




Global Code of Conduct



H&CO.



The **H&CO Global Code of Conduct** provides the Company with common guidelines. Such guidelines should aim to provide a common framework on the basis of which we hope to guide those who guide our behaviors and actions of all those with whom H&CO relates. This Code is based on H&CO's purpose, the values it shares and what the Company wants to achieve.



**Our purpose:
To conquer
new markets.**

H&CO's mission is to help people and organizations to **conquer new frontiers** by providing first class international professional services. We want to deliver quality in everything we do and gain the trust of not only our clients, but also the market.



**Our goal:
Trustworthy
global advisors.**

H&CO seeks to create long-term value as the world's best provider of **professional services**. We believe in building relationships with our clients, team members, and stakeholders.



**Our values:
Who
we are.**

H&CO professionals and everyone with whom it relates must act with integrity, respect, teamwork spirit and attitude and inclusiveness. H&CO expects its professionals to act with passion, enthusiasm, a desire to learn and the courage to lead. People who build relationships based on doing the right thing. We seek to develop outstanding leaders that create long-term value, lead us to sustainable growth and inclusive culture.
We care about people.



Message from the Senior Management to the H&CO team:

Today, we work in a demanding, complex, and increasingly globalized world. Every day we face challenging situations and the decisions we make in the face of these situations define our reputation as individuals and as an organization. To guide us, we rely on our values: (People first. Teamwork. Client Centric. Passion. Excellence. Diversity. Innovation. Knowledge. Hard work. Integrity). They guide our actions and behaviors. They influence how we work and how we serve our clients, and how we relate to communities.

These core beliefs go hand in hand with an ethical conduct and form the foundation of our company, which is committed to maintaining a work environment where our team members feel proud to belong to. In order to meet these goals, we present our Global Code of Conduct, which applies to ALL professionals, vendors, partners, suppliers and third parties with whom H&CO relates, and aims to create a work environment of productivity, teamwork, trust and respect.

It is essential that everyone fully understands and complies with the code. By doing so, we send a clear message to those with whom we work with on the strength of our commitment to ethical behavior, quality, and inclusive labor practices.

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H&CO expects us all to comply with the principles of honesty, respect, justice, and integrity. We must manage to preserve these values, through their application in the activities that we carry out in our respective jobs, every day. However, given that it is impossible for this code to cover all the practices and principles related to ethical and honest conduct, it will also be our responsibility to use common sense. This goes along with the simple desire to do the right thing when making business or personal decisions that are within the guidelines mentioned here.

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I hope this code is respected by all team members and guides us to be the best people and professionals every day.

Sincerely,

**Armando
Hérendez,
CEO**



The code in **action**

As we said, the Code helps guide our behavior, but it is not possible to cover all the situations you may face. Our goal is to help you make decisions that align with our values.

**But...
how do we put
it in action?**



Follow the principles **below**:

- **Complying with the law at all times.**
- **Being honest and impartial.**
- **Not manipulating, misrepresenting, abusing and hiding information.**
- **Avoid having a conflict of interest.**
- **Not discriminating.**
- **Not besieging.**
- **Not acting unethically (including when a person requests it).**
- **Never ask someone to act inappropriately or unethically.**
- **Asking your manager for help if you have any doubts in relation to the Code, or in the event of facing an ethical dilemma.**
- **Cooperating with any type of investigation related to a possible violation of ethics.**
- **Reporting violations or possible violations through our channel.**



Who does this Code **apply to?**



To all the professionals of all the countries in which we operate, regardless of your position, practice, or role. H&CO hopes that its suppliers, consultants, legal advisors and contractors act ethically and consistent with this Code. When hiring a provider, precautions should be taken when necessary, to ensure that you have hired someone with ethical conduct and integrity.

What are our **responsibilities?**

The following basic obligations apply to all team professionals and stakeholders:

- Always comply with the law. If you have any suspicion or knowledge of a violation you notice that another employee is breaking the law by occurring in your environment or employment relationships report it immediately.
- Read and understand the Principles of H&CO and apply them daily in your work.

- Learn the policies that apply to your work.
- Whenever you have any questions regarding the application of the Code or any other policy, ask your manager for help, People Experience or other people within the company.
- If you are aware of any possible violations of the Code or any H&CO policies, it is your duty to report it.

