



Conflicts of Interest

Global Policy



OBJECTIVE

Establish guidelines to opportunistically identify potential Conflicts of Interests, allowing employees to avoid negative impacts to the Company resulting from decisions influenced by these situations.

DEFINITIONS

Blood Relatives:

Relatives in ascending, descending or collateral lines such as grandparents, parents, offspring, grandchildren, siblings, uncles/aunts, nephews/nieces, and cousins.

Conflicts of Interest:

Personal situation of any employee where due to their position, time, resources, or information places them in a position that a decision made on behalf of the Company may render a benefit either personally and/or to their families. Employees' relationships with a third party that would impair his or her judgment to perform its job responsibly, or lead to a misuse his or her position, authority, or influence inside the Company.

Friendships:

People with whom a relationship has been nurtured, presenting fondness, sympathy, loyalty, solidarity, cooperation, unconditionality, commitment or any other relation or conduct that may influence, or may allow assume influence, our objectivity, liberty, and transparency to make decisions or define behaviors.

In-Law and Relatives by Election:

Relatives such as spouses / partners / cohabiting partners, relatives by marriage, godparents, and godchildren.



POLICY

It is of special interest for Sigma, that all employees perform their job in an environment that promotes a spirit of honesty and transparency inside and towards our Company. Most particularly, in the decision-making processes, Sigma expects all employees to act in a loyal and impartial manner, always striving to preserve the equity and both the internal and external images of the Company.

Sigma and its Companies have the policy of avoiding any decision made by its employees that is or gives the appearance of being influenced by a Conflict of Interest.

Conflict of Interest:

A Conflict of Interest arises when a personal situation of an employee, because of his/her role, time, resources, or information, place him/her in a position where a decision made in name of the Company may benefit his/her personal interests or those of his/her family or Friendships.

Additionally, a Conflict of Interest exists when an employee can't objectively perform his/her work responsibilities because of a relationship with a third party, doing improper use of his/her role, authority, or influence within the Company.

The following are or may be Conflict of Interest situations:

- Being or having Friendships, Blood, or In-Law Relatives as stockholders in companies that are competitors, suppliers, dealers, or customers.
- Having Friendships, Blood or In-Law Relatives working in companies that are competitors, suppliers, dealers, or customers of Sigma and due to the functions of the employee's position may lead to preferential treatment or limit the objectiveness in their responsibilities.
- Having Friendships, Blood or In-Law Relatives working in any Sigma subsidiary where there is a direct organizational dependence or they are in the same reporting organization line, or in a position related to that of the employee (the function of which is part of is the same process), leading to preferential treatment and/or limited or inadequate control of the operations.
- Provide services to Sigma's competitors, suppliers, dealers, or customers involving an economic compensation.
- Manufacture, transform or sell products and/or services that compete with current or potential offers of the group.



- The employee has responsibilities with a third party or interests outside the Company that are related with his/her duties.
- Receiving benefits or gifts from a supplier, competitor, dealer, or customer in more than three occasions during a twelve-month period or having a value greater than \$100 USD per event (with the exception of institutional events organized not only for the employee).

In presence of a situation compromising a potential Conflict of Interest, the employee must report this to his or her immediate supervisor and, upon the supervisor's judgment, refrain from making any individual decision, transferring such tasks to the supervisor or to a competent third party that would guarantee an impartial judgment.

Sigma's Policy ensures that all cases where a potential Conflict of Interest occurs, such event will be investigated, assessed, and resolved in a fair manner, always respecting both the employee's and the Company's rights and adopting the preventive or corrective actions that might apply.

All Conflict of Interest statements (Annex 1) from the Company's personnel shall be recorded and kept updated with the following frequency:

- Employees: every two years or whenever a case of a potential Conflict of Interest occurs; it may be submitted in physically or digitally.
- Employees in positions that have a greater exposure to a Conflict of Interest: annually or whenever a case of a potential Conflict of Interest occurs; in these cases, a handwritten signature is required.
- * Employees in positions with greater exposure to a Conflict of Interest are the CTO and the complete Technology area (direct and indirect reports), CITO and the complete Information Technology area (direct and indirect), Executive Committee and their direct reports, and employees in the following areas: Procurement, Vehicle Control, Marketing, Development Engineers, and those responsables for distribution centers.

