



ALEATICA

Smart & Sustainable Infrastructure

CODE OF ETHICS AND CONDUCT

Our values,
the pillars that support us

HOW TO NAVIGATE IN THIS PRESENTATION?

On your keyboard
BACK



On your keyboard
FORWARD



HOME



INDEX



BACK



FORWARD



In case you find any icon
CLICK to discover more info





TABLE OF CONTENTS

ALEATICA	2
Message from the CEO and the Chief Compliance and Risk Officer	3
The values that define us, the pillars that support us	5
Our Code	6
The role of our Directors and Managers	9
Ethical decision-making	10
We ask, report, and take action because it matters to us	11
PILLAR 1. SAFETY FIRST	13
Safety in our concessions and for our customers	14
Safety for our collaborators	15
PILLAR 2. SOCIAL AND ENVIRONMENTAL SUSTAINABILITY	16
Community relations	17
Environmental protection	19
PILLAR 3. SERVICE EXCELLENCE	20
Customer service	21
Quality and innovation	22
PILLAR 4. CORPORATE INTEGRITY	23
Zero tolerance for bribes, improper payments and facilitation payments	24
Anti-money laundering and terrorism financing	26
Gifts, hospitalities and representation expenses	27
Conflicts of interest	28
Accuracy of information and records	29
Free competition	30
Handling of privileged information (Insider Trading)	31
Third-party relations	33
Privacy and data protection	34
Use of assets	36
Protection of our name	38
PILLAR 5. PASSION FOR THE TEAM	39
Respect for human rights	40
Diversity and inclusion	41



ALEATICA

MESSAGE FROM OUR *CEO*

Our mission is to develop and operate smart transport solutions that exceed the expectations of our customers, contribute to the sustainable development of our planet, and create value for our shareholders.

That is why we have identified the values that reflect who we are and how we act to achieve this mission: **Safety first; social and environmental sustainability; Service excellence; Corporate Integrity; and Passion for the team.**

These values are the pillars support our business and our **Code of Ethics and Conduct**, which set out the general guidelines for action that all of us who form part of **ALEATICA** must observe in our professional performance at all times.

We must all respect this Code, regardless of the position we hold or the work we perform. The Code of Ethics and Conduct is our reference document to support in making decisions and guiding our daily actions. In this way, we protect the company, we protect ourselves, and we protect all of our colleagues.

Read it carefully. Make it yours.

Ethics is an essential duty for us all. It is our way of being **One way, One ALEATICA.**

David Díaz
CEO ALEATICA



MESSAGE FROM OUR CHIEF COMPLIANCE AND RISK OFFICER

Our Code of Ethics and Conduct is a dynamic document shared by us all. It is designed to help you and incorporate our values into your daily behaviors and in making ethical decisions.

All of the employees that form part of **ALEATICA** need to work together respectfully and openly, listening to one another with generosity and sharing information as needed.

The principles established in this document are not optional. You need to respect them because they represent the expectations for behavior that **ALEATICA** has for us all. You are the one with the ability to set an example and remember that **ALEATICA's** reputation depends on each one of us.



Make sure to consider that performance is not measured just by what you do, but also how you do it.

We continue working together to maintain and promote **ALEATICA's** strong ethics culture.

Marco Padilla
CHIEF COMPLIANCE AND RISK OFFICER
ALEATICA

THE VALUES THAT DEFINE US, THE PILLARS THAT SUPPORT US



Safety first

We are working to implement a Comprehensive Safety Management System that continually seeks out ways to improve safety conditions for our customers and employees, and promotes a culture of safety in our environment.



Social and environmental sustainability

We are implementing a comprehensive sustainability program to guarantee quantifiable contributions that help us reach the UN Sustainable Development Goals of the 2030 Agenda. We assume these goals as our own.



Service excellence

We work to constantly improve the service we offer to each of our customers, maintaining the highest safety standards. To achieve this, we develop cutting-edge technology that allows us to provide a travel experience that is safe, quick and comfortable.



Corporate Integrity

We behave in a way that is ethical, upstanding and transparent, every day and in all circumstances. That is why we are committed to always adopting international best practices for integrity, transparency and corporate governance, to guarantee the provision of a highly reliable service to our customers and communities.



Passion for the team

Day after day we foster a healthy organizational model where employees are integrated as a single team that lives out our corporate values.

OUR CODE

OUR COMMITMENT

We are a next-generation transport company. Our structure, tailored as a pure transport asset operator, allows it to focus exclusively on the design and operation of highways and other transport assets in Europe and Latin America. Our **ONE ALEATICA** culture, our values reflected in our five pillars, and the generation of value for our shareholders, are materialized through this Code, and this is what defines us as an organization.

We trust that each employee, director or member of our governance bodies will follow our Code and act to preserve the trust placed in us. We expect the same commitment and behavior from any third party who decides to have a relationship with us that is subject to compliance with the principles expressed herein, so we cannot ask any third party to, nor accept any of them, act in violation of the values expressed in our Code.



At **ALEATICA**, we take our Code very seriously, so violations have consequences and may result in disciplinary measures, up to and including dismissal. Additionally, non-compliance with the provisions of this Code could contravene the applicable legislation in each country and may lead to legal action and/or fines by the authorities.

QUESTIONS AND ANSWERS



Q. What does ONE ALEATICA mean?

A. **One Aleatica** refers to the fact that all of us who are part of **Aleatica** (including all collaborators and companies) share the same essence through a unique vision and pillars for all, the same internal regulatory framework and we have a business plan aligned to the vision of the controlling shareholder.

YOUR RESPONSIBILITY

Together we are all **ONE ALEATICA**. Think about the wellbeing of our company and act in a way that is upstanding and transparent and be an example for your subordinates or colleagues. All workers must exercise their activity with honesty, professionalism and objectivity.

Get to know and live by this Code and the legal Norms applicable to your activities at **ALEATICA**. Use your good judgment. Nobody at **ALEATICA** has the authority to require you to violate our Code.

If you become aware of a real, potential or apparent violation of the Code or the applicable laws, it is your duty to report it using the available methods described in this Code. You must also contact the Global Compliance Department if you are involved in a criminal process where you are accused of or defending activities related to your professional activity.

Respect all human beings, regardless of their nationality, place of residence, gender, national or ethnic origin, color, religion, language, sexual orientation or any other condition. Listen to and include those who you consider to be different from yourself, as they may contribute to improving our company, business and planet just as much as you.

Complete all of the obligatory training sessions assigned to you and collaborate on the activities that the corporate areas required of you, including Internal Audit, Compliance, Risk, Financial, Legal, HR, IT and Sustainability.



If you have personnel who report to you, your level of responsibility is even higher. You must lead by example, and make sure that the employees under your responsibility are aware of our Code. You must create an open-door workplace environment where employees feel comfortable bringing their questions and concerns to you. Never and under no circumstance retaliate in any way against employees who bring their concerns to you in good faith.

Listen and include those you consider different, because they can contribute to our company, society and planet the same as you.

WHO IS OUR CODE DIRECTED TO?

All of the members
of our Management
Bodies

Directors

Employees

PEOPLE WHO
FORM PART OF
ALEATICA:

THIRD PARTIES
RELATED
TO ALEATICA:

Third parties who
have or wish to enter
into a relationship
with us.

Subsidiaries and investees. For
subsidiaries where **ALEATICA**
does not have control and has
appointed a member of the
Management Body, such members
shall propose the adoption of
values similar to those expressed
in this Code.

THE ROLE OF OUR DIRECTORS AND MANAGERS

LEAD BY EXAMPLE

OUR COMMITMENT

- We foster the construction of a respectful workplace and provide our workers with the appropriate training, tools and environment to guarantee that the only way of working is with integrity.
- We foster a culture of open communication and positively value all communications received in good faith.
- We ensure that all workers receive specific training on this Code and the related policies, considering their role in **ALEATICA**.
- We include metrics addressing ethics matters in the performance evaluations of our employees.