- There are different ways to report problems. It is important that you understand that. You can do it directly with your manager or by directly contacting **compliance@hco.com**
- Cooperate with any investigations regarding violations to the Code or H&CO policies.
- Do not discriminate. H&CO does not accept  misogynistic, disrespectful, offensive, intimidating, humiliating, slanderous behaviors, among others!
- Treat each other with respect and dignity. 



How do you report an ethical problem or any other conduct or behavior opposite to the values and principles stated in this Code?

Using one of the following methods:

a. **Open Door Policy.** It is the most direct method to report any kind of problem to a manager directly. If you think your direct manager is engaged in such unethical conduct, you may report it to the highest-ranking leader you consider.

IMPORTANT: No retaliation will be taken against any collaborator who, in good faith, has reported an alleged violation to ethics in business.

b. **People Experience Area.** It is responsible for receiving any report of ethics violation at any level of the organization and must comply with the applicable investigation procedure. Complaints can be made in an identified or anonymous way, through the Direct Line channel on the Company's website. Complaints will be received and analyzed by the Compliance Area.

For a better understanding, we have organized our Global Code of Conduct in five categories:

- 1. Working with H&CO colleagues**
- 2. Working with clients and external parties**
- 3. Acting with integrity**
- 4. Maintaining our objectivity and independence**
- 5. Protecting data, property, and information**



Working with each other, **how?**

Building

relationships based on trust, knowing that each one of us is willing to give the best of themselves and do the right thing.

Respecting us,

valuing differences, and striving for H&CO to be an inclusive environment, free from discrimination, bullying and moral or sexual harassment. We do not tolerate mistreatment of any type.

Celebrating

our differences to foster an inclusive environment where all people feel valued.

Committed

to build diverse teams and maximize the power and essence of each one of our team members.

Valuing

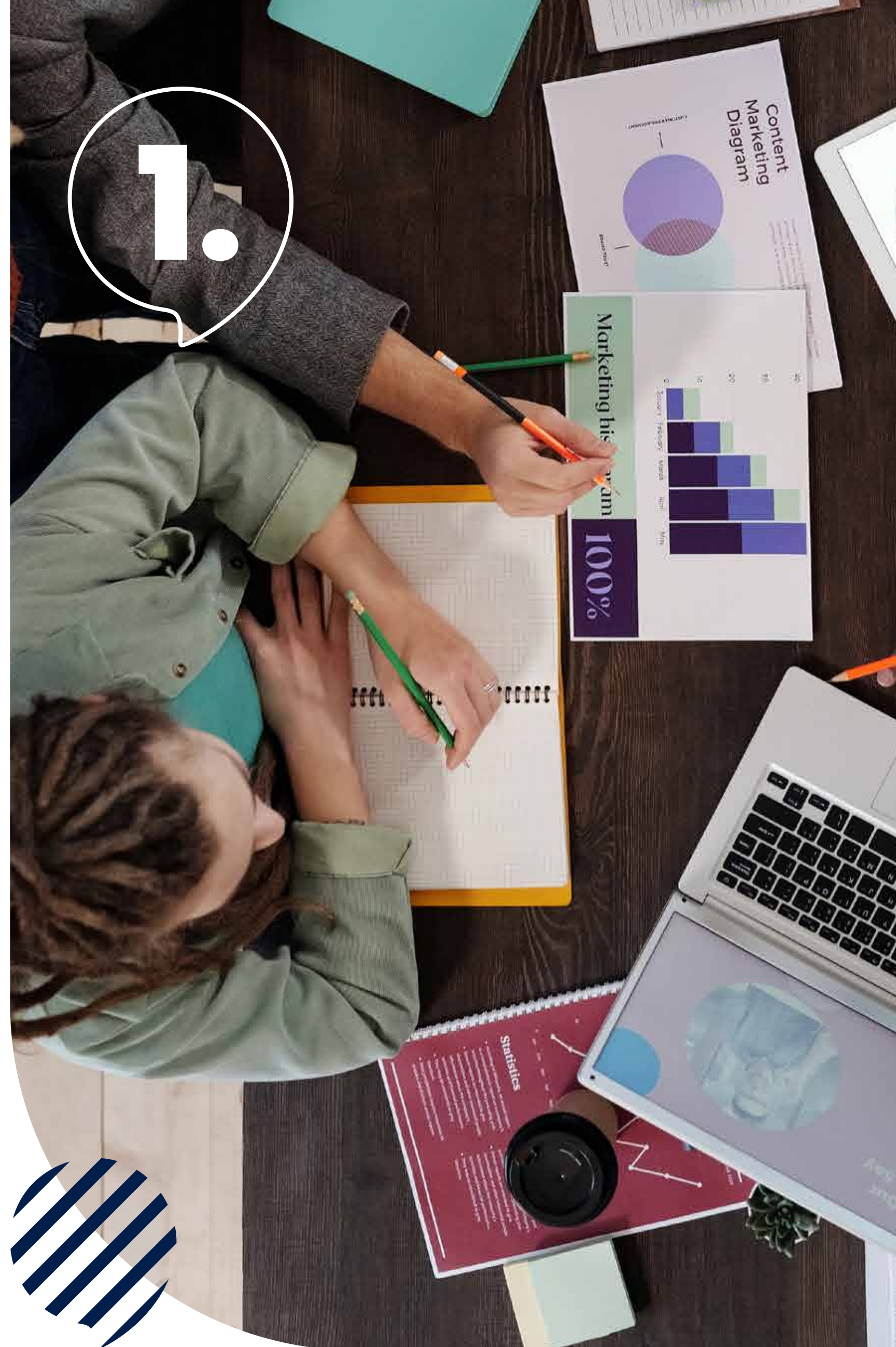
different perspectives and those who challenge our own point of view.

