

Sigma



Global Code of Conduct

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A Message From Our President and CEO

At Sigma we take pride on the fact that **our integrity and success are inseparable**. The goals we achieve are as important as the way we achieve them, our Principles guide the way we behave.

As Sigma has been growing to international locations over the years, a common guide is important and helpful. The Global Code of Conduct helps ensure our actions are led by our Principles and are congruent at every Business Unit where we operate.

*I encourage you to read and understand this Code to continue living a culture of integrity and inspire others to do the same.
I am counting on you!*

Rodrigo Fernández
Sigma President and CEO

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Our Purpose and Principles

Our Purpose helps us communicate why we do what we do, while our Principles help us prioritize and define the correct behaviors that will lead us to achieve our goals as a Company.

Our Purpose is to bring communities everywhere favorite foods to love

Our Principles are:

<p>Delight our consumers</p> <p>We improve our consumers' daily lives by creating and serving favorite foods they love.</p> 	<p>Innovate together</p> <p>We explore and learn to generate new opportunities for value creation.</p> 	<p>Deliver with integrity</p> <p>We deliver results with ethics and outstanding execution.</p> 	<p>Lead to inspire</p> <p>We lead by example, inspiring and motivating others to maximize their potential.</p> 	<p>Foster wellbeing</p> <p>We promote quality of life by taking care of our people and communities.</p> 
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Our Commitment

This Global Code of Conduct provides tangible expected behaviors that help us live a culture of integrity and sustainability.

Our commitment as employees is to:

Use this Code as a guide for making ethical decisions

Report any situation that violates or seems to violate this Code through our Integrity and Transparency Helpline

Additionally, we request our suppliers and business partners to act and behave in line with the general principles included in this Code.



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Integrity and Transparency Helpline

We must contribute to uphold this Global Code of Conduct and we encourage you to report any observations of others who fail to follow the Code.

The Internal Audit department from Alfa, Sigma's holding company, is responsible for the handling of the Integrity and Transparency Helpline reports. Alfa directs all reports to appropriate management personnel in Sigma for investigation support.

Integrity and Transparency Helpline Process



Using the Integrity and Transparency Helpline

Sigma does not tolerate retaliation against anyone who seeks advice, reports incidents in good faith, or cooperates during investigations on potential violations to the Code or our internal Policies and Procedures.

Violations to this Code will be subject to appropriate disciplinary actions and could result in civil and criminal penalties. If you have questions regarding the interpretation of this Code, please contact your direct supervisor or Human Capital department.

The Integrity and Transparency Helpline is available 24 hours per day, seven days per week.

**Contact the Integrity and
Transparency Helpline:**

[https://www.alfa.com.mx/CONT/
transparency.htm](https://www.alfa.com.mx/CONT/transparency.htm)

Decision Making Model

Before making a decision, ask yourself the following to ensure you *deliver with integrity*:

Does this action reflect the Sigma Culture: our Purpose, Principles, Behaviors, and Code of Conduct?

Does this action comply with our Company Policies, Procedures, guidelines, and the law?

Is this action in the best interest of Sigma?

Am I willing to be held accountable for this action?

If you answered *no* to any of the questions mentioned above, refrain from taking action.

If you are unsure about how to proceed, ask for advice with your direct supervisor, Human Capital department, or the Policies and Procedures department.

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We Live a Culture of Integrity

Adhering to Applicable Regulations
Abiding by Honest Business Practices
Avoiding Conflicts of Interests
Safeguarding Company Resources

Adhering to Applicable Regulations

At Sigma, we do not commit or condone any unlawful or unethical acts related to our work, nor do we encourage others to do so. We also avoid situations that could be perceived as unlawful.

Avoiding Fraud

Fraud could include the act of making false representation, failure to disclose information, or abusing a position of trust, with the intent to take advantage, cause a loss, or to expose another to the risk of loss.



Fraud may involve one individual or several people in collusion, who could be either from within or external to Sigma.