YOUR RESPONSIBILITY

- Remember that the best way to teach ethical behavior is to act that way each and every day.
- Communicate with the employees on your team and make sure that they are clear on what is expected of them under our Code.
- Make sure you are familiar with our Code and the Group policies. Consult them frequently. Demonstrate that it is a useful resource for doing business with integrity and share it with your team.
- Treat all employees with respect and dignity.
- The employees under your responsibility may decide not to speak with you about their ethical concerns or dilemmas. Inform them that you are available to listen to their concerns and remind them that employees who bring their concerns in good faith will always be protected from any retaliation.



- Listen to your employees and, if you are unsure on how to respond to their questions, inform them who is best suited to advise them appropriately.

QUESTIONS AND ANSWERS



Q. Are the ethics principles applicable across all levels of the organization?

A. The ethics principles are for everyone, and the higher the level of responsibility, the better the example that should be given.

ETHICAL DILEMMAS

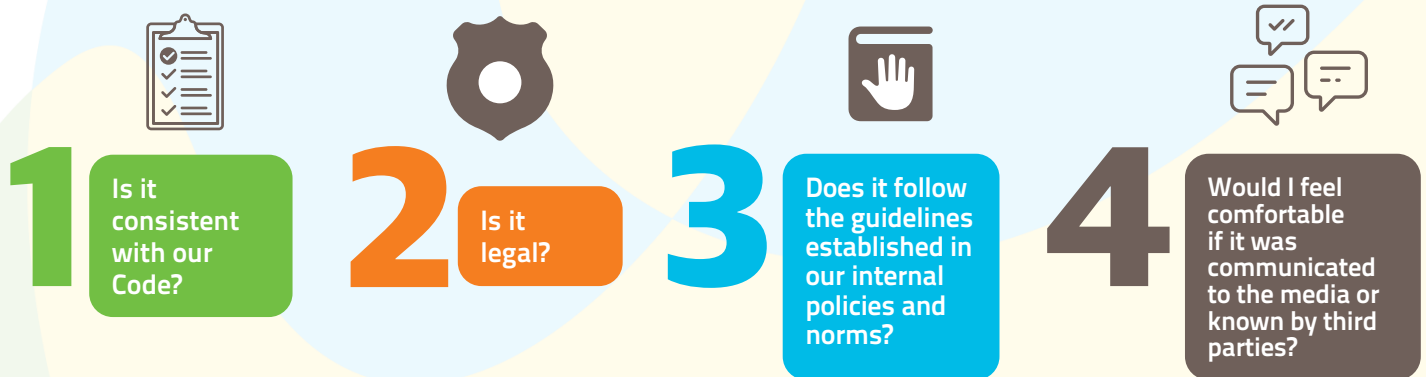


What is most important for me as a director, to comply with the business objectives I had set or those established in the Code of Ethics?

The two are compatible and are interrelated. **ALEATICA** wants to do business, but not at any cost. Acting correctly and for the right reasons is always the best practice.

ETHICAL DECISION-MAKING

We are committed to always doing the right thing and acting with ethics and integrity in all of our activities, respecting our Code, our pillars, our policies and norms, and the applicable laws. However, sometimes there are situations where it is more difficult to make the right decision. In these cases, reflect on these questions before you act:



If the answer to any of these questions is **NO**, stop and ask for help before taking any action.



If you need help you can contact:

Your Supervisor

The Global Compliance Direction

"I CARE", ALEATICA's
Whistleblower Hotline

WE ASK, REPORT, AND TAKE ACTION BECAUSE IT MATTERS TO US

Asking questions if we are uncertain, seeking advice, and communicating our concerns is the first key step towards all of us behaving in a manner that is in compliance with this Code. Remember that we are fully committed to protecting and defending our workers from potential retaliations for good faith reports.

If you have any questions, concerns, or need advice related to our Code, or you would like to report a concern, you can do so directly with your supervisor, with your Human Resources representative, with Compliance or with a member of the Legal Department. Alternatively, you can use the Whistleblower Hotline called "**I CARE**", which is available 24 hours a day, 7 days a week, and is managed by an independent third party.

At **ALEATICA** we investigate every report, accusation, complaint or concern confidentially, seeking to resolve the situation in the best way possible. All investigations are handled confidentially, and reports can be made anonymously.



You can access the "**I CARE**" Whistleblower Hotline in the following ways:

Internet: **<http://icare.aleatica.com/>**

Toll-free phone:



Chile: 1230 020 3559



Colombia: 601 381 6523



USA: 800 461 9330



Spain: 900 905 460



Italy: 800 727 406



Mexico: 800 681 6945



Peru: 0800 7 83 23

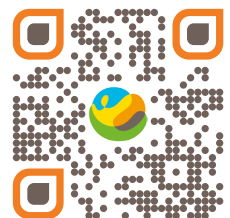


United Kindom: 0 808 189 10 53



Other countries: access the website **<http://icare.aleatica.com/>** and indicate the country of origin to get the rest of the toll-free numbers.

Raise your voice without fear.
At **ALEATICA** we have ZERO
TOLERANCE for retaliation.



WE ASK, REPORT, AND TAKE ACTION

BECAUSE IT MATTERS TO US

It is important that you know that, at **ALEATICA**, we take compliance with this Code, its policies and procedures and the applicable laws very seriously. That is why **ALEATICA** will take the legal or disciplinary actions it deems appropriate in accordance with the applicable legislation, up to and including dismissal. Depending on the circumstances, certain behaviors may also give rise to penalties of a civil or criminal nature by the corresponding authorities.

Inappropriate behavior that is thus subject to legal or disciplinary action may result in sanctions that may extend not only to the individual who committed the violation, but also to those who, through their actions or omissions, approved such behavior or were aware of the violations and did not make an effort to correct them immediately. Failure to comply with this Code may result in the amendment or cancellation of **ALEATICA**'s business relationship with the third party in question, subject to the contractual obligations and applicable laws.

OUR COMMITMENT

- We will address all questions or complaints received related to acts that go against our Code and corporate policies.
- All investigations will be treated impartially, confidentially and in accordance with internal regulations and applicable laws.
- We foster a culture where employees feel comfortable raising their concerns. At **ALEATICA** we have zero tolerance for retaliation against people who report conduct or questions in good faith.

YOUR RESPONSIBILITY

- If you have any questions about how to act, speak with your supervisor, Human Resources or Compliance.
- If you suspect or are aware of a violation of this Code, our policies or the law, tell us about it. It is your responsibility to report violations of the Code or the law, and to cooperate in investigations when required.
- We need the information reported to be true, precise and complete. We all need to cooperate during the investigation process.

QUESTIONS AND ANSWERS



Q: What are retaliation?

A. It may be any form of revenge, whether direct or subtle, for reporting real or suspected problems in good faith.

Q: Is it possible to communicate a fact completely anonymously through this channel?

A. Yes, **I CARE** gives you three options for communicating a fact: (i) completely anonymously, (ii) anonymously for **ALEATICA** but not for **I CARE**, the company that manages the Channel, or (iii) providing your information so the Compliance team can contact you.

ETHICAL DILEMMAS



My husband works for one of ALEATICA's competitors. We don't talk about our work at home, but some of my work colleagues have told me that I am in a compromised situation. What should I do?

This could be a potential conflict of interest. To protect both, yourself and the company, you would have to inform your supervisor, Human Resources or Compliance of this situation.

I think my work colleague is stealing materials from the warehouse. Should I report it?

Yes, we all have the responsibility to report things justly, honestly and professionally when we see a behavior or situation that seems to not be right.



**SAFETY
FIRST**



SAFETY FIRST

SAFETY IN OUR CONCESSIONS AND FOR OUR CUSTOMERS

OUR COMMITMENT

- We make an effort to operate our concessions safely and understand that, to achieve this, we need to maintain active dialogue about safety.
- We put our focus on the safety of our customers.
- We offer the highest safety standards as part of the excellence of the quality of our service in order to ensure the wellbeing of our customers and the surrounding communities.
- We comply with all the regulatory and administrative standards related to safety in our concessions.

