

LINIO GROUP CODE OF INTEGRITY

CODE OF INTEGRITY

Acting with Integrity keeps us united. This value must guide our actions at work and in society.

CONTENTS

LETTER FROM THE LINIO CEO	3
I. INTRODUCTION	4
Why a Code of Integrity?	4
To whom this Code of Integrity apply?	4
Which are our main ethical responsibilities?	4
Exceptions	5
II. LINIO PRINCIPLES	5
III. ORGANIZATIONAL INTEGRITY STRUCTURE	5
Ethics Management	6
Integrity Counsellors	6
Ethics Committee	6
IV. INTEGRITY CHANNEL	6
V. FORMS AND GUARANTEES TO COMMUNICATE ETHICAL CONCERNS	7
Questions	7
Complaints	7
No retaliations	7
VI. HOW TO ACT WITH INTEGRITY IN OUR WORKPLACE?	8
By respecting people	8
By maintaining good relationships with our customers	9
By maintaining good relationships among collaborators	9
By declaring and managing our conflicts of interest	10
By complying with the law and internal regulations on the use of alcohol and drugs	11
By rejecting any form of harassment and discrimination	12

By maintaining good relationships with providers and third parties	12
By complying with the internal regulations on gifts and invitations	12
By caring for the company assets	13
VII. HOW TO ACT WITH INTEGRITY IN THE MARKET?	14
By competing fairly	14
By respecting financial and documentary integrity	14
By handling the information according to the law and internal regulations	15
By respecting privacy and protecting personal data	16
By respecting intellectual and industrial property	16
VIII. HOW TO ACT WITH INTEGRITY IN SOCIETY?	16
By adhering to the law	17
By refusing any form of bribery	17
By acting responsibly towards communities and the environment	18
By protecting the health and safety of collaborators and customers	18
By complying with the product safety	18
By developing of political activities outside workplace and working hours	19
By relating with the authority with integrity	19
By having authorization before making statements to the media	19
By acting with integrity inside and outside work	19
IX. COMPANY'S CRIME PREVENTION	20
X. HOW TO ACT REGARDING AN ETHICAL CHALLENGE?	21
XI. APPLICABLE MEASURES IN CASE OF INFRINGEMENT	21
XII. OUR COMMITMENT WITH INTEGRITY	21

LETTER FROM LINIO CEO

INTEGRITY SINCE ALWAYS

Integrity is a fundamental value for Linio. It has been so for Falabella Group since always, for over 130 years. It is not enough to say that we want to do the right thing, it is necessary to do it, leading by example. Our actions must be coherent with our words and the higher the office we hold, the higher the coherence we must show.

From each of you we expect that effectively, in all our actions, the customer be at the center, deciding based on their convenience, contributing to a better quality of life. For that purpose, we aspire to perform a job of excellence, paying attention to detail. We must pay the same attention to how we do our job. We are references in our respective businesses and we also want to be a reference in our practices.

We hope this Code of Integrity helps you to make the adequate decisions in our daily actions. I invite you to read it, reflect and make it a reality to become the definition of our DNA more than a code. Read it, reflect, make it a reality. Let us help each other. Thus, we will be a sustainable company that will continue making history, making our customers' dreams come true in a correct and consistent manner.

Integrity is important to me and I know it is also important to you!

Regards,

Linio CEO

I. INTRODUCTION

Why a Code of Integrity?

Currently, so many companies have a Code of Integrity and companies as ours in size, presence and complexity have always had one. Have you asked yourself why? We did and here are the reasons:

- Because it is a good way to ensure that we live our values as a company and because it is important that we all are clear about what is the behavior expected from us. Our ethics must be clear, and this Code helps a lot to make it so.
- Because to do the right thing you need to know what is correct and sometimes the difference is difficult to see. This Code and the mechanisms established by it are tools to help us. Doing the right thing sometimes needs courage and if we put this in writing and communicate it in a good way, you know we are all behind it; that we are all committed to doing the right thing and that no one, absolutely no one in the company can ask you to break this commitment to ethics.
- To demonstrate our integrity, which talks about what we do, who we are and what we project, even when no one is watching.

To whom does this Code of Integrity apply?

This Code is applicable to all collaborators, regardless of the activities and responsibilities we have. This includes all employees, executives and directors. In addition, the company looks for and promotes that its providers and third parties in general act in accordance with this Code.

What are our main ethical responsibilities?