We must not submit false, inaccurate, incomplete, or untimely records or reports, nor be involved in financial Fraud.

Preventing Money Laundering

Money Laundering refers to the attempt to conceal or disguise the origin of funds generated by illegal activities.



To prevent Money Laundering, we maintain a complete and up to date adherence to relevant restrictive measures adopted by local governments and international organizations against certain countries, people, assets, or services.

Trade Regulations

We comply with all the import and export laws and regulations of the countries where we operate.

It is not permissible to export Sigma's products to a country, territory or person that is subject to a sanctions program or to a person that is otherwise prohibited or restricted by sanctions laws.

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Abiding by Honest Business Practices

Corruption

Corruption or Bribery Acts

Offer or promise, pay or receive money or *Anything of Value* to/from any individual or entity, to improperly influence their acts or decisions in order to obtain an unfair or unlawful benefit or advantage either as a personal favor or for the Company.



Anything of Value may include, but is not limited to discounts, gifts, training and education, entertainment, meals and drinks, transportation, lodging, insurance benefits, promises of future employment, forgiveness or cancellation of debt, as well as the use of materials, facilities or equipment.



At Sigma we honor the moral value of honesty and observe all anticorruption laws and regulations. We do not accept, perform, order, authorize, promise, conspire, or induce Corruption Acts whether directly or through a third party.

The mere act of offering or promising any kind of wrongful compensation, even if the act had not been completed, it is itself an Act of Corruption.

Facilitation Payment refers to an expediting payment to a public official, political party, or party representative, with the purpose of expediting or securing the performance of a routine governmental action.



Commercial Bribes and Facilitation Payments are also prohibited by the Company.

The definition of Corruption Act may differ from one country to another. Consult the applicable Policy for additional information.



Business Gifts and Hospitality

All gifts and business hospitality must adhere to good business practices, applicable laws, regulations, and internal Policies. Before giving or accepting gifts make sure you can agree to the following:

*I will feel at ease, even if it goes public.
My reputation or that of Sigma won't be affected.*

Consult the applicable Policy for additional information.



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Avoiding Conflicts of Interests

Conflicts of interests limit our objectivity while performing our duties and responsibilities. They arise when we make improper use of our position, influence or authority to benefit our personal interest.

We abstain from making decisions during actual or potential conflicts of interests and follow the applicable Conflicts of Interests Policy to ensure the objectiveness of our decision.

Consult the applicable Policy for additional information.



Safeguarding Company Resources

Company Assets and Resources

include information, products, phones, computers, printers, e-mail accounts, internet services, facilities, materials, equipment, time, services, company vehicles, among others.



Sigma is committed to provide its employees with the resources necessary to perform their professional activities. As employees, we responsibly use Company Assets and Resources for legal business purposes that are aligned with our Principles.

For that reason:

We do not access or share unsafe or offensive content

We take all reasonable security measures to safeguard the Company Assets and Resources

We are cost conscious at all times

Consult the applicable Policy for additional information.



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We Foster a Safe and Dignified Environment

Valuing and Respecting Each Other
Preventing Harrassment
Promoting a Safe Workplace
Guaranteeing Human Rights

Valuing and Respecting Each Other

Diversity refers to the similarities and differences among us in terms of gender, age, race, ethnicity, color, nationality, disability, religion, marital status, sexual orientation, among others.



We guarantee equal opportunities through decisions based on talent, performance, and qualifications; regardless of an individual's Diversity.

Our processes and strategies promote inclusion, impartiality, and do not discriminate against any current or potential stakeholder.

Consult the applicable Policy for additional information.



Preventing Harassment

Harassment is any offensive conduct that would be considered intimidating, hostile, abusive, severe or pervasive, among others.