YOUR RESPONSIBILITY

- Comply with the Norms in place and put your safety and the safety of our customers first.
- If your supervisor asks you to perform an unsafe maneuver, refuse to do it and report it. If you see someone else being instructed to perform an unsafe maneuver, intervene and say NO. The obligation to follow the instructions of a superior is limited to the instructions being legal, correct and in compliance with the Norms for execution of the work.
- Identify, report and bring up any safety issues you become aware of or suspect so that we can strengthen our focus on the safety of our assets.
- Report any cases where you witness a safety risk either for you or for customers to your supervisor.
- Listen to, assess and report safety questions and concerns raised to you by customers.

QUESTIONS AND ANSWERS



Q. How can I express my safety concerns?

A. You can share safety concerns or recommendations at any time by informing your supervisor or your individual responsible for Safety, Near Miss system

and if you want to report it anonymously, through **I CARE**.

ETHICAL DILEMMAS



I just saw that one of our maintenance providers does not post signs on the roadway indicating that maintenance work is being performed, placing our customers, employees or contractor workers at risk. What should I do?

You should immediately inform your supervisor and, if that is not possible, inform the provider that it is necessary to correctly indicate that work is being performed to not put customers, employees and contractor workers at risk.

I noticed a minor potential safety hazard. Because we need to comply with the deadline for an important project and reporting the danger could cause a delay, is it OK if I wait until we finish the project to report it?

No. Any safety issues must always be reported immediately, even when that means there will be a project delay.

Safety
Policy





SAFETY FIRST

SAFETY FOR OUR COLLABORATORS

OUR COMMITMENT

- We make methods available to minimize work risks for both our own personnel and subcontracted personnel.
- We develop a culture of safety among our employees and are committed to maintaining optimal working conditions in order to prevent the occurrence of accidents and occupational illnesses that may affect employees in carrying out their duties.
- We anticipate the preventive measures necessary to create the best possible workplace health and safety conditions.
- We provide and foster an appropriate work environment.
- We apply the strictest standards of hygiene.
- We apply our safety practices with contractors and providers.
- We provide the necessary PPEs for the development of the activity of each of our collaborators.
- We do not permit drug and alcohol use during working hours.

YOUR RESPONSIBILITY

- You must actively seek to create and maintain a safe work environment, scrupulously respecting the internal and external Norms.
- Take all logical methods of precaution to maintain a safe and healthy work environment.
- Make sure that you do not place yourself or anyone else in danger due to your actions.
- Make sure that you know what to do if an emergency occurs at your workplace.
- If any sort of accident occurs, even if it is minor, inform either the individual responsible for safety or your supervisor immediately, or access the information channels in place in **ALEATICA**. It is also important that you report any unsafe acts or conditions, or facilities or objects that put the safety of our work environment at risk.
- Question unsafe or inappropriate operations and insist on "stopping the work" if necessary, to address them.

QUESTIONS AND ANSWERS



Q. What is PPE?

A. PPE refers to Personal Protection Equipment. The term refers to the equipment employees must wear to be protected from the risks and hazards that could threaten their safety and

health, as well as any accessory or supplement used for this purpose.

ETHICAL DILEMMAS



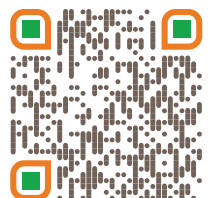
I just found out that one of our subcontractors has been drinking alcohol at our facilities. Since he technically isn't an ALEATICA worker, should I be concerned?

You should inform your supervisor of any behavior that could place someone or the safety of your work environment at risk.

My immediate superior indicates me to start the work without having previously carried out my on-site risk analysis process to identify, together with my colleagues, if we are taking all the risks into account. What should I do?

You must communicate what is happening to your group security leader, raise a Near Miss on the **ALEATICA** platform and not carry out the work until the situation is corrected.

Near miss





SOCIAL AND ENVIRONMENTAL SUSTAINABILITY



SOCIAL AND ENVIRONMENTAL SUSTAINABILITY

COMMUNITY RELATIONS

OUR COMMITMENT

- We develop and implement initiatives focused on improving the quality of life of the people and communities where we operate and the environment of our activities through social and environmental projects and actions.
- We understand the relationship with our neighbors and communities as a long-term commitment, so all actions, regardless of their size, are carried out with a clear plan on how to develop our participation therein over the course of time.
- We comply with the social and environmental regulations and other requirements applicable to the organization, as well as the requirements voluntarily assumed by the company.
- We respect and promote the human rights of the communities in the regions where we operate based on our Human Rights Policy and through the social and environmental programs, projects and actions that we implement.



YOUR RESPONSIBILITY

- Be proactive and participate in the implementation of social and environmental actions and projects that make possible to comply with the **ALEATICA** Sustainability Policy and Norm.
- Take care that the donations granted address material and relevant issues for the communities where we operate.
- Promote that the alliances we establish to address relevant community issues through donations are with reliable institutions, experts on the issues, with an excellent reputation and proven experience.
- Reject requests for political donations. We are a politically

neutral company. Don't make contributions to political parties, leaders or candidates on **ALEATICA's** behalf. If you engage in political activities in a personal capacity, please ensure that these are not directly or indirectly associated with **ALEATICA**.

- Don't use activities of this kind as electoral propaganda or as a method of bribery.

Sustainability Policy





SOCIAL AND ENVIRONMENTAL SUSTAINABILITY

COMMUNITY RELATIONS

QUESTIONS AND ANSWERS



Q. What is sustainability?

A. It is development that meets the current needs without compromising the capacity of future generations, guaranteeing balance between economic development, care for the environment and the social wellbeing of our environment.

Q. Can I make donations to a political party?

A. NA. Not on **ALEATICA's** behalf or as part of your role with the company. Yes, on your own personal behalf and using your own resources. Make sure that your participation is legal and consisted with our norms and make clear that your personal opinions and actions do not represent those of **ALEATICA**.

ETHICAL DILEMMAS



The hospital where I work as a volunteer is asking everyone for help in attracting new volunteers and they have asked me to try and get ALEATICA to participate. I know several of my colleagues may be interested, should I speak with them directly?

ALEATICA wants to support your efforts if they are aligned with the Sustainability Strategy. Inform your supervisor, who will decide whether the specific cause in question complies with **ALEATICA's** Sustainability Policy and Norm and

may propose the opportunity to the individual responsible for Sustainability at the Business Unit where you work.

At our office we have some chairs we don't use and that we are going to throw away. Can I give them to an NGO that is next to the office?

This action is also a donation, so you would need to inform your supervisor so they can review it with the individual responsible for Sustainability.



Sustainability Policy





SOCIAL AND ENVIRONMENTAL SUSTAINABILITY

ENVIRONMENTAL PROTECTION

OUR COMMITMENT

- We respect the environment and adopt a preventive approach to minimize the environmental impact of our activities. We perform our work based on the premises of:
 - Efficiency in the use of resources.
 - Avoid environmental and negative social impact.
 - Pollution prevention.
 - Protection of ecosystems, historical, cultural and archeological heritage and the socio-economic environment.
- We integrate responsible environmental practices into our decisions.
- We are committed to reducing our carbon footprint and measure both direct and indirect greenhouse emissions, including those related to the use of our infrastructure.
- We articulate the necessary environmental management mechanisms and systems.
- We provide timely training to our employees and collaborators on appropriate environmental management, the associated risks and the optimal management of our natural heritage to generate a culture of caring for the environment and its social surroundings.

YOUR RESPONSIBILITY

- Protect and respect the environment, complying with the applicable internal and external norms.
- Consider how our behaviors across all aspects of our work affect the environment so we can reduce the impact whenever possible.
- Reduce your waste generation and, when possible, separate it and make sure that is disposed of in an environmentally friendly manner (biodegradable or recyclable).
- Stay alert and immediately report any spills, unusual emissions or any other events that may have adverse impact to the environments we protect to the individual responsible for Sustainability or Environmental Control at the Business Unit where you work.
- If you are notified of the start of an inspection and/or requirement by any environmental authority or regulator, notify your supervisor, Sustainability, Legal and Compliance. Support immediate response to these requests.

