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# CODE OF ETHICS AND CONDUCT

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**ARCOR GROUP**

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**INCLUDING ADMINISTRATION PROCEDURE**

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# MESSAGE FROM THE PRESIDENT

Throughout its history, Arcor has managed to build a solid reputation. From the beginning, the company has been recognised for its economic, social and environmental commitment, and for seeking for a balance between its own business and the interests of the several stakeholders with whom it engages.

However, the major expansion the company is experiencing and the growing scope nature of its decisions have led to the development and implementation of a Code of Ethics and Conduct.

In other words, to establish a set of values, principles and rules that guide the actions of its members and that ensure the sustainability of the organization and of those with whom it engages.

It is in this spirit that we have published this document that contains Arcor Group's Values, Ethical Principles, and Rules of Conduct. And in order to facilitate its implementation, the document includes the ways and steps to be taken and followed in order to comply with the contents of this Code of Ethics and Conduct.

We are aware that understanding our objectives is as important as the way in which we wish to achieve them. I therefore invite you to proceed in conformity with these guidelines, so that we can ensure that our organization carries on its business in a responsible manner.

Faithfully,

**LUIS A. PAGANI**  
*Arcor Group President*



# ABOUT THIS CODE OF ETHIC SAND CONDUCT

## SCOPE OF THIS CODE

The provisions of this Code apply to Board members and the staff employed by any of the companies which are part of Arcor Group (hereinafter referred to as “the staff members” and “the company”).

At the same time, the operations and the staff members of the company are subject to the laws of the different countries. Staff members are expected to comply with this Code and with all applicable laws, rules and governmental regulations.

## ENFORCEMENT AUTHORITIES

In the first place, all staff members of Arcor Group are responsible for ensuring compliance with this Code within their different functions and roles.

In order to manage the Code of Ethics and Conduct and ensure its compliance, certain company areas perform the following functions:

### Committee of Ethics and Conduct

- ▶ This committee is appointed by the Board of Directors and is composed of a member of the Board and of the Human Resources, Sustainability, Legal Affairs and Environment, Hygiene and Industrial Protection Managements.  
It is in charge of solving disputes regarding compliance with the contents of the Code which cannot be solved at other stages.

### Internal Audit Management

- ▶ The Internal Audit Management is in charge of managing the company' Ethics Line, receiving and registering the cases related to non-compliances with the Code, and researching into, analyzing and preparing the cases to be submitted to the Committee of Ethics and Conduct.

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# CODE OF ETHICS

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THE SUCCESS OF OUR BUSINESS IS THE RESULT OF THE RELATIONSHIP THAT WE ESTABLISH WITH ALL THE STAKEHOLDERS WITH WHOM WE ENGAGE, BASED ON THE VALUES THAT UNDERPIN OUR IDENTITY AND THE PRINCIPLES THAT GUIDE OUR ACTIONS.

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# CORPORATE PHILOSOPHY



## INTEGRITY

We obtain results through transparent, coherent and responsible behavior.



## ENTREPRENEURIAL ENVIRONMENT

We promote an environment that encourages innovative thinking and boosts new initiatives amongst our team members while optimizing the available resources and investments. We recognize and value teamwork, theoretical and practical knowledge and intuition gained through experience.



## PROXIMITY AND COMMITMENT THROUGHOUT THE VALUE CHAIN

We are closely committed to the entire value chain, which includes our suppliers, employees and shareholders as well as our clients, consumers and the general community. We are convinced that growth can only be achieved if we all grow together.



## HUMAN RELATIONS

We believe that only through trustworthy human relations lies the possibility to grow. Therefore, we foster a collaborative and close work environment within the company and towards the community where our employees develop their daily activities.



## DIVERSITY

We are convinced that diversity enriches our understanding of the world. That is why we promote a diverse internal environment in which the fusion of different views, opinions and perspectives are an opportunity to grow.



