



# Code of Ethics



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## 1. PURPOSE

The general purpose of this Code is to clearly define the standards of behavior of all employees in relation to the ethical and management conduct in employment, commercial, professional and personal relationships expected by the COMPANIES in the performance of the employment relationship.

In addition, this Code seeks to outline both the expected behavior and that which is NOT acceptable on the part of employees, and to establish the means of escalation and/or consultation in the event that there is reasonable doubt when unexpected and/or previously undefined facts and/or situations arise.

This Code shall be compulsory for all employees of the COMPANIES and shall be part of the admission and training documentation in the Induction phase.

Furthermore, periodically, through the Governance & Compliance area, associated retraining shall be carried out for the purposes of reviewing and/or delving into the expected behaviors and the consequences of failing to comply with such expectations.

## 2. SCOPE

Companies (in this Code, the term COMPANIES is used in reference to the following companies, either jointly and/or individually):

- NEWSAN S.A.
- PILISAR S.A.
- VIENTOS DE CAMPANA S.A.
- NEWSAN FOOD S.A.U.
- NEWSAN MALL S.A.U.
- Business Units: All.

This Code shall apply to all employees of the COMPANIES, and each employee shall sign the acknowledgment of receipt of their copy of the Code, with such acknowledgment being recorded in their personal file.

## 3. RESPONSIBILITIES

All employees of the COMPANIES are responsible for complying with the provisions of the Code of Ethics.

#### 4. PROCESSES COVERED

All processes of the COMPANIES.

#### 5. DEFINITIONS

**G&C:** Governance & Compliance.

**Interested part:** Employees, suppliers, customers, business partners or any other person, entity and/or institution with whom the COMPANIES may directly or indirectly establish a relationship, whether it be commercial, contractual, business or any other type of relationship.

**Corruption:** The most internationally accepted definition of corruption is that provided by Transparency International, which defines it as “the abuse of entrusted power for private gain’.

- This definition covers the diverse forms that corruption can take, ranging from influence peddling between two people to complex institutionalized corruption schemes.
- Corruption may pursue not only economic and/or financial gain, but also other kinds of advantages.
- In addition, this definition applies to both the public and private sectors.

**The COMPANIES do not tolerate any form of corruption.**

**Bribery:** Bribery is one of the most common forms of corruption, consisting in the offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as inducement or reward for a person(s) acting or refraining from acting in relation to the performance of his or her duties.

**The COMPANIES do not tolerate any form of bribery.**

**Facilitation Payments:** Payments made and/or goods delivered by a company, either directly or indirectly, to a public official and/or person who has been assigned government functions, procedures, decisions, processes, actions and/or steps to expedite, confirm and/or guarantee such functions, procedures, decisions, processes, actions and/or steps without it constituting a discretionary act and/or legal infringement on his or her part. For example: Speeding up customs processes and/or facilitating the granting of licenses.

**The COMPANIES do not tolerate any form of facilitation payments.**

## 6. INTERNAL RULES AND REGULATIONS

### 6.1 Corporate Governance

The COMPANIES have established an Ethics Committee whose operation and actions are governed by specific regulations. The Committee undertakes:

1. To RESPOND to, and oversee, all complaints received for violations of this Code.
2. To ENSURE the CONFIDENTIALITY of the reports in every step of the process, as long as such confidentiality allows the Committee to conduct the investigation in a complete and impartial manner while complying with its obligations.
3. NOT to tolerate RETALIATION of any kind from anyone who asks questions or reports possible violations of the law and/or this Code of Ethics.

At the end of such investigation, the appropriate corrective measures shall be taken, which may include disciplinary sanctions, the loss of the right to receive bonuses and incentives or even the termination of the individual who committed the proven offense. In this sense, all employees of all the COMPANIES have the obligation to cooperate with any investigations carried out, answering all questions, providing complete, precise and true information, preserving any relevant documents and evidence, and refraining from interfering in any way with the investigation. Anyone receiving a report of an actual or potential violation of this Code MUST forward the report to the Ethics Line by the established means, keep the report absolutely confidential and refrain from conducting any investigation on the report on their own.

**Failure to report a violation of the law or this Code shall constitute a violation in itself and may result in disciplinary consequences, including termination of employment.**

### 6.2 Compliance with Laws, Rules and Regulations

The COMPANIES and their employees are required to comply with all the laws and regulations of the Argentine Republic and the countries where they do business. Failure to do so may result in financial detriment or penalties for the employees involved, and the reputation.

