



# CODE

— OF ETHICS —

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## ¡HEY FELLOW WORKER!

In this manual you will find the **Code of Ethics** of our company.

Ethics **create and build trust** with those around us and those who work with us.

Virtues such as **honesty and righteousness** are key for building great teams.



# MESSAGE FROM THE CEO

Ethical Framework Tecno Fast ATCO

Tecno Fast ATCO (“TFA” or the “Company”) is advancing towards more demanding and ambitious goals, developing its businesses in different contexts which require us to comply with a solid set of values. Therefore, **Ethics is the way to create trust with each of the parties involved in our business and it has to be a main feature for all of our managers, directors and collaborators.** Hence we share the Ethical Framework established by the Code of Civil Procedures and the principles of social responsibility defined by the ISO26000.

TFA requires to be seen as a company which develops its business focusing on its efforts to impact positively upon our shareholders, customers, collaborators and the community around us.

**Rodrigo Prado**  
Chief Executive Officer Tecno Fast

# MANUAL OF CORRECT USE

Reading Steps  
Of the Code of Ethics of Tecno Fast ATCO



## Chapter

# 01

- 1 READ** Every employee and contractor should read this brochure completely and in case of any doubts, should ask his supervisor, chief or manager.
- 2 FILL** After Reading and understanding the Code of Ethics, every employee and contractor has to fill the form in page 42, this must be completed by each person.
- 3 DELIVER** Deliver the form to the supervisor or line manager.
- 4 FILE** Afterwards, the supervisor or line manager will return the completed forms to Human Resources in the Santiago office or where the folder of the employee is and it will be filed there.

# INTRODUCTION

Guiding principles of this Code to be fully accomplished

## Chapter

# 02

This Code of Ethics (the "Code") describes the required behavior of all of our managers, employees, hired personnel and contractors of TFA and its subsidiaries.

It is a policy of the company to deliver a copy of the Code to the managers, employees, hired personnel and contractors of TFA and its subsidiaries. If you have any doubt regarding how the Code should be enforced in your area, ask your supervisor (in case of an employee) or any other appropriate authority of TFA (in the case of a Manager or Director). In this Code, when it is referring to the employees it is included every member of the recruited staff, either by permanent or fixed term contract, and those ones hired for specific jobs.

The guiding lines of this Code are mandatory and it is expected that they will be fulfilled under any circumstances (as long as the use of the Code is pertinent). **The Code ratifies the commitment of the Company to keep high standards of ethics and morals and it specifies the basic norms of behavior for every director, manager, supervisors and employees in general.**

Even though the Code refers to a wide variety of topics, it does not cover completely all the range of activities in the daily life of our workers. However, these values show an essential commitment to keep high standards of behavior and resemble the way of behavior that is expected of our directors, managers, supervisors and employees of TFA.

Sometimes could be difficult to apply the general principles in different circumstances. For these cases there are certain questions that each employee should ask themselves before taking a decision or action. When these questions are answered with honesty they can help you in difficult situations:

1

**IT IS LEGAL?**

Will your decision break any law or regulation?

2

**IT IS CONSISTENT WITH THE CODE?**

It is what the Code requires?

Have I measured the possible risks and effects of this decision or action?

Should I look for some kind of guidance from my supervisor or any other competent entity of TFA?

3

**IT IS THE RIGHT ACTION TO TAKE?**

How would I feel if this decision or action were published in a newspaper?

Would I feel OK if my family would know about this decision or action?

It is recommended, that in situations in grey areas or in which you are not sure how to proceed, to discuss with your supervisor or any other competent entity of TFA to take the right course of action.



# CORPORATE VALUES OF TFA

Features of our work in  
the factory, the office or on-site

## Chapter

# 03



### SAFETY

Safety is the main value present in every aspect of our work, either in the factory, the office or on-site. Nothing justifies reckless actions of those who do not consider their consequences.



### ENVIRONMENT

Each of our actions must be thought of in consideration with our environment. All of us can be aware of the great contributions we can make to ensure we live in a better world.