- **Always comply with the law**, this Code of Integrity and the company's internal standards.
- **Lead with integrity and always by example**. Always ensure that your actions are ethical and express the same as your words.
- **Maintain a healthy work environment** that encourages upright behavior and an environment of trust where people are comfortable to ask questions and file complaints about ethics, without fear.
- **Ask before you act** if you have doubts, report what is wrong and collaborate in the company's investigations.

If you have any doubt you may always turn to the Integrity Counselors, the Legal Affairs and Governance Management or Ethics Management.

Practical Examples

My boss asks me to omit certain information in the reports to the authority because they can severely affect the company's reputation.

What should I do?

This instruction is not only contrary to our Code of Integrity, but it could also be illegal.

If you are not comfortable enough to directly tell your boss that the action is wrong, you can turn to the Integrity Counselor, the Ethics Manager or make a report through any of the Integrity Channels of the company. If you prefer, your complaint can also be anonymous.

Exceptions

Although this Code applies to all of us, in very exceptional cases a waiver of its application can be requested when it does not compromise our integrity. The requests must be sent in writing to the Ethics Management before the conduct for which the approval is sought is performed. Likewise, the Ethics Management shall answer the requestor in writing.

II. LINIO PRINCIPLES

This Code is built on our Purpose and Values. **If we guide our decisions to comply with the company's Purpose and we act by putting into practice its Values, we strengthen corporate integrity.**

Our Purpose is to **work daily in order to simplify the life of Latin American people by transforming their purchase experiences.**

And we live our Purpose by always acting pursuant to our values, which are five: **We are a team, we exceed the customer's expectations, we act meaningfully, we grow with our achievements and we make things happen.**

We are ONE team: We are a diverse and committed team that is passionate for its customers, that collaborates, that communicates and achieves its goals in a direct, honest and constructive manner.

We exceed the customer's expectations: The customer is the core of our decisions, which is why we anticipate its needs by delivering an offer with quality service that adds value.

We act meaningfully: We are motivated to do the right thing and for that reason we guide our actions in a transparent manner to generate value.

We grow with our achievements: We work as a team and invest our capacities in attracting and training the best talent. We recognize their achievements; we encourage them to self-manage their development and growth and we reward the internal mobility between businesses and countries as a competitive advantage.

We make things happen: We take care of our actions; we take risks and build opportunities to make things happen with the same original entrepreneurship spirit.

III. INTEGRITY ORGANIZATIONAL STRUCTURE

In order to ensure that our commitment to ethics is working, the company has created an organizational structure that allows adequately spreading our values, educating collaborators and third parties with which the company relates and professionally manage all the consultations and complaints received.

Ethics Management

It is the department in charge of ensuring the good operation of our Ethics Program and the faithful compliance with the Code of Integrity by managing the consultations, complaints and investigations in a professional and confidential manner. In addition, it develops trainings and diffusion campaigns in order to guide collaborators in our ethics.

Integrity Counselors

They are collaborators that have received special training and therefore, they are trained to give us advise on integrity issues, clarifying doubts and concerns and channeling the complaints reported on a confidential basis. You can learn who they are in the intranet.

Ethics Committee

The Ethics Committee is comprised by the General Manager, the Legal Affairs and Governance Manager, the Country Manager of each country, the Chief Financial Officer or whoever acts as such in each country and the Human Resources Director of each country. Its purpose is to supervise the effectiveness of the company's Ethics Program.

IV. INTEGRITY CHANNEL

It is possible that when a decision is made, we have ethical doubts and it is necessary to consult before acting. In other cases, we can have doubts regarding the integrity of the actions of other collaborators or we have become aware that an offense or an illegal action has been committed inside the company.

This information is very relevant for the company in order to adequately lead the actions of its collaborators or sanction those conducts violating the law, our internal rules or the Code of Integrity.

The company puts at our disposal the following means by which we can directly contact the Ethics Management:

- **Access button to the link** "Integrity Channel" located in the intranet and website of the company. (<https://canaldeintegridad.ines.cl/linio/>)
- **Email** contactofalabella.com@gerenciadeetica.com
- **By personally** contacting the Ethics Management offices.

It is important to highlight that any information received by the company through the different means of the Integrity Channel shall be strictly treated as confidential by preserving the identity of

the complainant, the defendant and any person that participates in an investigation, as well as any data related thereto. Everyone having knowledge of an ethical case also has the duty of keeping extreme confidentiality.

Likewise, a collaborator or third party may, with the respective seriousness and responsibility, make an anonymous complaint.

