



CODE OF ETHICS

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SCOPE

This code is strictly and binding on all employees, company managers, suppliers of materials and services (recurring), and customers, regardless of their hierarchical status within the group or their employment status.

It is the responsibility of each employee to comply with, enforce, and promote the Code, as well as to report any violations of it, unethical conduct, or conduct contrary to the company's principles.

AIM

Inform all High Protein de México SA de CV employees, suppliers, contractors, and customers of the company's values and principles, thereby making known the behavior and conduct expected of each of the group's employees.

TERMS AND DEFINITIONS

Code of ethics: establishes standards that regulate the behavior of people within a company or organization.

Ethics: is linked to morality and establishes what is good, bad, permitted or desired regarding an action or decision.

POLICY

The principles that stand out in the company are based on the following points:

- 1.- Honesty
- 2.- Integrity
- 3.- Ethical behavior
- 4.- Simplicity
- 5.- Justice and equity in the treatment of all
- 6.- Dedication
- 7.- Leadership based on preparation, capacity, avant-garde and long-term vision.
- 8.- Passion and tenacity

9.- High individual and corporate responsibility with clients, suppliers and employees.

Of these principles, the company defines 4 main values.

- HONESTY
- RESPONSIBILITY
- JUSTICE
- PASSION FOR WORK

The company is committed to social development, *human rights* , and addressing society's nutritional needs.

PILLARS

Taking into account the principles and values, the company is based on the following pillars to achieve ethical behavior:

FIRST.- Be socially responsible in the communities where High Protein de México SA de CV sells its products, providing nutritious and safe foods and beverages.

SECOND.- That in all food product developments the negative environmental impact is minimized.

THIRD.- Use energy sources efficiently and monitor their consumption.

FOURTH.- Work closely and in support of producer associations that provide raw materials.

FIFTH.- The company will always conduct ethical business, with the understanding that obtaining benefits or business through bribery, gratuity or acts that violate the law is prohibited.

SIXTH.- The company, its clients, and its suppliers will adhere to the principles for responsible agricultural investments (RAI), thus adopting a zero-land grabbing approach.

SEVENTH. - *High Protein de México, SA de CV and its Representatives seek to align their operations with universal principles of human rights, and are therefore committed to respecting and promoting them in order to comply with recognized international standards in this area.*

The code consists of:

1. Honesty and responsibility

- 1.1** Always act correctly, in accordance with the provisions of this code and the laws of the country.
- 1.2** It is totally unacceptable to obtain personal benefits in the performance of one's duties.
- 1.3** It is unacceptable to take advantage of, divert, or misuse company resources.
- 1.4** Carry out the work entrusted to you with responsibility and professionalism.
- 1.5** Always act fairly and responsibly.
- 1.6** All employees are responsible for knowing, promoting, and enforcing the Code of Ethics, as well as reporting any violations of the Code or illegal or unethical conduct.
- 1.7** It is the responsibility of all employees to consult their immediate supervisor if they have any concerns regarding any ethical issue.
- 1.8** All staff must promote fair treatment, equal opportunities and non-discrimination.
- 1.9** Recognize the dignity *and human rights* of people, respect their freedom and privacy.
- 1.10** Respect and value employees' identities and differences.
- 1.11** Comply with applicable laws and company policies regarding recruitment, promotion, and compensation of employees based on demonstrated ability, experience, and training.
- 1.12** Acts of harassment and discrimination based on race, caste, religion, disability, marital status, union or political affiliation, health, pregnancy, job title, gender identity, dependents, social class, creed, sex, age, disability, sexual orientation, color, gender, nationality, or any other basis are prohibited. *Child labor and forced labor are prohibited.*
- 1.13** *At HIGH PROTEIN, the majority of our workforce are women. As part of a vulnerable group, and due to the discrimination they suffer in the workplace, and the physical, psychological, property, economic, and sexual violence they face, we must prevent, punish, and eradicate violence against women.*
- 1.14** It is the responsibility of all employees to ensure equal and fair treatment.

2. Harassment .

2.1 Harassment of any kind is not allowed: Not only is it not allowed, but it will be punished, in any of its forms such as:

- Verbal harassment: derogatory comments, jokes, or defamation, among others.
- Physical harassment: unnecessary or offensive contact.
- Visual harassment: such as the dissemination of degrading or offensive images, cards, calendars, drawings, messages, notes or gestures.
- Sexual harassment: advances, requests for favors, verbal or physical conduct of a sexual nature.

