



Employee Code of Conduct
September 2021



Company Values That Guide and Drive Our Success

Integrity

We are uncompromising in our honest and ethical behavior, which creates relationships of trust with each other and with our customers, suppliers, and communities.

Safety and Quality

We are firm in our commitment to the highest standards of safety and quality, both for ourselves and for our customers.

Support for our People

We attract, develop and retain exceptional people in an inclusive work environment, where all employees can reach their greatest potential.

Customer Focus

We listen carefully to our customers to fully understand their needs and offer them the unique solutions that guarantee their success.

Continuous Improvement

We are constantly striving to improve in all aspects of our business, guided by indicators, internal communication and our disciplined management process.

Collaboration

We work seamlessly across many locations, platforms, business units, business partners, and functions to take full advantage of our unmatched capability and expertise.

Innovation

We are passionately dedicated to new technologies, solutions, capabilities and approaches to generate tangible value for clients.

Respect, Loyalty and Social Responsibility

We have a responsibility as members of society to establish relationships in line with our scale of values based on respect and loyalty.



Message from Our Board of Directors

Our Code of Conduct and Ethics helps ensure that all employees understand what is expected of them and provides the tools to prioritize integrity at the forefront of everything we do. This applies to everyone at every level of our group and companies, up to our executive management and directors. In addition, it extends to our actions in an environmentally friendly manner and maintain a workplace that respects people, strictly prohibits discrimination or harassment, and fosters diversity, equity, and inclusion.

There are some activities that each of us will have to do to make this commitment a reality.

- Review this Code and commit to taking on the conduct, decisions, and actions that conform to it.
- If you have concerns about unethical or illegal activities, let your leaders know.
- If you have questions about this Code or appropriate behavior, never hesitate to ask or seek guidance.

We all have an important role to play in ensuring that AMV Global Group and its subsidiaries represent the highest ideals of ethics and integrity, for ourselves and for the clients, industries, and communities we serve.

Thank you for your continued commitment to this standard.

The Board of Directors
AMV Global Group



The Code of Conduct - Principles for Employees

The specific policies and guidelines included in the following pages can be summarized in these five principles of ethical conduct:

- Comply with the law
- Be honest
- Respect each other, and respect our customers and partners
- Be loyal and protect the company's reputation
- Ensure that environmental protection and safety guide your decisions and actions

All employees should be alert and communicate any concerns.

What is the Code of Conduct

Integrity is one of the Company's core values. Inappropriate or illegal activity is not tolerated at any level and under any circumstances. Our Code of Conduct explains policies and identifies options for help, so employees can ensure they always understand the appropriate course of action or where to turn if they have any questions or concerns.

What should I do?

First and foremost, we need you to fully support and promote our commitment to ethical business practices. As part of that task, you should read and familiarize yourself with the policies included in this Code of Conduct. If you have any questions or concerns, you should turn to one of the contacts mentioned at the end of this document

Where does the Code of Conduct apply?

This is a global Code of Conduct that sets benchmark standards for the way we conduct business. The Company expects its officers, directors, and employees to always act in accordance with all applicable laws, rules, and regulations in the Company and in its business and service operations. In all cases where local law sets a higher standard, this higher standard will be imposed. These general rules and standards are supplemented by the local rules and regulations for each Business Unit of the Company. If labor laws conflict with these rules of conduct, the conduct and discipline of employees shall be responsive to these labor agreements, laws, and local labor standards. In these situations, the code serves only as a reference.



What is the Code of Conduct?

All these components create a strong ethics program and a culture of compliance at AMV Global Group and its subsidiaries.

How is the Code of Conduct developed and maintained?

The Code of Conduct is part of the Company's Ethics and Compliance program, which is designed to communicate the Company's global expectations related to personal and business conduct to and ensure compliance with the Company's executives, directors, employees, suppliers and third parties acting on behalf of the Company. In addition to this Code of Conduct, the program ensures:

- Leadership and support from all levels of management
- Ongoing communication and training
- Controls, Monitoring and Auditing
- Appropriate actions in response to problems and concerns
- No retaliation for expressing concerns

What is the procedure for raising a question or concern?

Anyone with a question or concern can contact one of the following individuals or the Helpline. You can choose the route that is most effective and comfortable for you:

- Your supervisor or manager
- A representative from the human resources department
- A Director or Member of the Board of Directors
- A Company Attorney / Legal Counsel
- The global helpline, through a telephone call to the number indicated in the bulletin publications at the Company's facilities

You can communicate anonymously if you wish, but it is important to provide as many facts, details, witnesses, and documentation as possible.

