

A MESSAGE TO OUR VENDORS

For GCC it is of utmost importance that relationships with our vendors are always carried out transparently, that they remain based on trust and mutual benefit, ensuring equal opportunities, respect for all participants, and total integrity in GCC's operations.

The procurement personnel who are in contact with you, follow these principles at all times based on our Code of Ethics, continuously working to improve their performance and avoiding all conducts that could be considered detrimental to the organization or any vendor.

Our Code of Ethics provides us with a guide for correct and fair moral conduct, your daily applications help us make better decisions to ensure that we are consistent with our organizational philosophy.

If you observe any unethical or illegal conduct, we encourage you to report it to the GCC Ethics Committee through our different communication channels including via email at gcc@ethic-line.com

No unethical or illegal conduct will be tolerated against any vendor that honestly reports a concern about misconduct, nor will false incident reports be accepted. Your support and determined participation are very important to us.

CODE OF ETHICS OPERATIONS

The GCC Code of Ethics applies to the entire organization and it is our responsibility to comply with and to enforce it. For this reason, different communication channels have been established that the GCC vendors can use to answer questions about the vendor Code of Ethics, to make suggestions, report on exemplary cases where GCC values are promoted, or any evidence of improper conduct within the organization. It is not always easy to define and judge whether a situation violates the law or our GCC Code of Ethics.

Any questions about the legal and/or ethical nature of a situation must be reported to the appropriate person. To file reports, a GCC vendor has the following alternatives:

- Corporate Procurement
- Legal Department
- Local Ethics Committees
- Corporate Ethics Committee
- Corporate Audit department
- Immediate coordinator or Human Resources

At GCC, we believe that the success of our business lies in being the best option for each of our stakeholders, that is the reason why:

- We strive to develop and implement strategies that ensure the highest level of excellence, creating value for our customers, shareholders, staff, vendors, and communities where we operate in. We are certain that our effective service and our competitiveness are factors that are fundamental in achieving our mission.
- We believe that our people, by acting with integrity, give us a competitive advantage. To develop our activities with honesty, responsibility, and respect. We build lasting bonds of trust and mutual benefit in all of our interactions. We promote clear and direct communication because we know that the plurality of opinions helps us to improve.
- We are convinced that the collaboration and teamwork among those who integrate GCC motivate our decision making and lead us to achieve better results. We demonstrate our professionalism through continuous improvement, effective communication, willingness to share our effort, and sharing knowledge with our stakeholders.
- We proactively and innovatively seek to satisfy the needs and expectations of our stakeholders.

GENERAL RESPONSIBILITIES

Vendors are expected to comply with these guidelines, and they must be familiar with the business and subcontractors to ensure that they work within the guidelines established by this Code. Failure to adhere to this code may result in suspension or termination of the Vendor business relationship with GCC.

Equity and justice in the relationship with our vendors. At GCC, within a framework of confidentiality and respect, we grant our vendors the same opportunities to hire them, without generating false expectations and always keeping consistency in the procurement process. The evaluation of the offers for the selection of our vendors is based on the criteria established by our company, which fully adhere to our values of Integrity and Collaboration.

RELATIONSHIP WITH VENDORS

At GCC, we strive to promote the standards of this Code. We expect that our vendors comply with the stipulations of this Code of Ethics and, in addition, we recommend and expect that they carry out their activities within the framework of current and applicable laws.

RESPECT THE TERMS OF CONTRACTS, LICENSES, LAWS, AND REGULATIONS

One of the principles that moves GCC is respect for agreements and the commitments established in the contracts. We also respect intellectual property and industrial rights. GCC employees cannot establish commercial relationships with contractors or vendors who do not demonstrate that they are duly authorized to use or marketing of products and services subject to payment of royalties or property rights intellectual or industrial to third parties, as well as authenticity and legality.

GIFTS AND HOSPITALITY

It is forbidden to request or condition a negotiation on the exchange of gifts, courtesies, or any type of presents. However, GCC employees are permitted to receive gifts or other courtesies from vendors such as promotional items, hospitality or other legal goods, as long as they adhere to customary business practices and do not exceed a monetary value of USD \$30.00 (thirty dollars), so that they do not compromise or appear to compromise the objectivity of the negotiation.

GCC employees should also not request, manage or accept discounts or accommodations from GCC vendors for their benefit or, except in established and authorized agreements of general application between GCC and its vendors, with the written authorization of the applicable Manager or Director. Moreover, it is not allowed to GCC employees to ask vendors for any type of donations or services for their benefit or the benefit of any third party, unless GCC, as a company, has decided to join the efforts of other companies to support campaigns directed to the attention of specific needs.

OPERATIONS AND COMMITMENTS

Conflict of interest: All of us at GCC shall act with honesty and integrity, seeking to protect the best interests of GCC. All of GCC employees shall avoid situations that imply or could imply any conflict of interest. A conflict of interest occurs when a GCC employee is in a position to derive personal benefit from actions or decisions made in their official capacity, this situation includes benefits to family members.

GCC EMPLOYEE AS VENDORS

GCC employees are not allowed to act as a vendor or render services for GCC. Employees owning personal businesses shall refrain from providing GCC with products and/or services.

FAMILY MEMBERS OF GCC EMPLOYEES AS VENDORS

GCC employees shall not influence directly or indirectly in any negotiation and/or decision-making process that involves vendors with a family relationship with the employee. All GCC employees shall notify this type of situations to their superior.

INAPPROPRIATE PAYMENTS

GCC prides itself in conducting its business lawfully and with a high level of integrity. Bribery and extortion are illegal and are subject to civil and criminal penalties. Bribes and extortion payments to government officials by GCC employees, vendors or individuals acting on behalf of them is strictly prohibited. Vendors and GCC employees shall immediately report to the Ethics Committee any situation relating to extortion or bribery.

There shall be no recruitment of child labor. Our vendors must comply with all laws regulating child labor and employ workers who comply with the required minimum legal working age.

DISCRIMINATION

GCC supports diversity and equal employment opportunity. Discrimination will not be tolerated on the job site. Vendors are expected to comply with all laws and regulations regarding discrimination and employment practices.

ENVIRONMENTAL RESPONSIBILITY

It is GCC's priority to encourage environmental awareness among our employees and provide environmental learning opportunities. GCC seeks to minimize our consumption of natural resources through procurement opportunities and operational conservation. It is expected from GCC Vendors to comply with all applicable environmental compliance obligations in the management of their operations with GCC.

SAFETY AND HEALTH AT WORK

GCC's operations shall be executed safely for both its personnel and the communities in which it operates. Security is our first priority. Any GCC employee who notices an unsafe condition that may cause any type of damage is authorized to stop or correct this action, including stopping the equipment or machinery causing this situation.

Vendors are expected to provide a safe work environment, preventing accidents and minimizing exposure to health risks. It is expected from Vendors a complete

commitment to comply with all applicable OSHA Standards in all countries in which they carry out their operations.

CONFIDENTIAL INFORMATION

GCC vendors shall comply with all applicable laws and regulations governing the protection, use, and disclosure of confidential and personal information.