



# **CHESTERTON**

# **CODE OF ETHICS**



# **Code of conduct**

## **CHESTERTON MEXICANA**

**Chesterton Mexicana, S.A. de C.V.** values and respects the individuality of its collaborators, always seeking to encourage the diversity of ideas as a source of competitiveness.

This Code of Ethics is a unilateral statement of Chesterton's policy, and nothing contained in this code is intended to create enforceable rights in individual and/or collective contracts.

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# INTRODUCTION

COMPLIANCE •

BACKGROUND •

OBJECTIVES •

SCOPE •

## COMPLIANCE

Chesterton's Steering Committee has the primary responsibility for ensuring overall compliance with the Code of Ethics. It is important to emphasize the compliance is as to individual as well as a corporate responsibility.

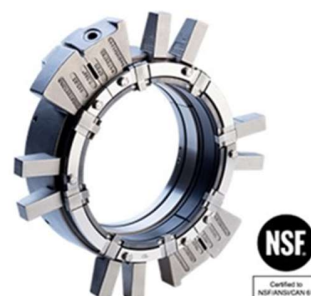
To help ensure compliance with the Code of Ethics, and to assist employees who may need clarification or advice concerning an ethical issue, the Human Resources Manager is the point person to whom questions may be directed and will provide advice and feedback as needed regarding ethical issues, investigate ethics complaints, mediate ethical disputes, and consult with the Steering Committee as necessary.

Violations of Chesterton's Code of Ethics may be subject to disciplinary action, up to and including termination of employment. Those who deliberately withhold pertinent information about a violation of the code may also be subject to such disciplinary action.

Each employee, including directors and officers, must sign a copy of the Code of Ethics each as a confirmation to have read the document and clearly understands its provisions.

This Code of Ethics is a unilateral statement of Chesterton's policy, and nothing contained in this code is intended to create enforceable rights in the employee's contract.

Kind regards,



# BACKGROUND

1. Integrity is and must be a cornerstone on which Chesterton Mexicana, S.A. de C.V. builds and maintains its corporate culture, as well as its methods of conduct in the business it carries out.
2. For Chesterton Mexicana S.A. de C.V., the actions we carry out and all relationships with other people, regardless of their character, must be based on ethical principles that speak of a sense of respect, honesty and integrity.
3. Although these principles are part of our organizational culture and the daily work of our company, it is necessary to formalize them and establish a common frame of reference that unifies the criteria and guides the actions of all the people employed in Chesterton Mexicana S.A. de C.V.
4. The businesses of Chesterton Mexicana S.A. de C.V. operate under the fundamental premise that they are governed by laws and regulations applicable in Mexico and in all the countries in which we do business, in particular in three topics: the antitrust laws, economic competition, import and export of goods.
5. In the light of the above considerations, Chesterton Mexicana management as approved and authorized the issuance of this Code of Ethics.

# OBJECTIVES

6. To establish the fundamental principles and standards that guide our ethical behavior in the relationship with our customers, suppliers, authorities, civil society organizations, environment, community and with everyone who interacts with Chesterton Mexicana S.A. de C.V.
7. Define the responsibilities of the company's collaborators to comply and enforce this Code of Ethics, together with the other internal guidelines of Chesterton Mexicana S.A. de C.V.
8. To publicize Chesterton's Complaint Line, through which any behavior, non-compliance or practice that does not comply with the provisions of this Code of Ethics and other internal guidelines of Chesterton Mexicana S.A. de C.V. can be reported.
9. To increase the ethical expectations of all Chesterton Mexicana S.A. de C.V. employees, regardless of their category.
10. Encourage dialogue and communication regarding ethical issues, to promote decision-making, prevent or discourage misconduct and reinforce the individual ethical responsibility of all employees.
11. To inform all employees of the organization of their ethical obligations to the company, marketers, customers, suppliers, competitors, and authorities, in their capacity as representatives of the company.
12. To establish basic criteria to regulate the ethical behavior of all the people who work in Chesterton Mexicana S.A. de C.V.

13. To point out the sanctions to which those who commit offenses against our Chesterton Code of Ethics are subject to.

## SCOPE

1. Our Code of Ethics applies to the members of management, collaborators and to any person acting on behalf of Chesterton Mexicana S.A. de C.V.
2. This Code of Ethics is not and does not pretend to be exhaustive. Therefore, situations not foreseen will be resolved in accordance with best management and corporate governance practices.
3. The present Code of Ethics is a set of rules to be observed by all members of Chesterton Mexicana, S.A. de C.V. These rules are because in most cases the correct action is clear, regardless of whether it is included in a code or not.
4. This code describes general situations related to relationships with our competitors, customers, suppliers, authorities and the environment, considering those in which there is a greater risk of a potential ethical conflict.
5. New topics will be added as necessary to address the dynamics of business situations and the environment in general.
6. Situations not foreseen in this Code of Ethics should be resolved in accordance with sound management judgment. In case of doubt, it is necessary to consult the Human Resources area or, failing that and as a last resort, the Steering Committee.





# CULTURE

## MISSION AND VISION •

## OUR VALUES •

### MISSION AND VISION

Integrity is and should be a cornerstone upon which Chesterton builds and maintains its corporate culture, as well as its methods of business conduct throughout the world.

The principles set forth in the following Chesterton Code of Ethics are intended to raise the ethical expectations of all who use or are affected by it, including directors and employees.

In addition, this code is designed to encourage dialogue and communication regarding ethical issues, promote ethical decision-making, prevent, or discourage misconduct and reinforce the notion of individual ethical responsibility.

**Mission:** To provide our customers with innovative, tailor-made solutions in fluid sealing, lubrication and protective coatings that exceed their expectations and enable them to perform better, compete stronger and make the world a better place.

**Vision:** To be first in our customers' minds when it comes to innovation and excellence.



# OUR VALUES

## Values

Chesterton is a family-owned company with a rich history of values to guide us in our commitment to our clients' success.