QUESTIONS AND ANSWERS



Q. As long as we comply with the local laws, why do we have to follow ALEATICA's environmental norms if it puts us at a disadvantage compared to our competitors?

A. Our commitment to the environment goes beyond merely a matter of simple compliance with the law. If you think there are competitive aspects at stake, you will need to inform your supervisor.

ETHICAL DILEMMAS



I need to contract a maintenance provider and, in the selection process, one of them has a much cheaper price but doesn't have the necessary environmental certifications, can I contract them?

Our providers must always comply with the necessary environmental requirements for performing their work, so if they don't have the necessary sustainability validation, they cannot be contracted.



SERVICE EXCELLENCE



SERVICE EXCELLENCE

CUSTOMER SERVICE

OUR COMMITMENT

- We provide our services based on the agreed performance standards and are always transparent about the information related to our compliance therewith.
- We make appropriate channels available to our customers to address every contact and receive assessments of our services through surveys that also measure satisfaction based on international standards and metrics, ensuring the accuracy of the information and the appropriate treatment thereof.
- We encourage the use of self-serve channels for customers.
- We maintain ongoing communication with our customers and develop information and roadway safety communication campaigns.
- We offer our customers a high-level experience and we are continually evolving and aligning with best practices.
- We provide customers with safe, quick and comfortable trips. To achieve this, we need to have a comprehensive understanding of who our customers are and proactively make improvements and implement efficiencies that allow us to meet their expectations.
- We establish transparent relationships with our clients and customers

YOUR RESPONSIBILITY

- Your responsibility
- Treat customers well at any point of contact with them.
- Understand and implement the customer service and attention processes and meets established performance indicators.
- Collaborate with other teams involved in offering service to our customers and foster an approach of teamwork.
- Listen to the voice of our customers through the different methods of contact we have available to them.
- Participate in the service and Customer Experience (CX) training offered to understand the CX methodology and be a professional in its application.
- Participate in the Transversal Customer Experience Committees of your Business Unit to apply the CX methodology and find solutions at the pain points for our customers by making use of our infrastructure.
- Register the information and data related to service and CX, observing **ALEATICA's** Norms and Policies, so that they are reliable, and we can make decisions in favor of collaborators and customers through data analysis.
- Be creative, purposeful, responsible, proactive, and collaborate and make contributions. Be a CX expert.

QUESTIONS AND ANSWERS



Q. How do we provide safe, quick and comfortable trips?

A. At each Business Unit, we put together a Transversal Customer Experience (CX) Committee with participation by the areas responsible for complying with our value offer. At this Committee, the team applies the CX methodology, tracing out

our customers' Journeys, defining the People to understand who our customers are and developing action plans to address the pain points identified, becoming points of contact where we provide excellent service.

ETHICAL DILEMMAS



During a certain period, our performance standards fell below the established target. Is it OK if I omit certain information or change certain records to avoid penalization?

No. It is never appropriate to omit, change or manipulate information to avoid reporting failure

to comply with an indicator we have committed to. We are responsible for gathering and reporting true information, and for taking the corrective actions necessary to comply with our value offer.

Excellence in Service Policy





SERVICE EXCELLENCE

QUALITY AND INNOVATION

OUR COMMITMENT

- We are committed to the development of efficient and innovative mobility solutions.
- We make the necessary training available to our personnel so they can perform their work with the expected quality.
- We foster in our collaborators an integrated culture of service and customer experience based on quality management and constant innovation.
- We are proud of the quality of our work, and we promote the quality and improvement of processes at each stage of our operation.
- We are aligned with the operations, maintenance and other teams to provide a safe service and an infrastructure that facilitates the travels of our customers.
- We assume personal responsibility for maintaining high standards and world-class protocols.
- We require our external collaborators to deliver the maximum quality and transparency, selecting providers that comply with our quality standards to provide the best service. We also evaluate them to continually improve.

YOUR RESPONSIBILITY

- Demonstrate your commitment to offering the best service each and every day.
- Comply with all of the applicable quality Norms, regulations and laws, including personal data protection.
- Make appropriate use of and protect the resources that **ALEATICA** provides to you for the development of quality and innovation.
- Make sure that our providers work in compliance with the same quality standards as we do ourselves.
- Report any problems or concerns that may compromise the quality of our service.
- Collaborate as a team, generating healthy communication, a high sense of responsibility, compliance, personal care and care of your colleagues.
- If you have an idea or proposal for an improvement, make sure to share it with your colleagues and supervisors.

QUESTIONS AND ANSWERS



Q. How do we foster innovation at ALEATICA?

A. At ALEATICA, we foster innovation on an ongoing basis through communication among our teams. We also have global programs in place, such as the INNOVA awards, where our colleagues

can propose novel solutions that help us perform activities at **ALEATICA** and facilitate improvements in the services provided.

ETHICAL DILEMMAS



A provider we regularly engage to perform work at the concession and with whom we have a longstanding relationship is being neglectful in performing their maintenance work, arriving late to perform the work. One day they did not show up at the roadway and the following day, they told us that they had a personal problem. The situation occurred again, and they asked me not to file an incident report. What should I do?

You should report this situation to your supervisor or through **I CARE** because the quality of our providers affects the quality of our service. If they are no longer performing their work appropriately, that could mean that we may propose not continuing to work with that provider. This situation should also be reflected in the assessment of the provider in question.



CORPORATE INTEGRITY





CORPORATE INTEGRITY

ZERO TOLERANCE FOR BRIBES, IMPROPER PAYMENTS AND FACILITATION PAYMENTS

OUR COMMITMENT

- We do not allow the payment of bribes, improper payments, facilitation payments or the illegal or inappropriate provision of other benefits or incentives. We do not tolerate requests for or the acceptance of bribes from anyone.
- We expressly prohibit giving, offering, promising, authorizing or accepting any item of value, including any type of gift, remuneration of any kind or undue advantage to any public official, authority or individual, either directly or indirectly, in order to have them violate their obligations for our benefit. This prohibition also extends to cases that involve attending to a preliminary request from a public official, authority or individual.
- We do not permit the reception of, request for or acceptance of unjustified benefits of any kind for the purpose of finding favor with third parties to grant to or receive an expected benefit or advantage through violation of their obligations.
- Any kind of facilitation payment, carried out direct or indirectly, is prohibited in all jurisdictions where we operate. Requests for facilitation payments are often backed by a form of extortion.
- In the event of an imminent threat to your health or safety, personal security payments may be made to ensure your immediate safety.

YOUR RESPONSIBILITY

- Respect the local laws and as well as the provisions of this Code and make particularly sure to consider these points in your dealings with public officials.
- Make sure that our partners and intermediaries are aware of our Codes and Norms, and that they specifically agree to respect them and act as representatives of **ALEATICA**.
- Inform your supervisor or the Compliance team immediately if you notice activities that could be in violation of our Anti-bribery policy.
- Consider what a third party could think if they found out that another third party is offering a gift, hospitality or any other type of advantage. If accepting it could call into question the legality thereof, courteously reject it and immediately inform your supervisor and the Compliance team.
- Refuse to make improper payments unless there is an imminent risk to your physical integrity or the integrity of your family. Always use your best judgment and immediately inform your supervisor and Compliance in these cases.
- In the event of making a payment due to an imminent threat to your health or safety, immediately contact the Legal and Compliance Department as soon as you are sure to report the incident. Don't forget to record the personal security payment expense after the danger has passed.

Anti-corruption
Policy





CORPORATE INTEGRITY

ZERO TOLERANCE FOR BRIBES, IMPROPER PAYMENTS AND FACILITATION PAYMENTS

QUESTIONS AND ANSWERS



Q. What are facilitation payments?

A. These are small payments made to public officials to accelerate or facilitate actions or services that are not discretionary, such as obtaining a regular business license or permit, issuing an entry or exit visa, police protection, phone, power or water services, or acceleration of customs clearance, among others.

