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### **MESSAGE FROM THE PRESIDENCY**

At mabe, we understand that in order to provide practical solutions for the well-being of households around the world, everyone who is part of the company must guide their actions with humility, commitment, respect, consistency, and of course, honesty—acting with integrity and uprightness every day in everything we do.

Our vision remains current thanks to the active participation of each person who is now part of mabe, but it is only possible if we all adhere to our culture and act ethically when making decisions. The content of this Code of Ethics stems precisely from that culture.

By complying with the guidelines set forth in this code, we ensure ethical, human-centered, and healthy interactions with our various stakeholders: collaborators, customers, suppliers, investors, board members, governments, and of course, communities.

I invite you to use this code as a tool to guide your decision-making when carrying out your work or any activity related to mabe. Your commitment to its principles brings us closer to living out our philosophy more effectively.

Additionally, I remind you that if you identify any irregularity or violation of what is established, you should use one of the official reporting channels to report it. With your support, we will be able to address each situation appropriately.

I am counting on you to continue building an ethical mabe, with a strong reputation and a solid position in the market. Let us remain a benchmark of commitment and honesty, working each day with pride and passion for what we do.

# PURPOSE OF THIS CODE OF ETHICS

To establish the guidelines and standards that guide our actions in our interactions with mabe. This document applies to any stakeholder who has a relationship with the company.

### **SCOPE**

This Code applies to all collaborators at mabe, regardless of contract type, hierarchical level, or area of work, recognizing that each person contributes value to our organizational culture. Its scope is global and reflects our shared commitment to act with integrity at all times and in all places

Its scope also encompasses our business and commercial partners, including suppliers, agents, and service providers in general—particularly those who act on behalf of or represent mabe. It also applies to our customers, especially authorized distributors, who must be familiar with the contents of this document and align with its principles.

It is essential that collaborators, suppliers, and customers understand and adhere to the values and ethical principles established herein. However, this Code cannot anticipate every possible situation. In cases where a specific answer is not provided, one must act with common sense, integrity, and in alignment with our values.

### **INTRODUCTION**

The Code of Ethics is the foundation that supports the behavior and actions of all collaborators at mabe, without exception, as well as its subsidiaries in the various countries where we operate. It sets forth the principles and standards that guide, clarify, and reinforce our policies, procedures, and decision-making at all levels of the organization.

As a collaborator, it is your responsibility to understand, respect, comply with, and promote this Code with commitment and conviction. Compliance must be genuine and effective, ensuring that all our activities are carried out in strict accordance with the laws, regulations, and values that govern us.

Remember that the integrity and honesty with which we operate at mabe not only strengthen our internal culture but also generate a positive impact on all stakeholders who interact with us.





### A. COMMITMENT:

We give our best, we follow through, and we are proud to be part of mabe.

- By striving to give your best, commitment helps you identify with the company and its organizational philosophy.
- Motivation to give your full potential and talent to achieving goals. Your growth depends on your personal merits.
- Responsibility for your area, workspace, and the team with whom you collaborate.

### C. CONSISTENCY:

We do what we say and say what we do, in alignment with what we believe as a Company.

- Strength and coherence in your work.
- Being someone who knows what they are doing and why, and who acts in alignment with what they expect from others.
- Support for your actions and credibility, by giving weight to your words.

### **B. HUMILITY:**

We are open to listening to and integrating other perspectives in a context of learning and collaboration.

- Willingness to acknowledge—without fear—the value and contributions of yourself and others.
- Enriching your work and appreciating the originality of each individual.
- Becoming a wise and self-assured person, capable of recognizing and leveraging the strengths of those around you.
- The ability to listen to other person's perspectives and value judgments in a context of learning and collaboration.

### D. RESPECT:

We recognize the dignity and worth of every person. We build relationships based on trust.

- Awareness of your own dignity and the dignity of others.
- Valuing yourself and those around vou.
- Open to opportunities and better relationships with others.
- Understanding that by upholding the company's principles and values, you respect both yourself and others.