We believe in the value of truth and respect, so we must use the Integrity Channel with responsibility.

V. FORMS AND GUARANTEES TO COMMUNICATE ETHICAL CONCERNS

Questions

The company is concerned about all the collaborators understanding well this Code of Integrity. For that reason, we have specialists to resolve any doubt or concern. All the consultations are very important and that is why they will be managed in a professional, quick and confidential manner.

Questions, doubts or concerns can be directly made to the Integrity Counselor or the Ethics Management by using any of the contact means of the Integrity Channel: email: contactofalabella.com@gerenciadeetica.com; access button to the link “Integrity Channel” located in the intranet and website of the company or personally visiting its offices.

Complaints

We all build corporate integrity daily. For that reason, your contribution is fundamental, not only with your ethical conduct but also informing those situations that are contrary to the expected conduct.

If you are aware of or witness an infringement of the Code of Integrity, the Company expects you to inform it to allow investigating the situation and take the necessary measures. Any complaint shall be managed by the Ethics Management and investigated in a confidential manner protecting the identity of the complainant, those who collaborate with testimonies in an investigation and any data related to the investigation.

Remember, each of us is called to help in this. Not informing an infringement to the Code of Integrity can be as harmful as the infringement itself. From there the importance of using the different contact means of the Integrity Channel to deliver this type of information. Do not feel inhibited from asking or reporting thinking that someone else will do it. If you see that something is wrong, report it.

No Retaliations

For the company it is very important to receive all the ethical concerns that the collaborators have to clarify their doubts. For the collaborators to be free to report, it is fundamental to have an

environment where everyone is confident to raise concerns without fear of suffering any type of damage or retaliation.

Retaliation is understood as any conduct that negatively affects or harms the collaborator after having raised a concern or complaint in good faith or collaborated in an ethical investigation.

Retaliation against collaborators who propose ethical concerns will never be tolerated, and they shall be deemed a serious infringement of the Code of Integrity. Therefore, once a retaliation conduct is proven, measures will be taken against the collaborator who has committed it.

Now, the company expects collaborators to act in good faith, that is, with the genuine and honest conviction of what they are proposing, despite the subsequent determination that there was an error. On the contrary, if a collaborator makes a complaint, knowing that it is false, it is possible that the company adopts measures against it.

If a collaborator considers that it has suffered retaliation, it must immediately notify this fact to the Ethics Management through the channels made available to it by the company.

Practical Examples

A few months ago, I participated as a witness in an ethical investigation and from that date, my boss excludes me from certain meetings and does not give me the information I require to do my job, as he used to do before.

Can this be retaliation?

Yes. A negative and unjustified change in treatment or the way of working might be considered retaliation. If your boss changed his/her treatment towards you after providing your testimony as a witness, you must notify it to the Ethics Management.

VI. HOW TO ACT WITH INTEGRITY IN OUR WORKPLACE?

Respecting People

Respect for the dignity of each of the collaborators is fundamental to the construction of corporate integrity and therefore the company is committed to always protecting it.

Any violation of the dignity of its collaborators or third parties with which the company is related will be duly sanctioned.

The company seeks to promote diversity among its collaborators, and therefore expects that the relationships between them are based on respect and inclusion.

Particularly the company is committed to:

- Respecting all people regardless of their ideological or philosophical views, political ideas, religious beliefs, sexual orientation, race, nationality, ethnicity or origin.
- Promoting diversity and inclusion as a source of mutual enrichment among collaborators. Therefore, it shall not tolerate any kind of arbitrary discrimination or harassment.
- Protecting the person, the health and dignity of all those whom it relates to. Likewise, banning the use of child and forced labor.
- Training collaborators so that they continue their personal and professional development.
- Protecting the identity of the collaborators that make inquiries or claims.
- Ensuring that the collaborators that make inquiries or claims in good faith do not suffer retaliation.

Maintaining Good Relationships with our Customers

All collaborators of this company have a duty to our customers, which is why we are committed to providing them with a professional and honest service.

Thus the customer will receive a respectful and non-discriminatory attention, and true, complete and appropriate information for its requirements.

Practical Examples

I witnessed a collaborator lying at a due diligence procedure that the company was conducting.

Is this attitude right?

No. The company's commitment is to always deliver true information, even if it means not completing a determined operation.

Maintaining Good Relationships among Collaborators

We are responsible for creating a working environment of mutual respect and trust.