### Customer Focus

We create value for our customers by anticipating their needs and responding quickly.

### Respect

We appreciate the ideas and opinions of others, and demonstrate this consideration at all levels of our organization.

### Responsibility

We take responsibility for our customers, the company, ourselves, our community and the environment.

### Development

We motivate professional and personal growth through the improvement of skills that allow us to achieve success in any action we undertake.

### Innovation

We promote individual creativity in a progressive work environment to transform new ideas into actions for proven results.

### Teamwork

Our strength comes from our dedication to cooperate with each other to achieve our common goals.

### Pride and Passion

We are passionate about our work and proud of our achievements - individually, collectively, internally and externally - and it is this pride and enthusiasm that drives us to continuously improve.

### Compliance and Sustainability

We maintain a strong focus on environmental stewardship in our internal operations, as well as in our support of customers, and work to balance social equity and well-being, along with the economic viability of the organization.

## Success Factors

### PROFITABLE SALES GROWTH

Recognizing and strengthening our Global Sales Organization  
Energize and strengthen relationships in each of our key channels (Retail, Distribution, OEM and Services)  
Increasing market share in specific sectors.

### EXCEPTIONAL CUSTOMER SERVICE

Maintain strong customer service in all areas of the company  
Transform customer interaction to a world-class experience  
Build customer service capability in every region, based on global procedures

### TECHNOLOGY AND INNOVATION LEADERSHIP

Drive innovation through product and service offerings, aligned with market strategy  
Leveraging innovation through organizational processes  
Actively influence industrial and commercial organizations as Knowledge Providers.

### OPERATIONAL EXCELLENCE

On-time delivery of high-quality products and services  
Investing in up-to-date and efficient manufacturing techniques and equipment to deliver quality and cost  
Drive productivity, quality and efficiency through a consistent culture of global continuous improvement.

### EXTRAORDINARY GLOBAL TALENT

Invest in, train and develop a customer focused and committed team.

# OUR PEOPLE

## HUMAN RIGHTS •

Respect for Human Dignity  
Inclusion and Diversity

## FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK •

## SAFETY AND HEALTH AT WORK •

### HUMAN RIGHTS

In Chesterton Mexicana S.A. de C.V. we recognize that human rights are the set of rights based on human dignity, whose effective fulfillment is essential for the integral development of the person.

Every Chesterton employee will treat every employee, customer, distributor, supplier, visitor or business acquaintance with dignity and respect. Harassment of any kind in the workplace, including the use of inappropriate language will not be tolerated. Likewise, discrimination against any member of the company because of illness, religion, ideas, sexual preference, including people infected with COVID 19 or any other disease will not be tolerated.

### Respect for Human Dignity

1. We show a loyal, respectful, diligent and honest conduct.
2. We respect people's dignity, freedom and privacy.
3. We do not allow verbal, physical or visual behaviors that violate dignity and respect.
4. We are committed to promoting and maintaining a work environment that condemns, prohibits, and sanctions all types of harassment, violence and bullying, or any other activity that violates the dignity and respect of our employees.

5. All persons working in Chesterton Mexicana S.A. de C.V. are required to comply with all laws, regulations and ordinances that govern or limit their area of responsibility, as well as the internal control rules and procedures defined in the Company's Business System.
6. Those who have personnel in their charge have moral obligation to treat them with dignity and proper respect.
7. It is everyone's responsibility to promote a job that has dignity and respect as its main value. Therefore, bullying or sexual harassment is illegal and will not be tolerated or accepted, imposing the necessary measures established by Chesterton Mexicana S.A. de C.V.; in the sexual harassment policy MEX GRHP 008.
8. It is the obligation of all employees to report in a complete, accurate, true, and timely manner everything that corresponds to the company's transactions, checks and business results. It applies equally to the concentration of reports, journals, and other accounting entries, such as: receipts, disbursements, invoices, quotations, statements, product terms and conditions, descriptions of purchase items and any other description related to the purpose of any transaction performed.

## Inclusion and Diversity

9. We promote inclusion so that the diversity of our employees can contribute value in an environment of equal rights and duties.
10. We do not discriminate against people by making any distinction, exclusion, restriction, or preference that is not objective, rational, or proportional and has the purpose or result of hindering, restricting, preventing, impairing or nullifying the recognition, enjoyment or exercise of human rights and freedoms;



11. for any reason, including origin, race, marital status, age, opinions, gender, creed, tribe, association or union membership, ethnicity, social or economic class, pregnancy, gender identity, sexual orientation, health condition, disability, or nationality.

12. For any reason, no fund or asset of the company that has not been registered shall be established or maintained.





# FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK

Chesterton's commitment to integrity requires that all our actions and relationships be based on at least the following ethical principles:

- Comply with all laws and regulations of all countries in which we conduct business, and which govern or apply to our products, transactions and operations.
- Treat each other with respect
- Treat each other fairly and/or impartially in all our dealings.



- Compete in the marketplace to win business based on product application, product feature/function, price, quality, availability, goodwill, and service but not by any unethical or illegal means.

- Communicate and report accurate and honest data.

- Offer high quality products that meet applicable safety and reliability standards.

- Avoid conflicts of interest, both real and perceived.

- Never use company assets, opportunities, or information for personal gain.
- Take responsibility for our activities.



# SAFETY AND HEALTH AT WORK

1. We consider that the physical integrity, safety, and health at work of our employees are as important as any other function and objective of Chesterton Mexicana S.A. de C.V.
2. Chesterton Mexicana considers that health and safety are as important as any other function and objective of the company.
3. All personnel have the obligation to perform their work in a safe manner and with the appropriate protective equipment in order not to harm themselves or others.
4. All employees must be informed immediately of any unsafe work or unsafe working conditions that they may encounter in their supervision. All employees have an obligation to perform their work in a safe manner so as not to injure themselves or others.
5. We take the necessary actions to ensure that the following occupational safety and health objectives are met:
  - a) Provide and maintain safe and healthy workplaces.
  - b) Provide and maintain a suitable working environment.
  - c) Develop a safety culture among personnel.
  - d) Provide the necessary tools in situations where teleworking is required.



