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The purpose of the present code of conduct of Grupo HAME, aims to reflect and preserve the high standards of conduct that have been and are part of our culture and the way we do business. Grupo HAME is composed of different companies which have different stakeholders who share the same values, described in the present code.

At Grupo HAME we are committed to fully comply with existing legislation and regulations and the way we operate. The ethical standards of this code are closely tied with the vision, strategy, and values. They intend to provide guidance to all individuals who act on behalf of Grupo HAME or are associated with it.
This code is equally applied to all collaborators. We also expect that our business partners, suppliers, advisors, agents, distributors, vendors, and third-party representatives engage to comply with the standards that are therein stipulated.

When analyzing our code, the following aspects must be considered:

1. This code reflects our values. It has been approved by the Governing body and keeps in force our policy of transparency, ethics and anticorruption which operates in a complementary manner with the present code and which expresses the willingness and commitments of Grupo HAME for the development of Compliance Plans and Systems in our activities.

2. This code may be modified. We engage ourselves to regularly check and update our policies and procedures. In that case, we will immediately communicate the changes to all collaborators.

3. It is expected and demanded that all collaborators comply with all applicable legislation and policies, irrespective of whether this is explicitly mentioned or not therein.
We encourage asking questions. Do not hesitate in getting in touch with the Department of Compliance or with the Department of Human Resources if you have any questions or concerns. Similarly, the Grievance Mechanism is available in case you wish to make a question or consultation hereby and may even be done anonymously.

Real or potential breaches must be reported. You must immediately get in touch with the Department of Compliance or use the Grievance Mechanism if you think or suspect that a breach to this code has occurred or may occur. Not to report it constitutes a breach and may result in disciplinary sanctions against the collaborator.

Grupo HAME will not tolerate reprisals of any kind for any collaborator, irrespective of the position he holds, his sex, or religion, among others. In case of a related event, appropriate measures shall be taken with the offender.
At Grupo HAME we are proud to be part of the Guatemalan agribusiness and industry that constitutes a motor to boost the national economy by being an important source of employment and generation of opportunities for many individuals, thus contributing to the life and dreams of thousands of Guatemalans. Since we started, we have based our actions on the following values which have been our pillars for the success of our organization, hence our Code of Conduct aligns with such values.

**Our Values**

- Teamwork
- Integrity
- Responsibility
- Respect for the environment
- Loyalty
We collaborate and cooperate with each other, we are team players, and we seek to work jointly to meet common goals of Grupo HAME. We express personal satisfaction for successes that are work related or from other departments or areas of the organization.

1. **Collaborator’s profile of Grupo HAME**

   A collaborator of Grupo HAME is an individual who provides his services in an employment relationship to reach the outlined goals. A collaborator of Grupo HAME has the following characteristics:

   - Has a strong commitment towards work and identification with the values of Grupo HAME: Teamwork, Integrity, Responsibility, Respect for the environment, and Loyalty.

   - Shows pride to work with and for Grupo HAME.

   - Seeks his personal development, adapting to changes set by the market trends and promoting the development of Grupo HAME.

   - Respects and complies with rules, guidelines, policies, and procedures of Grupo HAME, even if no one is watching.
2 Who must comply with this code?

It is expected that all collaborators read and comprehend this code, abide by these standards in their daily activities, and take personal responsibility in complying with it and with all applicable policies and procedures (fill in the Annex 1, Acceptance of the Code of Conduct).

It is also expected that our business partners, suppliers, advisors, agents, distributors, vendors, and third-party representatives engage to comply with the standards stipulated in this code. In addition, in many cases, we will request to such third parties the express and written acceptance thereof.

3 Sanctions in case of non-compliance

Those who breach this CODE may suffer immediate disciplinary measures, including termination of the employment relationship without prejudice of the consequences thereof from informing the police/legal authorities of possible criminal conducts. If such conduct fits into a misdemeanor or crime, we will inform the corresponding authorities.
Value of Integrity

We act with righteousness and honesty in relation with what each one says or considers important.