Praising

integrity, respect, teamwork, and inclusion.

Encouraging

and supporting the professional development of our colleagues and promoting individual achievement and development.





Working with clients and external parties, **how?**

Important: No client or external relationship is more important than the ethics, integrity and reputation of H&CO.

Committed

to maintain the trust placed in H&CO, by providing quality services that reflect our professionalism and our capabilities.

Being

loyal to our clients and not fearing to deliver undesired information.

Evaluating

not only if we can make a compromise, but if we must do it.

Supporting

our people, if there is undue pressure or threats from the client.

H&CO bases its relationships with its suppliers on legal, efficient, and fair business practices. The selection of suppliers should be based on criteria objectives of quality, price, and compliance of delivery dates. H&CO suppliers should be treated with respect, impartiality, and honesty. No professional at H&CO should take advantage of any supplier using the commercial position or influence of H&CO. The company also expects suppliers to comply with all legal requirements applicable to their business practices.

Acting with integrity, how?

Our integrity.

We comply with the laws, regulations and rules that apply to us. We defend the reputation of H&CO. We promote a culture of openness; we are open to questions. We address ethical issues and help solve them. We do not ignore problems. We understand and we comply with all policies, guidelines, and procedures of H&CO. We provide a hotline to report sensitive ethical issues.

Our approach.

We recognize that each one of us is responsible for keeping our knowledge up-to-date and share best practices. We compete with energy and vigor, and we are honest. We do not offer personal incentives to get a job or other advantages.

Documenting our work.