### EFFICIENCY

Our job is distinguished by our quality, speed and excellent service. All of our actions must provide a right level of delivery.



# STRATEGIES OF SUSTAINABILITY OF TFA

Pillars of our strategy of sustainability

## Chapter

# 04

TFA is not understood just through its growth, we must also look to the future and concern ourselves with the new reality of providing concrete answers to this new and complex scenerio of sustainability within our working environment.

### **STRATEGIC PILLARS: Our sustainability strategy**

Hoy se debe anunciar que esta declaración se materializará en un plan sistemático, consistente con nuestro ADN y que abordará los siguientes 4 pilares estratégicos:



**1. RELATIONSHIP WITH OUR STAKEHOLDERS:** Direct dialouge and invlvement with its stakeholders to achieve the interest of senior management leadership.



**2. BEST PRACTICES IN RELATION TO WORKERS, EMPLOYEES AND SUPPLIERS:** Especially in matters of labour relations with our employees, including matters of safety and quality of life throughout our value chain.



**3. CUSTOMERS AND THE ENVIRONMENT:**  
The bottom line is to ensure the health and product safety for our customers. Our focus is to establish our own initiatives to minimise the impact of climate change as part of our comprehensive and sustainable services.



**4. SUPPORT AND COMMUNITY INVOLVEMENT:**  
We define our participation and support to institutions or civil society groups in order to help the development of our impacted communities. We promote the creation of wealth and employment to members of the communities of Lampa and Coline, these communities surround our works and subsidiaries.  
This strategy is based on incorporating the principles of social responsibility- making decisions and implementing them.

**Operating principles of the ISO 26000:**

1. Accountability system
2. Honesty and transparency
3. Ethical behavior
4. With regards to the interests of the stakeholders
5. Respecting the law
6. Respecting international standards
7. Respecting human rights



# OUR COMPANY CODE OF ETHICS

STRUCTURED  
AROUND THREE  
PILLARS



## Chapter

# 05

Our current code of ethics and the different subjects are specified by and structured around three main pillars:

- A. OUR CORPORATE COMMITMENTS
- B. RESPONSIBILITIES OF THE INDIVIDUAL
- C. OUR WORKING ENVIRONMENT



### A. OUR CORPORATE COMMITMENTS

1. TECNO FAST ATCO and its directors, managers, officers, employees and contractors comply with the letter and spirit of all legal requirements, both national and international which apply to the company. In Chile and abroad, many of TFA activities are subject to complex and changing laws affecting both trade locally and abroad. In general, if the law is violated, no defence will be given for claiming the law was unknown to the individual. **CHECK!! In addition, agreements or contracts do not necessarily have to be written to violate those laws, since it is possible that the infringement of the conduct of the parties otherwise requires.**

**2. Directors, managers and employees must not provide, directly or indirectly on behalf of TFA, expensive gifts or excessive entertainment or benefits to others.**

All employees, who have the powers, can provide modest gifts, favours and entertainment to people.

- This can not include cash, bonds or securities and must be of limited value so that it is not interpreted as a bribe, rebate, commission or other improper payment.
- Exchanges must be carried out within the general and accepted business practice.
- There must be no infringement of the law.
- If this act is disclosed to the public, the act of the individual must not bring shame upon TFA or the receiver.

**3. All relations between directors, managers, employees or contractors within TFA and public officials, must be conducted in such a way so as not to compromise the integrity or damage the reputation of any public official or the Company.**

Any hint of improper conduct when dealing with public officials is unacceptable. The direct or indirect involvement of bribery, indirect contributions or similar payments is absolutely prohibited, regardless of whether this act is considered by the individual to be promoting the commercial interests of TFA. Maintaining a high standard of integrity is extremely important for TFA.

Delivering benefits whether inexpensive gifts or moderate value sums to a government official on behalf of TFA can be misinterpreted as an illegal offering to claim influence over the official. Therefore, any gift, entertainment or benefit can not be delivered by an officer or employee without the authorization of the Executive Director or General Manager.