Policy of Transparency, Ethics, and Anticorruption

Grupo HAME is committed to comply with national and international anticorruption law and to adopt the principles of the United Nations Convention against Corruption and the United Nations World Compact on issues of human rights, labor, environment, and anticorruption. As well as to establish the principles* that guide the behavior of all our employees and business partners who have a contractual relationship.

A bribery is defined as the act of giving, offering, promising, requesting or receiving anything of value as consideration for a undue benefit or inappropriate advantage or as consideration for the performance of any public or private function, irrespective of such offer, promise or request being for himself or a third-party, or under the proper name of that person or on behalf of a third-party.

Grupo HAME takes the responsibility to always maintain an ethical and transparent approach, as well as to responsibly conduct its businesses, operating under a philosophy of non-toleration of bribery in any way, including in a direct or indirect way through an agent or any other third party, whether in relation with a public official or a private person.

For any expansion or to get a complete version of the Policy of Transparency, Ethics, and Anticorruption, refer to the Compliance Manager or consult the webpage:

http://grupohame.com/politicas/
In a world where the only constant thing is intense and sometimes dramatic change, Grupo HAME updates the parameters that guide its firm performance, both within the operations as well as in relation with the social, political, and economic context where it influences.

Consequently it has formulated a comprehensive policy that expresses its vision of what it means to operate responsibly in tackling the challenges of a world where natural resources become increasingly limited and sensitive to human action, for which a permanent commitment to its preservation is required. The policy is complemented with commitments taken in issues of great importance such as human rights, environment, transparency, non-violence and intimidation, safety, and labor.

EL Grupo HAME takes on the commitment to respect and to promote human rights in all of his operations and value chains; for this purpose, it adopts as reference the “Universal Declaration of Human Rights”, the “Guiding Principles on Companies and Human Rights” and the “Sustainable Development Goals”, derived from the United Nations Organization.

For this reason, it considers them fundamental rules for managing the human talent just like its relationship with communities, state entities, clients, and suppliers.
Commitment to labor issues

EL Grupo HAME takes as a fundamental principle in the relationship with its collaborators the respect to the existing national legislation on labor issues, as well as the “Universal Declaration of Human Rights”, the “Guiding Principles on Companies and Human Rights” and the conventions derived from the International Labor Organization (ILO).

The relation is based on the values that gave rise to and have allowed the constant growth of EL GRUPO, which would not have been possible without the participation of its human capital.

Commitment to environmental issues

EL Grupo HAME recognizes its responsibility to preserve the environment of which it is part and for which it keeps full willingness to continuously prevent and reduce negative impacts it can cause, as well as to maintain and improve positive impacts it generates.
Grupo HAME adopts in its operations the principles of the United Nations Convention against Corruption and the United Nations World Compact on issues of human rights, labor, environment, and anticorruption, particularly the one which literally indicates: “Companies must work against corruption in every way, including extortion and bribery”. This applies to collaborators, as well as persons and companies to whom it relates, such as clients, suppliers, distributors, contractors, and those with whom any commercial, contractual or cooperation relationship is directly or indirectly established.

Takes the responsibility to always maintain an ethical and transparent approach, as well as to responsibly conduct its businesses, operating under a philosophy of non-toleration of acts that contravene the highest ethical standards.

Commits not to give, promise, receive or accept (directly or indirectly) any kind of non-officially established compensation; therefore, cash payments, gifts, tips or goods shall not be received in exchange of obtaining, getting or not getting something done to ensure an agreement, payment, credit, entry, concealment or provision of information, goods or services.
Grupo HAME rejects the use of violence or intimidation by any person related with their activities and does not tolerate any kind of harassment, threats, intimidation, or other disruptive behaviors, for which it employs the following definitions:

**Violence**

Use of physical, psychological, or economic force with the intent to cause bodily or emotional harm.

**Harassment**

Unwanted verbal or physical conduct that can be considered as such by another person.

**Threat**

Verbal or non-verbal expression that causes physical and mental harm or can be interpreted in that manner.

**Intimidation**

Actions that include but are not limited to harassment or behavior intended to force and induce coercion.