2.2 Under no circumstances may submission or harassment be used as a basis for employment decisions.

2.3 If you are a victim of harassment by a client, supplier, coworker, boss, or other person associated with the company, you must immediately notify your immediate supervisor. See sections 12 and 14 of this Code to report violations or misconduct.

3. Alcohol and drugs .

3.1. It is absolutely unacceptable for all employees and managers to be addicted to and/or consume, sell, or market any type of illicit drugs.

3.2 The consumption of alcoholic beverages within the company, nor working under the influence of such alcoholic beverages or drugs, is not permitted.

4. Health, safety and work environment

4.1 Safe and healthy workplaces must be provided and maintained, where a pleasant working environment is developed without aggressive or hostile behavior.

4.2 The company promotes the safety and health of all its employees.

4.3 Hygiene must be maintained in the company and in the workplace.

4.4 Entry into the business is prohibited for anyone who intends to sell or trade any type of item, as well as anyone who is not authorized to enter.

4.5 Violence, threats, and fighting are prohibited within any of the company's facilities.

5. Resources and Systems.

5.1 It is the responsibility of employees to care for and protect tangible and intangible assets, software, information and tools to prevent theft or misuse.

5.2 It is prohibited to use resources, systems, or infrastructure for advertising purposes, soliciting personal information, or otherwise. These resources must be used ethically and with the necessary confidentiality.

5.3 The company's telephone, email, voicemail, and computer systems are for work purposes, never personal purposes, so any misuse will result in disciplinary action.

5.4 You may not download programs onto computers from illegal or unlicensed systems.

5.5 All email communications are company property and should be used for business purposes, without damaging the company's image. Email should be used with discretion when sending confidential information.

5.6 Internet access must be used for work purposes. Accessing or distributing pornography or offensive materials via the Internet or email is strictly prohibited.

5.7 Passwords for accessing systems and equipment are confidential and personal, so under no circumstances should they be shared with others, even if the person requesting the password holds a high-ranking position in the company.

6. Records and reports

6.1 It is prohibited to distort records and/or accounting information, or falsify transactions, either to simulate the achievement of goals or objectives, or to obtain personal benefit.

6.2 All information generated in financial records is confidential and can only be released to duly authorized users.

6.3 Persons with access to the company's confidential information may not use it for personal or third-party benefit, as long as it is not known to the general public.

6.4 Objectivity and honesty must be maintained at all times when processing information so that the results are useful to the company.

6.5 Actual participation or any direct or indirect attempt to participate in money laundering is not permitted under any circumstances.

7. Use of information

- 7.1** Confidential and confidential information about the company, its clients, and suppliers must be safeguarded, and it must be refrained from publishing it, obtaining personal benefits, or causing harm at all times.
- 7.2** Customer and investor information must be used exclusively for the purpose for which it was collected, unless otherwise permitted by law.
- 7.3** The privacy and confidentiality of all employees' medical and employment records must be protected. These records should not be shared or discussed outside our facilities except with the director's authorization or as required by regulations, rules, and laws.
- 7.4** The improper use and disclosure of confidential, internal, or privileged information is a serious breach of the company's ethics and principles.
- 7.5** Files and records must be kept locked or protected with electronic passwords, so that only authorized users can access them. Theft of confidential information via USB drives, sending it to personal email, or using other electronic storage media is prohibited.

8. Relationship with suppliers and customers

- 8.1** Customer and supplier information is confidential, so disclosing them is strictly prohibited.
- 8.2** They must offer and require fair and honest treatment from suppliers in every transaction.
- 8.3** Conduct an impartial selection of suppliers based on criteria of quality, profitability, service , *and established human rights policies (desirable)*.
- 8.4** Employees who serve customers must offer them fair and honest treatment in every transaction, providing the products and services that are relevant to them with the highest quality and timeliness available, adhering at all times to official regulations and the company's internal rules.
- 8.5** Sufficient attention must be paid to the customer before and after the sale.
- 8.6** Any conflict of interest, such as benefits, that exists on the part of a government official, representative of a political party, or employee in any business, must be declared.