**4. Free competition and antitrust policy**

**We are always concerned with respecting all regulations in defense of free competition and to establish a fair and honest stage with which to interact with our competitors.**

Depending on the country in which you are working, there may be a competition and antitrust policy. Be sure to comply with them, as well as with the laws and regulations that are applicable, and ensure that the customer and suppliers (among others) connected to the Company do the same.

***Antitrust policy: It is strictly prohibited to execute an action that violates the rules governing free competition in the markets in which the Company is operating within.***

Never create agreements or establish partnerships with other companies, in order to fix selling prices or purchases, agree on any component of the price or rate, adopt a formula to determine prices, eliminate or reduce discounts for their products, limit services, establish areas, define markets, distribute customer, or any other similar practices to those mentioned above.

Although marketing and comparative advertising are generally acceptable, each of the members of Tecno Fast ATCO must be careful to not unfairly discredit the products or services of competitors. At the same time, we will give our customers only true and verifiable data, we will provide honest feedback based on real facts about our own products, services and business units.

Given the complexity of the antitrust laws, it is advised for individuals to consult Human Resources before carrying out planned actions with competitors. The HR staff will be able to confirm the information with the Corporate Lawyers Staff.

All employees must always comply with applicable laws of free competition and antitrust laws within each country where we work and/or operate.

It is not allowed under any circumstances for Tecno Fast ATCO workers to obtain competitive information improperly or fraudulently. If a worker receives Tecno Fast ATCO data from a competitor under questionable circumstances, you should never accept or distribute such information. If this should occur you should immediately notify Human Resources.

**5. The accounting records of TECNO FAST ATCO should reflect business transactions and the financial position of the Company accurately and on time.**

All transactions must be properly authorized and recorded to permit accurate preparation of statements and to maintain accountability of assets.

No funds, assets or transactions are allowed to not be registered or accounted for. The use of funds or assets of the Company for illegal or improper purposes is strictly prohibited.

**6. The Foreign Corrupt Practices Act (FCPA).**

Under the FCPA, US companies are prohibited from doing business with foreign companies in the US, making corrupt payments to foreign officials (both government officials, and employees likewise and any person acting in an official capacity) with the purpose of obtaining or retaining business. Tecno Fast activities are subject to FCPA ATCO throughout the world.



## B. RESPONSIBILITIES OF THE INDIVIDUAL

### 1. Alcohol and Drugs:

As a Tecno Fast ATCO member you have a personal responsibility to report your own substance abuse of either alcohol or drugs. You must do this out of respect for yourself, your colleagues and customers.

In particular, if you are a worker of Tecno Fast ATCO you are subject to special regulations (such as construction or work tasks). It is your obligation to know, respect and comply with the special rules and policies governing that activity and meet the measures implemented by the Company in order to protect the compliance with such standards and specific policies.

If following a medical treatment, including prescription medications, you must ask your doctor for advice as to how your health will impact on your performance or capabilities. If the workload is subject to specific rules, always ensure that you can perform the necessary functions while under medical treatment.

Never bring alcohol or drugs (prescribed nor illegal) into the workplace. Do not distribute them between Tecno Fast ATCO employees, customers or suppliers.

When participating in activities outside of working hours, which are organized by the company or that occur on behalf of the company, you should always maintain a proper and dignified attitude. Such activities may include dinners or lunches with clients or suppliers, internal celebrations, conferences or international fairs, among others.

## 2. Directors, Managers and employees should avoid any situation in which their personal interests may interfere with their responsibilities at Tecno Fast ATCO

Employees will not receive any benefit from or participate in any activity that:

- Removes the time required to perform their duties in TFA, or
- Creates an obligation or distraction that would affect their judgement or ability to act in the interests of TFA.

