



CODE OF CONDUCT



FOR A CLEANER
AND MORE
SUSTAINABLE WORLD

Code of Conduct of:

Notes:





CODE OF CONDUCT

The purpose of the Code of Conduct is to strengthen the work culture of AIEn USA, LLC ("AIEn" or "Company"), ensure AIEn's compliance with all legal requirements and the highest ethical business practices, and explain clearly the expectations of AIEn with respect to such compliance. It is a performance guide ensuring high standards of business and professional ethics in all aspects of its business.

SCOPE:

The Code of Conduct is addressed to AIEn's employees, directors and officers, affiliates and subsidiaries, and to those outside entities directly or indirectly participating in the Company's business, including shareholders, customers, suppliers, vendors and other business relations (collectively "Stakeholders"). While this Code of Conduct is not a binding contract between AIEn and any Stakeholder, it reflects the organization's philosophy and expectations with respect to all aspects of its business.

Stakeholders: Company's business, including shareholders, customers, suppliers, vendors and other business relations.

INTRODUCTION:

AIEn's philosophy is that the values of integrity, respect, fairness and honesty are the basis of all relations between AIEn and its Stakeholders and the community.

In order to carry out its business activities in accordance with these principles and values, the Code of Conduct requires commitment and responsibility of all members of the organization.

We truly believe that a culture based on a high standard of business and professional ethics contributes to the growth of the Company for all Stakeholders.

Message from Co-Presidency and General Management Grupo AIEn

At AIEn, all of us participating in the Company's activities continuously work for a cleaner and more sustainable world.

This Code of Conduct confirms our values and principles, governs our actions, and reflects the essence of our group. In addition, it serves as a guide for the performance of our vision as leaders in hygiene and well-being solutions in the Americas, as well as raw materials and other products worldwide.

As a result of our Company's strong commitment to working with integrity, respect, fairness and honesty, and always observing the highest conduct and responsibility standards, we offer and provide consistency, transparency and credibility to our Stakeholders.

Each individual working at AIEn is an ambassador of our culture and our way of conducting business. Therefore, we will continue promoting, by way of example, the principles and values that have always characterized our Company.

Best Regards,
AIEn USA LLC's Board of Directors

VISION

For a Cleaner and More Sustainable World.
To be leaders in providing hygiene and wellbeing solutions to our consumers in the Americas, and high quality natural raw materials and its derivatives at a global scale.

MISSION

To provide high quality consumer products through strong and innovative brands, raw materials of natural products, plastics and chemicals that exceed the expectations of our customers and consumers, based on a great team that is united, diverse, talented and committed.

VALUES



Continuous Improvement

We are an open-minded company, which proactively develops and adopts practices of excellence; anticipating changes in the environment.



Leadership

We recognize exceptional work as well as day to day activities, respecting our people and encouraging teamwork.



Entrepreneurial Spirit

We generate innovation in our brands and products through new technologies and work processes, implementing them through flawless execution.



Nature and Sustainability

We generate sustainable growth through social responsibility practices, while respecting the environment for the benefit of our present and future generations.



Integrity

We strengthen our company culture through our internal and external behavior that reflects integrity, honesty and alignment with all the values of our organization.

POLICIES



Talent

We attract the best talent and retain them through continuous training, competitive compensation and constant development. Our talent is key.



Safety and Quality

We care for the safety of all employees, committed to our activities, ensuring our products and services are on time and of high quality and value for our consumers.



Shareholders

We offer to our shareholders a profitable business that ensures the permanence and growth of their capital, looking to double the value of the group every 5 years.

PRINCIPLES

- 1 **Perform all operations with integrity, transparency and fairness.**
- 2 **Respect individuals' dignity as well as diversity of opinions.**
- 3 **Commit to maintaining and promoting a secure and productive work environment.**
- 4 **Care for the environment and making efficient use of natural resources.**
- 5 **Ensure accuracy and protect confidentiality of information.**
- 6 **Protect and responsibly use our assets and resources to the benefit of the organization.**
- 7 **Avoid conflict of interests in company operations.**
- 8 **Compete based on our brands' excellence and negotiation strengths.**
- 9 **Comply and adhere to applicable regulations.**
- 10 **Inform and directly report, through our Ethics Hotline and Webpage, any activity contrary to our policies and/or values**