What happens when a question or concern is shared?

When a problem is reported, the investigation corresponding to the nature of the problem begins. If inappropriate conduct or other problems are identified, appropriate action is taken, including training, consulting, warnings, or termination. All employees are required to cooperate in the investigation. Any attempt to interfere with investigations by intimidating investigators, concealing or destroying evidence, or coercing a third party to do so, is a serious breach of the



rules of conduct that will result in disciplinary action under local laws and regulations, including termination.

No retaliation of any kind is allowed for sharing concerns or alleged breaches of the program.

AMV Global Group's Specific Policies and Guidelines

Giving gifts or other items of value and bribes

The giving of small gifts to generate an atmosphere of cooperation is a normal practice when doing business. But even before you give a low-value gift to a customer, you should know what is allowed for our customers and for local laws. In many situations, there are strict policies or laws against receiving gifts or valuables from anyone, especially in the case of government employees. For that reason, you should make sure you understand the applicable law, culture, and policies of our customers before giving a gift.

The giving of gifts or valuables to corruptly influence business decisions is considered bribery, and it is illegal. The definition of bribery also extends to actions such as hiring relatives of a government official in exchange for a sale or something else of value. Bribes can be subject to civil and criminal legal action against the individuals involved and their employers, and penalties can be hefty fines or even prison time. Working with a third party as an intermediary (e.g., a distributor or an agent), does not make bribery more acceptable or less illegal. A breach of anti-bribery laws can occur even in situations where we do not actually make a bribe or are not aware of it, but we do not notice that a third party (such as a distributor) did so in certain circumstances.

What is considered an appropriate gift can vary greatly depending on the circumstances, but the important thing is to avoid any appearance of inappropriate conduct. The Company prohibits the delivery of cash, vouchers or gift cards, or gifts that may be luxurious or inappropriate in certain circumstances. If you are unsure whether a gift is legal or appropriate, consult with your supervisor or an executive.

We must be particularly cautious in paying the travel costs and expenses of foreign officials. These payments must be previously authorized by an attorney or executive of the Group. These payments must be legal and directly related to the promotion, demonstration or explanation of products or services, or to the performance or conclusion of a contract. You should always consult with an attorney or executive of the Group before accepting and making these types of payments.



Accepting gifts

The same principle applies to receiving gifts as to giving them. Soliciting or accepting money, gifts, or anything else of value in exchange for a business transaction with a supplier, sales representative, or distributor, or any other corrupt exchange of value, constitutes a bribe including from the supplier's perspective.

Accepting gifts of little value, the intention of which is simply to create a climate of cooperation, is an acceptable practice. But the Company does not want employees to solicit or ask for gifts or anything else of value in exchange for business transactions from a supplier or other third party, or under any circumstances.

If you do not know whether to accept a gift, consult with your manager, an executive, or an attorney of the Group. If it would be culturally offensive to refuse a gift and its value is negligible, discuss the situation with your manager or an executive. They will help you determine the best way to protect yourself and the company against the appearance of any type of misconduct.

Honesty related to accounting records, including expense reports

Our shareholders, customers, and business partners rely on us to record and report accurate financial data. In addition, it is our legal obligation to do so. You must never falsify accounting records or operating performance. You should never introduce into company books or records information that conceals, deceives, or confuses the true nature of any transaction, result, or balance sheet. And you should never falsify or distort accounting records so that you or the company have a better image. Always follow the law and generally accepted accounting principles.

This rule doesn't just apply to those in charge of financial or accounting roles. We all have an obligation to be honest when it comes to accounting records such as expense reports, hours worked, or documentation of business transactions. Falsifying expense reports, even for small amounts of money, is fraud and theft, and will result in disciplinary action that can include termination or even criminal charges. Attempts to substantiate an expense report with receipts that do not represent an accurate and legitimate record of the transaction being documented is also fraud and will not be tolerated.

Conflicts of interest

Conflicts of interest may occur when your personal interests interfere, or even appear to interfere, in any way with the interests of the Company, or create a situation in which you or someone you know may make a profit at the Company's expense. For example, it would be a clear conflict of interest if, acting on behalf of the Company, you agree to pay more than the



Company is required to pay for supplies to another Company that you, a friend or a family member owns in whole or in part.

The Company prohibits its officers, directors, and employees from having personal, business, or financial interests that are not consistent with their obligation of loyalty and responsibility to our company.