En algunas ocasiones, los beneficiarios o tener participación en la propiedad de una empresa de la competencia o complementaria podría crear o parecer que crea algún tipo de conflicto. Se les exige a los funcionarios y empleados presentar por escrito al Director Ejecutivo o Gerente General todos los intereses comerciales, financieros o actividades en las que aquellos intereses o actividades pudiesen crear conflictos con sus actuales o futuras funciones.

Todos los empleados TFA deben evitar cualquier tipo de conflicto de interés.

### 3. Conflicto de Interés

El conflicto de interés se materializa cuando en razón de sus funciones, el administrador, directivo o colaborador al tomar una decisión, realizar u omitir una acción, debe escoger entre su interés personal y el de su Empresa, cliente o proveedor, generando con su decisión, acción u omisión un indebido beneficio que no recibiría de otra forma. Este tipo de conflicto desconoce los deberes legales, contractuales, estatutarios o éticos; para que se confíe este conflicto no es necesario que los intereses de la Empresa y los del administrador, directivo o colaborador estén contrapuestos, basta con que coexistan. El interés personal es aquel asunto que afecta a un administrador, directivo o colaborador o a una persona con él vinculada.

**Ningún administrador, directivo o trabajador participará en contratos o negociaciones en las cuales se encuentre incurso en un conflicto de interés;** lo mismo aplicará para sus parientes, hasta el cuarto grado de consanguinidad, segundo de afinidad y primero civil.

Ante los conflictos de interés, la actuación de los administradores, directivos y colaboradores de **TECNO FAST ATCO** y sus Filiales deben regirse por lo siguiente:

- **Lealtad:** deben actuar en todo momento con lealtad a **TECNO FAST ATCO** y sus empresas asociadas y sus accionistas, independientemente de sus intereses propios o ajenos.
- **Abstención:** deben abstenerse de intervenir o influir en la toma de decisiones que puedan afectar a la empresa, o a las personas o entidades con las que exista conflicto.
- **Confidencialidad:** quien se encuentre en una situación de conflicto de interés debe abstenerse de acceder o divulgar información calificada como confidencial que afecte el conflicto.
- **Información:** los administradores, directivos, colaboradores y contratistas que tengan en curso conflictos de interés deben informar a su jefe jerárquico inmediato sobre estos, mediante procedimiento de reclamos establecido en el código de ética.

### 4. Los empleados y contratistas no deben usar su estatus laboral para obtener beneficios personales de aquellos que buscan hacer o hacen negocios con la Empresa.

Empleados y contratistas no deberían buscar o aceptar obsequios, pagos, servicios, honorarios, privilegios especiales, vacaciones o alojamiento, préstamos preferenciales de ninguna persona, grupo u organización que haga u busque hacer negocios con la Empresa, o de alguien de la competencia de TFA. Sin embargo, funcionarios y empleados podrían aceptar obsequios modestos, favores o entretenimiento que cumplan con estándares razonables.

### 5. Relaciones familiares y personales.

Evite realizar transacciones o tomar acciones que puedan ser cuestionadas por otros al involucrar en decisiones de compra familiares directos o amigos íntimos. **La contratación de familia y amigos queda prohibida en el caso que éstos dependan jerárquicamente de usted.** En general, evite situaciones de este tipo que puedan entrar en conflicto con sus responsabilidades con **TECNO FAST ATCO** o

que comprometan los intereses de la empresa, aunque sólo den la impresión de generar un conflicto de interés.

Nunca tome decisiones de compra o realice otro tipo de transacción comercial en representación de **TECNO FAST ATCO**, con empresas en las que trabajen familiares directos o amigos íntimos, sin el conocimiento y aprobación por escrito del gerente de su área. En ningún caso podrá contratar, supervisar directamente, influir en decisiones de promoción o ascenso, fijar remuneraciones o realizar evaluación de desempeño de familiares directos.

Tenga especial cuidado si un funcionario gubernamental o familiares de un funcionario gubernamental postulan o están en proceso de selección para un cargo dentro de **TECNO FAST ATCO**, mientras dicho funcionario todavía tenga capacidad de influir en la toma de decisiones acerca de asuntos que puedan afectar o beneficiar a **TECNO FAST ATCO**.