Prompt legal consultation is essential for ensuring the legitimacy of business and protecting the interests of the COMPANIES, as well as to ensure competitive advantages and the normal development of business activities.

The situations in which the employees of the COMPANIES should seek legal advice from appropriate professionals, as defined by the COMPANIES, are listed below:

- Execution of contracts, agreements and commercial transactions.
- Handling litigation and actions involving regulatory agencies.
- Actions involving competition and/or antimonopoly issues.
- Actions pertaining to claims by customers and commercial conditions.
- Actions pertaining to claims by suppliers and/or commercial conditions.
- Employment of personnel by the COMPANY or through third parties.
- Aspects related to asset security.
- Situations involving corruption, bribery, facilitation payments or any other circumstance that implies or is construed as a violation of this Code.

### **6.3 Employer/Employee Relationship**

#### **6.3.1 Respect, Dignity and Fair Treatment**

**I.** The COMPANIES must operate in full compliance with the applicable laws concerning salaries, working hours, overtime and benefits.

**II.** The COMPANIES are committed to ensuring that all employees work in an environment that promotes diversity and fosters mutual trust, respect for human rights, equal opportunities and no discrimination or victimization.

**III.** This Code details what all employees must do to ensure such conditions:

**a)** Everyone should be treated clearly and equally, avoiding discrimination based on gender, race, disability, religion, sexual orientation, age, marital status, social class of origin or role within the organization.

**b)** Determinations for employment with the COMPANIES and for promotions, rewards, benefits, training or retirement itself should be based on merit, with no additional considerations that may relate to the categories mentioned above.

**c)** All employees must respect the dignity and human rights of their colleagues.

**d)** The COMPANIES must respect the legal right of the employees to form or participate in a union, pursuant to the law.

**e)** All employees must be aware of their own terms and conditions of employment.

**IV.** Furthermore, employees must not:

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- a) Directly engage in offensive, intimidating, malicious, or insulting behavior toward colleagues. This includes persecution, harassment or bullying behavior.
- b) Engage, either directly or indirectly, in bullying or harassing activities, such as making offensive jokes or insults, sending offensive emails or text messages, or distributing any other material containing personal information, thereby creating a hostile or intimidating environment for a colleague and ultimately reducing or inhibiting the possibility of working or having access to opportunities.

V. Employees must not use or permit the use of compulsive or forced labor, which is contrary to freedom of employment.

VI. The COMPANIES shall not use child labor, understood as the work of minors under 16 years of age in Argentina or the applicable legal age when carrying out activities in other countries.

VII. In addition, they shall comply with all legal requirements for the employment of authorized Young workers (16 to 18 years of age in Argentina or the applicable age in other countries).

### **6.3.2 Occupational Health and Safety**

I. The COMPANIES are committed to providing a healthy and safe work environment to their employees.

II. The COMPANIES comply with all laws, rules and regulations pertaining to health and safety at work, while encouraging the improvement of such conditions.

III. Managers are responsible for the health and safety conditions in the workplace, as well as for all their direct reports and for any third parties under their charge and control.

IV. All employees are part of the health and safety at work system and must observe and enforce the applicable rules and policies. In this regard, all employees must:

- a) Observe safe conduct in compliance with the applicable regulations.
- b) Access and attend the proposed training.
- c) Never carry out work activities under the influence of alcohol, drugs or impairing medications.
- d) Stop working if they observe unsafe conditions.
- e) Immediately report risk situations or accidents, without ever assuming that someone else will do it for them.

V. The leaders of the organization must assume their role as such:

- a) Establishing and maintaining an adequate health and safety system at work, monitoring the performance of the system, adjusting objectives and allocating resources to minimize any potential identified risks.



- b) Identifying and limiting any occupational health and safety risks.
- c) Regularly reviewing and adapting the practices to the applicable laws and regulations.
- d) Keeping the emergency plan active and properly communicated to all employees.
- e) Ensuring an adequate level of training for all employees.

### **6.3.3 Confidential Use of Personal Information**

I. The COMPANIES respect the privacy of all employees and the confidentiality of the information they maintain about them in their records.

II. This complies with the local legislation on the protection of personal data, and the COMPANIES only acquire and retain personal information as strictly required for the proper performance of their business.