Harassment, intimidation, violence, or violence threats according to the guidelines of this CODE must be reported immediately. Except for positions on Physical Safety or highly qualified and authorized exceptions, carrying, guarding, and use of firearms or of any other kind, including knives, sticks, explosives or similar, is forbidden in the facilities.
Commitment to safety issues

In Grupo HAME, aware of the importance of our human capital we promote a management system focused on the protection of life, health and safety of our collaborators, contractors, and visitors.

For more information refer to the policy of Occupational Health and Safety included in procedure code: GSSOS-PL-100.
Commitment to non-discrimination

We are committed to offering equal opportunities to candidates and collaborators in every labor process, including recruitment, training, promotion, and compensation. We do not tolerate discrimination based on race, religion or belief, age, sex, incapacity, nationality, or any other condition protected by applicable legislation.

All collaborators have a right to work and participate in activities organized by Grupo HAME in an environment free of sexual harassment, harassment based on ethnicity, religion, or any other kind, victimization, hostility, and intimidation. Our policy of non-discrimination demands compliance of all applicable legislation against discrimination.

Substance abuse

In Grupo HAME we prohibit working and entering the facilities to persons under the influence of drugs or alcohol. We also forbid collaborators and suppliers the use, sale, distribution, possession, or promotion of illegal drugs, including prescription drugs, while they are at the facilities of Grupo HAME.

We abide by a Policy of Zero Tolerance regarding collaborators and suppliers who abuse or are under the influence of drugs or alcohol while carrying out their functions. Those who do not comply with this policy, besides being penalized in accordance with the corresponding disciplinary regime, must also be reported to the respective authorities.
Use of resources

It is fundamental for the success of the business to make appropriate use of available resources, in such a way that we are more productive and efficient. All collaborators must protect the patrimony of Grupo HAME so they must:

- Responsibly use the assets and resources according to the established rules.

- Optimize the use of available resources without compromising quality to be as productive as possible.

- Use communication and information systems (computers, telephones, copy machines, etc.), goods, and other resources from Grupo HAME strictly for work purposes.

- Maintain in an optimal state all equipment, vehicles, tools, and machinery, trying to extend their life cycle through a good use.
Opportunities and organization assets

All collaborators have a duty to promote legitimate interests of Grupo HAME whenever an opportunity rises. Consequently, the collaborators will not:

- Take advantage of the opportunities that may rise during their work or through the use of goods or information of the organization.

- Use goods, information or positions in the organization to obtain improper personal benefits.

- Borrow or use the name of Grupo HAME, goods, commercial reputation, funding, data or other assets of Grupo HAME for their personal benefit or gains nor for the benefit of third-parties.

- Use organization assets for unlawful or improper purposes.

Because robbery, negligence and wastage have a direct impact on the productivity of Grupo HAME and may infringe the law, it is expected that the collaborators ensure that the assets are used for legitimate purposes only. Once the employment relationship finishes, the collaborators must return all assigned records and equipment according to contract terms and applicable regulations.

“Suspicion of fraud or robbery must be immediately informed to the Department of Compliance, Human Resources or through the Grievance Mechanism.”

Policy of internet use

Grupo HAME makes available for its collaborators different computing tools that must be used for work purposes.

Acting in good faith and in full confidence towards its collaborators, it is expected that they will make use of internet in a responsible and productive manner, focusing the use of such resources to work activities.
About internet misuse

Non-acceptable use of internet by the collaborators includes, but is not limited to:

- The access to pages with unlawful content or that attempt against human dignity: those with pornographic, terrorist, racist content, etc.
- Use the computers to perpetrate any kind of fraud, and/or piracy of software, movies, or music.
- Steal or use a third-party password.
- Send or post defamatory information for Grupo HAME, its products/services, collaborators and/or clients.
- Introducing malicious software in the network of Grupo HAME and/or to risk the safety of electronic communication systems.
- Send or post chain letters, requests or announcements not related with work purposes or activities.
- Communicate personal opinions on behalf of the opinions of Grupo HAME.
- Install programs to play MP3, WAV, or radio stations via internet.

Any kind of transmission via internet which has not been authorized (listening to music or watching videos) is prohibited during working hours.