**6. Los directores, Gerentes, Jefes, empleados y contratistas no deben usar información confidencial sobre TECNO FAST ATCO para beneficio propio y no deben divulgar este tipo de información.**

Los empleados podrían verse enfrentados a una violación de las leyes de seguridad si están en conocimiento de información que generalmente no se divulga al público e intercambian o inducen a otros a transar en la bolsa de valores de la Empresa o de otra o se benefician de esta información directa o indirectamente (a través de un familiar o cónyuge). **La información confidencial específica involucra descubrimientos significativos, cifras de ventas y ganancias, o contratos de alta importancia, adquisiciones o fusiones.**

**7. Algunos de los registros, informes, ensayos, dispositivos, procesos, planes y métodos de la Empresa y de terceros se consideran privados y confidenciales y se les prohíbe a directores, gerentes y empleados divulgar información sobre aquellos temas sin autorización.**

Se les pudiere dar acceso a directores, funcionarios y empleados a cierta información que sea considerada privada y confidencial

Esta información puede ser información digital, documentos de papel, grabaciones, fotografías y películas. Información confidencial también involucra planes y estrategias de negocios, información técnica, resultados de pruebas, contratos, software y programas de computación, clientes, empleados, proveedores, socios e información sobre el estado financiero y asuntos privados de TFA. Los empleados no deben usar o copiar, para su propio beneficio o de otras personas, información obtenida como resultado de su empleo en TFA u obtenida de fuentes de TFA.

**8. Los empleados TFA deberían proteger los fondos de la empresa e informar cualquier pérdida o malversación de dinero o de propiedad de la Empresa, o cualquier fraude o robo.**

Todo el dinero recibido (pago por servicios, equipo y materiales) debe ser acreditado al cliente correspondiente y depositado en la cuenta bancaria de la empresa. Los vouchers y cuentas por pagar de la Empresa serán aprobadas según el régimen de aprobación. Se requiere un análisis exhaustivo y un conocimiento definido sobre la legítima y apropiada cobertura de los gastos de la Empresa.

Empleados TFA tienen el deber de informar comportamientos o asuntos contables ilegales o poco éticos, o cualquier fraude o robo del que tengan conocimiento.

**9. El software y hardware electrónico son de uso de la Empresa. Se prohíbe estrictamente el uso ilegal o sin previa autorización del equipo electrónico.**

TFA provee varios sistemas de comunicaciones con fines comerciales. Cabe destacar que el uso de internet y de cualquier otro sistema de comunicación proporcionado por TFA queda estrictamente prohibido para:

- Diseminación o impresión de material protegido por derechos de autor (incluyendo artículos y software) que violen los derechos de autor. Es de suma importancia para los empleados entender que el uso indebido, duplicación o distribución del software computacional es una ofensa criminal;

- El envío, recepción e impresión sin autorización que divulgue información privada que incluye secretos de negocios u otra información confidencial;
- Enviar o recibir de forma intencional frases, gestos o imágenes que puedan ser ofensivas o despectivas para otras personas;
- Enviar o reenviar de manera intencional imágenes o mensajes con orientación sexual;
- Operar un negocio, usurpar una oportunidad de negocios, solicitar dinero para benefi personal, enviar cadenas de mensajes o conducir algún negocio no relacionado con la empresa;
- Apostar o involucrarse en alguna actividad que infrinja la ley; y
- Cualquier uso personal que sea excesivo, que tenga un impacto negativo en la Empresa o interfiera con el desempeño laboral.

#### 10. Manejo de Información de la Empresa

Directores, Gerentes, Jefes y empleados deben salvaguardar información confidencial o de propiedad de la Empresa contra la divulgación sin autorización de información externa e interna.

Funcionarios y empleados son responsables de asegurarse que cada uso de los sistemas de la Empresa sean los apropiados y que estén autorizados. Además, cuando los directores, funcionarios y empleados guarden información en un computador personal, debiesen existir niveles apropiados de protección de claves para prevenir el acceso sin autorización.