**PRINCIPLES THAT SUMMARIZE  
OUR WAY OF DOING AND THINKING.**

# ETHICAL PRINCIPLES

## ▶ **PRINCIPLE 1**

To act with transparency and to respect the established agreements with the different stakeholders with whom the company engages, promoting lasting relationships based on trust.

## ▶ **PRINCIPLE 2**

To rely on the highest quality and service standards available with the aim of satisfying our customers and consumers.

## ▶ **PRINCIPLE 3**

To generate innovative forms of growth and development that add value to the company and its shareholders.

## ▶ **PRINCIPLE 4**

To promote communication based on accurate information and facts.

## ▶ **PRINCIPLE 5**

To provide a safe and healthy workplace that will stimulate initiative, creativity, and continuous growth of the company's human capital.

## ▶ **PRINCIPLE 6**

To contribute to the comprehensive development of the communities where we operate and of society at large, respecting their cultures and customs.

## ▶ **PRINCIPLE 7**

To establish a sustainable management of processes, based on a balance between the economic, social and environmental dimensions.

## ▶ **PRINCIPLE 8**

To observe Argentine and international laws and conventions, integrating this commitment into our value chain, and promoting a sustainable and competitive business context.

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# CODE OF CONDUCT

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**ARCOR GROUP'S CODE OF CONDUCT IS ORGANIZED ON THE BASIS OF THE EIGHT PRINCIPLES OF THE CODE OF ETHICS, EACH PRINCIPLE COMPRISES A SET OF RULES THAT GUIDE OUR ACTIONS.**

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# PRINCIPLE 1

## RULES OF CONDUCT

### Conflicts of interest

- ▶ Employees shall not represent ARCOR Group in any business relation in which they may have a personal, direct or indirect interest, at the expense of the company.
- ▶ Staff members must refrain from giving, doing or receiving gifts, benefits or favors that affect ARCOR Group's business relation with third parties.
- ▶ Decision-making is exclusively based on professional criteria. Hierarchical position, activity or influence shall not be used to obtain any personal advantage.
- ▶ Staff members undertaking external and personal business must ensure that such business does not conflict with the interests of ARCOR Group.

### Company assets

ARCOR Group's assets are treated responsibly and professionally, observing the criteria set by the company.

### Relación comercial con proveedores y clientes

The decision-making processes involved in the business relations between ARCOR Group and its customers and suppliers are unbiased and objective, and based on strictly professional criteria previously established.



**TO ACT WITH TRANSPARENCY AND TO RESPECT THE ESTABLISHED AGREEMENTS WITH THE DIFFERENT STAKEHOLDERS WITH WHOM THE COMPANY ENGAGES, PROMOTING LASTING RELATIONSHIPS BASED ON TRUST.**

### **Transparent relationship with governmental organizations**

The relationships established between ARCOR Group and governmental organizations are based on ethical criteria.

### **Consumer protection**

ARCOR Group protects the rights of consumers by maintaining an ongoing dialogue with governments, the consumers themselves and different business organizations, control bodies, trade unions and civil society organizations.

### **Political participation**

- ▶ ARCOR Group's political involvement is carried out on the basis of transparent criteria and is relayed to its staff members and society at large.
- ▶ Arcor Group staff must not use the company name or the position they hold when they participate in political activities.



# PRINCIPLE 2

TO RELY ON THE HIGHEST QUALITY AND SERVICE STANDARDS AVAILABLE WITH THE AIM OF SATISFYING OUR CUSTOMERS AND CONSUMERS.

## RULES OF CONDUCT

### Product quality

ARCOR Group promotes the continuous improvement of the quality of its products based on the most demanding international food safety standards and on each country's regulations.

### Desarrollo de Proveedores y Clientes

ARCOR Group promotes the development of suppliers and clients through a rating and follow-up system for the services offered that ensures the quality of the products until they reach the end consumer.



# PRINCIPLE 3

TO GENERATE INNOVATIVE FORMS OF GROWTH AND DEVELOPMENT THAT ADD VALUE TO THE COMPANY AND ITS SHAREHOLDERS.