Q. If I find myself in a situation where my physical integrity is in danger, because an authority is demanding a payment from me to get out of the dangerous situation, can I make the payment?

A. Yes, at **ALEATICA** we prioritize the physical integrity of our collaborators. However, you must inform your supervisor and the Compliance team immediately afterwards so that they can take the appropriate actions.

ETHICAL DILEMMAS



We have hired a local advisor to help us get all the necessary permits, and he has asked me for an advance, arguing that he must use the money to "move the process along". Should we be concerned about this comment?

Yes. The agent's comment indicates that he is willing to make an improper payment. Act immediately and do not make any payment, suspend the services and contact the Compliance and Legal departments. Remember that the actions of our agents or advisors could act directly to **ALEATICA**.

I'm getting a new office ready, and the local authorities have asked me for a small tip to carry out the inspection in a more agile way. Can I do this?

No. If the payment is not for a legitimate charge, you shouldn't pay it.





CORPORATE INTEGRITY

ANTI-MONEY LAUNDERING AND TERRORISM FINANCING

OUR COMMITMENT

- We are committed to complying with the applicable laws and regulations related to money laundering and terrorism financing.
- We do not tolerate the application of practices that could be considered irregular in the development of our relationships with clients, suppliers, partners, competitors and other third parties or stakeholders.
- We do business only with third parties involved in legitimate business activities, with funds derived from legal sources. We achieve this through the application of our due diligence procedures, where we look for information about the third parties with which we will engage in operations.

YOUR RESPONSIBILITY

- Pay special attention when you work with clients and third parties, especially if the transaction involves payments in cash.
- Don't forget to do the Compliance Due Diligence when you have a professional relationship for ALEATICA with a third party.
- Always know who is behind each transaction and only do business with third parties of good repute.
- Inform the Compliance team if you have suspicions that a transaction or operation may be illegal.
- Stay alert and escalate any indications of potential money laundering or other illegal activities.
- Pay special attention to unexpected extraordinary payments not set forth in the corresponding agreements or contracts.

QUESTIONS AND ANSWERS



Q. What is money laundering?

A. Money laundering is the process of receiving assets obtained through criminal activities in a legal business. It refers to the activity of covering up the origin of the funds obtained through illegal activities. The goal is for the illegal money to appear to be the fruit of a legal economic or financial

activity. The idea is to legitimize funds obtained through drug trafficking, corruption, tax fraud, contraband, etc. so that it can be brought into and circulated in the financial system.

ETHICAL DILEMMAS



I want to make a purchase of less than 5,000 euros and I suspect that one of the suppliers I am considering for the purchase may be involved in illegal business, but they offer the best price and payment conditions. The purchase does not reach the minimum amount for being required to perform Compliance Due Diligence, so I'm thinking of contracting it directly, am I acting correctly?

No. Even though it doesn't reach the minimum amount for being required to go through the Compliance Due Diligence process, as regulated in our Compliance Third-party Due Diligence Norm, if you suspect that a third party is engaged in illegal operations, you must inform the Compliance team so they can investigate whether they have actually engaged in operations of this kind. The reputation of the third parties we work with may affect us, so we need to appropriately control these types of relationships.



CORPORATE INTEGRITY

GIFTS, HOSPITALITIES AND REPRESENTATION EXPENSES

OUR COMMITMENT

- Allow our employees to offer and accept gifts and hospitality that is reasonable, proportional and does not exceed the limits established in the Anti-corruption Policy and that have the corresponding authorization by the Compliance team, having previously considered:
 - The value and frequency
 - The time of offering or acceptance and the identity of the recipient
 - The legal and regulatory environment
- The method of offering or acceptance
- Making and/or accepting gifts, hospitality or representation expenses of any amount or nature to or from public officials is prohibited. This prohibition also extends to people closely tied to the public official, authority or individual by family bonds or friendship.

YOUR RESPONSIBILITY

- Make sure that any gift or hospitality you are offered is not, and cannot be perceived as, a bribe or other inappropriate benefit.
- Never accept or offer a cash gift.
- Know the difference between what is acceptable and what isn't. Never request gifts or favors and refuse any type of gift that does not comply with the law, our Code or our policies.
- Register all gifts or hospitalities you receive or will extend, using the gifts record form ([Gifts form](#)) and wait to receive a response from the Compliance team before proceeding.
- Before commencing a relationship with a third party, make sure they are aware of **ALEATICA's** guidelines on gifts and invitations to avoid any future misunderstandings.

QUESTIONS AND ANSWERS



Q. Can I receive or give gifts to third parties?

A. Yes, as long as it is not a gift to or from a public official and the public official and that the requirements set out in the Anti-Corruption Policy

ETHICAL DILEMMAS



As part of my work, I organize many business meetings and trips. A hotel where I often reserve rooms for ALEATICA's employees has offered me a free weekend for my parents' wedding anniversary. It is a very nice gesture. Can I accept it?

No. Even if you are not going to personally benefit from the gift, accepting the offer means you will no longer be impartial when organizing future hotel stays for **ALEATICA**. You must courteously reject the offer and indicate why you are doing so.

and the Gifts, Hospitality and Entertainment.

Take care that such a gift is not or cannot be perceived as a bribe as a bribe. Norma de Regalos, Atenciones y Gastos de Representación.

A supplier just offered me tickets to a Rolling Stones concert. I don't think the tickets exceed the limit established in our Anti-corruption Policy. What should I do?

You should only accept if the invitation is reasonable, common and habitual for our business relationship and the supplier is present. If the invitation may be or could appear to be a bribe or inappropriate benefit, you must courteously decline.



CORPORATE INTEGRITY

CONFLICTS OF INTEREST

OUR COMMITMENT

- We perform all of our activities with integrity and professional ethics, always seeking out benefits for **ALEATICA** and not our own personal benefit.
- We avoid any personal activity or relationship that could interfere or even appear to interfere with our decision-making as **ALEATICA** employees.
- Those who have or seek to have commercial or business relationships, or investments in companies or other

businesses that have or seek to have commercial or business relationships with us, may only enter into such commercial, business or investment relationships if they have been previously analyzed and approved based on our internal policies and norms.

- We do not have interests or investments that allow us to have an influence over or a stake in the commercial activities of our business competitors.

YOUR RESPONSIBILITY

- If there is a potential conflict of interest that could influence or appear to influence our opinions and actions, inform the Compliance team.
- You must be capable of recognizing the types of personal situations that may cloud your professional judgment. Some examples are:
 - Hiring, supervising or doing business with family members or friends.
 - Taking on additional work outside of **ALEATICA** that

competes with the work you perform for **ALEATICA** or that interferes with your time for **ALEATICA**.

- Attending director meetings for companies that share the same commercial interests as ours.
- Receiving gifts or hospitalities from suppliers who do not comply with our policies, etc.
- Holding stakes in companies that provide services to **ALEATICA**.

QUESTIONS AND ANSWERS



Q. What is a conflict of interest?

A. It is a situation where the judgment of an individual -pertaining to their primary interest- and the integrity of an action are unduly

influenced by a secondary interest, usually of an economic or personal nature.

ETHICAL DILEMMAS



My brother-in-law has a maintenance company. Can he work with us?

Yes, provided he has participated in the bidding process and appropriately demonstrated that he has the characteristics that are most advantageous to **ALEATICA's** interests, and another person is responsible for the decision-making related to the contract in question. You must also notify Compliance about this relationship to avoid potential conflicts of interest in the future.

For the position of Technical Director for a concession, and within an open call, the person in charge of human resources receives the curriculum of the son of the current Ministry of Transport, should they refuse the candidate because they are related to a public official?

No. The selection process should be performed considering all the candidates, respecting the highest standards of traceability and transparency. However, this circumstance warrants that the case should be analyzed and evaluated by the Compliance team.