### E. HONESTY:

We have a strong sense of honor and act with integrity and rectitude.

- Being a trustworthy person who speaks the truth.
- Doing your work well by seeking what is good in everything you do.
- Support for working with confidence and clarity.
- Teaching you to be a person of integrity and uprightness.
- Helping you remain a good example and point of reference for others.

### Assertive communication should positively reinforce our values:

For collaborators at mabe, the pursuit of the common good is a fundamental principle. Therefore, the company's interests must take precedence over individual, departmental, or functional interests. This means that, at all times, actions should be taken with mabe's best interest in mind.

In addition, every collaborator is expected to uphold and actively promote the company's values, both in the performance of their duties and in their interactions with colleagues, customers, suppliers, visitors, and any other person with whom they engage on behalf of mabe.



It is also essential to avoid destructive criticism, whether inside or outside the company. If you need to express a negative opinion, consider the following to ensure your feedback is constructive:

- a. Every critique should be accompanied by a suggestion or proposed solution.
- b. The comment should be aimed at improving processes or correcting mistakes.
- c. It should be delivered respectfully, without disqualifying others.
- d. It should be communicated to the right person, at the right time. This means speaking first with the person directly responsible for the matter, following the principles mentioned above. If no solution is reached, you

may escalate the issue to the person responsible for the area. The escalation process should be carried out respectfully, clearly, and in an orderly manner.

A person is considered transparent and trustworthy when they act sincerely, take responsibility, accept the consequences of their actions, and conduct themselves with honesty—without resorting to deceit. This is how we want to be perceived as a company.

Apply these recommendations in your day-to-day work, and you will be moving closer to the goal of becoming an exemplary collaborator, aligned with the values and principles that distinguish mabe.





At mabe, people are our priority. For this reason, we have established a set of statements that reflect our stance on issues that safeguard personal integrity, as well as what we expect from you in each of these areas:

### A. EQUAL OPPORTUNITIES

We ensure equal opportunities in all processes: hiring, promotions, professional development, celebrations, awards, benefits, training, and compensation. Selection is based on the position profile, its function, and our values—evaluating both integrity and the candidate's skills in order to protect the company's reputation.

We guarantee that no employment opportunity will be limited due to pregnancy, viral illnesses, disabilities (so long as the functions can be performed without risk), or other conditions, unless they pose a health risk to the collaborator. We promote equitable opportunities, always driving meritocracy.

We value and respect individual differences, as they enrich our culture, foster innovation, and contribute to making mabe an excellent place to work.

#### How do we promote meritocracy?

We make hiring, promotion, and reward decisions based on merit—skills, competencies, and performance. This ensures that everyone has the same opportunities to grow, and advance based on their achievements. We build a workforce that strengthens our organizational culture and contributes to achieving our business goals.

#### What do we expect from you?

- 1. That you actively contribute to maintaining a respectful workplace, free of discrimination and harassment, whether interacting with people inside or outside of mabe. Decisions involving others should be based on merit. You can rely on internal tools for managing collaborator performance and potential. Remember that acting with consistency allows you to make clearer, more objective, and fair decisions, promoting equity in all your interactions.
- 2. That you respect the differences of those you collaborate or interact with in your daily work, regardless of the

stakeholder group they belong to. Integrate different perspectives with humility and recognize the unique value of each individual, always acting with integrity and respect.

#### **B. HUMAN RIGHTS**

At mabe, we prioritize human dignity and the respect for fundamental rights. We reject human trafficking, forced labor, and child exploitation, and we promote fair labor practices both within and outside the company.

#### What do we expect from you?

- 1. To comply—without exception—with internationally recognized Human Rights, as well as with local labor laws related to working hours, wages, forced labor, and child exploitation.
- 2. To respect the working hour limits established by local legislation, both in your own case and in that of others. Overtime should only be performed when necessary to meet business performance indicators.
- 3. To ensure that our suppliers, customers, and business partners share

and respect these principles before entering into any relationship. If you later identify any practices in violation of them, report it immediately through mabe's official reporting channels (see Chapter 4). Remember: healthy labor relationships are built on the respect for Human Rights.

