

## To our suppliers:

For GCC it's very important for the relationships with our suppliers to be transparent at all times and based on confidence and mutual benefit, ensuring equal opportunities, unrestricted respect for all the participants, and total integrity in the operations.

The Supply personnel who are in touch with you observe the principles of our Code of Ethics at all times, striving to better perform their work and preventing for their activities to be deemed harmful to the Organization or any supplier.

Our Code of Ethics provides guidelines to the right, fair moral conduct; applying it day by day helps us make the right decisions to make sure we are being consistent with our organizational philosophy.

Should you observe any unethical or illegal conduct, we encourage you to report it to GCC's Ethics Committee through the various channels to report incidents, such as the e-mail address at: [gcc@ethic-line.com](mailto:gcc@ethic-line.com)

No retaliation shall be allowed against any supplier who honestly reports a concern for some improper conduct; reports on false incidents shall not be accepted.

Your determined support and involvement are very important for us.

## Code of Ethics Operations

GCC's Code of Ethics is applicable throughout the organization and we are responsible for complying with it and having others comply with it. For this purpose, various communication channels have been established for GCC's suppliers to use to solve any doubts about the suppliers' Code of Ethics, making suggestions, notifying success stories where GCC's values are promoted, or making improper conducts found in the organization evident. It's not always easy to define and judge if a situation is breaking the law, ethics or provisions in this Code of Ethics.

Any doubt on the legal and/or ethical character of any situation shall be notified to the appropriate department. In order to submit reports, GCC's suppliers have the following alternatives:

- Corporate Supply Management.
- Legal Department.
- Local Ethics Committees.
- Corporate Ethics Committee.
- Corporate Audit Area.
- Immediate Coordinator or Human Resources Area

Besides the channels above, GCC provides its suppliers with an e-mail address for them to submit complaints and reports on any violation of the Code of Ethics.

[gcc@ethic-line.com](mailto:gcc@ethic-line.com)

**\* An abstract of our Code of Ethics and Conduct is shown below. Please read it and clarify any doubts you may have.**

At GCC we believe that the success of our business lies in being the best option for each of our stakeholders, which is why:

- We strive to develop and implement strategies to ensure our excellence in creating value for our customers, shareholders, personnel, suppliers and communities where we operate. We are confident that our permanent orientation to effective service and competitiveness are fundamental factors to achieve our Mission.
- We believe that our personnel contribute with competitive advantages when they act with integrity. In developing our activities with honesty, responsibility and respect, we build lasting bonds of trust and mutual benefit in all our interactions. We encourage clear and direct communication because we know that plurality of cultures and opinions enriches us.
- We are convinced that collaboration and teamwork among those who are part GCC streamline our decision-making and lead us to achieve better results. We express our professionalism through ongoing update, effective communication and willingness to share our efforts and knowledge to work as a team.
- We proactively strive to innovatively meet our stakeholders' needs and expectations. We like to continuously improve, adapt to change and be devoted to our work.

## **Overall responsibilities**

Suppliers are expected to do as required to comply with these guidelines. Suppliers shall be familiar with their suppliers and subcontractors' practices in order to make sure that they work according to the guidelines set forth in this code. If this code is not complied with, the trade relationship with GCC could be suspended or cancelled.

## **Equity and fairness in relationships with suppliers**

In GCC, we give our suppliers equal opportunities within a confidentiality and respect framework to contract them without creating false expectations and always being consistent in the supply process. Bid assessment to select suppliers is based on the criteria our company has established, which fully adhere to our values of Integrity and Collaboration.

## **Supplier Relations**

In GCC we strive for encouraging the practice of this Code's standards. For this reason, we encourage our suppliers to comply with the stipulations of this Code of Ethics and recommend them to develop their activities within the current laws.

## **Respect for Terms of Contracts, Licenses, Laws and Regulations**

One of our principles in GCC is respect for agreements and commitments made through contracts. We also respect the right for intellectual and industrial property. For this reason, GCC employees cannot have trade relations with contractors or suppliers that do not prove they are duly approved to use or market products and services subject to royalties or intellectual / industrial property payment to third parties, as well as their authenticity and lawfulness.