**11. Debido a que un negocio no sólo es juzgado por sus productos y servicios, sino también por su gente, se espera que los funcionarios y empleados de TECNO FAST ATCO se vean y actúen de manera ordenada.**

Los funcionarios y empleados deben ser respetuosos al momento de vestirse y cuidar del aseo personal. Esto es especialmente importante en aquellos trabajos en los que funcionarios y empleados están en contacto con el público. Gerentes y Jefes deberían encargarse de incentivar a sus empleados para lograr una apariencia limpia y ordenada.



### C. OUR WORKING ENVIRONMENT

#### 1. ENVIRONMENT:

Caring for the environment and safety of our employees are fundamental values within the Company; we all have an important role to play in ensuring that our operations comply with environmental legislations, standards of appropriate business and Comapny policy.

**Promote the implementation and enforcement of national and international environmental standards with it's ability.**

As a company we also promote education and environmental awareness within the company and with third parties who, for work issues, will be involved within the company's activities.

Management has a moral and legal responsibility for the safety and protection of the environment and each supervisor also has specific obligations involving environmental awareness.

Each officer and employee has the personal responsibility to take actions to ensure personal safety and must take precautions to avoid any damage to third parties.

#### 2. Respect for Human Rights

**TECNO FAST ATCO** and its subsidiaries perform all their operations within a framework that respects and promotes human rights. In particular the actions of the company are linked to human rights national legislation and global initiatives (Standard ISO26000).

**TECNO FAST ATCO** and its subsidiaries reject any of its stakeholders that are directly involved with, or who act as accomplices to the practices that violate human rights, or that contribute any payments to the illegal actions of terrorism or money laundering.



Tecno Fast ATCO and its subsidiaries categorically reject any form of discrimination, child labour or forced labour, the company commits to publicise this position to its stakeholders, and especially to its suppliers and contractors.

### 3. Relationship with others:

The TFA employees must adhere to Tecno Fast ATCO policy with respect to providing a work environment that is free of discrimination and harassment. The work environment must give individuals equal employment opportunities based on merit and capabilities.

You, as a member of Tecno Fast ATCO should promote a work environment marked by respect and tolerance, in which all decisions and actions related to employment are made without taking into account factors such as, sexual orientation, race, colour, religion, nationality, social origin, gender, age, marital status, political opinion, relationship status, physical disability or any other condition. Pregnancy is also included, yet by itself, pregnancy can alter the equal treatment context, it has the ability to impair the equality of treatment.

Depending on the country in which you work, there may be non-discrimination policies. Be sure to comply with them, as well as laws and regulations which are applicable.

If you have questions regarding what constitutes discriminatory behaviour, contact Human Resources, who can provide support and clarify the application of existing legislation and expected behaviour in the employment context.

We will defend the rights of our employees to work in an environment free of harassment or intimidation of any kind. We will not tolerate, under any circumstances, such behaviour that may contribute to creating a hostile working environment.

**TECNO FAST ATCO will not tolerate, under any circumstances, harassment in the workplace.** The term 'harassment' refers to any act or form of conduct that an individual or group of individuals deem to be inappropriate, humiliating, intimidating or hostile.

Sexual harassment involves an individual making improper requests of another in a sexual nature, without the given consent by the recipient, this threat may also harm their employment status or employment opportunities. No demonstration of this type of harassment is permitted, if this does occur, an investigation will be carried out complying with the legal and formal procedures established for these purposes. To sexually harass another at work is deemed an offence that shall be punished by law.

Depending on the country in which you work, there may be no specific policies relating to harassment. Be sure to comply with them, as well as with the laws and regulations which are applicable.