4. If you participate in political activities, you must do so on your own personal time, without using mabe's resources, spaces, or image.

### C. NON-DISCRIMINATION

At mabe, we prioritize human dignity and the respect for fundamental rights. We categorically reject human trafficking, forced labor, and child exploitation, and promote fair labor practices both inside and outside the company.

- **Discrimination**: Refers to any distinction or exclusion that limits the recognition or equal exercise of human rights or fundamental freedoms, according to the Inter-American Convention Against All Forms of Discrimination and Intolerance.
- Ableism: Refers to discrimination against people with disabilities, based on the mistaken belief that they are inferior to those without disabilities. This includes attitudes, practices, and policies that reinforce the idea that people with disabilities are less capable or less worthy of respect.

#### What do we expect from you?

1. You must treat all individuals with respect and dignity.



### **D. NO HARASSMENT**

We do not tolerate any form of harassment, violence, or workplace or sexual misconduct—under any circumstances and against any person. This applies to collaborators, suppliers, and customers alike, regardless of hierarchy or position. We also ensure that our suppliers and customers uphold harassment-free work environments for their own teams.

The following are not permitted, tolerated, or justified:

- Gender-based violence: Any harmful act directed at an individual or group based on their gender.
- Sexual harassment or misconduct: Physical or verbal behaviors of a sexual nature that aim to or result in undermining a person's dignity—especially when they create an intimidating, degrading, or offensive work environment, regardless of the offender's rank or position.
- Psychological Violence: Any intentional act that harms another person's emotional well-being through threats, coercion, or emotional manipulation.

• Digital or media-based violence: Gender-based acts of violence that are committed, incited, or aggravated through the use of information and communication technologies, such as social media, mobile phones, the internet, or email.

- 1. That you contribute to maintaining a safe, respectful, and violence-free work environment in all your professional interactions.
- 2. That you report, in alignment with our principles, any behavior that threatens the integrity of a person—whether within mabe or in interactions with suppliers, customers, or other third parties.

# E. OCCUPATIONAL HEALTH AND SAFETY

We ensure a safe and healthy workplace where everyone feels valued and can perform their duties without risks to their physical or emotional well-being. To achieve this, we work under the following principles:

- Physical and Psychological Safety: We promote physical and mental well-being through a culture of prevention focused on continuously improving working conditions and preventing psychosocial risks and acts of violence in the workplace.
- Workplace Violence: We reject all forms of violence, including harassment, physical aggression, threats, or the use of weapons—ensuring a space free of aggression for all.
- Flexible Work: We encourage flexible work arrangements that support work-life balance and strengthen the well-being and performance of our collaborators.
- Substance Abuse: The use or possession of harmful substances during

work hours is strictly prohibited in order to protect everyone's safety and comply with applicable laws.

- Contingencies: We follow the guidance of local authorities to effectively manage any emergencies or health-related contingencies in the countries where we operate.
- Substance Handling: We comply with local environmental regulations regarding the use, storage, and proper disposal of hazardous and non-hazardous substances.

#### What do we expect from you?

That you act responsibly, follow all applicable health and safety rules and procedures, and contribute to a safer workplace for everyone.

# F. PUNCTUALITY AND ATTENDANCE

At mabe, we believe that responsibility, productivity, and commitment are not tied to a physical location, but to the attitude and consistency with which each person faces their daily challenges. Punctuality and presence—whether in-person, hybrid, or remote—reflect respect for our work, for the teams we collaborate with, and for the goals we aim to achieve.