CORPORATE INTEGRITY

ACCURACY OF INFORMATION AND RECORDS

OUR COMMITMENT

- We are committed to transmitting information about the company completely and truthfully, allowing shareholders, analysts and other stakeholders to form an objective judgement.
- We ensure that our records are transparent, complete and accurate. We follow the internal requirements and applicable laws to maintain not only financial integrity, but trust and transparency as well.
- We are committed to working with the inspecting bodies or entities when required to provide oversight.
- We do not allow any actions aimed at coercing, manipulating or unduly misleading the Company's internal or independent auditors in their supervision activities of **ALEATICA**.

YOUR RESPONSIBILITY

- Make sure that any financial transaction includes all applicable support documentation and obtain the required approvals before proceeding.
- Ensure complete, fair, accurate, timely and comprehensible disclosure in the reports and documents submitted on ALEATICA's behalf.
- Accurately assign transactions to the appropriate account.
- Record all transactions promptly, including complete descriptions, and retain the support documentation for each one.
- Note that it is prohibited to:
 - Create false records or distort or omit material information on the true nature of a transaction.
 - Alter receipts in expense reports.
 - Falsify the quality, security or results of tests.
 - Underestimate or exaggerate known assets or liabilities.
 - Maintain liabilities, funds or accounts or records off the books that are not disclosed or registered.
 - Incorrectly record or fail to record aspects that should be accounted for as expenses.
- If you are notified of the start of an inspection and/or requirement by any authority or regulator, notify your supervisor, Legal and Compliance. Support immediate response to these requests.

QUESTIONS AND ANSWERS



Q. What are accounting records?

A. Accounting records are physical documents for all of the transactions performed by a company. These records reflect all of the

company's book movements in order to provide its financial information.

ETHICAL DILEMMAS



I've been asked to review the KPI report prepared by my supervisor for year-end. I think I found an error, but nobody seems to have noticed. I'm not sure if I should mention it, because I don't want to jeopardize my relationship with my boss. What should I do?

The reason you've been asked to review the report is precisely for you to make sure that there aren't any mistakes. If you fail to communicate the mistake, you wouldn't be doing your job correctly or serving the company's interests. You should let your boss know what you found. They have no reason to be upset with you, in fact, you will have done them a service by avoiding having inaccurate information being passed on to the next phase.

Finance Policy





CORPORATE INTEGRITY

FREE COMPETITION

OUR COMMITMENT

- We do business fairly everywhere we operate, respecting free competition based on our ethical principles and complying with the competition laws in the countries where we operate, avoiding any actions that represent an abuse or transgression of free competition.
- We provide our services based on the agreed performance standards and are always transparent about the information related to our compliance therewith.
- We make appropriate channels available to our customers to address every contact and receive assessments of our services through surveys that also measure satisfaction based on international standards, ensuring the accuracy of the information and the appropriate treatment thereof.
- We have a transparent relationship with our clients and users.

YOUR RESPONSIBILITY

- Avoid all types of conduct that could be an abuse or illegal restriction on competition.
- Don't propose or enter into any agreement with any other party in bidding processes or how to present them. Only submit offers for bids if the purpose is to compete and win a specific part of the business.
- Don't request confidential or sensitive information directly from the competition.
- Avoid contact with competitors that could create the appearance of inappropriate agreements or misunderstandings. Actively avoid situations where inappropriate agreements or information is presented, shared among competitors, and promptly report situations of this kind to the legal department

QUESTIONS AND ANSWERS



Q. What are the most common anti-competitive conducts?

A. The behaviors that are repeated the most and that have been sanctioned on most occasions by

the competition authorities are market sharing, price fixing, cartels, abuse of a dominant position.

ETHICAL DILEMMAS



A little while ago I was at a convention and ran into a business development colleague from one of our competitors and, while we were having a coffee, he told me the price range they were proposing for a bid that we were also participating in. Who do I have to report this to so we can get the most leverage out of it?

If a competitor offers to disclose information about prices or offers, you must immediately end the conversation politely and inform your supervisor and the legal department and not share this information with anyone else. Although the exchange was not ill-intentioned, I could also appear to be manipulation of the price or the bid, which is not very ethical and, in some countries, illegal.

Finance Policy





CORPORATE INTEGRITY

HANDLING OF PRIVILEGED INFORMATION

OUR COMMITMENT

- We comply with the laws that protect the integrity of the securities market, financial instruments and issuance rights in which we are involved and take measures to avoid manipulation of the market.
- We do not buy or sell shares, either of **ALEATICA** or of other companies, nor do we give advice to others in order for them to do so, based on or while in possession of material non-public (privileged) information.
- We establish the measures necessary to safeguard the privileged information of the different business areas and companies, making correct use of such and avoiding any action that could result in a situation of abuse and/or manipulation of the market, including attempted manipulation.
- Violation of insider trading laws can result in severe fines and criminal penalties, as well as disciplinary action by **ALEATICA**, up to and including, for an employee, termination of employment or, for a director, a possible separation from the Board of Directors.
- We do not hire directors or employees for the purpose of providing confidential information about their previous company or job.

YOUR RESPONSIBILITY

- Use information cautiously, maintaining its confidentiality and availability and minimizing the risks derived from its disclosure and misuse, both internally and externally.
- Keep all information that is not public confidential.
- Never negotiate actions for **ALEATICA** or other companies when you hold material information that still has not been disclosed publicly.
- Be careful in conversations or requests for information by friends and family related to **ALEATICA** or the companies that **ALEATICA** has business ties with that could result in the adoption of an investment or business decision based on non-public information.
- Apply the necessary security measures to protect each type of information based on its content and level of confidentiality.





CORPORATE INTEGRITY

HANDLING OF PRIVILEGED INFORMATION

QUESTIONS AND ANSWERS



Q. What is material non-public (privileged) information

A. It is information that is not public domain that, if it were, would be information important by a reasonable investor when determining whether to buy, hold or sell the shares of such company, or that could reasonably be expected to affect the price of that company's shares. There are times when it is possible to access the privileged confidential information of our company or a company we do business with. Usually, if this

information motivates you to buy or sell shares, it is probably privileged confidential information and should not be used for securities trading until it becomes public domain.

Privileged confidential information is information that, if known, could affect the price of **ALEATICA's** shares.

ETHICAL DILEMMAS



Eduardo works in the accounting department and recently received some documents about an important acquisition that will increase the value of ALEATICA's shares considerably. Eduardo got the idea that, since his brother has been having some economic problems recently, he could suggest to him that it might be a good idea to buy ALEATICA shares to resolve his situation. Can Eduardo do this?

No. Eduardo cannot suggest to his brother that he buy **ALEATICA** shares based on material non-public (privileged) information. It is illegal to communicate privileged confidential information to third parties for them to use it to buy or sell shares. With this action, Eduardo would be committing a serious violation of this Code, and violating the laws on the use of confidential information for securities trading.





CORPORATE INTEGRITY

THIRD-PARTY RELATIONS

OUR COMMITMENT

- We value our business relationships and work to be a good, responsible partner, so we only have relationships with third parties that share our ethics and values.
- We perform processes for the selection of third parties based on impartial and objective terms, ensuring equal participation based on technical, financial and compliance criteria.
- We work with federal, state and local governments. Requirements for government contracts tend to be stricter than our other contracts, but in all of them, we follow the rules and never take ethical shortcuts.
- We contribute to the improvement of the labor, social and environmental performance of the third parties we work with and seek to have them operate based on the policies, principles and practices of a responsible business.
- We carry out business with companies and countries that are not restricted or sanctioned under the international trade laws of the countries where we operate.

YOUR RESPONSIBILITY

- Promote knowledge of this Code among third parties and follow up on compliance herewith to guarantee the quality of the products and services we receive. If you are aware of or suspect that a third party is violating our Code, immediately inform your supervisor or Compliance.
- Treat third parties fairly and with respect. Don't favor any specific provider when contracting a service; favor fair competition.
- Remember that we are responsible for the actions of the third parties that represent **ALEATICA**.
- Follow our Purchasing and Contracting Norm and make sure that the third party select reflects **ALEATICA's** best interests. Never enter into a relationship with a third party without the corresponding financial, technical and compliance analyses.
- Retain all support documentation for the purchases you make.
- If you find yourself in a situation where there is a potential conflict of interest with a third party we are likely going to work with, inform your supervisor, Human Resources or Compliance.