## RULES OF CONDUCT

### Ethical relationship

ARCOR Group's relationship with its different stakeholders is underpinned by its principles and values, so that it contributes to the development of the parties and ensures the protection of the company's image, reputation and brands.

### Support of causes

ARCOR Group participates actively in the development of the countries where it operates, supporting social, environmental and business causes, and promoting the implementation of public policies in these areas.



# PRINCIPLE 4

## RULES OF CONDUCT

### Information processing

- ▶ ARCOR Group ensures that any information on its actions made available to the media and the society at large is disclosed in an open, transparent, accurate and qualified manner.
- ▶ ARCOR Group establishes an open and transparent relationship with control bodies, providing them permanently with consistent and up-to-date information.

### Handling of confidential information

Information deemed to be confidential must be handled by the company and the staff members with integrity, ensuring that it is used exclusively for matters related to the business management.



**TO PROMOTE COMMUNICATION BASED ON ACCURATE  
INFORMATION AND FACTS**

**Right to information**

ARCOR Group transmits to its clients and consumers clear and accurate information on the contents, attributes and benefits of all its products.

**Dissemination of values**

ARCOR Group uses its channels of communication with clients and consumers to disseminate the values it fosters and its commitment to society.



# PRINCIPLE 5

## RULES OF CONDUCT

### Equality of opportunity

- ▶ ARCOR Group promotes the employability of its staff, offering training and development opportunities, as well as conditions for the performance of their work activity.
- ▶ Benefits are granted to our staff on the basis of professional criteria, without any distinction, and are disclosed to everybody.
- ▶ Recruitment, training, development and promotion processes are carried out in line with professional criteria based on equality

### Quality of life

ARCOR Group assumes a responsible management, requiring its staff to undertake work commitments that do not affect their quality of life.



**TO PROVIDE A SAFE AND HEALTHY WORKPLACE THAT WILL STIMULATE INITIATIVE, CREATIVITY, AND CONTINUOUS GROWTH OF THE COMPANY'S HUMAN CAPITAL.**

### **Participatory dialogue**

Participatory and integrated dialogue between ARCOR Group and its staff is established through upward, downward and cross communication channels.

### **Handling of private information**

Our staff's private information is treated confidentially, ensuring their right to privacy.

### **Right to information**

All staff members have the right of access to information that may have an impact on their working conditions and quality of life.



# PRINCIPLE 6

TO CONTRIBUTE TO THE COMPREHENSIVE DEVELOPMENT OF THE COMMUNITIES WHERE WE OPERATE AND OF SOCIETY AT LARGE, RESPECTING THEIR CULTURES AND CUSTOMS.

## RULES OF CONDUCT

### Local development

- ▶ In hiring and signing contracts with equally qualified staff members and suppliers, Arcor Group shall prioritize local populations.
- ▶ The community projects supported by ARCOR Group contemplate co-responsibility and community participation for the solution of its problems, and the families of staff members will be active participants therein



# PRINCIPLE 7

TO ESTABLISH A SUSTAINABLE MANAGEMENT OF PROCESSES, BASED ON A BALANCE BETWEEN THE ECONOMIC, SOCIAL AND ENVIRONMENTAL DIMENSIONS.

## RULES OF CONDUCT

### Economic, social and environmental impacts

- ▶ ARCOR Group takes responsibility for guiding and training its staff and suppliers in preventing and minimizing any adverse economic, social and environmental impact of its operations.
- ▶ ARCOR Group engages in a close dialogue with the community to enhance the positive economic, social and environmental impacts of its operations, and minimize or correct any adverse impacts.



# PRINCIPLE 8

TO OBSERVE ARGENTINE AND INTERNATIONAL LAWS AND CONVENTIONS, INTEGRATING THIS COMMITMENT INTO OUR VALUE CHAIN, AND PROMOTING A SUSTAINABLE AND COMPETITIVE BUSINESS CONTEXT.