Our approach to conflict is aimed at protecting you and protecting the Company. Therefore, it is important to disclose any potential conflicts of interest to protect against the appearance of inappropriate conduct. You should report these situations when they occur and in our group annual conflict of interest questionnaire.

The Company requires its officers, directors, and employees to disclose situations where their personal interests and their obligation of loyalty to the Company may conflict, to make corrections or implement controls in order to avoid any actual problems or perceived problems. For example, when disclosing a potential conflict of interest in a supplier selection case, the Company may simply determine that another employee selects the supplier to eliminate any actual problems or perceived problems in the transaction.

Concealment of a potential conflict is considered a serious breach of company policies and rules. As with many other areas of our Code of Conduct, if in doubt, consult your supervisor or the other resources identified in this manual.

Gathering Competitor Information

In our global competitive market, we must collect as much information as possible about our competitors. However, we must do so without breaking the law or directly or indirectly violating our contractual obligations. While collecting information in the public domain is always permitted, obtaining confidential information through direct communication from our competitors is not.

Information may be obtained from former employees of competitors, but this information must not include trade secrets, or any other information protected by confidentiality agreements or laws. You should consult with your supervisor, or the other resources identified in this Code of Conduct before requesting any information that could potentially fall into these prohibited categories.

Equitable treatment

All employees, officers and directors of the Group must strive to have fair treatment of customers, suppliers, competitors and employees of the Company, and not to take unlawful



advantage of anyone through the manipulation, concealment or misuse of privileged information, falsification of material facts or any other dishonest practices.

Antitrust or anti-competition laws

Antitrust or anti-competition laws, as they are commonly called, can impose fines for anticompetitive conduct, such as agreements to fix prices with competitors, fix tenders, divide sales territories, or share certain information. If you are unsure about a situation involving a competitor or the prices of our products, please seek legal advice before moving forward.

Compliance with international trade laws

Compliance with trade laws is one of the Company's most complex and technical areas of legal compliance. At its most basic level, compliance with trade laws means respecting government controls regarding shipments, transmission, or release of goods, technology, software, and services ("items") from country to country. You should know whether the items you trade are controlled and, if they are, whether they can be shipped, transmitted, or "shared" with a third party. A special license may be needed to share or ship-controlled items with people of certain nationalities or from certain countries. It is also possible that this is outright prohibited, and shipping any product to certain countries is illegal.

Each of the Group's business units has a commercial executive. Make sure you know the rules that apply to the items you work with, strictly adhere to them in all cases, and, as with all other aspects of our compliance and ethics program, if in doubt, consult your manager or any other of the resources identified in this manual.

Sanctions and embargoes imposed by national governments are trade issues that we sometimes must deal with in our business. Some of the laws in place require us to adhere to penalties and embargoes, while others prohibit us from participating in them. All transactions involving a client or country that is subject to a sanction or embargo should be reviewed and authorized by the business manager or executive, and legal advice should be obtained where necessary.

Compliance with immigration or labor laws

The Company requires strict compliance with all immigration or labor laws. Employees are not allowed to travel and work with inadequate visas or work permits. On the other hand, filling out forms with false information is generally a crime that can lead to civil or criminal charges and rejection of visas and work permits in the future.



To protect yourself and our company, be sure to get legal advice from an immigration expert so you know how to fully comply with the laws that apply in your situation.

Using Email

The Company provides its email system for business, not personal, purposes. Limited personal use of email may be permitted. But our IT systems, including email, are aimed at business communications.

Always keep in mind that email is considered an official business record. You should never send an email that could embarrass you or the company if it goes public. Email should never be used to argue. Resolving problems over the phone or in person is always the best way to resolve differences. Finally, never send an email if you are angry, as it can cause both you and the Company to project an unprofessional image.

Information Technology Security

As with many other companies, different criminal groups and even intelligence agencies under the government's orbit try to penetrate IT systems. These attacks often take the form of emails that attempt to use phishing techniques. As an employee of the Company, you have a responsibility to be very careful when opening emails, links, or documents within emails, or to provide information in response to emails. Always analyze the sender's full email address and evaluate the language usage and overall look of the message. Do not click on suspicious links in emails. Send all suspicious emails as an attachment to amvglobal.operations@gmail.com

Another way in which the Company's IT system is exposed to security risks is by downloading unauthorized software and/or illegal content from websites, such as pornography or gambling sites, or by viewing such content on a Company device. The Electronic Media Policy prohibits this activity, which is generally detected by the Company's IT security systems and will result in disciplinary action and reporting to local law enforcement for criminal charges, whenever possible or required by local law.