9. Gifts and gratuities

- 9.1** Employees must refrain from accepting and/or receiving gifts, bribes, favorable terms, salaries, travel, commissions, or any other form of compensation from clients, suppliers, financial institutions, dealers, contractors, companies, or individuals with whom they conduct business.
- 9.2** All forms of corruption, extortion, or embezzlement of suppliers and customers are prohibited.
- 9.3** When in doubt about whether a gift or other consideration is valuable, employees should consult with Management, who should communicate the relevant policy or make a decision in case of doubt.
- 9.4** Gifts or courtesies may be accepted in the form of: customary and reasonable meals, as well as recreational activities where the person providing them is present, such as occasional meals or sporting events. Likewise, any hospitality or business event between clients or suppliers remains reasonable in nature, solely for the purpose of maintaining good business relations and not intended to in any way influence decisions about rewarding future business.

10. Product quality and responsible innovation.

- 10.1** Products are delivered and received in compliance with the specified specifications and quality and safety criteria.
- 10.2** Research and development is carried out responsibly.

11. Compliance with laws

- 11.1** All applicable laws and regulations of the country must be complied with.
- 11.2** Applicable international laws and regulations, including those related to international trade, must be complied with.

12. Concerns, not retaliation.

- 12.1** Any written requests left in the suggestion box must be followed up and will be available *to clients, suppliers and collaborators* (as long as they are logical and the information allows it) or that are presented directly to Human Resources or the direct supervisor.

- 12.2** When any difficulty arises as part of the employment relationship, workers must be heard and questioned before making any decision. Testimonies or statements about any difficulty must be taken as confidential when the worker requests it *and always respecting their human rights and dignity as people*.
- 12.3** Solutions to difficulties must be fair, impartial and rapid.
- 12.4** Retaliation against any employee who expresses a concern or complaint is prohibited.
- 12.5** The anonymity of any employee who reports a violation of the code of ethics will be protected at all times, and the right of employees to express themselves and receive a response appropriate to their comments will be promoted.
- 12.6** The company also undertakes an annual evaluation of the *favorable work environment* to identify concerns or violations of this Code of Ethics, seeking areas of opportunity and growth that ensure compliance with the principles and content of this Code.

13. Sustainability

- 13.1** High Protein strives to ensure that the greatest number of activities carried out by High Protein, as well as the required services, are carried out using the maximum amount of energy and natural resources, with the goal of protecting and preserving the environment and avoiding environmental impact.
- 13.2** All necessary legal permits are requested and maintained for operations.

14. Report violations

- 14.1** Any breach of this policy must be reported as appropriate (client, supplier, High Protein management).
- 14.2** Customers and suppliers, as well as any of their employees, are allowed to express their opinions without fear of retaliation for reporting actual or suspected violations. A space is provided in the supplier update questionnaire to express any violations of the code of ethics, which will be promptly addressed.

14.3 Non-compliance reported in good faith will be investigated, and the results will be discussed with the responsible party. The responsible party must cooperate with the investigation.

14.4 When required, an action plan must be presented and implemented.

15. Ethical Trading Initiative

This Code of Ethics also complies with the guidelines of the Ethical Trading Initiative (ETI). Therefore, this company, our customers, and suppliers agree to abide by its provisions, as follows:

15.1 Employment will be freely chosen .

- There will be no involuntary, forced or slavery prison labor .
- Workers will not be required to leave *any deposits or fees in the employer's custody. Our recruitment and selection processes are free of charge. Original identification documentation cannot be retained; it is requested only for verification purposes against copies, and the originals will be returned immediately.*

15.2 Freedom of association and the right to collective bargaining will be respected.

- Workers, without distinction, have the right to join and form unions of their own choosing, as well as to negotiate jointly.
- The employer shall adopt an open attitude towards the activities of trade unions, as well as their organizational activities.
- Employee representatives will not be discriminated against and will have access to perform their representative functions in the workplace.

15.3 Working conditions will be safe and hygienic .

- A safe and hygienic working environment will be provided, taking into account the prevailing knowledge of the industry, as well as any specific hazards. Necessary measures will be taken to prevent accidents and health hazards that may arise, are associated with, or occur in the course of work, by reducing, to a reasonable extent, the causes of hazards inherent in the work environment.

- Workers will receive regular, written health and hygiene training, which will be repeated for new or appointed workers.
- Access to clean toilets and drinking water will be provided, and, if necessary, sanitary facilities for food storage.
- Accommodation, if necessary, will be clean, safe, and meet the basic needs of workers.
- The company responsible for code enforcement will assign responsibility for health and safety to a senior management representative.