## RULES OF CONDUCT

### Relationship with our competitors

ARCOR Group competes in the market in a loyal and transparent manner, in compliance with the legislation in effect in the countries it operates and promoting free competition to the advantage of consumers.

### Supplier selection and dealings with clients

In its supplier selection processes and business relations with clients, ARCOR Group takes into account those who comply with tax and employment legislation, and places special emphasis on aspects that prevent child labor and adverse environmental impacts.

### Commitment to the Global Compact

ARCOR Group reaffirms its commitment to the Global Compact and seeks to encourage compliance with its principles by involving its suppliers and customers.



# COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT

## EVALUATION OF CODE NON-COMPLIANCES

Although Arcor Group's Code of Ethics and Conduct includes a wide variety of principles and rules to guide its staff regarding accepted individual or business behavior, it cannot contemplate all situations faced by individuals. Thus, **the Code of Ethics and Conduct does not replace each staff members' responsibility and duty to apply good behavior criteria.**

In case of doubts about a decision of staff members, the following questions shall be made as a first step:

1. Is this situation contemplated by Arcor Group's Code of Ethics and Conduct?
2. Is it legal?
3. Is my decision correct?
4. Will my colleagues, family and friends approve of it?
5. Will I feel good tomorrow after making this decision?

**Each executive shall be responsible for the compliance with the Code of Ethics and Conduct of staff under his or her supervision**, addressing the concerns of staff members regarding the Code, trying to prevent its infringement and reporting any non-compliance that could take place.

In order to manage the Code of Ethics and Conduct and ensure its uniform implementation in all daily activities of the business, **Arcor Group has established a procedure which is described below:**



# ADMINISTRATION OF THE ETHICS AND CONDUCT CODE

## Enquiries into and reporting of non-compliances

In case of an enquiry or possible situation that may result in a non-compliances of the Code of Ethics and Conduct, the staff member must inform/contact his immediate superior. If this were not possible, he/she may contact a representative of any of the areas which integrate the Committee of Ethics and Conduct of the company or a representative of the Internal Audit Management.

In case the staff member is not comfortable using the previous lines of action, or if he/she has contacted such persons but has not been given a satisfactory answer, he/she may use Arcor Group's Ethics Line.

In those situations referred to possible conflicts of interest arising from commercial relationships, the employees shall always obtain the resolution issued by the Ethics and Conduct Committee which acts as the higher authority in the matter.

The **Ethics Line** is a tool that the company offers to all staff members to facilitate the submission of facts and/or acts that could mean a non-compliance with the Code of Ethics and Conduct. It consists in the possibility of using any of the following communication channels: fax, mail and e-mail. **Enquiries and reports are anonymous and confidential.**

## Receipt and registration of cases

The cases received through any of the above mentioned means shall be referred to the Internal Audit Management for their registration and investigation.

## Research, analysis is and preparation of cases

Once the Internal Audit Management receives a case, it shall investigate it and it may turn to the relevant areas of the company so as to delve into the issue.



Research shall be carried out according to the following criteria:

- ▶ Staff members shall be willing to offer support in case they are summoned for investigation.
- ▶ The details of the case and the people involved shall be kept confidential throughout the investigation.
- ▶ Any reprisal against an employee who honestly submits a problem report shall constitute a non-compliance with the Code.
- ▶ Making a false accusation knowingly, lying to researchers or refusing to cooperate in an investigation related to the Code shall also constitute a non-compliance.

Once progress has been made in the investigation, the Internal Audit Management shall submit the case to the Committee of Ethics and Conduct.

### Case resolution

The Committee of Ethics and Conduct shall meet periodically in order to analyze and make decisions related to non-compliances with the Code. The Committee shall be supervised by the Company's Senior Management.

### Registration and follow-up of solutions

Once a decision on the case has been made, the Committee of Ethics and Conduct shall formally communicate its decision to the Manager of the corresponding area so that he/she may give effect to the resolution and ensure its compliance and follow-up, giving written notice to the person or sector involved, with a copy to the Internal Audit Management.