As collaborators, we are committed to acting without endangering or affecting the health, safety, dignity, integrity or reputation of the people who are part of this organization.

Likewise, we relate with honesty, respect and kindness.

Due to the above, it is strictly forbidden within the company to abuse authority, sexual and labor harassment, psychological harassment, arbitrary discrimination, derogatory or humiliating treatment, as well as any other action that affects us in a negative way.

Practical Examples

One of my co-workers uses swear words when he talks, he refers to others offensively and tells obscene jokes at work meetings. I have made it clear to him personally that this situation makes me uncomfortable, but he still has the same attitude, which affects me at work. He says that, if people in our country talk like this, he can also do it at work and that I am the problem because I am too sensitive.

What should I do in this situation?

This type of behavior is inappropriate and undermines the respect we owe to each other. Go to the Integrity Counselor or the Ethics Management and raise the issue. You can also make a complaint through any of the Integrity Channel means that the company makes available to you.

Declaring and Managing our Conflicts of Interest

As collaborators, we have the responsibility and obligation to make decisions and to act in the best interests of the company. Therefore, we must avoid any situation where our personal interests are or appear to be in conflict with the interests of the company.

There is a conflict of interest if, when having to make a decision on behalf of the company, the collaborator's objectivity is affected by the possibility of obtaining a personal benefit or for a third party.

Sometimes conflicts of interest are real and sometimes they are apparent. But just because they are apparent does not mean that they cannot be serious, because your reputation and our reputation could be affected.

Situations that result in conflicts of interest can arise in a number of ways, and may not be negative or incorrect in themselves. The best way to avoid said situations from generating a conflict between the collaborator's interests and the company's interests is to timely communicate them. In general terms, any economic interest, personal or commercial relationship with other workers, customers, suppliers and/or competitors should be reported, as well as external jobs and any other activity, association or connection with other people that may generate a conflict of interest.

For clarity and practical criteria, our company has a Conflict of Interest Management Policy. It includes detailed information on the types of conflicts that can occur, the responsibility of the collaborators and the way to manage them.

In case of doubt, consult your hierarchical superior or the Ethics Management, which may guide you.

Practical Examples

1. I have a romantic relationship with a co-worker whom I indirectly supervise.

Is this a conflict of interest?

Yes, a conflict of interest exists when you are the direct or indirect supervisor of someone you are romantically involved with. You may be acting appropriately, but your relationship could be perceived as influencing your judgment, which is why you should disclose it so that the company takes appropriate actions and manages this conflict.

2. I would like to form a company and partner with one of my subordinates to do so. This company will never have a business relationship with the company.

Can I do this?

No, this constitutes a conflict of interest. Your objectivity and judgment in decisions concerning your subordinate may be affected by the fact that he/she is your partner.

Complying with the Law and Internal Regulations on the Use of Alcohol and Drugs

The safety of our collaborators and customers is one of the main responsibilities and concerns of our company.

The consumption of illicit drugs, and the misuse of drugs and alcohol can deteriorate this level of safety, and at the same time, have harmful consequences for people. Likewise, the sale and distribution of illegal drugs is also a crime. For these reasons, our company strictly bans the possession, distribution, sale and consumption of illegal drugs and/or alcohol at work.

Occasionally, it is possible that, because of an illness or health condition, a doctor has prescribed you to take drugs that, although legal and ordered by the doctor, may impair some of your abilities that are necessary to do your job, such as your ability to concentrate or your reflexes. If that happens, it is important to discuss with your doctor whether this may pose any risks to you, your co-workers, your customers or company assets, and to get advice and instructions in that regard.

Smoking is not allowed in the company facilities, except in those places established in accordance with the law.

Practical Examples

I have personally witnessed how one of our work peers was using drugs in one of the company's bathrooms.

What should I do?

Hopefully you find a way to help your peer. If you have a relationship of trust with him, maybe you can recommend that he gets rehabilitation treatment. But, still, and in any circumstance, contact the Integrity Counselor and present this issue so the corresponding measures can be taken or make a report. This is the best way to help him and take care of all those working with him. Informing this situation is not an act of disloyalty with your peer; it is an act of loyalty with your other peers and

the company, because the fact that a person is under the influence of illegal drugs is a danger to everyone.

Rejecting any Form of Harassment and Discrimination

One of the fundamental values of our company is the respect for the person. All sexual and labor harassment conducts, and any act of discrimination are severe violations of this Code.