III. Personal information must be:

- a) Provided by the employees themselves or by third parties with the consent of the employees or future employees.
- b) Pertinent, adequate and used exclusively for the purpose for which it was collected.
- c) Up-to-date and correct.
- d) Maintained confidentially and securely, under lock and key.

IV. Personal information shall NOT be:

- a) Excessive, in relation to the purpose for which it was collected.
- b) Maintained for an excessive amount of time or for a period that exceeds the legal requirements.
- c) Shared internally or externally, unless it was collected for such purposes.
- d) Removed from of the usual place of storage or filing, unless the COMPANIES determine a different place for its disposal.

### **6.3.4 Use of IT Systems and Applications**

I. The COMPANIES' systems, including PCs, notebooks, tablets, phones and other mobile communication devices, networks, software, emails, data, internet and intranet, are critical to the operation of COMPANIES.

II. All of the above systems must be used responsibly and safely by employees.

III. We must all apply the same personal and professional standards that we apply in all business activities when using the Internet, Intranet and e-mail.



**IV.** All employees must observe the law when using and handling electronic systems and data.

**V.** All employees must:

- a)** Comply with the Information Security Policy Guidelines and its associated Internal Regulations.
- b)** Uphold the criteria of confidentiality, integrity and availability of information and refrain from incurring in any action or activity which allows or facilitates the leakage of information of the COMPANIES.
- c)** Maintain their passwords for access to systems and/or platforms confidentially and securely.
- d)** Participate in the Information Security training courses and workshops.

**VI.** All employees must refrain from:

- a)** Disabling any firewalls or security controls established by the COMPANIES.
- b)** Downloading any software not authorized by the COMPANIES. In the event that the use of a non-corporate tool is authorized, it must be scanned with an antivirus authorized by the COMPANIES before use.
- c)** Sharing information of the COMPANIES with third parties or people not authorized by the COMPANIES.
- d)** Uploading or transferring outside of the COMPANIES any application or software with a license acquired by the COMPANIES or over which they hold any rights.
- e)** Accessing, storing, sending, publishing or posting pornographic, sexually explicit, indecent or obscene material promoting violence, prostitution or bigotry.
- f)** Defaming or damaging the reputation of any person or entity.
- g)** Deleting, destroying or modifying the existing systems, programs, or information without proper authorization.
- h)** Taking photographs, videos or any other type of image from the inside and/or outside that could compromise the corporate image of the COMPANIES, including the graphic production of images, photographs or videos showing illicit acts or acts contrary to morals and good customs. The publication of any such photographs, images or videos (in any printed or digital media, including graphic media and social networks) must be properly authorized by the COMPANIES.
- i)** Publishing any photograph, image, video or comment (in any printed or digital media, including graphic media and social networks) on behalf of the COMPANIES without their proper authorization.

**VII.** Employees may not use the COMPANIES' systems for personal purposes.

Employees must not:

- a) Consume more than a limited amount of network resources and/or personal file and/or document storage space, only being allowed to do so on an exceptional basis.
- b) Make long or long-distance telephone calls for personal purposes.
- c) Impair the productivity and performance of the systems based on personal situations.
- d) Damage the reputation of the COMPANIES.

**VIII.** The internal investigations that the COMPANIES carry out on all aspects of interest within the framework of identifying alleged crimes, disciplinary offenses, damage to the organization's assets, among others, may reach all the information stored in all the media and devices that the COMPANIES are placed in the hands of collaborators and interested parties, so collaborators and interested parties must refrain from making private and/or personal use of them in their daily tasks, and must be limited to strictly work use and for the purpose for which which have been granted such resources.

COMPANIES may use all their internal control systems in the framework of an investigation.

### **6.3.5 Conflicts of Interest**

**I.** Conflicts of interest can have a significant negative impact on the effectiveness and reputation of the COMPANIES and their employees.

**II.** The conflict may be expressed in terms of business opportunities, relationships with competitors, customers or suppliers, external employers or third parties, consultants, governments or other agents and/or interested parties of the COMPANIES.

**III.** To avoid conflicts of interest, employees **MUST**:

- a) Complete the annual conflict of interest statement.
- b) Complete the conflict of interest statement whenever requested by the COMPANIES.
- c) Complete the conflict of interest statement upon any change to the previously reported information.

**IV.** To avoid conflicts of interest, employees must **NOT**:

- a) Allow their personal financial or political interests to affect or be perceived as affecting their work with the COMPANIES. In the event that employees believe that any such interests create, or may create, a conflict of interest, they are to inform their direct supervisor immediately.