At AIEn we perform and conduct work based on the following ten principles:

1. Perform all operations with integrity, transparency and fairness.

Our conduct is based on integrity, transparency and fairness, and all internal and external conduct must reflect ethical conduct, honesty and consistency with all of the organization's values. This means that all employees, directors and officers, and other individuals or entities acting on the Company's behalf must:

- Perform activities transparently with Stakeholders
- Ensure honesty and integrity in our actions and conduct
- Value the individuality of the person, seek participation, contribution and integration of each individual towards the Company's objectives.
- Promote a culture of shared responsibility that contributes to professional and personal well-being

At AIEn we are committed to recruiting, compensating, retaining and promoting individuals based on their skills and performance on the job, as well as compliance and commitment to the company's philosophy.

To promote an appropriate work environment, based on equal employment opportunity and non-discrimination, we avoid all kind of preference between parties. Preference means privileges granted to colleagues, personnel, friends and/or acquaintances with objectives different from previously established values and work purposes.

2. Respect individuals' dignity as well as diversity of opinions.

We strive and commit to having our hiring, promotion and organizational development processes guided by the principle of equal employment opportunity and non-discrimination for all. Likewise, all of AIEn's employees, directors and officers, and other individuals or entities acting on the Company's behalf, must respect the individuality of the people with whom we interact: their personalities, lifestyles, thinking processes, personal and labor experiences, races, ethnic and/or national origins, political preferences, religions, genders, gender identities, sexual preferences, civil statuses, and physical or mental conditions, or other protected characteristics.

We are truly committed to acting to further and guarantee equality and diversity within the workplace; promoting our development, not only economically but also intellectually, morally and ethically. We believe that it is vital and necessary to ensure harmonious interactions between the diverse groups that constitute our Stakeholders.

At AIEn we promote a culture of inclusion at all times and a respectful workplace. There is zero tolerance for discrimination, physical or psychological violence, or sexual or other harassment.





3. Commit to maintaining and promoting a secure and productive work environment.

At AIEEn we comply with the various federal, state and local laws and regulations governing our business and the different international standards concerning workplace protection, such as the Statements of the International Labor Organization (ILO). Forced or compulsory labor and child labor are prohibited; we do not allow working under the influence of alcoholic beverages and/or unlawfully used controlled substances; and we are committed to ensuring that our workplaces are places of physical and mental safety. Therefore, we have implemented policies, procedures and health and safety programs to maintain the social, mental and physical well-being of our employees.

We perform actions that reflect our Company vision and values, through the creation, implementation and enforcement of policies and procedures, as well as increasing awareness among employees, directors and officers, and other business partners seeking optimal use of resources.

The firm commitment of management and active participation of all employees, directors and officers and other business partners are necessary elements for the success of our health and safety programs, therefore we promote and provide a health and safety prevention culture which is fundamental for long term positive results.

4. Care for the environment and make efficient use of natural resources.

All of us at AIEEn are committed to working for a more sustainable world for current and future generations. Therefore, we foster environmental responsibility involving our Stakeholders in different initiatives.

Our actions adhere to the values, commitment and respect towards the environment and the communities where we operate, always making efficient use of natural resources and complying with the applicable regulations.

Commitment to the environment and sustainable development is reflected in our daily work, operation and products. We are continuously innovating to incorporate biodegradable and recyclable materials in our products and contribute to the conservation of the environment.

5. Ensure accuracy and protect confidentiality of information.

At AIEn we must avoid any kind of fraudulent or illegal activity within or outside of our facilities, which tends to deceive third parties and/or hides or misrepresents relevant information. In all cases, these activities will be treated seriously and handled as an internal disciplinary matter and/or submitted to legal authorities as appropriate.

It is everyone's duty to provide accurate, complete, unbiased, relevant, precise and understandable information for correct and lawful operation of the organization's functions.

AIEn's employees, directors and officers, and all individuals or entities acting on the Company's behalf must be committed to complying with any internal policies and procedures, agreements with third-parties, and the law.

