the Code of Ethics and other specific policies such as: Total Respect Policy, Asset Protection Policy, Conflict of Interest Policy, Anticorruption Policy, Privacy and Personal Data Confidentiality Policy, amongst others, the complaints system and other specific processes, the sanctions and incentives system, the organizational structure, the communication and training strategy, the evaluation processes and the monitoring of risks and complaints.

Our Code of Ethics applies to and is known by our employees and Board of Directors, as well as by third parties related to the company, such as customers, suppliers, and other community stakeholders. In this document, the company takes as its starting point the basic principle of complying with the law and regulations applicable in all countries where we operate and establishes more demanding behavioral parameters in specific aspects. Among the main objectives addressed are the respect for human rights, respect in our workplace, the protection of the environment, our contribution to communities and occupational health and safety conditions, our commitment to the delivery of safe and high quality products to our consumers, the prevention of corruption, bribery and conflict of interests, respect for free and fair competition, our commitment with suppliers and customers, our compliance with trade laws, the safekeeping of company assets, including personal data, confidential and proprietary information, and the anonymous and non-retaliatory reporting of violations of our Code of Ethics, among others. Regarding the protection of Human Rights, we also have an additional and specific instrument for our suppliers, the document of the Guiding Principles for Suppliers of The Coca-Cola Company, this document and our Code of Ethics are signed by every supplier that is registered in our portal.

Among the conduct policies set forth in our Code of Ethics we include: the Asset Protection Policy, the Anti-Corruption Policy, the Conflict of Interest Policy, the Privacy and Personal Data Confidentiality Policy, and the Policy to Prevent Money Laundering.

The entire Ethics and Compliance System has its own structure and governance, with the final responsibility falling on an Ethics Executive Committee, which reports on the development and status of the system to the Audit Committee of Arca Continental's Board of Directors, through the Ethics and Compliance Officer. In addition to this centralized structure, each territory and business has a local Ethics Committee.

The Executive Committee is headed by the company's CEO and the highest-ranking directors within the organization, and its function is to design and approve strategies and dictate the company's actions so that they remain aligned with the Code and the Complaints System Manual, as well as with the agenda of compliance issues approved by AC.

The Local Committees, as well as the Operating Committee are composed of three persons occupying senior management positions, and are responsible for resolving all deviations from the Code and the policies, and executing the action plans decided in the Executive Committee.

The Ethics and Compliance Officer connects the Local Committees with the Executive Committee, and the latter with the Audit Committee of the Board; oversees the administration of the code, monitors the work of the committees, supports the Executive Committee in its functions, and reports on all of the above to the Executive Committee and the Audit Committee of the Board. The Ethics and Compliance System encourages any unethical behavior to be reported by any person, even anonymously, through the Transparency Mailbox, which has been systematized and outsourced for greater transparency, and also provides the obligation to preserve the confidentiality of the whistleblower and the prohibition to take retaliatory measures against the complainant.

There are four formal ways to report an event:

- I. Link on the corporate intranet or on Arca Continental's website (internal and external).
- II. Email address report@transparencymailboxac.com
- III. Toll-free telephone lines in each of the territories.
- IV. By chat on the Transparency Mailbox webpage: www.transparencymailboxac.com

Once a complaint is received, it is assigned to the respective Local Committee, which communicates with the complainant at various times to inform the complainant of the status. Within 30 days, the Committee investigates the case and makes a decision with the possibility of extension for another 30 days; if there is a violation of the Code, it determines the applicable consequence, which may range from a warning to termination of the relationship, as well as the root causes and remediation measures, and informs the responsible areas.

The Communication and Training strategy is another element of the Ethics and Compliance System. Awareness and communication activities have been carried out in all territories and massive online training has been implemented, as well as face-to-face activities at operational facilities. We are currently deploying a new e-learning module on the Code of Ethics and Transparency Mailbox with reach to all associates in all five countries, as well as a Fraud and Corruption Prevention Program that includes the modules: i. Public Corruption, ii. Private Corruption, iii. Conflict of Interest, iv. Misappropriation of Assets, and iv. Financial Best Practices.

Finalmente, los riesgos de ética y cumplimiento que han sido identificados y valorados y sobre los cuales se diseñan estrategias de prevención, son monitoreados por diversas vías. Por ejemplo, para los riesgos de corrupción y fraude se hacen análisis de alertas que arrojan nuestros sistemas, a partir de operaciones inusuales o riesgosas. La evolución de los riesgos, su prevención y de las estrategias relacionadas, son reportados periódicamente al Comité Directivo y al Comité de Auditoría del Consejo.