# OUR PLANET

## COMMITMENT TO OUR COMMUNITY AND ENVIRONMENT

### •COMMITMENT TO OURCOMMUNITY AND ENVIRONMENT

We honor our commitment to contribute to the development of the communities through our business management, which is an example of the principles and values we have practiced since our origin.

Environment: We are aware of, address and mitigate the risks associated with the environmental impact of energy use, water, and waste management throughout the value chain of all our operations.



1. In accordance with Chesterton's policy to (A) manage and operate its business in compliance with all applicable environmental laws and regulations, (B) protect the environment, and (C) conserve energy and natural resources.

An advertisement for Chesterton 650 AML lubricant. The background is a golden-yellow color. In the center, a splash of golden oil rises from a pool, forming a shape that resembles a small plant with two leaves. To the right of the splash, there is a grey rectangular box with white text. The text in the box is: "High performance lubricant, readily biodegradable, environmentally friendly and safe for the worker". Below this, in Spanish: "Lubricante de alto rendimiento, fácilmente biodegradable, ecológico y seguro para el trabajador." Below that, in bold: "650 AML". Then: "Lubricante Avanzado para Maquinaria" and "Certificado NSF H1". At the bottom right of the box is the Chesterton logo, which consists of a globe icon and the word "CHESTERTON" in bold, with the tagline "Global Solutions, Local Service." below it. At the bottom left of the splash, there is another grey rectangular box with white text that reads: "650 AML Advanced Machinery Lubricant".

2. We exercise active citizenship by participating in community and public affairs, which allows us to have an impact on the human and economic development of the communities in which operate.



We take the necessary actions to ensure that in Chesterton Mexicana S.A. de C.V.:

- a) Development and diffusion of environmentally friendly technologies is encouraged in our operations.
- b) Effective emergency response procedures are implemented to minimize the impact of non-predictable incidents.
- c) Significant process changes are evaluated in advance to prevent adverse impacts on the environment.
- d) Discharges to drainage and emissions to the air are reduced and do not cause an adverse environmental impact.
- e) Use of clean energy sources is promoted; energy use is efficient and energy consumption is monitored.
- f) Necessary measures are taken to prevent environmental accidents that may be caused by our operations.
- g) Efficient use of water is encouraged, as well as activities that encourage its care and conservation.
- h) Culture of care for plants and living beings is promoted.
- i) Operational growth is committed to reducing the impact on the environment, implementing programs for the reduction, reuse and recycling of waste from our operations, as well as waste related to our products and services.



## OUR RESOURCES

### USE OF ASSETS • INFORMATION MANAGEMENT •

Confidential Information  
Accounting and Financial Records  
Intellectual Property  
Personal Data  
Information Security

## Sello Rotatorio Matrix

Diseñado para facilitar la instalación en aplicaciones de eje desgastado



Matrix  
Rotary Seal  
Designed to  
facilitate  
installation in  
worn shaft  
applications



## USE OF ASSETS



We have the responsibility to protect and properly use the assets of Chesterton Mexicana, S.A. de C.V., as well as to seek the best use of the assigned resources.

1. We protect and preserve the assets of Chesterton Mexicana, S.A. de C.V., and those that we use in the name of Chesterton.
2. We efficiently use Chesterton's assets to contribute to the achievement of its objectives.
3. We use Chesterton's name or resources responsibly, always and only looking for the benefit of the company.
4. Involvement of personnel in any political process must be entirely separate from company activities. The company's name, property, stationery and work time must not be used in connection with any political activity.

# INFORMATION MANAGEMENT

We protect and preserve the information we generate, obtain, and treat, whether our own or that of third parties, as a company asset, responsibly, ethically and in accordance with the laws applicable to our operation and with the systems authorized by management.

## Confidential Information

1. We do not disclose and prevent the leakage of privileged and/or confidential information to unauthorized persons, in compliance with the provisions of national laws, unless requested to do so by the authority.
2. We do not carry out operations for our own benefit or for the benefit of third parties, with any kind of securities issued by Chesterton, whose price may be influenced by the privileged information we possess.
3. Those of us who carry out activities as professors, lecturers or students, only use Chesterton's public information for the performance of our activities.
4. We do not make any comments, including in family media or on social networks, about activities we carry out within Chesterton that are detrimental to Chesterton or to those of us who are part of it.



5. Employees in the performance of their duties may have access to confidential information or information that is proprietary to the company or its customers. Therefore, no employee may disclose this information to any person, unless these persons are known and/or have been specifically authorized to receive such information or unless it is by order of a judicial authority.

6. All personnel must protect and safeguard the information of this nature and comply with the confidentiality agreements and clauses entered into with the company.

7. It is the obligation of all personnel to scrupulously keep the technical and commercial secrets to which they have knowledge due to the work they perform, as well as reserved administrative matters, whose disclosure may cause damage to the company, in accordance with the provisions of article 134, section XIII of the federal labor law 002E.

8. Due to the new official norms before the STPS, certain information may be shared with our suppliers, account, and personal information, with due care and respect for this.

## Accounting and Financial Records

9. We record in a complete, correct, and timely manner the accounting and financial information in accordance with the accounting regulations in force, the provisions of the laws applicable to our operation and the securities regulators, ensuring the veracity of the indicators under our responsibility. Likewise, we take the best possible measures to ensure the integrity of the personnel in charge of the financial operations, since the moment of their hiring to the validation of their reliability in the accounting area.