**b)** Seize or let others seize opportunities derived from management in the COMPANIES for their own benefit.

**c)** Work or furnish direct or indirect services for suppliers, competitors or customers, unless they have obtained a formal written authorization from the COMPANIES' CEO indicating that such situation has been reviewed and does not have a material impact on the business of the COMPANIES.

**d)** Fail to inform the CEO of the fact that they have direct relatives working for competitors, suppliers or customers. Direct family member shall mean spouse, domestic partner, child or other person who has lived together with an employee for more than 12 months.

**V.** In the event that employees obtain a second job or have a managerial role in any non-profit organization or commercial organization, or if they have a government position, they must obtain written authorization from the COMPANIES' Human Resources Management BEFORE undertaking such roles. Management shall take into consideration the reasonable time that the employee will have to spend in undertaking such a role, as well as the nature, skill requirements and scope of performance of the role.

**VI.** Director positions in government schools, non-government roles, roles in sports or recreational groups, and roles in neighborhood or neighbors' organizations, shall NOT require authorization from the COMPANIES.

**VII.** THE FOLLOWING CONDUCT SHALL BE CONSIDERED A SERIOUS BREACH OF THIS CODE:

**a)** Failing to complete the conflict of interest statement, even if the employee does not have any conflict of interest, in which case the employee must report that he or she does not have any conflict of interest.

**b)** Failing to report, or hiding, a conflict of interest.

### **6.3.6 Prevention of Information Misuse Situations**

Employees must not use insider information to trade or encourage others to trade using insider information, or provide such information to unauthorized third parties. This constitutes a crime and a violation of the applicable laws. Insider information refers to information which is not available to the general public and which an investor and/or any other interested party could probably consider important for certain purposes, such as to decide whether to invest or divest in the company.

Examples of such information would include:

**a)** Financial results or budgets.

- b) Customer complaint or product incident situations.
- c) Projects concerning investments, divestments, mergers or acquisitions.
- d) Restructuring projects.
- e) Litigation or agreements with regulatory authorities or governments.
- f) Review of dividend distribution policies.
- g) Changes in the composition of the Board of Directors.

Should an employee consider that material insider information is not being handled properly or correctly, he or she must promptly inform the COMPANIES' management and their direct supervisor.

## **6.4 Business Integrity**

### **6.4.1 Anti-Corruption Policy**

The COMPANIES uphold their commitment to zero tolerance of corruption, bribery, facilitation payments and conflicts of interest in all of their forms.

### **6.4.2 Anti-Bribery and Anti-Facilitation Payment Measures**

I. The COMPANIES do not give or receive bribes or facilitation payments to gain undue advantages in their business or finances.

II. The COMPANIES do not use agents or third parties to give or receive bribes and/or facilitation payments on their behalf.

III. Resorting to these means constitutes a crime and is therefore covered by local legislation on the subject.

IV. Resorting to these means constitutes a serious breach of this Code and damage the reputation of the COMPANIES.

V. employees must NOT:

- a) Give or accept bribes, facilitation payments and/or undue advantages.
- b) Give anything or value, including cash, which has the potential to be considered or perceived as an effort to influence decisions by third parties when dealing with the COMPANIES or vice versa.
- c) Give anything or value, including cash, which has the potential to be considered or perceived as an effort to cause the recipient to act improperly. This includes, but is not limited to, money, services (including favors), discounts, use of resources, loans, promise of future employment, gifts and entertainment.
- d) This prohibition also applies to all third parties, including:
  - Current or potential customers, agents, or distributors.
  - Current or potential suppliers or consultants.

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- Other current or potential service providers, such as banks, financial companies, etc.
- Government and regulatory officials.
- Politicians.

e) Use any of the above agents to give or accept bribes or facilitation payments or obtain an undue advantage on behalf of the COMPANIES, by making payments and/or delivering goods to government officials, in their individual capacity, to legitimize services of any national, provincial, municipal or other government agency.

#### VI. Los empleados DEBERAN:

- a) Prior to arranging or making any payment that could be considered a violation of this Code, obtain the approval of the CEO of the COMPANIES stating that such situation does not constitute a violation of this Code.
- b) If such payments are made on a regular basis, an annual authorization may be granted, which must be reaffirmed annually.
- c) Should an employee, in the exercise of his or her role, be in physical danger and unable to escape imminent harm or damage unless he or she complies with a demand for payment, the payment shall be allowed. Such incident must be reported as soon as possible, as well as recorded in detail in compliance with the applicable laws.

