

## Tecate Group's Code of Conduct

Corporate social responsibility is fundamental to Tecate Group's core values. As such, we have adopted the Responsible Business Alliance ("RBA") Code of Conduct, version 6.0 (2018). The RBA Code of Conduct defines performance, compliance, auditing, and reporting guidelines across five areas of social responsibility:

A. **LABOR.** Tecate Group is committed to upholding the human rights of workers.

- 1) **Freely Chosen Employment.** Forced, bonded (including debt bondage), or indentured labor, involuntary prison labor, slavery, or trafficking of persons shall not be used.
- 2) **Young Workers.** Child labor is not to be used in any stage of manufacturing.
- 3) **Working Hours.** Workweeks are not to exceed the maximum set by local law.
- 4) **Wages and Benefits.** Compensation paid to workers complies with all applicable wage laws.
- 5) **Humane Treatment.** There is no harsh and inhumane treatment, including any sexual harassment, sexual abuse, or corporal punishment.
- 6) **Non-Discrimination.** Tecate Group is committed to a workplace free of harassment and unlawful discrimination.
- 7) **Freedom of Association.** Tecate Group respects the right of all workers to form and join trade unions of their own choosing.

B. **HEALTH and SAFETY.** Tecate Group recognizes that a safe and healthy work environment enhances the quality of our products.

- 1) **Occupational Safety.** Worker exposure to potential safety hazards is controlled.
- 2) **Emergency Preparedness.** Potential emergency situations and events have been identified and assessed.
- 3) **Occupational Injury and Illness.** Procedures and systems are in place to prevent, manage, track, and report occupational injury.
- 4) **Industrial Hygiene.** Worker exposure to chemical, biological, and physical agents have been identified, evaluated, and controlled.
- 5) **Physically Demanding Work.** Worker exposure to the hazards of physically demanding tasks has been identified, evaluated, and controlled.
- 6) **Machine Safeguarding.** Machinery has been evaluated for safety hazards.
- 7) **Sanitation, Food, and Housing.** Workers have been provided with ready access to clean toilet facilities, potable water, and sanitary food-preparation, storage, and eating facilities.
- 8) **Health and Safety Communication.** Health- and safety-related information has been clearly posted in the facility.


C. **ENVIRONMENTAL.** Tecate Group recognizes that environmental responsibility is integral to producing world-class products.

- 1) **Environmental Permits and Reporting.** All required environmental permits, approvals, and registrations are maintained and kept current.
- 2) **Pollution Prevention and Resource Reduction.** The use of resources and generation of waste of all types has been reduced or eliminated at the source.
- 3) **Hazardous Substances.** Chemicals and other materials posing a hazard if released to the environment have been identified and are managed to ensure their safe handling and movement.
- 4) **Solid Waste.** A systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste has been implemented.
- 5) **Air Emissions.** Air emissions are controlled.
- 6) **Materials Restrictions.** Tecate Group adheres to all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing.
- 7) **Water Management.** Tecate Group has implemented a systematic approach to prevent contamination of storm water runoff. Wastewater generated from operations, industrial processes, and sanitation facilities is controlled and treated as required.
- 8) **Energy Consumption and Greenhouse Gas Emissions.** Tecate Group has identified and implemented cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

- D. ETHICS. Tecate Group upholds the highest standards of ethics.
- 1) Business Integrity. Tecate Group has a zero-tolerance policy toward bribery, corruption, extortion, and embezzlement.
  - 2) No Improper Advantage. Bribes or other means of obtaining undue or improper advantage have not and will not be offered, authorized, given, or accepted.
  - 3) Disclosure of Information. Information regarding participant labor, health and safety, and environmental practices will be disclosed as needed.
  - 4) Intellectual Property. Tecate Group respects intellectual property rights.
  - 5) Fair Business, Advertising, and Competition. Standards of fair business, advertising, and competition are upheld.
  - 6) Protection of Identity and Non-Retaliation. Tecate Group ensures that the confidentiality, anonymity, and protection of supplier and employee whistleblowers are maintained.
  - 7) Responsible Sourcing of Minerals. Tecate Group has a policy to reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or any adjoining country.
  - 8) Privacy. Tecate group is committed to protecting the privacy of personal information of everyone they do business with.
- E. MANAGEMENT SYSTEM. Tecate Group has established a management system whose scope is related to the content of this Code.
- 1) Company Commitment. A corporate social and environmental responsibility policy statement affirming Tecate Group's commitment to compliance and continual improvement has been posted in the facility in the local language.
  - 2) Management Accountability and Responsibility. Tecate Group has clearly identified the company representative responsible for ensuring implementation of the management system.
  - 3) Legal and Customer Requirements. A process to identify, monitor, and understand applicable laws, regulations, and customer requirements, including the requirements of this Code, has been instituted.
  - 4) Risk Assessment and Risk Management. A process to identify the legal compliance, environmental, health and safety, and labor practice and ethics risks associated with Tecate Group's operations has been instituted. Risk assessment includes the following areas: Production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities, and kitchen/cafeteria.
  - 5) Improvement Objectives. Objectives and targets to improve the social and environmental performance of Tecate Group have been set.
  - 6) Training. A training program for managers and workers has been implemented.
  - 7) Communication. A process for communicating clear and accurate information about Tecate Group's policies, practices, expectations, and performance to workers, suppliers, and customers has been instituted.
  - 8) Worker Feedback, Participation and Grievance. An ongoing process to assess employees' understanding of and obtain feedback regarding practices and conditions covered by this Code and to foster continuous improvement has been instituted.
  - 9) Audits and Assessments. Periodic self-evaluations are carried out.
  - 10) Corrective Action Process. A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews has been instituted.
  - 11) Documentation and Records. Documents and records to ensure regulatory compliance and conformity to company requirements, along with appropriate confidentiality to protect privacy, have been created.
  - 12) Supplier Responsibility. A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code has been instituted.

Certified by: Keith Short

Signature:



Title: Chief Operations Officer

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