Privacy and data protection

It is vital for our business to protect the personal information of employees and customers, as well as to comply with all privacy and protection laws in all legal jurisdictions where we operate. The Company uses strong IT security measures and does not use employee or customer data for inappropriate purposes. Employees with access to personal data must comply with IT department's data protection and security policies, confidentiality rules, and legal requirements.



Confidentiality and intellectual property

The Company's employees, officers and directors must maintain the confidentiality of all information entrusted to them by the Group, its customers or its business partners, except where disclosure is authorized or required by law. Confidential information includes all non-public information that may be useful to competitors or harmful to the company or its customers if disclosed.

The Group protects intellectual property with patents, copyrights, trade secrets, and contractual confidentiality agreements. Employees may not take or give away intellectual property without authorization. Similarly, you should never take or use another company's intellectual property if it is a breach of the law or contractual protections. The Company will not allow theft of your intellectual property and will not knowingly use the intellectual property of others if it means breaking the law.

Protection and proper use of company assets

It is the responsibility of each of the Company's executives, directors and employees to ensure the efficient use of the Company's assets and protect them against loss, theft and misuse. All company assets must be used exclusively for legitimate business or service purposes, and assets may not be sold, loaned, given away, or disposed of without proper authorization.

Speaking on behalf of AMV Global Group and/or subsidiaries

As part of our ongoing efforts to strengthen and protect the Group's reputation, it is critical that our company communicates with the public in a clear and consistent manner. Therefore, a few people authorized to speak on behalf of the Group outside the Group have been appointed. This includes posting comments or content on group-related topics on personal accounts on social media platforms (e.g., Twitter, LinkedIn, Facebook, YouTube, WeChat, Tik Tok, etc.), beyond your account's privacy settings, as well as posting comments or content on forums, websites, blogs, or other types of pages on the Internet.

Sharing public content from social media accounts (e.g., Twitter, Facebook, LinkedIn, YouTube, WeChat, etc.) and digital platforms managed by the company is an authorized and recommended practice. You don't need to train or register to use non-public social media sites, which are aimed at internal communication and collaboration with colleagues (e.g., Yammer, SharePoint, etc.). For more information about our policies on employee use of social and digital media, please contact your marketing or human resources department.



Health and safety

Protecting the health and safety of employees is one of the Group's core values, and it goes beyond mere compliance with laws and regulations. Robust health and safety programs are required, including safety of physical machines, safety of behaviors and procedures, training, audits, corrective actions, reports, and awards. It is against our policies for anyone to work in an unsafe way or condition. If you have a safety-related concern or suggestion, please feel free to report it.

Environmental protection

The Company's primary mission is to provide solutions that enable our customers to operate at their highest level of efficiency and performance. We help customers maximize production, maximize reliability, reduce energy costs, automate processes, and avoid unexpected operational issues. It's no coincidence that all these things are also beneficial to the environment. Energy efficiency and waste reduction means that the goods society needs are produced with less impact on the environment and fewer natural resources. These efficiencies are good for business and help our customers improve their environmental protection.

We are also committed to complying with all applicable laws and environmental regulations where we do business, and we seek to reduce energy consumption and carbon emissions in our operations. Whenever possible, we request that employees participate in environmental actions during our operations.

Discrimination and harassment

The Company strictly prohibits discrimination or harassment because of race, color, religion, gender, gender identity, sexual orientation, age, disability, nationality, or any other factor that is deemed unlawful. We do not tolerate any form of bullying, harassment, or abusive conduct. If you believe you or someone else is being discriminated against or harassed, please seek assistance from your local human resources representative, an executive, or through the ethics program hotline.

Diversity and equal opportunities

Employment decisions should be based solely on the company's needs, job requirements, and the individual's qualifications. The Company has a very diverse workforce, but we are always looking for opportunities to increase that diversity. We need your help to do this by broadening the diversity of candidate pools, being open to different viewpoints, characteristics and backgrounds, and the opportunity to create a space where those differences coexist whenever necessary.



How to Report a Concern or Potential Breach of Ethical Standards

- Contact your supervisor, manager, or executive
- You can also call +58-412-7713649
- Write email to amvglobal.operations@gmail.com

If you wish, your contact can be anonymous. There will be no retaliation against any employee for reporting potential violations or concerns.