It is unacceptable to make jokes or comments, regardless of the intent or meaning behind them, that either disqualify, insult, disparage or cause grievances to others, whether this be co-workers, customers or suppliers. This includes jokes or comments regarding race, colour, physical characteristics, sexual orientation or any other form of arbitrary discrimination. When travel allows the individual to work in other offices, company facilities or work spaces in another country, you must internalise customs, laws and practices that may be different from the individual's country of origin, behaviours should be adapted accordingly.

# VALIDITY

Period of validity  
Code of Ethics Tecno Fast ATCO

## Chapter

# 06

During a meeting of the board held on October 10 2012 it was requested for a Code of Ethics to be drawn up for Tecno Fast ATCO and Subsidiaries. This was to be effective for all employees, contractors, suppliers and members of the Board and/ or directors dated 01 January 2013.

The Code of Ethics of TFA and its subsidiaries will be reviewed and updated periodically, when there is occasion for it, after evaluation taken by the management committee of the ethics code.

## PROCEDURE FOR COMPLAINTS, CLAIMS OR SUGGESTIONS

Action to be taken when making a complaint of any kind

### Chapter

# 07

There are two ways to file a complain of any kind:

- E-mail: *luzonith@ardfastatco*
- Addressing personally a HR Assistant Manager or Social Worker.

HR Assistant Managers will have 72 hours to respond to the complaint and for necessary actions to be performed in response to your particular claim, complaint or suggestion. All cases will be reported to the Administrative Committee of the Code of Ethics.

**IMPORTANT:** Allegations will only be investigated if the complainant is clearly identified. No charges will be accepted anonymously.

In case of doubt or need for advice regarding the compliance with the Code of Ethics, the manager, officer or employee should first contact their immediate supervisor; if the doubt persists one may contact the Ethics Line Mechanism (communication). The request will be received guaranteeing the confidentiality of the information and the person presenting it, an answer will be provided within five working days of submitting the concern.

# CODE OF ETHICS MANAGEMENT COMMITTEE

Sustainability Committee

Chapter

08

This committee is responsible for analysing and making decisions with respect to the various themes incorporated into the code of ethics.

**The committee is composed of:**

- Executive director
- VPOperations
- General Manager
- Administration and Finance Manager
- HR Assistant Manager

# ANNUAL REVIEW

Signing the form of knowledge and acceptance



## Chapter

# 09

All current workers and those hired after the effective date of this code of ethics must sign the form of acknowledgement and acceptance likewise, which will be filed in the personal folder of the individual. In addition, all persons connected with TFA or its subsidiaries are subject to the same obligations.

In January of each year, the Deputy HR Manager of Tecno Fast ATCO will confirm the Executive Director and the General Manager that all officers and employees, as mentioned above, have completed and signed the form. A confirmation will be given that each member of the company has read or re-read the current version of the code of Ethics, with any potential issues or conflicts being raised with an individual superior or other appropriate member with TFA authority. Any potential conflicts that has not been reported in advance must be described within the attachment of the Recognition Form.

It is expected of director, officers, managerd and employees who are aware of any violation of this Code to promptly report it to their supervisors or other appropriate TFA authoratative members.

# FORM

## A. Recognition



## CODE OF ETHICS TECNO FAST ATCO Recognition

I recognize that:

- a. I have a copy of the latest Company Code of Ethics
- b. I have read or re-read the code during the current year
- c. I have expressed in writing any matters of potential conflict to the Executive Director or General Manager, according to corporate law and the regulations of the Company.

Any potential conflict that has not been reported in advance is attached to this form.

---

Name

---

Position - Title

---

Employee's Signature

---

Date



# FORM

B. Declaration



## CODE OF ETHICS TECNO FAST ATCO

### Declaration of Potential Conflicts

Dear Sir/Madam

Ethics Management Committee

Through this letter, I wish to bring a potential conflict of interest to your attention of which I consider to be important as an employee and/ or collaborator within Tecno Fast ATCO or any of its subsidiaries:

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\_\_\_\_\_  
Name

\_\_\_\_\_  
Position - Title

\_\_\_\_\_  
Employee's Signature

\_\_\_\_\_  
Date