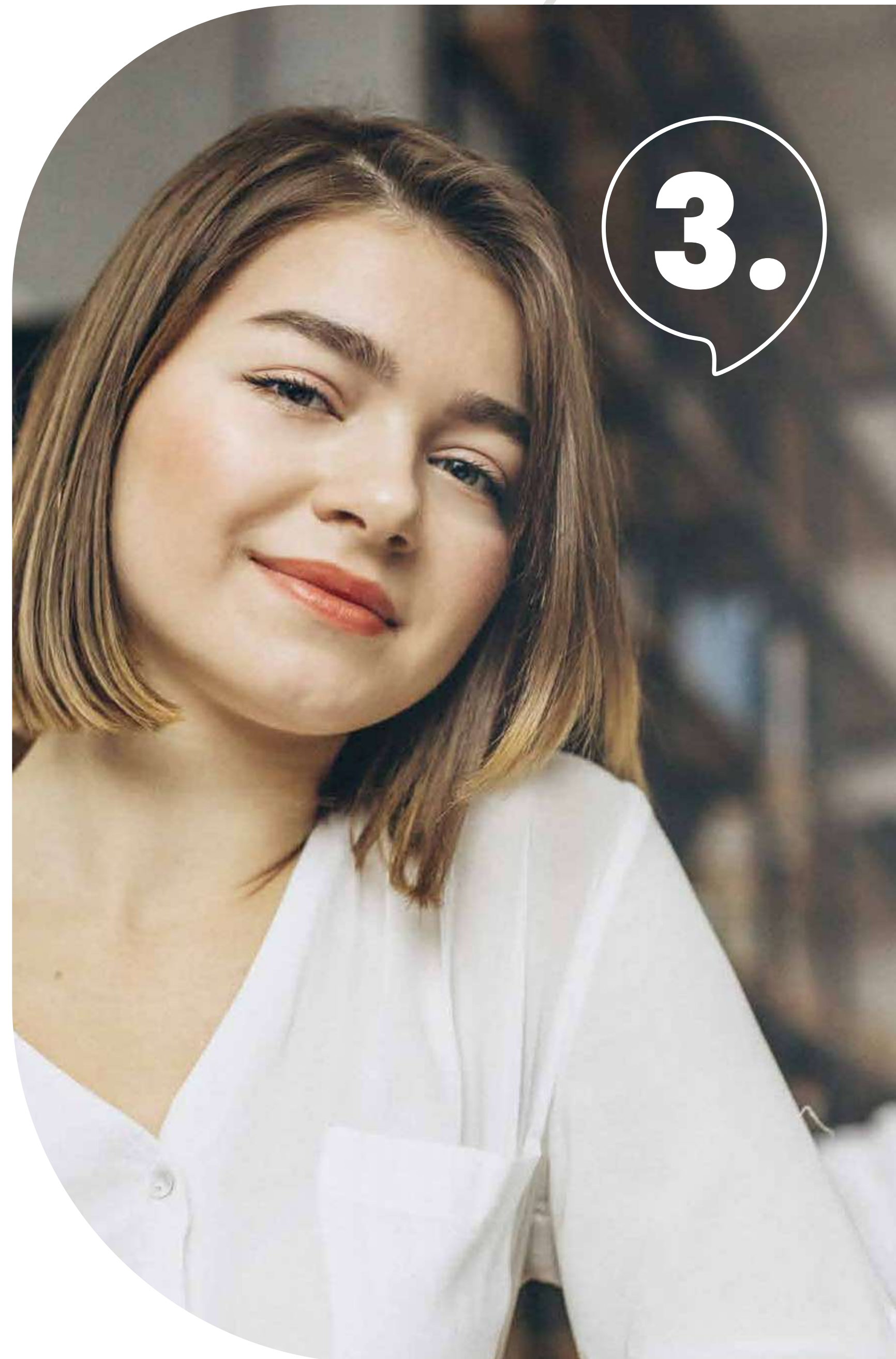
We document our work and our commitments to our clients. We never destroy or alter documents, nor do we recommend their destruction or alteration. We archive and store documentation in a safe manner.

Our rates.

Our fees are appropriate following the standards of H&CO professionals.

Time and expenses.

We report actual hours worked and expenses incurred following H&CO policies.



4.

Keeping our objectivity and independence, **how?**

Our objectivity

We keep

and affirm our objectivity and independence, recognizing that they are fundamental for our professional responsibilities.

We reject

inappropriate pressure from customers or others.

We are alert for

personal and professional conflicts of interest and we take immediate and appropriate action if needed.

We do not accept

payments or anything of value if this could be seen as it influencing our decisions.

Our independence

We comply

with H&CO's standards of independence, including the restrictions applicable to our families.

We continuously

monitor our independence.

5.

Protecting data, property, and information

We respect and protect

information and confidential data obtained from, or related to, clients or third parties, as well as data and information about the people of H&CO.

We only share

information when there is a purpose and it is done following the Policies of H&CO.

We take proactive

measures to safeguard our documents, computers and other devices that contain information and data that is personal or confidential.

We inform you

as soon as possible of any loss, theft or inappropriate disclosure of personal or confidential information.

We do not use

sensitive data or personal information for the benefit of personnel. We comply with applicable laws on trafficking insider information and H&CO policies.

We use social media

and technology responsibly and respect the confidentiality of everyone we work with.

We obtain,

develop and protect intellectual capital.

Where to find support?

At H&CO we promote a supportive culture. In addition to the established internal relationships, we have created a network of support that is available for consultation and advice, to help each of us live according to our commitments under the Code.

That is why we are committed to:

- 1 Offer quality in everything we do, to help generate trust in our clients, colleagues and stakeholders.**
- 2 Promote and support the Code in our daily activities, both at work and at the personal level.**
- 3 Behave in accordance with the principles contained in the Code when understood and comply with them.**
- 4 Understand that deviations or violations of the Code are unacceptable and that we should speak up every time we see something that is not correct.**
- 5 Warn that infractions of the Code may warrant serious disciplinary action.**

If you find yourself facing an ethical dilemma, you can send an email to:

> compliance@hco.com

* Employee Signature.

H&CO.



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of Conduct**