## Intellectual Property

10. We do not disclose any confidential information, including those related to industrial and intellectual secrets, processes, methods, strategies, plans, projects, technical, market or any other type of data. We maintain the confidentiality of such information even when our working relationship with Chesterton Mexicana S.A. de C.V. has ended, as well as with the confidential information of the companies in which we have previously worked.
11. In general, the company's property, equipment and facilities cannot be used by an employee for personal benefit or for any other business that is not for any purpose for Chesterton and much less without prior permission of the employee's manager.

## Personal Data

12. We obtain and process personal data responsibly, ethically and in accordance with the laws applicable to our operation.
13. No employee shall disclose such information to any person unless such persons are known and/or have been specifically authorized to receive such information.

## Information Security

14. We are aware of the responsibility shared by all, in the protection and preservation of the security of the information we manage.
15. We use and protect access accounts and passwords assigned to technological resources in a responsible manner.

# OUR RELATIONSHIP WITH THIRD PARTIES

CUSTOMERS •

SUPPLIERS •

GENERAL BUSINESS ACTIVITY •

GOVERNMENT AND AUTHORITIES •

## CUSTOMERS

At Chesterton we seek to improve the value proposition and experience of our customers.

1. We serve customers by offering them fair and honest treatment in every transaction, adhering to Chesterton's principles and values, providing products and services with the highest quality and timeliness.



2. We do not make false comparisons with products or services equivalent to those offered by competitors.

3. We understand the consumption needs of our customers and we are committed to innovate our processes and products to satisfy them.

4. We disseminate, through our official communication channels, our Code of Ethics throughout our value chain.



# SUPPLIERS

We contribute to the improvement of labor, social and environmental performance of our suppliers and we seek that they operate based on responsible business policies, principles, and practices.



1. We only include in our supplier portfolio those suppliers who share our ethics and values in accordance with this Code of Ethics.

2. Those of us who negotiate the acquisition of goods and services required by Chesterton, offer and demand from suppliers a professional treatment in each transaction, always seeking the best interests of the company.

3. We ensure the equitable participation of suppliers based on the criteria of quality, profitability, and service, and considering the ethical, environmental and information security standards established by Chesterton.
4. We consider it unlawful conduct to request or receive any incentive of any kind from suppliers for their selection or promotion, acceptance of their product, which is not for the benefit of the company.



## GENERAL BUSINESS ACTIVITY

We conduct business fairly based on our ethical principles, and in compliance with the competition laws applicable to our operation.

In the course of our business, we will obey applicable laws and regulations in Mexico and in all other countries in which we do business, in particular, antitrust, competition, and trade laws. We will respect all applicable laws and regulations in Mexico for exporting and importing.

We will act in accordance with the Anti-corruption Law. Likewise, we will conclude our transactions honestly. Accordingly, no payments will be made, either directly or indirectly, to any person, including government officials, personnel, as well as employees or agents of commercial customers, for the purpose of obtaining business. All nominal gratuities are permissible under certain limited circumstances, after consultation with the General Manager and the Director of Administration and Finance.



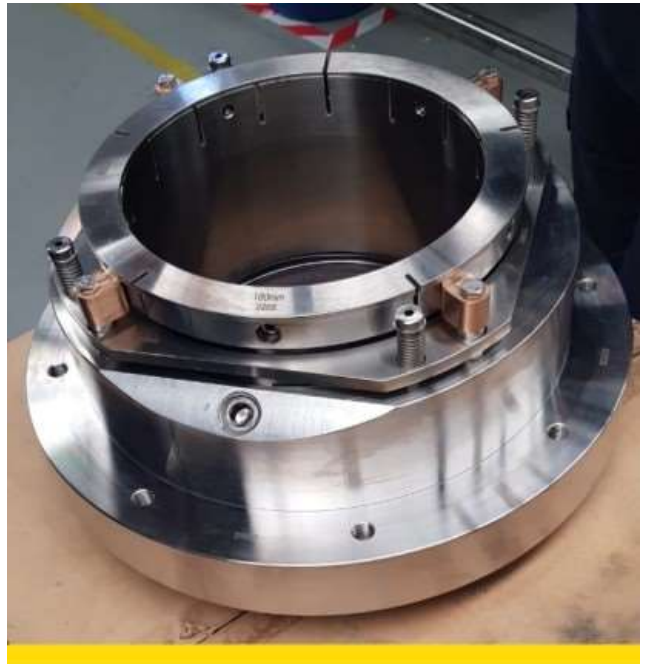
1. We do not enter into any agreements with customers, suppliers or competitors that are intended to limit the free play of market forces in the markets in which we operate.
2. Those of us who have contact with representatives of competitors, show a professional attitude, attached to the principles and values of the company we represent, and take care of our personal image and that of Chesterton.
3. When interacting with competitors, either individually or in forums and business or professional associations, we do not comment on issues that could generate risks or possible contingencies for Chesterton in terms of compliance with competition laws.



# GOVERNMENT AND AUTHORITIES

At Chesterton our values are the basis for our relations with government and authorities of the countries where we operate, providing an open and respectful treatment.

1. All personnel must cooperate at all times with competent government authorities, internal and external auditors, for the full exercise of their powers and act in accordance with the law in defense of the legitimate interests of Chesterton Mexicana S.A. de C.V.
2. All personnel who have relations with authorities and auditors must offer them a kind and respectful treatment, recognizing their quality as such, seeking an atmosphere of openness and trust that facilitates the discussion of issues and the establishment of agreements.
3. The requirements and observations of the authorities and auditors must be fully complied with, seeking to collaborate effectively and with courtesy in the fulfillment of their mission, within the powers granted to them by law or regulation.
4. We comply with the laws, regulations and other applicable norms established by the governments of the countries in which we operate.
5. We always cooperate with government and competent authorities for the full exercise of their powers, and act in accordance with the law in defense of the legitimate interests of Chesterton.
6. We respect the government and authorities, to whom we offer a friendly treatment, and we seek an atmosphere of openness and trust that facilitates the discussion of issues and the establishment of agreements.
7. We comply with the requirements and observations of governments and authorities in the exercise of their powers granted by applicable laws or regulations, seeking to collaborate effectively and courteously in the fulfillment of their mission.