We promote and support creation and protection of new ideas and developments. Therefore all employees, directors and officers and all individuals or entities acting on the Company's behalf are expected to respect and protect all patents, copyrights or any other kind of intellectual property, and infringement on such rights is strictly prohibited. Likewise we use original software and/or computer products to promote scientific development in the Company.

We maintain, and require all employees, directors and officers and all individuals or entities acting on the Company's behalf, to protect the confidentiality of information provided by our Stakeholders, observing at all times any intellectual property or industrial property rights strictly in accordance with all applicable laws and the policies and/or procedures of AIEn.

We require all financial reporting to be timely, honest and accurate. All employees, directors and officers and all individuals or entities acting on the Company's behalf must comply with applicable laws, rules and regulations with regard to all financial, accounting or audit matters.



6. Protect and responsibly use our assets and resources to the benefit of the organization.

At AIEn, all assets and resources of the organization are at our employees' disposal and shall be used exclusively for the performance of the designated functions. Therefore, AIEn's property, assets and resources must be used only in accordance with the organization's policies and/or procedures and never for different or improper or unlawful purposes.

Material and/or tools assigned to us shall be properly stowed and kept in good working order, making sure that maintenance is completed as needed.

7. Avoid conflict of interests in company operations.

At AIEn we are committed to fair competition and equality for all individuals. Therefore, employees, directors and officers, and other individuals or entities acting on the Company's behalf must avoid all kinds of personal, financial or family conflicts of interest that can compromise, or create the appearance of compromise of, the objectivity and transparency of our actions and decisions within the Company.

Conflicts of interest may arise from any situation in which there is a tension between an individual's or entity's personal interests and his/her/its obligations to the Company.

The policy requires that all employees, executives and managers request approval from Human Resources and the Ethics Committee regarding any individual personal or financial relationship with any Stakeholder.

Every employee, director or officer, and other individual or entity acting on the Company's behalf is responsible for immediately informing Human Resources about any potential or possible conflict of interest, in order to avoid violation of this Code of Conduct, the Company's policies, or any legal requirement.

No employee, director or officer is allowed to:

- Compete with AIEn for business opportunities.
- Have another job with a Company other than AIEn during the same business hours or that interferes with the performance of his/her duties and responsibilities.
- Receive personal benefits, or provide personal benefits to any family member, as a result of his/her title, role or position at AIEn (for example, suppliers, clients or collaborators).
- Share unauthorized confidential information or information which can be used to the detriment of the Company with external parties, or use any such information for personal benefit.

At AIEn we adhere to the following prohibitions in order to guarantee objectivity of the decisions in current or future negotiations with clients, suppliers and related entities:

- We absolutely prohibit making indirect or direct bribes.
- We do not receive undue compensation, any service or payment received by our collaborators in favor of third parties whether economic, personal or in kind.
- We do not receive cash or e-money gifts.
- We do not receive vouchers or tickets for sports events, concerts, lunches, trips or the like greater than 50 non-cumulative. If the sum of these kind of gifts is greater than 50, authorization is required from the Director of the Business Unit and the Ethics Committee shall be informed.
- We do not exchange or use Company information for any purpose other than in furtherance of the legitimate business interests of AIEn.





8. Compete based on our brands' excellence and negotiation strengths.

The reputation, value and quality of our brands are our main negotiating strengths and therefore, we maintain a healthy competition to win our clients' loyalty and respect.

At AEn, we strive to maintain our reputation through time in order to guarantee value to each and every one of our Stakeholders. Therefore, each one of the members of our organization is responsible for making sure that the corporate image and reputation remains impeccable and flawless.

9. Comply and adhere to applicable regulations.

We are aware that our relation with the community and the government must be transparent, therefore at AEn we observe the international treaties adopted by the United Nations regarding human rights, by the International Labor Organization regarding employee rights, and the various federal, state and local laws and regulations applicable to the organization and the industry.

We are fully committed to observing and complying with the legislation in force regarding money laundering and terrorism financing in Mexico, the United States and elsewhere. Thus, any irregularity in connection with money and assets of the company or any illegal act shall be immediately reported through the available mechanisms. These mechanisms include reporting any suspected violations of law or other impropriety to Human Resources, the Ethics Committee and/or the Company's management. Reports may also be made through AEn's Ethics Hotline and Webpage.