Create a Grupo HAME, webpage, blog, among others, that mentions Grupo HAME, without prior authorization from Public Relations or Human Resources. Working groups in applications such as WhatsApp or equivalents, whose purpose is to facilitate and improve communication and coordination amongst work team members, are omitted from this disposition.

Use social media in a way that interferes with the regular development of their work.

If a collaborator is not sure about what constitutes internet use, he must get in touch with Information Safety and/or Information Technology.

Improper use of these resources may be sanctioned in accordance with the disciplinary regime. Every user is responsible for its use and, thus, takes and accepts the sanctions that Grupo HAME.
Value of responsibility

We are committed to carry out mandated tasks, with dedication, caring to meet both deadlines and requested quality, and striving to the best possible outcome. We are always accountable for our actions.

Law compliance

At Grupo HAME we are committed to comply with existing and applicable legislation and regulations in the way we operate. We respect the highest ethics standards and expect that those who act on our behalf behave the same way.

Considering the legal framework of the penal code and the law against corruption of Guatemala, the present code of conduct reinforces the compliance culture in our organization for a proactive prevention of irregularities and internal control.

Production practices of commercial, accounting, and financial reports

In Grupo HAME we seek to maintain accurate and reliable records that meet applicable accounting rules and established internal controls. Cash payments, transfers of goods, provision of services or other transactions on behalf of Grupo HAME are not approved without appropriate backup documentation nor carried out when it is understood that part of those payments are used for other purposes than the ones described in the documentation.

Transactions in black markets (markets in which production and/or distribution of goods and services that are exchanged is illegal) are strictly forbidden.

The collaborators do not attempt to influence, confuse nor interfere with internal or external auditors hired to carry out audits of books, records, procedures, or internal controls of the business.
All collaborators must:

1. Present in a reasonable manner (for example, in a precise, complete, objective, relevant, timely, and intelligible manner) financial or any other information which is relevant for accounting statements, according to applicable legislation, rules and regulations.

2. Respect and, where appropriate, supervise and improve processes of EL GRUPO to maintain efficient internal control of financial reports.

3. Act in good faith, with due care and in a responsible, competent and diligent manner, use fact-based, professional, and independent criteria and present, every time, relevant information and reasonably, available in a timely manner to the direction and other managers according to general accounting policies of Grupo HAME.

Prevention of money laundering and terrorism financing

In Grupo HAME we meet legal provisions to prevent money laundering and terrorism financing.

We do not establish any relationship with persons or entities who do not meet applicable legislation or do not provide appropriate information regarding its compliance.
Generally, antitrust and competition defense laws prohibit agreements or deals among real or potential competitors to fix or control prices, manipulate tenders, sabotage specific suppliers or clients, limit products production and on-line sales, or allocate markets and/or clients.

Other laws forbid controlling resale price from distributors and traders, discrediting a competitor, making false statements on products of Grupo HAME, stealing commercial secrets, or offering or paying briberies.

According to our policy, we will compete strongly, fairly and in compliance with all antitrust and free competition regulations. As a general rule, collaborators are forbidden to discuss non-public information with competitors and suppliers, including representatives of trade union associations, such as the following:

1. Costs
2. Policies on price fixing, discounts, profits, credit terms.
3. Geographic areas of operation or sales.
4. Production or sales quotas.
5. Clients allocations and tenders for jobs or contracts.
6. Other conditions of sale and/or purchase of goods or services.

Questions about relevance of proposed or real contacts with competitors which include these topics must go to the Department of Compliance, Human Resources or through the Grievance Mechanism.
Whenever someone is acting as a collaborator or any other type of representative of EL GRUPO, he must take decisions in the best interest of the organization. A “conflict of interest” exists when personal interests interfere, in some way, with interests from Grupo HAME.

For example, there may be a conflict of interest in the following cases:

1. When a collaborator takes measures or has interests that may hinder objective and efficient compliance of his functions.

2. If you as a collaborator or members of your family receive undue personal benefits, such as cash, loans, loan guarantees or inappropriate gifts, because of your position.

