

Company Code of Conduct and Ethics

pecom

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INTRODUCTION

Our Company Code of Conduct and Ethics establishes the manner in which all employees of PECOM work, regardless of the location we are in or the position we hold.

Our goal is to be a leading company in innovative and sustainable solutions for the energy industry in the markets in which we operate, permanently exploring new opportunities and working proactively with our clients to identify their needs and generate appropriate solutions.

Our Philosophy is to operate in an Ethical and Austere manner, preserving the safety of our employees and contractors, actively involving ourselves in the communities where we operate, and taking care of the Environment. We consider that our differentials are our Brand and our People in a framework of constant Innovation and Continuous Improvement.

We request that our suppliers, subcontractors and other strategic partners adhere to the Principles of our Company Code of Conduct and Ethics.

CHAPTER I: **OUR EMPLOYEES**

We believe that the main differential resource of the organization is the people in it. The key to the development of the company is the relationship with its employees, based on mutual respect and commitment.

PECOM UNDERTAKES TO:

- Guarantee a safe and healthy work environment, based on our Quality, Safety, Health and Environmental policies included in the Integral Management System of the company.
- Respect local existing laws for labor agreements and the international Principles of the International Labor Organization and the Universal Declaration of Human Rights of United Nations.
- Promote personal and professional development of our people in an environment of continuous motivation, innovation and training.
- Provide equal opportunities to employees without distinction of gender, race, nationality, religion, ethnicity, marital status, sexual orientation or any other factor of individual differentiation. We respect and promote diversity and combat all forms of prejudice, discrimination or harassment.
- Provide an Ethics Line, a formal, confidential and anonymous communication channel for concerns and claims, free from retaliation, based on our open and transparent communication.
- Respect the right of employees to affiliate to or associate with unions in accordance to the existing laws, without any form of discrimination towards unionized workers.

PECOM EMPLOYEES UNDERTAKE TO:

- Respond professionally and with dedication to the responsibilities PECOM has entrusted, leaving aside any attitude or behavior that might damage or conspire against the positive outcome of a project.
- Act in an honest, fair and decent manner, with an entrepreneurial and service approach towards everyone we relate to at work, understanding that the other person's success is also our own.
- Work as a team, maintaining a positive and collaborative attitude that stimulates the creativity potential of members and the best path to a job well done.

- Avoid direct or indirect involvement or participation through a relative, acquaintance or friend in any activity or business in opposition of the interests of PECOM or that results in a financial benefit for oneself.
- Avoid participation in and report any internal or external act that could damage the image, reputation or interests of PECOM. Additionally, report any act of discrimination or harassment the employees become aware of.
- Avoid and report situations that might generate a conflict of interests, financial or otherwise.
- Maintain confidentiality of any information that might be used by third parties against the interests of PECOM, except when requested by Justice and with the intervention of the Legal Department of the Company.
- Avoid using PECOM goods for personal use and give them proper use for the observance of our responsibilities.
- Avoid obtaining undue advantages from the task performed or post held at PECOM.
- Avoid demanding, insinuating, accepting or offering any type of favor or good as counterpart for professional activities that could jeopardize the transparency of entrusted responsibilities.

CHAPTER II: **COMPANY ETHICS**

The present Chapter describes the framework for all commercial practices of PECOM with key stakeholders (clients, suppliers, subcontractors, partners, government, municipalities, among others).

We establish ethical conduct Principles in our relation with all the parties interested in connection to our operation, including our employees.

Every act against the present Company Code of Conduct and Ethics must be reported. To that end, we have a confidential and anonymous Ethics Line where the interested parties can channel their claims and report events that do not respect the Principles of this Code.

PRINCIPLES:

- We comply with the existing legal requirements in the country and adhere to the Principles of the International Labor Organization and the Universal Declaration of Human Rights of United Nations. The adherence of the Company to said standards generates a limitation in the relation with suppliers, subcontractors and clients that breach such Principles.
- No employee will, directly or indirectly, offer nor accept any type of undue payment nor any other type of retribution to nor from a person or organization for that person to act against their obligations to ensure undue advantage pertinent to the management of the business of PECOM.
- We do not admit payment of contributions to public officers with the purpose of them performing their duties in a certain form.
- Employees as well as external interested parties (clients, suppliers, partners, subcontractors, among others) must sign their adherence to the present Company Code of Conduct and Ethics, and commit to comply with the principles herein.
- All representatives of PECOM must act with sound judgement, honesty and integrity. They must avoid and report situations that might generate a conflict of interests between their financial interests and the company business.
- We do not tolerate corruption, bribe nor unlawful and anti-competitive actions.
- We do not accept any form of discrimination nor harassment addressed to or exerted by any of our employees.
- The breach of compliance of the present Company Code of Conduct and Ethics or applicable laws shall result in internal and/or legal sanctions.

CHAPTER III: ***SAFETY AND ENVIRONMENT***

It is a priority for PECOM to maintain the highest level of safety for our employees in order to preserve their integrity and that of the community at large.

We are strongly committed to the environment during our operations. We make rational use of resources, generate specific programs and comply with existing laws.

We seek to maintain the highest quality standards in management by complying and adhering to all existing standards. We are certified in ISO 9001, OHSAS 18001, ISO 14001 Standards. The latter establish the effective requirements to achieve Quality Management System, Safety and Occupational Health Management System and Environmental Management.

PRINCIPLES AND UNDERTAKINGS:

- To develop business with social and environmental responsibility.
- To maintain and update the Integral Management System that provides the compliance framework for safety and environmental standards.
- To involve external interested parties such as clients and subcontractors in the environmental process of the company.
- To promote internal and external awareness actions in safety and environment.

CHAPTER IV: **CORPORATE GOVERNANCE**

The foundations of development and success of a company are the adoption, identification and fidelity to its values and principles. Such values must provide a common sense of direction for the entire organization by establishing action guidelines.

We view the company as a framework that must satisfy the principles of direction unity, team work, participation, delegation, motivation and professional development.

In our organization, the roles of the shareholder and management work cooperatively according to the particularities of the activity, providing autonomy but at the same time establishing clear strategic guidelines within the framework of our Corporate Philosophy.

CORPORATE GOVERNANCE OF PECOM UNDERTAKES TO:

- Find the balance between interests and rights of stakeholder, board of directors, and high administration, aligned with the strategic objectives of PECOM.
- Do business with integrity and ethics, respecting communities, the environment and all interested parties.
- Maintain a relation with competitors based on respect and compliance with competition rules. Additionally, promote honest and fair negotiations with suppliers and clients, avoiding advantages rendered undue or connected to personal interests.
- Have an Ethics Line, a formal, confidential and anonymous communication channel for reports, suggestions or claims from different audiences.

CHAPTER V: **COMMUNITY AND GOVERNMENT RELATIONS**

Establishing dialogue and collaboration spaces with the interested parties is key to achieving sustainable management.

PECOM believes it is fundamental to have an active role in society, for which we develop social investment actions and programs in the communities where we operate and in society all large.

Our role in the community is of a socio-economic nature, but not political, thus we are plural and independent. Under such framework, we respect the laws governing our relation with public authority.

PECOM UNDERTAKES TO:

- Contribute to technological and economic development using the best available practices in the energy industry.
- Contribute to improve the quality of life of our employees, and thus, the society where they live in, especially in the areas where we operate. We focus our actions of corporate voluntary work based on the pillars of Education and Social Services, among others.
- Maintain collaborative relations with Municipal, Provincial and National Governments, respecting existing legislation, stakeholders' guidelines and the Principles of the present Company Code of Conduct and Ethics which regulate our relation with public authorities.



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