We foster dignity and respectful treatment for all employees; prohibiting any type of Harassment:

Sexual Harassment, which includes inappropriate gestures, remarks, requests, or physical contact, among others

Physical Harassment (such as hitting, shoving, kicking, among others) and **Psychological Harassment** (offensive or degrading language, jokes, slurs, insults, among others)

Abuse of power or authority through intimidation, inappropriate requests, or threats, among others

Consult the applicable Policy for additional information.



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Promoting a Safe Workplace

We ensure our ability to work safely and effectively by:

Enforcing our Safety Best Practices, a world-class program for managing Environmental, Health and Safety risks

Leading programs that motivate us to adopt habits that improve our quality of life

Reporting unsafe conditions, incidents, near misses, or accidents to the employees qualified to take proper actions

Prohibiting the distribution or consumption of drugs or alcoholic beverages in the workplace

If something can't be done safely, it will not be done.

Guaranteeing Human Rights

Human Rights are those rights inherent to human beings, despite any condition of Diversity, status or activity.



We respect and support Human Rights — as defined in the United Nation's International Bill of Human Rights— and as a Company:

We provide fair and equitable wages and other employment conditions in accordance to international and local laws

We respect the right to freedom of association

We secure a safe and humane work environment

We prohibit forced or child labor

We promote respect and compliance with Human Rights and fundamental freedoms

Consult the applicable Policy for additional information.



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We Commit to Our Stakeholders

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and Legally
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Promoting Quality and Food Safety

To guarantee the best food products:

We design, innovate, purchase, produce, and distribute healthy and safe foods with world class quality standards every time

We do not produce, or transfer hazardous or defective products

We comply with local food safety legislations and regulations

To ensure total customer and consumer satisfaction all comments, complaints, petitions, or reports are investigated and resolved in a timely manner.

Consult the applicable Policy for additional information.



Collaborating with Our Suppliers Ethically and Legally

To guarantee transparency we formalize contracts or agreements and select our suppliers under unbiased criteria.

We expect our business partners to:

Comply with all applicable laws and regulations, or any other relevant statutory requirements

Comply with applicable Company Policies and Procedures

Provide a safe and healthy work environment for their employees, as well as to act in an environmentally responsible manner

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Competing with Integrity

We strictly comply with the competition laws of the countries where we operate. To meet the needs of our customers and consumers through free market competition:

We do not engage in false advertising

We do not get involved in any agreements, understandings, or direct or indirect coordination between competitors regarding prices, terms of sale or purchase, market-sharing, or the allocation of customers or suppliers

We do not participate in any other activities that may aim or have the effect of restraining competition

Ensuring Transparency in Communications

We are committed to delivering truthful and timely information to each of our stakeholders.

To uphold our rich history of success we ensure internal and external communications are managed carefully by experts designated by the Company. We are also expected to conduct a professional behavior in representation of the Company.

Consult the applicable Policy for additional information.



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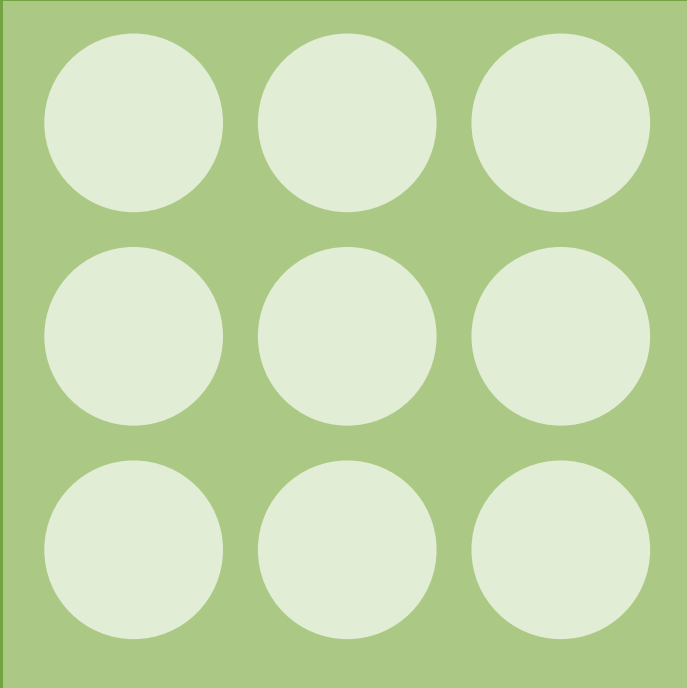
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Following Security Procedures

Personal Data refers to any information related to an identified or identifiable person, i.e. the data subject.