3. The collaborators cannot work for a competitor nor perform as advisors or collaborators of the Board of Directors of a competitor. As best practice, he must avoid maintaining direct or indirect commercial relations with clients, suppliers, or competitors of Grupo HAME, unless he does it on his behalf. In this last case, he must always inform his immediate superior. If you have any doubts consult with the Compliance Manager.
When the collaborators have financial interests or other employments or managerial positions that may conflict with interests from EL GRUPO or avoid that they work effectively. In those cases, it is expected that they themselves disclose the corresponding information to the Compliance Manager or Human Resources and that they refrain from taking decisions related to that potential conflict.

As best practice, EL GRUPO seeks to have collaborators who work exclusively for it.

Our code prohibits conflicts of interest. However, we recognize that it is not always easy to determine whether there is a potential conflict of interest. Hence every collaborator who may become involved in a potential conflict of interest must go to the Compliance Manager or Human Resources to inform him about current and future potential conflicts, through Annex 2, form for Declaration of potential conflict of interest.

"If you have doubts, you may also consult through the Grievance Mechanism."
In Grupo HAME we have a Policy of Zero Tolerance towards bribery and we are committed to act professionally, impartially and with integrity in all our activities wherever we operate.

Collaborators will not use their position to request gifts of any kind, additionally to those legally agreed. They will not accept gifts of any kind, price or magnitude, whose acceptance may bias the collaborator’s judgement to the detriment of the company’s interests.

If gifts would arrive unexpectedly, either to work areas or the residence of the collaborator, he must hand them over to Human Resources, who in turn will place them in a raffle or will be donated in activities organized by the company (Ver annex 3).

As an exception to the rule gifts and courtesies that can be accepted must be considered promotional or bear the logo or commercial brand of the supplier or institution, such as pens, caps, calendars, agendas, lunch boxes, shirts, cups or similar whose estimated value is inferior to Q 180. This also applies to perishable products under the same criteria.
Implementation of gifts, tokens, hospitality, and courtesies

To give invitations or make promotional expenses is acceptable when:

- They are related to events with the commercial activity.
- They are allowed under local regulations and customs.

As commercial invitations of considerable value may also be used as bribery, every gift, token, courtesy, and other benefits that are offered to third-parties (government officials, clients, or suppliers) must:

- Be reasonable and usual for the circumstances.
- Be tasteful and in accordance with professional courtesy rules generally accepted in the country where it is offered and in the country in which Grupo HAME has operations.
- Be offered in an open and transparent manner.
- Be offered in connection with a holiday or a recognized event in which gift exchange is customary.
- Be offered in connection with a legitimate commercial purpose.
- Not be offered to any government official, client, or supplier regularly or frequently to generate an inappropriate perception or to distort the purposes of the present policy.
- Not be motivated by the desire to inadequately influence the government official, client, or supplier.
- Comply with local legislation and rules applicable to the government official, client, or supplier.
Reception of gifts, tokens, hospitality, courtesies, and other benefits

In Grupo HAME we do not allow acceptance of gifts or tokens of any kind that:

1. Can influence in commercial relations, either with clients or suppliers, so that any advantage, difference in treatment, business expectation, capacity of influence or obligation (direct or indirect) of recruitment with them is created.

2. Can affect in any way the professional activity of the collaborator of Grupo HAME not to perform his job in an independent and objective manner, in the most favorable way to the interest of Grupo HAME.

3. Are opposite to any legislation, regulation, and/or rule, whether external and general or internal and from Grupo HAME.

Other complementary guidelines, also from regulatory compliance regarding the acceptance of gifts by the collaborators of Grupo HAME are:

- Accepting personal financial support of any kind provided by a third-party is forbidden, unless it originates from a financial institution acting in her ordinary activity and with no exceptional nor singular criteria.

- Acceptance of cash is forbidden.

- Accepting leisure travels or attentions of any kind for the collaborator and/or any relative, paid by third parties with direct or indirect economic relations with Grupo HAME, is forbidden.

“Any attempt of bribery must be communicated and reported through the Department of Compliance or by means of the Grievance Mechanism. In addition, any gift that is received must be reported (through Annex 3, Handover of received gift) and handed in to Human Resources.”
Protection of confidential information is fundamental for the success of Grupo HAME, including confidential information about collaborators, clients, and suppliers of the organization.