Likewise, the company values and protects the diversity of race, color, sex, civil status, association, religion, political opinion, nationality, ethnic ancestry, sexual orientation or social origin. The company shall aim at identifying and correcting, promptly and adequately, any conduct that attempts against this value, but the responsibility of maintaining an environment free of discrimination at work, among us, with our customers, providers and third parties in general, falls on all of us.

Maintaining Good Relationships with Providers and Third Parties

In our relationships with providers and third parties with which the company has any relationship, the search for the benefit of our customers must always be present.

For that purpose, we must establish ties based on transparency, efficiency and respect for legal regulations in force. The Company shall always look to obtain better conditions, better quality and service, without privileging or arbitrarily discriminating any provider or third party.

We will not do business or maintain commercial relationships with persons and companies that deliberately do not comply with the law, that participate in illegal businesses or whose conduct deliberately violates the principles and values of the company. We will care for our reputation by looking to relate with those sharing our ethical standards.

Complying with the Internal Regulations on Gifts and Invitations

The practice of making or accepting gifts or invitations in business contexts is a reality. However, this could lead to abuse; it can encourage situations of corruption; it confuses the professional and personal aspects; it increases the general cost of doing business, to the detriment of the customers and the company. In addition, accepting gifts or invitations may cause a conflict of interest or the appearance of a conflict between your personal interests and your responsibility as a collaborator.

We must not accept gifts or invitations from any provider, potential provider, public officer, customer, commercial partner or competitor. This gift or invitation may be intended to influence business or commercial decisions.

Notwithstanding the above, we may receive some goods or items as long as they are clearly of lesser value, customary according to the culture, place and circumstances in which they take place, perhaps bearing the provider's brand or not, in order to publicize its business or services, and as

long as they are distributed in good faith and indiscriminately to providers or customers as a marketing activity, such as key rings, pencils and caps, among others.

More detailed information and exceptions to these rules can be found in the Gift Policy and Invitation Policy.

If you have any questions, you can consult the Integrity Counselor or the Ethics Management.

Practical Examples

A supplier invited me to eat at an exclusive restaurant to talk about his new product line.

Can I accept the invitation?

Yes, you can accept, but you must request authorization from your superior beforehand and pay your restaurant bill. Explain to the supplier that this is a company policy. Every time you receive an invitation or gift from a supplier, ask yourself, "Would this supplier make this invitation or offer this gift to me if I didn't work for the company and didn't have to make decisions that affected him?" If the answer is no, then you cannot accept.

Caring for the Company Assets

We must all take care and protect the company's assets. Therefore, we must safeguard products, information, facilities and equipment. We must not misuse them, that is, use them for personal purposes, carelessly or unreasonably. Nor may we remove such goods from the premises where the company placed them, unless duly authorized.

The payroll or files of clients, suppliers, databases, commercial secrets, among others, are the property of the company and must be managed in a strictly confidential manner. In addition, they may only be used for business purposes and by persons authorized to do so. If, by carrying out our functions, we generate intellectual creations, these are the property of the company.

We should not download or install software on company computers, as we may expose our network to computer viruses or violate software licenses. The computer software or information processing systems provided by the Company may only be used for our work. Institutional e-mail can only be used for business purposes, not for personal purposes.

We will use company letterhead, stamps and any representation of the organization only in matters pertaining to the performance of our duties.

All collaborators have a responsibility to protect company property from fraud, misuse, theft, robbery, loss or damage and to report it when we become aware of it.

Practical Examples

My boss asked me to print out his vacation photos. He tells me that his home printer is not working and acknowledges that this is an exception.

Is this right?

No. It's not appropriate for your boss to ask you to print personal things. We recommend that you report this situation to the Ethics Management as it is not permitted to use company assets for purposes other than work. Ethics Management will handle this information confidentially.

VII. HOW TO ACT WITH INTEGRITY IN THE MARKET?

Competing Fairly

We seek to compete openly and independently in the markets in which we are present, inspired by consumer loyalty and with respect for free competition. Therefore, we do not use methods that prevent, restrict or hinder free competition or constitute acts of unfair competition, all methods that ultimately harm our customers.

To ensure free competition, we will not directly or indirectly participate in any situation that may prevent, restrict or hinder free competition; such as collusive pricing agreements, abuse of a potential dominant position or predatory practices. We also reject conduct contrary to good faith that by illegitimate means seeks to attract a competitor's customers.

Practical Examples

A supplier of the company called me to offer information about the discount and margin structures that the supplier offers to a competitor of ours.