QUESTIONS AND ANSWERS



Q. What should I do if I have questions about how to carry out a contracting process?

A. You should consult the Purchasing and Contracting Norm and the Supplier Certification

ETHICAL DILEMMAS



We urgently need to carry out some maintenance work in three days, which implies hiring four operators. A potential supplier offered me to carry out the work in said period, with only two operators who would double their work hours to meet the deadline. Should I hire him?

Registration and Assessment Norm. If you have questions, you can contact your direct supervisor or the Processes and Ongoing Improvement department.

No. Despite the urgency of the task, it is necessary for our suppliers to have legal practices related to our culture. In this case, this supplier is violating labor laws, and is also treating its employees improperly, so it should not be hired.



CORPORATE INTEGRITY

PRIVACY AND DATA PROTECTION

OUR COMMITMENT

- We are concerned with the security of the personal information we have in our possession, protecting the information of all the individuals whose data we process (employees, suppliers, customers, etc.), we comply with the regulations in place in this regard, and we respect the right to your privacy.
- We ensure that the people from whom we gather information are aware of the type of information we are gathering, what it will be used for, and how they can contact us if they have questions.
- We gather only the personal information that is necessary, and we destroy or correct erroneous or incomplete information.
- We ensure that the personal data is stored securely and for the time necessary to comply with the legal or business information for which it was acquired.
- We only share personal data with authorized individuals, or with those with whom we have entered into the agreements required by the applicable Data Protection standards or regulations. We ensure that the third parties to which we delegate the treatment or the information or that use the information on **ALEATICA's** behalf comply with these principles.
- We ask for legal advice before transferring or disclosing personal data to any recipient located outside the country where it was gathered.

YOUR RESPONSIBILITY

- Request, use or share personal information only for clear, concrete and legal purposes. If you have any questions, consult with the Individual Responsible for the Data Protection Activity for your Company (organization chart available [here](#))
- Protect and safeguard the confidentiality, integrity and availability of the personal information you request, have access to and/or share in the exercise of your functions. Abstain from disclosing the information through any means or misusing it. Request, use or share the personal information that is strictly necessary, don't duplicate it unnecessarily and eliminate it in accordance with the corporate Norms in place.
- If you gather "sensitive" information (particularly information on health, biometrics, political or union affiliation, etc.) you must always have legal authorization or otherwise the consent of the owner of the information. In both cases you must request authorization from the Global Data Protection Delegate for the treatment of this information (dpo@aleatica.com).
- Do not provide personal information to third parties, even other companies from Grupo **ALEATICA**, except when there is a legal obligation, the recipient is a service provider that has signed the clauses required by the normative or regulations applicable to the activity or, if none of the above conditions are met, when the owner has granted valid consent.
- Urgently notify your IT Department (via email or by phone) and the ALEATICA Data Protection area (using this [web form](#)) if you discover that non-public **ALEATICA** information, or any system or device that contains such information, has been compromised.

Personal Data
Protection
Norm





CORPORATE INTEGRITY

PRIVACY AND DATA PROTECTION

QUESTIONS AND ANSWERS



Q. Why does ALEATICA need to have access to personal data?

A. ALEATICA requests and uses personal data to comply with legal obligations (e.g., tax payments, or due diligence controls) and contractual obligations (e.g., supplier certification, formalization of contracts, payment of worker

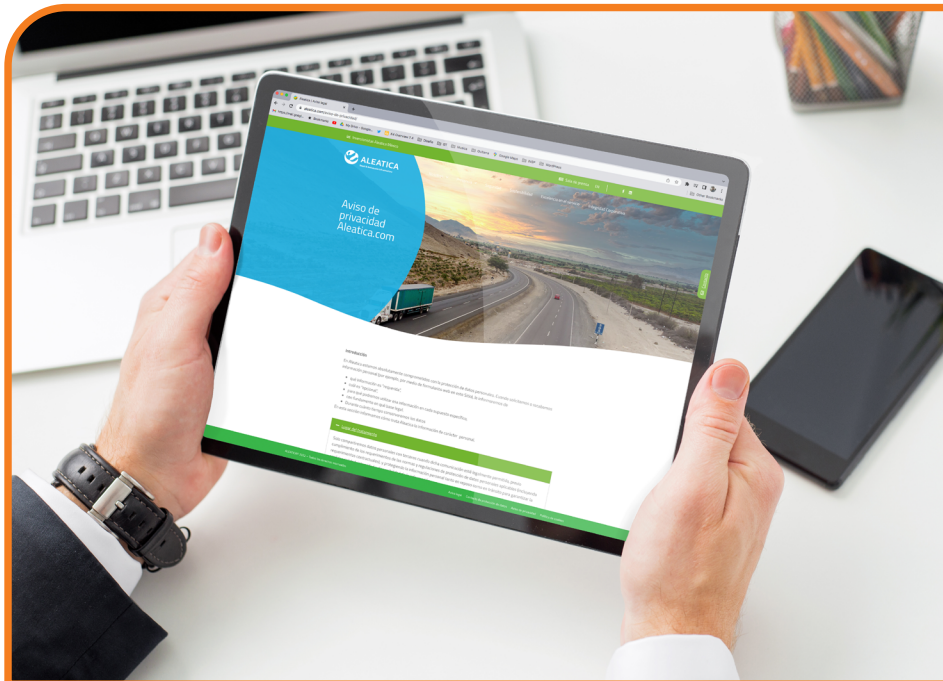
salaries or provider fees), security obligations (e.g., worker IT footprints or data captured by video surveillance equipment), as well as for purposes of management of bids with the consent of the data owners (e.g., Innova awards).

ETHICAL DILEMMAS



I sent an email with payroll information to the wrong recipient. The information was not protected even with a password. What should I do?

Report immediately the fact to the Company's Data Protection Officer through the form provided for this purpose. Keep in mind that in some countries the period for analyzing and reporting the incident is 72 calendar hours.



Personal Data
Protection
Norm





CORPORATE INTEGRITY

USE OF ASSETS

OUR COMMITMENT

- We make available to our employees the resources necessary for them to perform their professional activity and provide them with the means for appropriate protection and safeguarding thereof.
- We use our assets for legal purposes, handle them with care and protect them from theft, loss, fraud and undue use.
- We do not permit the use of unauthorized software or downloads or any other behavior that involves the risk of bringing a virus into our network, or any other elements that are dangerous for information security.
- We do not grant unauthorized physical access to restricted assets.
- We have a cybersecurity protection system to guarantee the integrity of our IT systems and the continuity of our business.

YOUR RESPONSIBILITY

- Remember that all of the assets and documents you work with belong to **ALEATICA**.
- Respect and protect the assets and resources provided to you by **ALEATICA**, making sure that they do not get lost, damaged, used inappropriately or wasted, and that they are not provided to others, transferred, sold or donated without authorization.
- Obtain licenses or authorizations from the legal owners for the use of third-party industrial property.
- Don't use the company's resources for personal purposes. Reasonable use of communication tools like email, phone and internet, is permitted provided no excessive expenses are incurred and it does not interfere with our work responsibilities.



- Inform your supervisor if any of your assets are damaged or need repair.
- Be a cybersecurity champion. Make sure to follow the processes and practices we have in place to protect our networks, computers, programs and data from attacks, damages or unauthorized access.



CORPORATE INTEGRITY

USE OF ASSETS

QUESTIONS AND ANSWERS



Q. What is included in the assets and resources provided by ALEATICA?

A. Everything that is property of **ALEATICA**, whether tangible or intangible, that provides value to the Company, including physical property, electronic/technological assets, information assets and intellectual property.