Many aspects of our business that allow us to effectively compete are based on the information: our products, our plans, and our strategies to serve clients and meet their needs. Our information assets may include but are not limited to:

- Clients’ names and their product needs.
- Patents, brands, licenses, and other types of intellectual property.
- Know-how and commercial secrets, as registered equipment, (equipment and raw material) suppliers and products development.
- Future commercial ideas and concepts.
- Characteristics of a non-launched product, launching programs and strategies.
- Access passwords to the network and systems.
- Financial data not available to the public.
- Information on acquisitions of other companies.
- Production, commercialization, and sales forecasts.
- Price fixing and sales strategies.
- Vendors, suppliers and their terms of agreements with Grupo HAME.
- Prices of bought goods, materials, and services.
- Records of collaborators.
- Organizational charts and changes.
- Operational strategies.
- Safety procedures.
- Any other information that has value, provides competitive advantages and, in general, is not available to the public.
We hope to provide confidential commercial information to our collaborators and partners so that they can carry out their work successfully. This confidential information is property of Grupo HAME and will only be used for work purposes. Maintaining confidentiality of registered commercial information and commercial secrets is crucial to achieve success and growth, as well as to maintain our reputation and relation with clients, vendors, suppliers, and commercial partners.

We are committed to protect confidential information in any form. Confidential information may be presented or stored in many formats, including, for example, printed documents, cloud storage services, emails, voice mails and recordings, Skype messages, faxes, information on hard drives and other electronic storage devices, tables and graphic displays, and audio and video tapes. We do not share confidential material, commercial secrets, or information of Grupo HAME outside of it.

No collaborator from Grupo HAME may access or use records or information from other collaborators, unless they have authorization to do so and, in that case, only as far as legitimate business needs demand it according to applicable law. We collect and safeguard personal information from all collaborators deemed necessary for the creation and/or compliance of the employment relationship or required by the law.

We use designed procedures to protect and limit access to the collaborators’ personal information according to applicable law that govern their privacy.

The duty to preserve confidential information continues even after the end of the employment relationship. If he decides to stop working for Grupo HAME, he cannot disclose confidential information to third-parties, in accordance with the subscribed Confidentiality Agreement.

“Nos comprometemos a proteger la información confidencial en cualquier forma.”
Policy of email use

Email has become the main channel for internal and external communication. Thus, in this section we define how we must use the email and how this policy affects both email accounts and messages from personal email addresses (@gmail.com, @hotmail.com, @yahoo.com, etc.) addressed or related to our operations. As a collaborator you must consider that:

Every email account is strictly for professional use and is associated to one person responsible for it. Therefore, you must not use his email account to send, forward or receive e-mails of a personal nature.

You must not send or forward messages that violate the safety and integrity of clients, suppliers, colleagues, and other collaborators of EL GRUPO. It is forbidden to send or forward disparaging, misleading, and false messages, that attack or abuse clients, suppliers, colleagues, or other collaborators.

You must not disclose confidential information, nor reveal information which discredits or may harm Grupo HAME.

You must report to Information Technology reception of spam email, unsolicited email, email of dubious origin (from unknown or malicious users) or email with virus.

You must not send, receive, download, copy or execute videos, music, graphics, nor any other files unrelated with work activities you perform.

You must not use the email in such a way that it interferes in your regular work development.

Those who do not use their email account correctly will be sanctioned according to existing policies and procedures.
Email account is defined as the allocation by Grupo HAME of:

An electronic address which contains:

- A mailbox (drive space) to store messages.
- A password (or key word) to access the account privately.
- The possibility to send and receive internal and external messages using the assigned electronic address.

Every collaborator, or authorized user, is responsible for the safety of his account and password. The first time that the user receives his email account, he must change his password.

To report problems, make suggestions or make any request related to email accounts or the email service in general, you must make a call or send an electronic communication to the Technical Support of the department of Information Technology.
Email use

- Every email address allocated to a collaborator is institutional before personal. Therefore, it must be used for institutional, not personal affairs, alien to the institution and the functions and responsibilities proper to work.

- Must use an appropriate language in your messages.