Can I receive this information as a parameter for our negotiations with the supplier?

No. Under no circumstances can you receive information or discuss the pricing policy that a competitor has agreed with our supplier. This is a violation of the standards of free competition. You must immediately report this situation to your supervisor, the Competition Officer, the Legal and Governance Management or the Ethics Management.

Respecting Financial and Documentary Integrity

All transactions carried out by the company must strictly adhere to the law. Furthermore, all our transactions and operations must be carried out according to their type and characteristics, without simulating something that they are not. Finally, all of our transactions must be accurately documented and recorded in form, date and substance, whether in our contracts, our communications, our filings or our accounting.

To this end, we will maintain complete and accurate agreements, documents, filings, correspondence, books, records and accounts that reflect company operations or transactions.

Under no circumstances is it permitted to omit or alter the information in these books, records and accounts.

We must not use the company's money for any purpose other than that for which it is intended. Only expressly authorized persons may sign documents and represent the company.

Those who are authorized to incur expenses must leave a record of each transaction and provide accurate and timely accounts of the transactions, in accordance with the company's internal rules for handling money.

We will also maintain the accuracy and truthfulness of all documentation circulating within the company, without intentionally altering or modifying its date, content or any other aspect thereof.

Practical Examples

My boss donated one of the computers on display for sale to a poor school and asked me to register it as a loss.

Can I do this?

No. This is not only dishonest, but also illegal, so you should report this situation to the Integrity Counselor or the Ethics Management.

Handling the Information according to the Law and Internal Regulations

Information is an important asset of the company, and therefore it is our responsibility to protect it regardless of the medium that contains it.

As a result of our functions we may have access to private data of our customers, suppliers, shareholders and/or collaborators protected by law; commercially sensitive, strategic and privileged information that we cannot share with competitors. It is our obligation to protect, handle and store the information in strict compliance with the law and internal regulations, with absolute discretion, without using it for our own benefit or that of third parties and, likewise, to destroy it safely when appropriate.

The company has special policies and procedures to classify information according to its level of sensitivity and the treatment that should be given to it. It is your obligation to be aware of these policies and procedures and to comply with them. In general, we can only disclose information to those people who, because of their duties at the company, need to know it.

Practical Examples

One of my colleagues has resigned, but he'll still be working at the company for three more days. He told me that he will take the company's strategic plan to develop his own business.

Is this correct?

No. Your colleague is in violation of our Code of Integrity and, quite possibly, free competition laws as well. You should report this to your direct supervisor or to the Ethics Management.

Respecting Privacy and Protecting Personal Data

All collaborators and other persons to whom the provisions of this Code apply are obliged to respect the privacy of the company's customers, collaborators and suppliers, in strict compliance with the regulations on Personal Data Protection and the company's internal regulations on the subject.

In addition, collaborators and any other person to whom this Code is applicable, must bear in mind that the personal data maintained by the company in its databases are its exclusive property, and that they must not be communicated to third parties without the express authorization of the company, unless this is validly required by the local authorities and laws.

Both collaborators and other persons to whom the provisions of this Code apply must treat personal data with special care. Thus, such data may only be used for the purposes authorized by their owners, in compliance with the company's internal regulations governing the processing of personal data.

Likewise, throughout the process of handling the company's personal data, collaborators and other persons to whom this Code is applicable must safeguard the confidentiality of such data and respect, at all times, the security measures provided by the company for these purposes.

Respecting Intellectual and Industrial Property

We are an innovative company, and we promote creativity both in our own brand products and in those we acquire from third parties. However, we must always respect industrial and intellectual property rights.

Practical Examples

Can we market goods by associating them with a distinctive sign which we have not previously registered as a trademark and which bears a striking visual or phonetic similarity to a trademark registered in the name of a third party?

No. Such conduct could constitute a violation punishable by industrial property law, to the extent that it could be misleading or confusing. On the other hand, the law regulating unfair competition also considers as an example of such an act any conduct that takes unfair advantage of another's reputation, leading to the confusion of one's own goods or distinctive signs, for example, with those of a third party.

VIII. HOW TO ACT WITH INTEGRITY IN SOCIETY

Adhering to the Law

As collaborators we have the responsibility to comply with the different laws and regulations that apply both in our country and in the rest of the countries with which the company relates or has operations and never conduct ourselves or participate in fraudulent activities.

Practical Examples

My boss told me that there was a faster way to get our products into a certain country, which meant bypassing certain regulations.