# CULTURE OF LEGALITY

## REGULATORY COMPLIANCE •

### ANTI-CORRUPTION •

- Anti-Bribery –
- Anti-Money Laundering –

### CONFLICT OF INTEREST •

- Financial Interests –
- Family Members and Others –
- Gifts, Hospitality, and Entertainment –
  - Acceptance of gifts and/or gratuities
  - Giving gifts and/or gratuities
  - Nominal value definition
- Competition –

## REGULATORY COMPLIANCE



At Chesterton, legality is part of our culture, and we work to ensure that our employees practice it. We firmly believe that our world requires organizations and individuals committed to society.

All employees are encouraged to access Share Point for other policies and procedures that support this Code of Ethics.

1. We comply with the laws, regulations, and ordinances applicable to our operation, as well as with the internal guidelines established by the Steering Committee and AWC Corporate.



# ANTI-CORRUPTION

We conduct business practices in accordance with the law, in an honest and ethical manner, with zero tolerance for bribery, rejecting, denouncing, and combating any act of corruption and extortion.

1. In our activities inside and outside Chesterton or on behalf of Chesterton, either directly or through a third party, we do not participate in acts of corruption, therefore;
  - we do not order, authorize, or promise to engage in corrupt practices,
  - we do not induce any person to engage in corrupt practices; and
  - we do not conspire in the performance of corrupt practices.
2. We comply with anti-corruption laws applicable to our operation and country.



## Anti-Bribery

3. We reject any form of bribery of government officials.

## Anti-Money Laundering

1. We comply with applicable laws for the prevention of money laundering, and we promote knowledge of and compliance with these laws among our employees.
2. We develop processes and mechanisms for compliance with applicable laws for the prevention of money laundering, which contribute to the generation of security and confidence in the sectors of the economy in the countries in which we operate.

# CONFLICT OF INTEREST

In Chesterton we perform all our activities with integrity and professional ethics, avoiding the obtaining of undue personal benefits.

No person of Chesterton Mexicana S.A. de C.V., should involve their interests or personal relationships that oppose or clash with those of the company:

- Personnel with financial participation or interest in a competitor, marketer, customer, supplier, or in an employment or contractual relationship with any of them (directly or indirectly, for example, a relative).
- Personnel with an external and independent employment to the interests of Chesterton Mexicana cannot participate or appear as a legal representative.

## Financial Interests

1. Those who have or intend to have commercial or business relationships or investments in companies or other businesses that have or seek commercial or business relationships with Chesterton, may only carry out such relationships if they have been previously analyzed and approved in accordance with the Internal guidelines of Chesterton Mexicana S.A. de C.V. and AWC.
2. We do not have interests or investments that allow us to have an influence on, nor do we participate in commercial activities of our competitors.



## Family Members and Others

3. We do not participate or influence directly or indirectly in the requirements, negotiations, contracting and decision-making processes, with respect to any customer, supplier and/or business partner, if with any of them, or in any of them:
  - we have a family relationship, or
  - we have a family member who is a partner, investor or representative; or
  - we have a relationship (including a friendship) that is likely to bring us into conflict with Chesterton's interests or personal benefit, (including whether that relationship is with a partner, investor, representative or employee of that customer, supplier, or business partner).
4. Those of us who perform monitoring, supervisory, audit or control work on the activities performed by a family member, inform our superior in order to be replaced of such responsibility.
5. We do not intercede or satisfy the requirements of superiors, subordinates, co-workers, relatives, or friends, if this would be detrimental to Chesterton Mexicana S.A. de C.V.

## Gifts, Hospitality and Entertainment

6. Our code on gifts, entertainment and gratuities must preserve and enhance Chesterton's reputation as a global company of integrity and fair dealing.
7. The giving of gifts to customers as part of the company's hospitality, such as lunch, dinner, and appropriate entertainment must be of nominal value and free of any suggestion that the recipient should be encouraged to deal with Chesterton or to violate the recipient's policies on such matters. Nominal value will vary according to culture, business practices, or by one account alone, but should be considered by the recipient as a gratuity and not as an improper inducement to purchase.
8. Receiving gifts should only be as hospitality on behalf of the company, but not an incentive intended to motivate the purchase of Chesterton's decision. Receiving promotional items, lunches, or dinners are considered acceptable practices.
9. Giving or receiving excessive gifts may cause a conflict of interest and as such should be avoided.

### Acceptance of gifts and or gratuities

10. The acceptance of gifts from suppliers/vendors as an exchange of gratitude, such as lunches and dinners, must be of nominal value and not intended to suggest or encourage the recipient to do business with the supplier/vendor or to violate Chesterton Mexicana, S.A. de C.V.'s policies regarding these matters. The nominal value of gifts may vary by culture, business practice in an industry, or on its own, but should be measured by the recipient as a gratuity and not as an inducement to force business.
11. It is prohibited for employees who have direct contact with suppliers of Chesterton

Mexicana, S.A. de C.V. to accept gifts, gratuities, or compensations of any value in exchange for preferential treatment in the awarding of purchases, specification of products or administration of contracts to be entered into on behalf of Chesterton Mexicana, S.A. de C.V.