All potential Conflict of Interest events shall be analyzed, assessed, documented, and resolved in a term not longer than 30 days by a committee especially created to such effect, the resolution of such committee shall establish a deadline for its implementation. The committee shall be coordinated by the Human Capital area and integrated by several members of other areas as described in Annex 2.



The result of the analysis and research process must be reported to all involved parties, taking applicable actions, duly recorded, and signed by the committee members, attaching it to the employee's Conflict of Interest statement.

Responsibilities

All employees shall:

- Report their personal situation with respect to a potential Conflict of Interest when joining the Company and keep that situation updated as per applicable frequency, signing a Conflict of Interest statement.
- Report to their supervisor whenever a situation that is or seems to be a Conflict of Interest occurs.
- Refuse all benefits or gifts that might cause a Conflict of Interest in their job and in case of considering that they do not cause a Conflict of Interests to obtain the written consent of their supervisor.
- Refrain from making decisions under a Conflict of Interest and during any analysis process of a potential Conflict of Interest.

All Managers with other employees under their direct supervision shall:

- Support the Human Capital department efforts in the communication of this Policy and sign the Conflict of Interest statements including their respecting updates.
- Monitor the Policy's enforcement and compliance.
- Evaluate potential Conflict of Interests reported by their direct reports and report them to the Human Capital area.
- Assume responsibilities and take decisive actions when a Conflict of Interest arises to any direct report or when a potential Conflict of Interest may be under investigation.
- Determine, alongside the Human Capital area, if an employee may or not accept the benefits or gifts that might cause a Conflict of Interest.

The Human Capital area shall:

- Ensure that newly hired personnel are aware of, and in compliance to this Policy, and has signed a Conflict of Interest statement.
- Implement and require the updated Conflict of Interest statements and their signature as needed.
- Keep in custody all signed statements, physical or digital, as applicable.



- Coordinate committee meetings to assess reported cases of Conflict of Interests and identify employees in positions having a higher exposure to a Conflict of Interest to maintain a yearly update.
- Request the update of the Conflict of Interest statement upon receiving notice of a Conflict of Interest.
- Notify to the Unit Director and the Human Capital Director in doubt of or under a potential Conflict of Interest. In case of an evident Conflict of Interest, notify the Alfa's Internal Corporate Audit area.

The people responsible for the compliance and enforcement of this policy are:

- The President, in all cases regarding Group CEOs.
- The CFO, in all cases regarding the OU's Excomm members.
- The Talent & Culture Senior VP, in all cases regarding other Directors.
- The Human Capital area, in all cases regarding all other employees.

It is essential the compliance of these guidelines. Making decisions under a Conflict of Interests and/or not reporting it on time is a breach of this document and may have serious repercussions. Penalties may result in loss of trust in the employee and rescission of contract.



ANNEX 2. Conflict of Interest Committees

The members of this committee will be the following, based on the organizational level of the people involved:

1. For Employees:
 - Immediate Supervisor
 - Corresponding Area Manager
 - Corresponding Human Capital Manager
 - Alfa's Internal Audit Manager

2. For Managers:
 - Immediate Supervisor
 - Corresponding Human Capital Manager
 - Talent & Culture Senior VP
 - Alfa's Internal Audit Manager

3. For OU's Excomm members and Directors:
 - Immediate Supervisor
 - The corresponding OU's Human Capital leader
 - Talent & Culture Senior VP
 - Alfa's Internal Audit Director

4. For Group CEOs:
 - Sigma's President & CEO
 - Sigma's CFO
 - Alfa's Legal, Auditing and Corporate Affairs Senior VP