Should I follow my superior's instructions?

No, because each of us is responsible for complying with all the rules and regulations of each country where we operate. These practices, in addition to being illegal, can seriously damage the company's reputation and you should report them immediately to the Ethics Management.

Refusing any Form of Bribery

Bribery is illegal, unethical, increases the cost of doing business, introduces uncertainty into commercial transactions, destroys trust in institutions and prevents the efficient functioning of markets. In light of this, **the company strictly prohibits any collaborators from making or offering improper payments to, or receiving bribes from, any person for the purpose of obtaining a benefit, gift, or advantage.**

Bribery means promising or giving a benefit -whatever its nature- as well as accepting a request for a benefit from a person, whether a public official or not, in order to make him or her do or not do something. No collaborator, even under the pretext of giving courtesy gifts, may commit a bribe.

The particular criteria for the delivery of courtesy gifts will be regulated in the Gift Policy.

As collaborators we must not offer, promise, give or consent to the giving of a benefit of any kind to a public or private employee, national or foreign, under any pretext or circumstance and by any means, or to obtain advantages, influence a decision or speed up a procedure.

Practical Examples

1. The customs inspector of the country of origin of an import has offered us to expedite the procedures if we give him a voluntary donation.

Can I accept this request?

No. This request also constitutes a bribe punishable by law as a bribe to a public official. You must report this fact immediately to the Ethics Management.

2. A supplier offered me a percentage of the deal with the company if I could intercede to close it as soon as possible.

Can I expedite the requested deal without accepting what he offered?

No. The mere fact of offering you a financial benefit in exchange for a particular action constitutes a bribe. You must notify the Ethics Management immediately.

Acting Responsibly towards Communities and the Environment

Just as important as the relationship we have with our customers, suppliers and authorities, is the one we establish with the different communities where we operate. We are part of the community, we seek not only the profitability of the company, but also to mitigate possible adverse impacts on the quality of life of the communities where we operate.

We are committed to being responsible with the possible effects or consequences that our actions could have in the places where we work, always trying to improve the ties with all the actors involved.

Likewise, care for the environment will always be a concern for us and we will comply with all environmental laws and regulations.

Protecting the Health and Safety of Collaborators and Customers

Our company is committed to protecting the health and safety of its collaborators and customers. As collaborators we must always comply with all laws, regulations and policies regarding health and safety. Acting with integrity in relation to health and safety is essential to providing a safe work environment.

Practical Examples

In the warehouse there are boxes that block the aisles every day. I have told the warehouse manager, but he has indicated that it will be cleared up soon, but the situation remains the same.

Should I report this situation to a superior?

Yes, this situation represents a serious risk to the safety of the collaborators who pass through the warehouse and it is your responsibility to report this fact so that the appropriate measures can be taken

Complying with Product Safety

The safety of our customers is a fundamental concern for the company.

That is why it is very important to comply with all laws and regulations applicable to the safety of the products. Likewise, we must demand from our providers compliance with such laws and regulations, to ensure that, within the supply chain, there is no problem that may affect our collaborators or customers.

Developing Political Activities outside the Workplace and Working Hours

In our company we value diversity in all its forms and that includes diversity of opinions, perspectives and political participation.

We want your contribution to the company, with all your identity, in everything that is important to you, because your dignity as an individual deserves it and because diversity enriches us.

Therefore, in order to give a place to everyone in the company, it is important to keep neutrality in the workplace in those things that are not directly related to our duties with the company.

Consequently, appreciating your opinion and how it is reflected in your identity, we all must take care to develop our political activities outside the workplace and working hours. This also means that collaborators cannot use their positions, office or the company assets for their political activities.

Relating with the Authority with Integrity

We will collaborate with the requirements made by the authorities in the exercise of their functions, with transparency, truthfulness, integrity and efficiency.

As collaborators, sometimes we must carry out processes with the authorities on behalf of the company. In these cases, we should strive to comply with the provisions of our internal regulations on the way in which we relate with the authority.

We will treat the public authorities with respect, not performing any act that may adversely affect our institutional image.

Having Authorization before making Statements to the Media

Communication plays a key role in the globalized world we live in. Thus, and in order to ensure the accuracy and timeliness of the information provided to the public in the media, only areas or spokespersons authorized can make statements on behalf of the company.

Acting with Integrity Inside and Outside Work

Just like you expect the company to be a loyal and law-abiding corporate citizen, always and not only as an employer, the company also expects you to be ethical and integral inside and outside work.