12. The personnel of Chesterton Mexicana, S.A. de C.V., is authorized to receive promotional items, as long as such items have a nominal value and do not compromise the decisions of Chesterton Mexicana, S.A. de C.V. in the business or the awarding of purchases or contracts.
13. It is prohibited for employees to receive gifts or gratuities from customers or suppliers of Chesterton Mexicana, S.A. de C.V., directly at their home address or for employees to indicate their home address to receive any type of these gifts.
14. When any gift or compensation received has a value exceeding the nominal value, it must be returned to the sender as soon as possible and give notice of this situation to his immediate boss, who will notify within two days to the Human Resources Management.
15. Any gift considered unacceptable that cannot be returned to the sender will be held by Human Resources Management pending a solution by General Management, which may decide within a maximum of 5 days whether to use it as a charitable contribution or to put it to other uses.
16. Chesterton Mexicana, S.A. de C.V. employees must inform the sender about the content of this Code of Ethics and ask him/her to refrain from such activities in the future.
17. Suppliers or others may provide meals on trips made by Chesterton Mexicana, S.A. de C.V. employees, as a normal part of a business trip, if a responsible and decorous conduct is shown, without falling into excesses.



### Delivery of gifts and/or gratuities

18. The delivery of gifts to customers as an exchange of gratitude, such as lunches, dinners and/or appropriate gifts must be of nominal value and not intended to suggest or motivate the recipient to do business with Chesterton Mexicana, S.A. de C.V. or to violate its policies.
19. The nominal value of gifts and/or gratuities may vary according to culture, region, and business practice in an industry, but always should be measured by the recipient as acts of appreciation and not as improper inducements to do business with Chesterton Mexicana, S.A. de C.V.
20. Loan guarantees for customers, either personally or through Chesterton Mexicana, S.A. de C.V., are prohibited.
21. It is prohibited to give expensive gifts, cash payments, lavish gifts, trips and bribes of any kind to any of Chesterton Mexicana, S.A. de C.V.'s customers.

### Nominal Value Definition

22. Giving an actual monetary value to a gift/hospitality given or received is impractical as the currency and what is culturally acceptable is very different in each country. The value of giving or receiving should be commensurate with each situation, recognizing that the purpose is to strictly avoid extravagant values or those that encourage inappropriate behavior by the parties involved.
23. If in doubt, especially in defining the value of gratitude, seek advice from your immediate supervisor, Area Manager or Human Resources Manager, preferably in that order. If approved, you will be asked to provide a written report regarding the event including the actual cost or an estimate of the cost.

## COMPETITION

24. We will earn our business by competing vigorously, but fairly, honestly and in a manner consistent with good manners.
25. Our communication will be based on accurate facts regarding our competitors and their products, expecting our competitors to act in the same way towards Chesterton Mexicana.

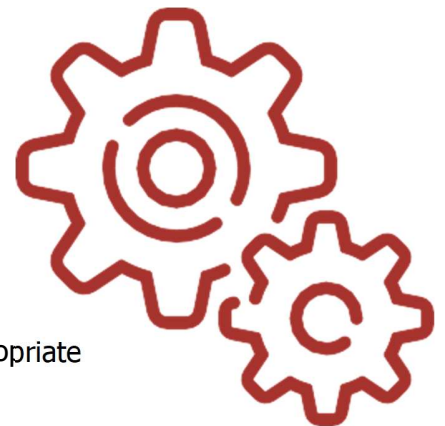


# OUR RESPONSIBILITIES

STEERING COMMITTEE •  
HUMAN RESOURCES •  
DIRECTORS, MANAGERS,  
CHIEFS AND SUPERVISORS •  
EMPLOYEES •

## STEERING COMMITTEE

1. Approve the content and adjustments to the Code of Ethics, as well as its issuance.
2. Approve the content of Chesterton Code of Ethics.
3. Authorize its adjustments.
4. Issue the Code of Ethics.
5. Ensure, in coordination with the General Management, the dissemination of this code, including its publication in the appropriate official format or in Share Point.
6. The Committee has the primary obligation to ensure overall compliance with this Chesterton Code of Ethics.







## HUMAN RESOURCES

1. Oversee compliance with the Code of Ethics.
2. Submit proposed amendments to the Code of Ethics to the General Manager for approval.
3. Disseminate the Code of Ethics among the employees of Chesterton Mexicana S.A. de C.V.
4. Ensure that the members of the Steering Committee know and disseminate this Code of Ethics among their collaborators.
5. Ensure, in its Business Units, compliance with the Code of Ethics to promote Chesterton's Culture.
6. Ensure the dissemination, understanding and use of the Code of Ethics and the Complaint Line.
7. Provide guidance in dealing with reports received on the Complaint Line, as well as with doubts and concerns related to possible violations of this Code of Ethics and other Internal guidelines.
8. Promote and oversee that the investigation process of reports received through the Complaint Line is carried out in an objective, impartial and confidential manner.
9. Deliberate and resolve on the corrective measures that, according to the Sanctions Guidelines, are applicable for acts or omissions that violate the Code of Ethics and other Internal guidelines and suggest their application.
10. Include in the induction and training programs, the topics contained in the Code of Ethics and other Internal guidelines.

11. Integrate to the organization collaborators who share our ethics and values in accordance with this Code of Ethics.



## DIRECTORS, MANAGERS, CHIEFS AND SUPERVISORS

12. It is the responsibility of the Directors, Managers, Chiefs and Supervisors to know the Code of Ethics and to comply with its provisions.
13. Ensure that he/she and their staff know, and annually endorse, their commitment to comply with the Code of Ethics.
14. Take the necessary measures so that the personnel reporting to him/her give due importance to the contents of the Code of Ethics in the development of their activities.
15. Support their immediate collaborators to clarify doubts, comment on and resolve any difficulties that may arise in the interpretation of this Code of Ethics, or in its application.
16. Sign annually the letter of commitment with the Chesterton Code of Ethics.

## COLLABORATORS

17. Know and comply with the Code of Ethics and other Internal guidelines.

18. Report any violation and/or risk of violation to the Code of Ethics and other Internal guidelines.



19. To know and use, if necessary, the Complaint Line.

20. Sign the Letter of Commitment to comply with the Code of Ethics and other Internal guidelines in accordance with the periodicity indicated by the organization.