#### 6.4.3 Gifts and Hospitality

The COMPANIES' relationships must be based on ethics, transparency and integrity. Gifts consist in the giving of goods either as a gift, through a contest, or through vouchers or gift cards for the purchase of goods/services, whereas hospitality comprises food, lodging, transportation and entertainment offered/received as a demonstration of kindness and courtesy, in both cases without asking for anything in return.

Gifts and hospitality should not be used to gain an undue advantage or create an actual or apparent conflict of interest.

The COMPANIES shall establish specific regulations governing Gifts and Hospitality, which all their employees must observe.

Additionally, the employees of the COMPANIES must also understand and respect the policies of third parties in this regard.

#### 6.4.4 Donations, RSE Activities and Institutional Gifts

Donations, RSE activities, and institutional gifts should be:

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- a) Aligned with the standards established by the COMPANIES,
- b) Aimed at entities which do not have any ethical and/or integrity record that negatively affects their reputation.
- c) Aligned with the principles, organizational values, and work standards upheld by the COMPANIES.

### **6.5 Accurate Records, Reporting and Accounting**

- I. The financial reports and other information provided by the COMPANIES to shareholders, regulators and other concerned parties must be accurate and complete.
- II. The COMPANIES' records provide valuable information for the business and evidence of their actions, decisions and obligations.
- III. Procedures and processes must be in place and up-to-date to ensure that transactions are properly authorized and recorded.
- IV. Falsifying or creating misleading information to influence others may constitute fraud and result in civil and criminal penalties for the employees of the COMPANIES.
- V. This Code of Ethics sets forth the responsibilities of employees to ensure the accuracy of our business information.
- VI. Employees MUST:
  - a) Record all transactions in an accurate, complete and prompt manner.
  - b) Only perform such transactions, such as the purchase, sale or transfer of goods and/or assets, for which they are authorized.
  - c) Ensure that transactions are legitimate based on valid supporting documentation.
  - d) Notify their immediate supervisor of any possible fraud or misrepresentation of accounting or other sensitive information.
  - e) Maintain the following records for ten years, or longer, if required by the local authorities, laws and/or regulations:
    - Accounting records.
    - Tax records.
    - Contractual documentation.
    - Employed personnel.
  - f) Retain any records that may be relevant to any ongoing audit, litigation or regulatory investigation, even if they exceed the normal retention period..
  - g) Cooperate fully, openly and honestly with internal and/or external auditors and ensure that they are aware of all the information relevant to their work.
  - h) Any employees responsible for filing accounting information must comply with:

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- All applicable laws, including those relating to financial statements, tax returns and environmental requirements.
  - All standards and regulations applicable to external reporting, such as international and national accounting standards, stock market rules, financial rules, health and safety requirements, corporate governance codes and regulatory standards.
  - All internal accounting manuals, reports, instructions and schedules, as well as reporting standards and information definitions.
- i) Accounting employees must ensure that:**
- All sales, profits, assets and liabilities are recorded in the correct time period.
  - The assumptions supporting the accounting records are properly documented, especially those relating to provisions, journal entries, and contingent liabilities, including taxes.
- j) Employees MUST NOT:**
- Artificially increase or shift sales or profits between reporting periods.
  - Conceal, alter or falsify records and documents of the COMPANIES..

## **6.6 Anti-Money Laundering Measures**

- I.** In order to protect the reputation of the COMPANIES and avoid criminal liability, we must not become associated, however innocently, with the criminal activities of others. In particular, we must ensure that we do not receive the proceeds of criminal activity, as this may amount to the crime of money laundering or concealment.
- II.** This Code of Ethics sets forth the essential steps that we must take in order to avoid being involved in activities or conduct related to money laundering.
- III.** Employees **MUST**:
- a)** Notify the CEO if they have any suspicions about money laundering activities within the COMPANIES.
- b)** Look out for warning signs of money laundering, such as:
- Supplier requests to:
    - Pay or transfer funds to a bank account in the name of a different third party or located outside of the country in which the supplier operates.
    - Make payments in a way that differs from the usual business terms.
    - Split payments to several bank accounts.
    - Overpay.
  - Payments from customers:

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- From bank accounts overseas when not a foreign customer.
- Made in cash when normally made by cheque or electronically.
- Received from other third parties.
- Made in advance when not part of the usual business terms.