- Email has no guarantee of being private. Remember that there are people who try to “capture” information through de internet, therefore, never write down in an e-mail message information that you would not write in physical correspondence.

- Every information shared and disclosed through this mean, must answer to the values of teamwork, integrity, responsibility, respect for the environment, and loyalty.

- Email mass mailing is authorized only to assigned personnel.

- Users must not read alien mail nor generate or send emails on behalf of another person supplanting her.

- Do not reveal your account password or code, nor allow its use to third parties for activities outside work.

- Email use to conduct any type of harassment, defamation, slander, with intent to intimidate, insult or any other form of hostile activity, disregarding language, frequency, or size of the message, is forbidden.

- Activities that contravene systems safety or generate network or services interruptions are forbidden.

- Users must report to Information Safety any kind of irregularity or abuse of these services.
Non-disclosure of records

The collaborators are committed to avoid improper use of the information registered in work records.

Because information on the operations can be quickly and easily disclosed (for example, by email), the collaborators must take precautions to avoid non-authorized or unnecessary disclosure of crucial and recorded information.

Access must be conducted only for commercial and working purposes, and for the performance of functions. Information on clients and collaborators held in archives will not be disclosed outside EL GRUPO without any permission, except for a subpoena or other legal processes or requests from government investigators or regulatory agencies with the approval of the compliance responsible.

Ownership of ideas and new products

Collaborators who develop ideas, products or services while working for Grupo HAME, with support of its resources, such as materials, information, equipment, technology or facilities or with its time, will do so with the understanding that these elements are sole property of Grupo HAME in the framework established by the law.

Violations to the rights of any person or institution protected by copyright, patents, or any other type of intellectual property, are forbidden.
Value of respect for the environment

We carry our operations responsibly according to the law, applicable environmental regulations, standards included in the certifications in which we participate, and policies of our clients.

Environmental issues

Grupo HAME recognizes its responsibility to preserve the environment and for which holds full readiness to prevent and continuously reduce impacts of its operations, as well as to maintain and improve positive impacts it generates.

We are committed to fully meet all applicable environmental legislation and regulations. Working practices of the collaborators must respect such existing legislation, regulations, policies, and procedures adopted in Grupo HAME.

For more information refer to the Policy of Responsible and Sustainable Production section Commitment to Environmental issues:

http://grupohame.com/politicas/
Value of loyalty

We show commitment, trust and fidelity to Grupo HAME; its mission, objectives and products.

Responsibilities and duties:

- Should be sure to read, understand, and comply with this Code of Conduct and any disclosed information related to it.

- Prevention, detection, and report of briberies is responsibility of all those who work for Grupo HAME or under control of Grupo HAME. It is required from every collaborator to avoid any activity that could suggest or guide to a breach of this code.

- Must notify, through the Grievance Mechanism, of any detected or suspected irregularity/ies, as soon as possible, even if the irregularity may occur in the future.
Administration of the code of conduct

Governing body

The Governing body of Grupo HAME has a clear and unalienable commitment with its values, which guide our conduct and are at the base of our decisions on how we act facing different situations posed to us by our day to day.

Similarly, it has arranged the following actions and measures to support compliance culture and the ethics in the way of doing business:

- It has approved a policy of transparency, ethics and anticorruption, which complements the present code of conduct, that expressly prohibits any kind of unlawful behavior.

- It has approved the present code which includes what is expressed in the policy of transparency, ethics and anticorruption that intends to serve as a reference guide and mandatory guidance for all collaborators.

- It has arranged all required resources for the effective functioning of the non-bribery management of Grupo HAME.

- It periodically checks the System evolution, its effectiveness, as well as needed improvements to be undertaken.

- It periodically receives information on the System functioning and incidents.
Board of Directors and Management

In compliance with the policy of transparency, ethics and anticorruption of Grupo HAME and with respect to lawfulness, and in accordance with the existing regulation in non-bribery matter, the Board of Directors and Management:

Establish, defend and encourage that the actions of collaborators are always in conformity with the legal order, in general, and with the criminal nature, in particular, encouraging an appropriate compliance culture, meeting and fulfilling our policy transparency, ethics and anticorruption.