21. Immediately report any conflict of interest, whether real, potential, or apparent.

# ETHICAL COMPLIANCE SYSTEM

- REPORTS •
- COMPLAINT LINE •
- ATTENTION TO QUESTIONS AND CONCERNS •
- CORRECTIVE ACTIONS •
- PROHIBITIONS •
- SANCTIONS •

## REPORTS

In Chesterton our values are an essential and indispensable part of our life and culture, therefore, we take seriously any report about illegal practices or inappropriate behaviors detected in our company.



1. We keep in total confidentiality the reports received by any member of the company, whether by managers or by employees and third parties, or those collected through the Ethics Line or by any other means, except when it is mandatory to disclose part or all of the content of the report and/or its corresponding investigation, in accordance with applicable legislation.
2. We do not tolerate reports that are made in bad faith and unfoundedly to an innocent person.
3. To determine that a person has committed an act or omission that is in violation of the Code of Ethics and other internal guidelines, we conduct an objective and well-founded investigation that supports the imputation of responsibility to the person under investigation.
4. We do not take any type of retaliation against persons who report and/or collaborate in good faith in investigations where there is a presumption of non-compliance with any provision established in the Code of Ethics or in the other Internal guidelines.



5.Failure to report any violation of this Code of Ethics and/or other internal guidelines of which you are aware, implies being co-responsible for it, and is deserving of a corrective measure.

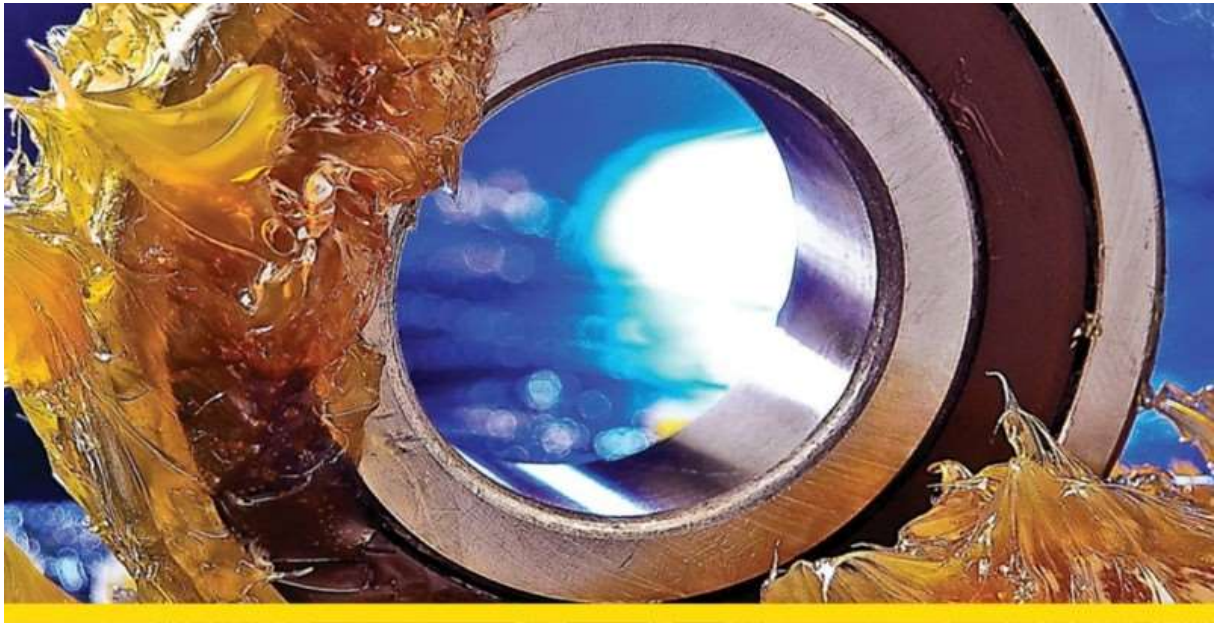
6.We attend to and document all reports received through the Complaint Line.

## COMPLAINT LINE

We promote and facilitate the detection of illegal practices and inappropriate conduct through open communication and formal mechanisms implemented in accordance with the provisions established in the Code of Ethics, and we report violations in a timely manner.

1. The Complaint Line is a formal mechanism that is used by directors and collaborators, as well as by third parties with whom Chesterton has a relationship in the development of its operations, to report any breach of Chesterton Code of Ethics and other Internal guidelines of the company.
2. The Complaint Line through the web portal is available 24 hours a day, every day of the year and is confidentially managed by a Chesterton International Compliance Committee.
3. Any breach of Chesterton Code of Ethics and other Internal guidelines, in addition to being reported to the Complaint Line, may be reported directly to Human Resources with the Human Resources Manager through a written statement of facts regarding an anomaly or violation of this Code of Ethics.





**Juntos,**  
podemos proteger  
nuestros valores.

Together,  
we can protect  
our values.

- To facilitate the reception of reports, we have the portal  
<https://secure.ethicspoint.com/domain/media/es/gui/66624/index.html>
- There is also the option of the "Complaint Mailbox", at [quejas.denuncias@chesterton.com](mailto:quejas.denuncias@chesterton.com) where any member of the company, supplier, customer or who has a relationship with Chesterton Mexicana can go to raise a report, making a statement of facts, which will be

handled with all possible caution and confidentiality required, in the Human Resources department with the Human Resources Manager putting in writing the description of such facts about an anomaly or violation of this Chesterton Code of Ethics.



## ATTENTION TO QUESTIONS AND CONCERNS

We promote a culture of prevention, so we welcome questions and concerns regarding compliance with our Code of Ethics and other Internal guidelines.