**IV.** Employees in charge of overseeing contracts with new suppliers and/or customers must conduct appropriate screening to assess their identity and legitimacy before contracts are executed or transactions occur. The outcome of the assessment must be carefully analyzed before deciding whether to do business with the new third party.

**V.** Several factors come into play in determining the appropriate screening process, such as the amount of the contract, the nature of the good or service, and the potential for corruption within that third party or the environment in general and its location. The screening process may include:

- a)** Verifying that the company is duly registered by obtaining legal registration documents, and checking whether its jurisdiction of registration is included in the list of cooperative jurisdictions and countries for tax purposes.
- b)** Conducting legal reviews to identify any recent or pending court cases against the company, its directors and, when possible, the results of operations.
- c)** Ensuring that its directors do not have any criminal, commercial or civil convictions, and are not banned from serving as corporate directors. Searching for reports in the media that may suggest inappropriate behavior by the companies or individuals.
- d)** Search for media reports that may indicate impropriety by society or individuals.
- e)** Due diligence is authorized for large contracts.
- f)** Managers in charge of admitting new clients and suppliers shall regularly monitor their business or government-related activity to determine if there are any indications of money laundering activities.

## **6.7 Public Activities**

### **6.7.1 Contacts with Government, Regulators and NGOs**

**I.** Any contact with governmental authorities and/or non-governmental organizations must be made with honesty, integrity, openness, and in compliance with local and international laws.

**II.** Contact means all forms of communication, whether formal, informal, social, electronic, in person or by written correspondence.

**III.** The term NGOs comprises multinational, regional, national or local organizations working on issues related to social issues, environment, human rights, local or national consumer groups, animal protection, and related topics.

**IV.** The following actions require prior approval by the CEO:

**a)** Making payments, donations, payments in kind, gifts, delivery of money and/or goods of any kind for any reason.

**b)** Assuming commitments, responsibilities and/or obligations of any kind and nature.

**c)** Granting rights, benefits, favors, authorizations, sponsorships and/or gratifications of any type and nature.

**d)** Granting spaces, permits, loans and any other type of privileges and/or rights.

**e)** Engaging in any type of negotiation of commercial and/or administrative nature,

**f)** Engaging in any type of legal, corporate and/or contractual act regardless of its nature.

**g)** Executing contracts, covenants and/or agreements of any type and nature.

**h)** Bidding on tenders, calling for bids, writing bid specifications, awarding contracts, submitting offers and/or performing any action of similar characteristics.

**i)** Self-reporting by the COMPANIES in the event of any type of legal and/or regulatory violation of any nature and/or type.

**j)** Executing effective collaboration agreements within the framework of the Corporate Criminal Liability Regime.

**V.** The CEO may broadly authorize certain employees to carry out the actions above by means of a power of attorney and/or by means of authorization through an agency relationship with the employee, his or her functional profile or position and/or pursuant to applicable regulations.

**VI.** All activities that employees carry out in a personal capacity with these institutions shall not be part of this Code.

**VII.** Any employees who interact with these organizations on behalf of the COMPANIES, under any of the terms described in item IV, MUST:

**a)** Be properly trained in ethical matters and previously authorized by the CEO.

**b)** Be courteous, open and transparent when required to identify themselves, both in their name, position, role, and other information that allows for their proper identification.

**c)** Keep a record of their contacts and interactions.

**d)** Ensure that the information provided is accurate and necessary to properly serve the contact.

### **6.7.2 Political Activities and Political Donations**

**I.** Employees are prohibited from participating in political activities or financially supporting political parties or candidates on behalf of the COMPANIES.

**II.** Employees may only participate in such activities in a personal capacity, outside of their working hours with the COMPANIES.

**III.** Employees must ensure that:

**a)** Any participation in, or support of, political activities is in their personal capacity and does not compromise the COMPANIES or their business, and takes place according to law.

**b)** Their participation does not interfere with their normal activities within the COMPANIES, and that their decisions or actions within the COMPANIES are not influenced by such participation.

### **6.8 Protection of Assets**

**I.** Employees are responsible for the protection of the assets of the COMPANIES.

**II.** The assets of the COMPANIES include:

**a)** Physical assets and property.

**b)** Financial assets.

**c)** Intellectual and industrial property, creations or inventions made within the scope of the employment relationship.

**d)** Private information of the COMPANIES.

**III** The leaders of the organization must identify the risks inherent in the assets owned by the COMPANIES and ensure contingency plans are in place to prevent such risks from materializing.