We protect our Personal Data and that of fellow employees, suppliers, customers, and consumers by:

Processing Personal Data only when necessary for a legitimate business purpose

Considering data privacy implications for any activity involving Personal Data

Following strict security procedures when managing Personal Data, including access only to those authorized to manage Personal Data

Reporting any Personal Data breach immediately to the appropriate Company leadership

Consult the applicable Policy for additional information.



Ensuring Confidentiality

Confidential Information refers to any information that we deem proprietary and that could be detrimental to the Company if it was made public. This could include information related to client lists, investors and employees, business or marketing strategies and plans, contractual relationships with others, trade secrets, technical specifications, products, activities, financial position, accounts, reports, recipes, or manufacturing methods and procedures that are not public in nature.



We do not share or disclose Confidential Information to anyone outside the Company or its holding company, affiliates, or subsidiaries.

The internal processing and access of Confidential Information, particularly trade secrets, will be technically and contractually restricted to employees having a business need to use it within the scope of the interests of the Company.

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The above confidentiality restriction shall apply to the same kind of information obtained by the Company from any third party in the context of a commercial or contractual relationship when the parties have agreed to such confidentiality restrictions.

If in the context of commercial or contractual relationships, the disclosure of or access to Confidential Information is necessary, Sigma and the disclosing or receiving party shall undertake the proper technical and legal measures to ensure the confidentiality of the information. These matters will remain in effect even after someone ceases to have a formal tie to Sigma.

Consult the applicable Policy for additional information.



Respecting Intellectual Property Rights

We value intellectual property rights (including patents, trade secrets, trademarks, or copyrights), and we shall take the appropriate measures for their protection.

We must avoid the unauthorized access to any third parties' intellectual property rights or its improper use.

We consider such intellectual property rights in our everyday actions; including in agreements with customers, clients, suppliers, or any other entity with whom we have a business relationship.

We report to our local Legal Department any suspected counterfeit products or any practice that may infringe our intellectual property rights, including any creations of commercial image (logos, brands, or slogans), creative work (software, music, videos, designs, among others) or technological developments (processes, products, equipment, packages, among others).

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Avoiding Insider Trading

Inside Information refers to non-public corporate information relating a Company or its Securities, which is not available to the rest of the market participants.



Insider Trading refers to the buying or selling of the Company's Securities, or that of related companies, including its holding company or subsidiaries, using Inside Information to take advantage for personal benefit.



Securities refer to shares, bonds, and other negotiable instruments.



We will not trade the securities of Sigma, Alfa or those of companies related to the group while we have knowledge of Inside Information.

Additionally, to avoid Insider Trading, we must not disclose any Inside Information.

Reporting Clear and Objective Information

Our data reflects our financial and operating status. We avoid tampering, manipulating, or altering data reports, accounts, bills, or any other Company information. Additionally, we cooperate with internal and external auditors when performing audit and regulatory activities.

Audit results or other financial information of the Company are time-sensitive. For that reason, they will be shared exclusively by Sigma's President and CEO, Organizational Unit CEOs, CFO, and/or spokespersons designated by them.

Records Retention

We shall comply with Sigma's Policies related to records retention to ensure that:

Critical records are available for business needs

Legal and corporate requirements are met

Outdated or no longer needed records are destroyed in an appropriate manner to assure confidentiality

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**This Code represents our shared
commitment to ensure integrity,
transparency, safety and
wellbeing —
every day, every time.**

Updated 2020
This is the current version of the Code.
It overrides previous versions.