## CORRECTIVE ACTIONS

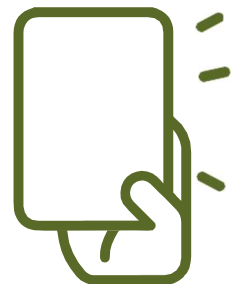
1. Violations of this code will be subject to sanctions in accordance with the provisions of the internal work regulations and the Federal Labor law in its article 423 section X and other relative and applicable to the case, considering the following:
  - The seriousness of the offense committed
  - The background and record of the offender
  - The circumstances of the specific case
  - Recidivism

2. In all cases, employees shall have the right to be heard before the sanction is applied.
3. Sanctions for bullying or sexual harassment will be carried out in accordance with policy MEX GRHP 008.
4. Violations of this Code of Ethics and other internal guidelines will be subject to corrective action.
5. The severity of the corrective measures shall be in accordance with the seriousness of the offenses committed.
6. Corrective measures range from written reprimand, dismissal, to criminal charges before the competent authorities and the exercise of any other legal action that may be appropriate, in accordance with the provisions of the sanction's guidelines of this Code of Ethics.
7. We consider it a violation of this code not to apply corrective measures to breaches of this Code of Ethics.
8. We respect the rights of people involved in the reports received and validate and document all available evidence before issuing any corrective action.
9. Drugs and Alcohol: the possession, sale, use or being under the influence of illegal drugs (including pharmaceuticals, except in the strict case of prescription parameters) or alcohol while on the job or during working hours and/or on company property or other property-related work is strictly prohibited. Alcohol is permitted at certain company-sponsored events upon the explicit prior approval of a company officer and on the condition that the required responsible conduct is maintained at all times.

## PROHIBITIONS

For purposes of exemplification, the following actions are considered violations of the Code of Ethics:

10. Failure to comply with any of the points set forth in this code.
11. Performing any act that may endanger your own safety, that of your co-workers or third parties, as well as that of the establishments or places where the work is performed.
12. Absence from work without justified cause or without permission from the employer.
13. Legally committing the company without having authorization for such purposes.
14. Omitting or failing to report violations of the code in a timely manner.
15. Carrying out operations for personal, family, or third-party benefit to the detriment of the company.
16. Influence or coerce, manipulate, or mislead any auditor performing an investigation or review within the company.





17. Distorting accounting records.
18. Report fictitious transactions including sales, purchases, loans, credits, and expenses.
19. Cashing checks by forging endorsements.
20. Falsifying or altering vouchers.
21. Carrying out unnecessary purchases of goods and services to the detriment of the company.
22. Failure to adhere to the procedures established by Chesterton to the stipulated standards.
23. Bullying or harassment of any member of the company, which meaning is: different actions covering a wide range of offensive behaviors. It is usually understood as conduct intended to disturb or upset a member of the company, customer, supplier, or visitor, mistreat



someone, tease them insistently. Sexual harassment also refers to persistent sexual advances, usually in the workplace, where the consequences of refusal are potentially very harmful to the victim.

24. Stealing work tools, raw materials, product, or any other item from the company.
25. Reporting to work in a state of drunkenness.
26. Reporting to work under the influence of any narcotic or enervating drug, unless there is a medical prescription. Before starting work, the employee shall inform the employer of the fact and present the prescription signed by the physician.
27. Carrying weapons of any kind during working hours unless the nature of the work requires it. Exceptions to this provision are sharp and sharp-edged weapons that are part of the tools or equipment used in the work.
28. To suspend work without the employer's authorization.
29. Using the tools and implements supplied by the employer for purposes other than those for which they are intended.
30. To make any kind of propaganda during working hours, inside the establishment.
31. Sexually harassing any person or performing immoral acts in the workplace.
32. Disclose the technical, commercial, and manufacturing secrets of the products manufactured by the company and reserved administrative matters, when their disclosure may cause damage to the company.
33. Failure to comply with legal provisions that generate sanctions by the authorities, property damage, or future contingencies for the company.

34. Negligently disregard policies, rules and practices for the good administration of the company with serious prejudice to it.
35. Failure to comply with safety standards that endanger personal life or the company's assets.
36. Unfoundedly and in bad faith denouncing an innocent person.
37. Using, distributing, transporting, selling, or possessing any type of prohibited drugs and alcohol (alcohol is permitted at certain company-sponsored events with explicit authorization).
38. Promote acts of "workplace mobbing," where any member, customer, or partner of the company is disrespected either within or on the work commute of any Chesterton employee.



39. Discriminate against any customer, collaborator, guest, or supplier according to race, ethnicity, gender, beliefs, sexual orientation and on the contrary promotes its commitment to equality and balance in labor relations, strengthens the protection of the rights of workers, according to Mexican Standard NMX-R-025-SCFI-2015, IN LABOR EQUALITY AND NON-DISCRIMINATION.
40. Distracting a worker in his or her work area, taking time away from him or her without any justification and this may cause low productivity.

## SANCTIONS

These actions can have as a sanction either from:

- Call to attention.
- Administrative or corrective act PIP.
- Labor sanction with days off without pay.
- Suspension and/or termination of labor contract.
- Criminal complaint to the competent authorities.

- Use of cell phones or mobile devices in production areas. This will generate a penalty of one day off without pay (the use of these devices will only count as an exception in case of emergencies or upon request of the company).
- Harassment in all its definitions, misrepresentation of information, breach of responsibilities, will be subject to a sanction ranging from an administrative act or if the harassment of one worker to another persists even with the administrative act until, if the actions of misconduct persist, the termination of employment contract.
- Any act of violence or physical aggression against any member of the organization or third parties, within, in transit or on behalf of the company will be considered as force majeure and immediately proceed to the termination of the labor contract.
- Distracting a member of the organization from his or her activities without any justification whatsoever and that this causes from a low productivity to an accident at work, in this case the case will be analyzed, and it will go from an administrative act to the termination of the labor contract.





*[Handwritten signature]*

Kindly,  
Karla Cuéllar  
Human Resources Manager

**Rev. 10/022**