Our Company operates in several countries, therefore the Company observes the applicable regulations of each region, including laws concerning anticorruption, anti- laundering of money and/or assets, anti-bribery, handling of personal information and data protection, intellectual property, and all other applicable legal requirements, backed up by our values and principles.

Likewise, all employees, directors and officers, and all individuals and entities who are acting on the Company's behalf are required to comply with all internal policies and procedures.

10. Inform and directly report, through our Ethics Hotline and Webpage, any activity contrary to our policies and/or values

Our organization's philosophy is to reflect integrity, impartiality and honesty in all we do. Nonetheless, it may be possible that in spite of all these efforts, employees, directors and officers or other individuals or entities who are acting on the Company's behalf, or other Stakeholders may learn of or suspect violations of our Code of Conduct, policies and procedures, or applicable laws. It is the duty of each individual Stakeholder to immediately report any knowledge or suspicion of a violation of our Code of Conduct or other misconduct directly to the Ethics Hotline or Webpage.

The information provided through the Ethics Hotline or Webpage is confidential and will be handled confidentially (to the extent consistent with the Company's obligation to investigate and permitted by law) and without any retaliation against those who report violations or suspected violations of the Code of Conduct. The Ethics Hotline and Webpage are managed by an independent third party, who will then share reports with ALEn's Internal Audit Committee. The Internal Audit Committee (Department? Manager?) will inform the Legal & Corporate Affairs Manager who will then assess the matter, decide how best to proceed and so inform the Internal Audit Committee (Department? Manager?). The action taken will depend upon the nature of the matter reported. Any investigation will be undertaken promptly. The Internal Audit Committee has the authority to delegate the investigation to the Legal & Corporate Affairs Manager, Ethics Committee, Human Resources Manager or to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the matter reported.

The following means are at your disposal to file reports through the Ethics Hotline or Webpage:

- a) Via phone at **1 (800) 062-3171**
- b) Website: **<http://www.ethic-line.com/ALEN>**
- c) E-mail: **alen@ethic-line.com**

We must always keep in mind that in order for ALEn to conduct any appropriate investigation in each case, the following information must be provided to the extent possible:

- A detailed description of the activity or issue
- The individuals involved
- Relevant time periods and locations
- Any immediate or urgent concerns
- Any additional information that is important and relevant to the report of potential misconduct

If there is evidence that can support the report, it is important to provide it in order to allow the Company to perform a full and complete investigation.

No employee or other Stakeholder who reports an actual or suspected violation in good faith using the Ethics Hotline or Webpage will be subjected to retaliation in any form. Retaliation is a serious violation of this Code of Conduct. Any employee or other Stakeholder who believes that any such retaliation has occurred should immediately report it to his or her manager, Human Resources, the Ethics Committee, or through the Ethics Hotline or Webpage. However, improper or bad-faith use of the hotline, webpage or other reporting mechanisms will result in disciplinary action.



Compliance of the Code of Conduct

The Code of Conduct applies to all AEn employees, directors and officers, and other individuals or entities acting on its behalf. It is the responsibility of all of us to abide by it and enforce it.

Adherence to the principles and values reflected in this Code of Conduct will maintain our organization's culture and reputation, and are integral to the Company's success.

All members of AEn's team are responsible for becoming familiar with the Code of Conduct and the policies of different subjects that are applicable to the work performed within the Company. Any noncompliance with this Code of Conduct or any other applicable policies and procedures of the Company will result in discipline up to and including discharge such as:

- a) Written or oral warnings
- b) Suspension
- c) Contract or Employment Termination
- d) Reporting of unlawful conduct to appropriate legal authorities

This list is not exhaustive and severity of the sanctions will depend on the seriousness of the violations.

If there is a question regarding the existence of a breach of any of the provisions herein, the Ethics Committee shall evaluate the available evidence before imposing the corresponding sanction. For the foregoing purpose, the Ethics Committee can request support from any area of the Company deemed relevant, and all employees, or others acting on the Company's behalf and other Stakeholders are expected to comply with any such requests.



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Ethics Hotline 1 888 238 3343

Ensure compliance with our Values and Principles is everyone's responsibility.

Report any activity that is at variance with our Code of Conduct. Your report is confidential, anonymous and is through a supplier.