**IV.** All employees must protect the financial assets of the COMPANIES, such as cash, bank accounts, funds, securities, bonds, shares, or any other security within their reach, ensuring their adequate protection in the means provided or to be provided.

**V.** Intellectual and industrial property:

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- a) Employees must report to the CEO any suspicion of counterfeit products, copyrighted systems or services that resemble those of the COMPANIES, which could constitute an infringement of copyright, registered trademarks and/or other intellectual property rights.
- b) Employees who are researching, developing or preparing to launch new brands, sub-brands, designs, inventions, advertising and promotional materials must follow the patenting process procedures to ensure that all necessary controls have been performed and that the necessary documents have been submitted to comply with the patent, design and trademark application and registration process.
- c) Employees performing work in collaboration with third parties must ensure that contracts are in order and in place, with appropriate provisions to protect the intellectual property rights of the COMPANIES.

**VI.** Employees shall NOT remove from the premises of the COMPANIES any fixed assets or personal property owned by the COMPANIES without their due permission or authorization.

### **6.8 External Communications**

- I.** Employees shall not provide confidential, critical, or otherwise "non-public" information about the COMPANIES to the media, such as the press, governmental or non-governmental entities, unions, professional forums, investors, opinion makers, or others.
- II.** Responsibility for relations with the media, opinion makers and/or mainly the press, shall be restricted to the PUBLIC RELATIONS Department of the COMPANIES, and no other area shall be allowed to maintain such contacts without prior authorization.
- III.** Within the scope of the stock market transparency regulations, the Board of Directors of Newsan S.A. shall appoint an Investor Relations Manager in order to submit the information required by agencies such as the Argentine Securities Commission (CNV, for its acronym in Spanish), Bolsas y Mercados Argentinos S.A. (ByMA) or Mercado Abierto Electrónico S.A. (MAB), among others.
- IV.** Only the CEO shall be entitled to authorize new spokespersons and/or authorized personnel to maintain external contacts, carry out transactions and/or submit information on behalf of the COMPANIES.
- V.** In the event of a crisis, the management Committee shall designate additional spokespersons as an extraordinary measure.
- VI.** If any activities and/or actions of the COMPANIES must be disclosed to specific external audiences for academic, professional, business, scientific and/or general release purposes, within the scope of the performance of a specific function, such

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presentations shall be checked and/or approved by the Institutional Relations department, which shall ensure their relevance and evaluate the risks of sharing the information.

**VII.** Any speech, dissertation, presentation and any other external release action developed by the employees on behalf of and/or representing the COMPANIES shall be subject to review by the Institutional Relations department.

### **6.10 Responsible Risk Management**

**I.** All employees must be responsible and fully aware of the risks associated with their actions in the performance of their duties.

**II.** In case of doubt regarding the risks assumed, they should bring such doubts to the attention of their immediate superior, who should clarify them or, failing that, escalate the doubts to the Risk Management department.

**III.** All employees are responsible and must avoid compromising the corporate image of the COMPANIES by performing (i) illegal acts or acts contrary to morals and good customs; and/or (ii) compromising good market practices in the industries and other activities in which the COMPANIES operate.

**IV.** The Risk Management department shall be the area responsible for reliably assessing the risks and specific mitigation procedures for their reduction and/or elimination.

### **6.11 Responsible sourcing**

The COMPANIES and their Concerned Parties must carry out responsible procurement, especially regarding:

**I.** The non-use of conflict minerals (tantalum, tin, gold and tungsten from the Democratic Republic of the Congo and neighboring countries) according to the OECD definition (Organisation for Economic Cooperation and Development).

**II.** The non-use of products or raw materials that benefit armed groups that perpetuate human rights abuses.

**III.** Do not sell and / or manufacture antipersonnel mines and / or components that are used to manufacture antipersonnel mines.

### **6.12 Prohibition on transactions with North Korea Entities/Persons**

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COMPANIES and their Concerned Parties are prohibited from:

- 1) employ persons with nationality or citizens of North Korea,
- 2) participate in any transaction that, in any way,
  - a. involves a person or entity that is:
    - i. Located in North Korea;
    - ii. controlled, directly or indirectly, by a North Korean person or entity; or
  - b. involves a citizen or national of North Korea.
- 3) Employ and participate in any transaction with any nation, including a person or entity, that is sanctioned under laws and/or regulations.