15.4 Appropriate age of workers.

- Children and young people under the age of 17 will not be employed. *Child employment is prohibited.*
- The goals and requirements established in the ILO Conventions on the Worst Forms of Child Labour (No. 182) and the Minimum Age Convention (No. 138) are met.

15.5 A living wage will be paid .

- Wages and benefits paid for a typical workweek will comply, at a minimum, with national legal standards or the applicable industry standard, whichever is higher. In any case, wages will always be high enough to meet basic needs and provide a discretionary income.
- All workers will be provided with written, understandable information about their working conditions and wages before accepting employment and with details of their wages during the pay period in question each time they receive their wages.
- Deductions from wages as a disciplinary measure will not be permitted, nor will any deductions be provided by national law without the express consent of the employee concerned. All disciplinary measures must be recorded.

15.6 Working hours will not be excessive .

- Working hours will comply with national legislation and the regulations of the relevant industry, or those that offer greater protection.

- In any case, workers will not regularly work more than 48 hours per week and will have at least one day off for an average of 7 days. Overtime will be voluntary, with a minimum of 9 hours per week encouraged, will not be required regularly, and will be compensated in accordance with the law.
- Under no circumstances may an employee be detained within the company's facilities without his or her consent.

15.7 There will be no discrimination .

- There shall be no discrimination in hiring, treatment, compensation, training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, sex, marital status, sexual orientation, union or political affiliation, health and disability, pregnancy, job title, gender identity, color, dependents, or social class.
- All workers are treated equally, with respect and dignity.
- Pregnancy testing or any form of health screening will not be performed for discriminatory purposes (*pre-employment medical evaluations will be conducted* to protect employee health, and disease monitoring will be used to monitor employee health and prevent contamination of manufactured food).
- When reports of harassment, bullying, or sexual assault are received, they will be addressed diligently and quickly *by the ethics committee seeking to guarantee the safety, tranquility, dignity and human rights of the affected worker and, if necessary, channel it as soon as possible. with professionals and corresponding authorities as appropriate.*

15.8 Regular work will be provided .

- In all respects, the work performed shall be based on recognized employment relationships established through national law and practice.
- Obligations to employees subject to labor or social security laws and regulations arising from normal employment relationships shall not be avoided through the use of employment-only contracts, subcontracts or contracts for working from home, or through internship programs where there is no intention to impart skills or provide employment, nor shall such obligations be avoided through the excessive use of fixed-term contracts.

15.9 Inhuman or harsh treatment will not be permitted .

- Physical abuse or punishment, or threats of abuse, are prohibited.
- *Forced labor is prohibited.*

16. Universal Rights

This code of ethics is also in accordance with Universal Rights, and therefore, in this company, our employees, clients, and suppliers commit to abide by its provisions.

17. Food Fraud

17.1 Modifications or alterations to formulations already established by our customers are prohibited. All product composition information must be clearly detailed and available for traceability.

17.2 Purchasing from unauthorized suppliers is prohibited, even if it involves the same raw material, without prior analysis .

17.3 Suppliers must ensure that they comply with the requirements to prevent fraud in their products.

17.4 The purchase of all raw materials and packaging materials must be supervised by the General Manager.

18. Community Care

*As well as our clients, suppliers and collaborators **HIGH PROTEIN DE MEXICO** will attend to the community in front of any concern, complaint, suggestion, congratulations and you can write to us at the email account hubozcuenta@highprotein.com.mx , with the commitment to establish solid constructive relationships and mutual respect between the company and the community, also leaving at your disposal our code of ethics and human rights policy on our website <https://www.highprotein.com.mx/>*

Our products have a customer service number printed on the packaging. This is also an official communication channel so we can address and follow up on any concerns that may arise from the community or customers.

19. Remedial Measures

The company must ensure that measures are taken to remedy or mitigate the impact of violations of this code of ethics, including the Human Rights Policy.

These measures must be evaluated individually, depending on the violation and its impact. The important thing is to ensure compliance and that people are no longer affected. Each case must be thoroughly investigated to determine the root cause.

Sanctions must be applied to those responsible for a violation, which may range from a warning to justified dismissal, and corrective actions must be documented to prevent it from happening again if they are attributable to internal procedures or policies.

In the case of Human Rights, the direct, indirect, and potential risks or impacts must be assessed *using our risk matrix* to determine the mitigation actions necessary to reduce these risks.