Ensure the establishment of mechanisms to achieve the commitment of Grupo HAME expressed in the policy of transparency, ethics and anticorruption and the present code of conduct through the adequate adoption, implementation, maintenance and continuous improvement of our non-bribery management system, using clear procedures, policies and processes, defined and designed to prevent and detect bribes or to significantly reduce the risk of their commission, according to the Standard ISO 37001:2016 in the specific framework of risks derived from our activities.

Provide the non-bribery management system with suitable and sufficient financial, material, and human resources for its efficient functioning.
Periodically examines, at least once a year, the effectiveness of the non-bribery management system, modifying it, if necessary, when serious non compliances are detected or changes in EL GRUPO, in the control structure or in the developed activity, are produced.

Ensure that required resources planned for the proper operation of the System are available and are used effectively.

Establish internal processes to inspire participation and report of any act or conduct that may be suspicious or criminal, to protect any member of Grupo HAME who collaborates in this task, from any type of retaliation, discrimination or sanction for this reason.

Aware of the complexity of the goal and the permanent change of context, the Board of Directors and Management are committed to the continuous improvement of our non-bribery management system inspiring all collaborators to participate with their proposals and suggestions that can improve the ethical performance of Grupo HAME.
Compliance Manager

Takes the functions and responsibility of the function of Non-bribery Compliance of the position named Non-bribery Responsible. He is mandated to supervise the functioning and execution of the non-bribery management system, and is responsible for:

- Encouraging and continuously supervising the implementation and effectiveness of the non-bribery management system.
- Providing advice and guidance to the personnel about the non-bribery management system and issues related to bribery.
- Ensuring that the non-bribery management system is adequately implemented.
- Informing about the performance of the non-bribery management system to the Governing body, the Board of Directors, and to other compliance functions, as applicable.

The Non-Bribery Responsible is supported by the Legal Area, Internal Control, and other areas he may require. He will be able to rely on specialized external advisors in the topic, to improve his capacities and thus demonstrate:

- Integrity and commitment to the non-bribery management system.
- Efficient communication and influence capacity capabilities.
- Capacity and reputation so that his advices and guidelines have acceptance.
- Required competence and knowledge.

The Non-bribery Responsible embodies the position of ultimate guarantor of the supervision, monitoring, and control of the compliance duties in Grupo HAME, both inside and outside the company, so he has access to required resources and holds suitable competences, status, authority, and independence.
Common Duties and Obligations

To prevent or, where appropriate, to detect any irregular conduct that may take place in any of the hierarchical levels, it is required from all collaborators of Grupo HAME, to inform and to report, through the appropriate procedures including the Grievance Mechanism, possible risks or non-compliances to the Law, the code of conduct, any other implanted internal regulation or action protocol and/or any action that could be considered a breach to them.

Every head of department/area must ensure that its collaborators know about this code and apply what is established therein, as well as processes, procedures and/or policies related with compliance that can affect them being those defined.

Questions

Do not hesitate to get in touch with the Compliance Manager of the organization or with Human Resources if you have any doubts or questions about the application of this code to your tasks.

If you have any doubt or get to know about possible violations to the code or the organization policies, you must report them to the Compliance Manager.

Name and surnames: ____________________________

Email: ____________________________

Contact telephone: ____________________________
Grievance Mechanism

We have established a mechanism for handling denunciations, complaints, and consultations considering the following elements:

- The confidential and anonymous presentation of concerns and denunciations by the collaborators, groups of interest and business partners of Grupo HAME, about risks of current or potential violations to the code of conduct and/or to the policy of transparency, ethics and anticorruption.

- Reception, custody and treatment of concerns, consultations, complaints, or denunciations that Grupo HAME receives about violations to this code.

Web Site
http://grupohame.com/contacto/

Corporate complaint line:
1-801-137-7777

Compliance department
cumplimiento@olmeca.com.gt
On behalf of the direction of Grupo HAME, we appreciate the time and attention you will devote to the consideration and comprehension of this code and your continuous support to the commitment that our Grupo HAME has taken towards its compliance.
We are HAME
Leaving our Mark
generating value

GRUPO HAME