## **Gifts and Favors**

Conditioning a transaction to be given a favor, courtesy or gift is forbidden. GCC's personnel is allowed to be given promotion items, favors or any other courtesies by suppliers that are legal, comply with the usual trade practices, and do not exceed a trade value of \$30.00 USD (thirty dollars) in order to prevent them from compromising, or appearing to compromise, the transaction objectiveness.

GCC's personnel shall not request, arrange or accept discounts or facilities from the company's suppliers for their own benefit or third parties', except for general agreements held between the Group and its suppliers, with the written approval of the Functional Manager or the Area Manager. The personnel is not allowed to request from current or potential suppliers donations or services to benefit themselves or third parties, unless GCC has decided to join other companies to support campaigns aimed to address specific needs.

## **Operations and Commitments**

### **Conflict of Interests**

All of us who work in GCC have an obligation to act with integrity, honesty and ethics, always seeking to protect the company's interests. GCC's personnel should avoid any situation that causes, or could cause, a conflict between personal interests and the company's interests. "Conflicts of interests" exist when personal interests or third parties' interests interfere with GCC's interests, including its affiliated companies' interests.

A conflict of interests exists when someone who works at GCC seeks personal benefits, or when the company gives any member of GCC and/or his/her family inappropriate benefits.

### **GCC Personnel as a Supplier**

GCC's personnel are not allowed to be supplier of our company at the same time. For this reason, anyone who owns a business shall refrain from supplying GCC with his/her products and/or services.

### **GCC Personnel's Relatives as Suppliers**

GCC's personnel shall not take part or influence, either directly or indirectly, the requirements, transactions and decision processes with suppliers to whom they are 3

related as family, or due to an interest other than those of GCC, through which they could get personal benefits. GCC strives for maintaining its operations free from conflicts due to its personnel's disloyal practices.

GCC's personnel shall avoid any situations leading to conflicts between their personal interests and GCC's interests. Such situations shall be notified to the Local Ethics Committee. Anyone working in GCC is obliged to notify his/her immediate coordinator in written if he/she has any relatives who own companies and are, or are trying to become, our company's suppliers or customers.

## **Inappropriate Payments**

GCC conducts businesses at a high level of integrity and within the law. Bribery and extortion are illegal and subject to criminal penalties. Bribery, extortion and alike payments made to government officers, GCC's employees or agents acting in behalf of GCC are strictly forbidden.

This is also applicable to areas where such actions could not violate local laws.

Both the supplier and GCC's personnel are responsible for immediately notifying the Ethics Committee about any situation or awareness of extortion, bribery or pressure in their work relations, both inside and outside the organization.

## **Suppliers' employees**

GCC neither uses nor supports the use of children as workforce. Our suppliers shall comply with the laws that rule child workers, and employ workers who comply with the minimum working age in the place.

## **Discrimination**

GCC supports diversity and equal employment opportunities. Illegal discrimination shall not be tolerated at the workplace. Suppliers are expected to comply with all the local laws on discrimination and in hiring and employment practices.

## **Environmental Responsibility**

Performing operations in harmony with nature is GCC's priority. To meet this purpose, we encourage the development and establishment of systems to prevent, control and reduce environmental impacts in all our operations. GCC's suppliers are therefore expected to conduct their operations in a way that protects the environment. As well as in compliance with all the laws and regulations applicable in the countries where they develop operations.

## **Industrial Safety and Health at Work**

GCC's policy is to have operations that are safe for both its personnel and the communities where it operates; this includes safeguarding the company's equipments and facilities.

Industrial safety and labor health are part of GCC's work system. This is reflected in the day-to-day behavior of all of us, members of the company; we're always alert to correct any unsafe conditions detected in the facilities and prevent unsafe acts at work.

Safety is not negotiable. Any GCC's employee who finds any unsafe condition that, in his/her good sense, could harm people or equipments, is entitled to stop the equipment or machinery causing such situation.

Suppliers are expected to provide a work environment that encourages to prevent accidents and reduces the exposure to health risks to a minimum. Suppliers are expected to comply with all the labor, safety and health laws and regulations applicable in the countries where they develop operations.

**Confidential Information**

GCC is dedicated to comply with the applicable regulations on confidential and personal information. GCC's suppliers are to comply with all the applicable laws and regulations that rule the protection, use and disclosure of GCC's confidential and personal information.