

Panamerican Coffee Trading Inc. S.A. Code of Conduct

This Code of Conduct establishes a common and consistent framework throughout our organization for how to accomplish our Mission and our Objectives. It guides us and tells us how we should do our daily work. A high professional ethics and personal integrity ensure our credibility and reputation as a group.

Corporate Governance

Corporate Governance aims to protect the legitimate interests of our stakeholders in an appropriate and effective manner. The concept of Corporate Governance is consistently reflected in our organizational structure and procedures.

Corporate Social Responsibility.

We recognize our social responsibility and, therefore, our goal is to improve the quality of life of our employees, their families and the communities in which we operate. We implement a clear policy of employment practices, occupational safety and health, community engagement and customer and supplier relationships.

Sustainable Environmental Performance

We strive to preserve the environment for future generations, seeking a balance between economic growth, continuous improvement of environmental performance and social responsibility.

Compliance

Appropriate measures are implemented to comply with the laws and regulations applicable to the businesses and countries in which we operate. In particular, in relation to:

- **Loyal Competition**

We respect the principles and rules of fair competition that prohibit anti-competitive conduct and abuse of a dominant market position.

- **Bribery and Corruption**

We must not use bribery or corruption in the management of our businesses, or offer or agree, directly or indirectly, on any pecuniary or other advantage, for the purpose of obtaining, retaining, directing or gaining undue business advantages.

- **Insider Information**

Any of us who have access to inside information, which could substantially influence the price of the shares or other financial instruments of a company involved, must comply with applicable insider legislation.

Use and Protection of Goods and Information

Each of us, to whom goods owned or controlled by Panamerican Coffee Trading Inc. S.A. have been entrusted, is responsible for ensuring its careful use, protection, consumption and administration. We use and protect confidential information owned by the company to the extent that we must disclose such information for the proper performance of our functions. We pay special attention to IT aspects such as data protection and security.

Conflict of Interest

In situations where our personal or financial interests may significantly conflict with those of Panamerican Coffee Trading Inc. S.A., we must disclose them in full. We must not participate in any Panamerican Coffee Trading Inc.S.A. business activity in which we may be influenced by personal relationships that are or may be interpreted as an obstacle to objective decision-making. If we believe that our situation may lead to a conflict of interest, we should consult our direct chiefs or legal advisors to find an appropriate solution.

Gifts and Donations

It is prohibited to offer, solicit or accept gifts and donations related to our professional activity. Invitations or attentions of negligible monetary value, resulting from normal corporate hospitality activities, may be accepted. Donations for social purposes are permitted exclusively within the limits of local laws and with complete transparency.

Documents and Accounting

All business operations will be recorded in a truthful, fair and timely manner. We ensure the reliability and accuracy of our accounts, documents and reports, in accordance with established procedures and appropriate accounting systems, controls and audits.