Q. What is third-party intellectual property?

R. This could be patents, utility models, brands, photographs, movies, articles, etc.

ETHICAL DILEMMAS



I think one of my colleagues has been attending to an external consulting business during company work hours and has used the company laptop and email to do so. I told a friend of mine from the Information Technology area. He can access this person's email and has offered to help me investigate what is happening. Can he do that?

No. If you have a suspicion of this kind, you will need to communicate it to your supervisor directly, or to Compliance. There are specific procedures for accessing worker email accounts when misconduct is being investigated. Even though your friend from Information Technology area has access to these accounts, he shouldn't use it for this purpose without due authorization through the company's official channels.



I need to do a presentation and I found an image from another company online. Can I use it?

No, that wouldn't be right. Using a photograph without permission could violate the company's rights. You should always ask for permission before using another company's images.



CORPORATE INTEGRITY

PROTECTION OF OUR NAME

OUR COMMITMENT

- We protect **ALEATICA's** name because it represents our stakeholders and their investment, our employees, and the trust of our clients and customers in our performance at all the sites where we operate.
- We use good judgment in all communications, bet they verbal, written or digital.
- We communicate a coherent image through our positioning in the communications we make so they do not affect our reputation.
- We are transparent and comply with the legislation applicable to our interest representation activities in each country.

YOUR RESPONSIBILITY

- Never speak on behalf of **ALEATICA** unless you are expressly authorized to do so.
- Channel external consultations about **ALEATICA's** business to the Communication department.
- Make sure there is no confusion between your personal interests or opinions and those of **ALEATICA**.
- Do not give negative or controversial opinions about colleagues and our workplace on social and/or professional media.
- Only identify yourself as an **ALEATICA** employee on social media when you do so as part of your work activities.
- Take care that the political activities you carry out in a personal capacity are not directly or indirectly associated with **ALEATICA**.

QUESTIONS AND ANSWERS



Q. How does ALEATICA protect its name??

A. We have a global communication strategy that allows us to share our actions and the way we

work with our stakeholder groups transparently and reliably. We follow up on news that affects us directly or indirectly, to address it appropriately.

ETHICAL DILEMMAS



I've seen a lot of incorrect information about ALEATICA online. Is it my responsibility to correct it?

No. If there is erroneous information circulating publicly, you should inform the Communication department and they will take the necessary actions.

A colleague published some personal opinions about ALEATICA's management on Facebook. He didn't specifically say he was an ALEATICA employee, but it was very easy to deduce it based on the other information he has shared. Do I need to do anything about this?

Social Media is a very popular way for people to express themselves. Bring it up with your colleague first, because he may not have realized that his actions could go against **ALEATICA's** interests and, if you think it's necessary, you could bring it to your supervisor's attention or report your concern through **I CARE**.



PASSION FOR THE TEAM



PASSION FOR THE TEAM

RESPECT FOR HUMAN RIGHTS

OUR COMMITMENT

- Our human team is a reflection of our values, and that is why we make an effort to create work environments where trust and respect for people's dignity, cordiality and teamwork are the prevailing norm.
- We prohibit any abuse of authority, as well as any other behavior that could create a work environment that is intimidating, offensive or hostile.
- We subscribe to and encourage compliance with Human Rights (including modern slavery, forced labor and any form of discrimination in our business) and avoid working with organizations that violate them. That is why we respect

all of the provisions issued by the International Labor Organization and the UN Global Pact. We are opposed to any type of modern slavery and therefore take care to ensure that the third parties we interact with do not engage in practices of this kind.

- We promote and respect the right to association and collective negotiation in the labor environment.
- We do not permit any type of verbal, physical or visual conduct that threatens dignity or respect.
- We promote practices that favor the wellness and quality of life for all of our employees.

YOUR RESPONSIBILITY

- Contribute to maintaining a work environment that is pleasant, gratifying and safe and that encourages people to give the best of themselves.
- Respect the Human Rights and Public Freedoms included in the UN Universal Declaration of Human Rights.
- Always act in a way that is loyal, respectful, diligent and honest.

- Respect the dignity of others, their freedom and their privacy.
- Abstain from any attitude, physical or verbal expression that could be interpreted as sexual or workplace harassment.
- Observe these principles when selected third parties.
- Report any actions you see that violate the principles described herein to your supervisor, Human Resources or Compliance.

QUESTIONS AND ANSWERS



Q. What behaviors are considered sexual harassment?

A. Sexual harassment is considered to be any situation where there is an unwanted verbal, non-verbal or physical behavior of a sexual nature, for

the purpose of, or with the effect of infringing on the dignity of a person, particularly when it occurs in an environment that is intimidating, hostile, degrading, humiliating or offensive.

ETHICAL DILEMMAS



I've witnessed my supervisor making offensive and inappropriate jokes at work, creating a bad work environment. I'm afraid I'll lose my job if I report this situation to my supervisor. What should I do?

You should report this situation. If you are afraid to report it to your hierarchical superior, you can do it through **I CARE**, our whistleblower hotline, or to Human Resources. **ALEATICA** guarantees the confidential, impartial and professional treatment of the information you report.

I've seen on the news that one of the contractors we are evaluating for a selection process is involved in child labor. I'm not involved in the decision, so should I say something

Yes. Selecting a contractor that has a history of participating in abuses of human rights goes against **ALEATICA's** values and could put our company at risk. You should communicate the information you know to the department performing the selection process or to Compliance, to help **ALEATICA** make an informed decision about the case.

Human
Rights Policy





PASSION FOR THE TEAM

DIVERSITY AND INCLUSION

OUR COMMITMENT

- We are proud of the diversity of our team and value the different cultures that comprise it because they enrich our work.
- We promote inclusion so that the diversity of our employees can add value in an environment of equal rights and responsibilities.
- We develop selection, hiring, training, remuneration, development and professional growth practices based solely on the contributions made in the position, professional experience and work results. We promote access to employment for people with different capabilities or who belong to underrepresented groups to the extent that the work centers and activities are appropriate to those individuals.
- We promote a work environment with zero tolerance for the use of inappropriate, disrespectful, sexist, discriminatory or disparaging language.
- We are committed to supporting local employment and local companies that are aligned with the culture and policies of **ALEATICA**, for them to form part of our supply chain and to promote the improvement of their skills.

YOUR RESPONSIBILITY

- Foster the principles of equal opportunity and non-discrimination and contribute to the creation of a diverse and integrated work environment.
- Have an attitude in favor of integration and the creation of a solid corporate identity.
- Make sure that the third parties we work with are aware of our Norms related to integration and diversity management.
- Don't discriminate, harass or intimidate anyone for any reason, including:
 - Gender
 - Disability
 - Marital status or family situation
 - Sexual orientation
 - Age
 - Political or philosophical opinions
 - Religious beliefs
 - Ethnic, social, cultural or national origin
 - Union activity





PASSION FOR THE TEAM

DIVERSITY AND INCLUSION

QUESTIONS AND ANSWERS



Q. What exactly does ALEATICA mean by "discrimination"?

A. There may be countries where the discrimination laws do not prohibit certain behaviors that **ALEATICA** considers unacceptable. For example, we oppose not only direct discrimination, but also indirect discrimination.

Direct discrimination refers to any action carried out related to work, learning, promotions, ongoing

work or any other aspect of work life where the individual affected does not enjoy equal treatment or opportunities.

Indirect discrimination is any action that, although it may appear neutral, puts any person with a gender, age, disability or other specific characteristic at a disadvantage compared to others.

ETHICAL DILEMMAS



One of my colleagues ruled out a supplier that seemed to meet all our expectations but given their comments, I think it's because of the supplier's nationality. What should I do?

Any discrimination against people for the color of their skin, their nationality or their ethnic origin is unacceptable to **ALEATICA**. Communicate this information to your supervisor, Human Resources or Compliance.

I feel uncomfortable when I hear jokes about some colleagues who are homosexual. What should I do?

Homophobia is unacceptable. If you encounter a problem of this kind, try to make the people telling the jokes understand that their behavior is unacceptable. Alternatively, go to your supervisor, Human Resources or Compliance.







OUR VALUES, THE PILLARS THAT SUPPORT US