The company does not intend to intrude in your personal life, only to invite you to live ethics and integrity inside and outside work. Likewise, a responsible use of social media is expected regarding what you say that may affect the image or reputation of the company.

Dishonest or unethical actions of any collaborator in their personal environment can affect not only the company's reputation, but also the credibility your peers and subordinates place on us regarding the importance it gives to corporate integrity.

IX. COMPANY'S CRIME PREVENTION

The company is committed to preventing the commission of crimes within the organization, whether or not it benefits from it. That is why it has a Crime Prevention Model applicable in accordance with the current legislation of each country on criminal liability of legal entities, which requires strict and diligent conduct by all collaborators.

The commission of any crime within the organization is considered a violation of the Code of Integrity. In the case of the crimes of bribery, receipt of stolen property, money laundering, terrorism financing, corruption among individuals, mismanagement, incompatible negotiation, misappropriation, crimes of the fishing act, and the remaining crimes subsequently incorporated to the catalogue of Law No. 20.393 or the current legislation of any country are considered a serious violation of this Code of Integrity and the Crime Prevention Model. Therefore, the company will apply the corresponding disciplinary sanctions or measures, as a clear sign of the commitment acquired.

As collaborators, in case of becoming aware of the commission of any of these crimes, we are responsible for immediately reporting to the Crime Prevention Officer, the Legal and Governance Management or the Ethics Management, through the different contact means of the Integrity Channel.

Collaborators must not offer or consent the delivery to a public or private employee, whether national or foreign, of an undue benefit, under any pretext or circumstance and any means. Such undue benefits should not be received either.

Collaborators will always take care that the moneys or goods they receive on behalf of the company or due to their work do not come from unlawful activities; ensure that they are not allocated to fund unlawful activities; take care that they are properly managed; and will not take actions contrary to the interest of the company or third parties who are holders of the assets they manage.

CONTACT MEDIA

- Button to access the link "Integrity Channel" located on the intranet and the company webpage.
- Email contactofalabella.com@gerenciadeetica.com
- In person, directly visiting the offices of the Ethics Management.

X. HOW TO ACT REGARDING AN ETHICAL CHALLENGE?

Regarding complex decisions, the certainty of acting with integrity is not always clear.

Whenever we face an ethical dilemma, and before acting, we must ask ourselves the following questions:

1. Do I feel right about what I'm doing?
2. Is it legal?
3. Does it represent any conflict of interest?
4. Is it in line with the company's values?
5. Would anyone who I trust act in the same way?
6. What would I feel if it is published on the front page of a newspaper?
7. Would my family be proud of me?

On the other hand, we all have a natural tendency to look for or make up justifications to conclude that what we have done or what we are about to do is not wrong, despite being so. This psychological process to adjust or justify the discomfort of our ethical conscience is called rationalization. Some typical examples of rationalization are the following justifications:

1. If it is just once, it does not matter
2. Nobody will notice
3. Everybody does it
4. We have always done it this way
5. In practice, it works like this

Be careful! Sentences like these are frequently excuses that allow us to do what we know is wrong.

If you have any doubts, then it is advisable that you approach the Integrity Counselor or the Ethics Management, who will guide you to make the best decision.

XI. APPLICABLE MEASURES IN CASE OF INFRINGEMENT

The company can apply disciplinary measure ranging from an oral warning to the dismissal of the collaborator in case of infringement of the Code of Integrity, the current laws or regulations.

The measures to be applied will be defined according to the seriousness of the infringement, the impact and significance for the company and the responsibility of the person who has committed such infringement.

On the other hand, the sanctions above will also apply to the person who willfully makes false accusations or who lies in the collaboration asked in an investigation of an ethical case.

XII. OUR COMMITMENT TO INTEGRITY

The principles and values can fall on deaf ears if we do not bear in mind what is most important: our commitment to integrity.

With my signature as a sign of having received a copy of this code and having read and understood it, I undertake as follows:

1. To accept personal responsibility to maintain the integrity of our company in each and all my actions and decisions, respecting the values, principles, standards and policies described in this Code of Integrity and in the other official policies and documents of the company.
2. To accept the duty to act setting an example, always keeping a correct attitude and preventing those situations that may harm our customers, collaborators or the company's reputation.
3. To consult in case of doubt about the scope of the ethical obligations and denounce in good faith those situations that represent an infringement of these regulations.
4. To keep due confidentiality after making a complaint or collaborating in an ethical investigation.