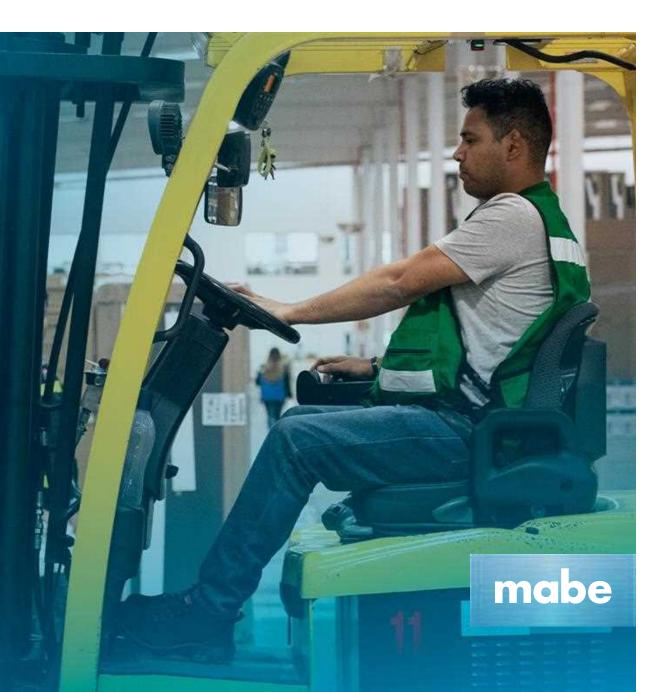
Fulfilling your tasks, attending meetings, maintaining open communication, and honoring the terms of your work arrangement are essential to building a trustworthy and efficient environment.

- Compliance with Work Schedules and Schemes: Respect the working hours and format agreed upon for your role. These are designed not only to meet objectives, but also to support your personal well-being and work-life balance.
- Personal and Professional Commitment: We expect you to take ownership of your responsibilities, participate actively in projects, and collaborate consistently with your team—always aligned with mabe's values and strategy.

• Absences, Delays, and Special Leave: Inform your immediate supervisor or the Human Resources area promptly in the event of an absence or delay. We understand that unforeseen situations may arise, which is why we provide clear procedures to manage leave, illness, or personal circumstances.

Leave for extraordinary reasons should be requested in advance and agreed upon with your leader. In cases of emergency, communicate as soon as possible. Improper use of leave or unjustified absences may have consequences in accordance with our internal policies.

- To be aware of your work schedule and arrangement, according to your role, area, and responsibilities.
- To meet your individual or team objectives, maintaining commitment to your assigned tasks and projects.
- To respect the principles outlined above and encourage the same level of commitment among those you collaborate with, whether in your direct team or other areas.





It is important to protect the resources and information provided by the company to safeguard their integrity and use them responsibly. Treat company resources—including financial ones—as if they were your own at home; by doing so, you contribute to stability and harmony within the company.

# A. PROPER USE OF ASSETS

At mabe, we trust our collaborators to care for and responsibly use the assets assigned to them, as these are essential for the efficient development of our operations.

#### What do we expect from you?

- To commit to acquiring, safeguarding, managing, using, and properly maintaining the assets and resources that mabe places under your responsibility, control, or possession.
- To make efficient, responsible, and exclusively work-related use of all assigned equipment, materials, tools, and technological resources, including software, systems, and computer programs.
- To correctly use electronic resources such as the internet, intranet, email, computers, mobile phones, video conferencing tools, and other digital tools provided by mabe. These resources

may be audited or monitored at any time without prior notice.

- To refrain from installing or using systems, programs, or software that are not authorized by mabe or that do not have valid licenses. Improper use may lead to legal or financial sanctions for the company.
- To understand that any physical or intellectual development, improvement, document, or discovery resulting from your job duties or from projects assigned by mabe will be the exclusive property of the company from the beginning of your contractual relationship. Reproduction, use, copying, or registration without express authorization is strictly prohibited.

# B. CONFIDENTIALITY OF INFORMATION | PROTECTION OF DATA AND CONFIDENTIAL INFORMATION

At mabe, we have security measures in place to prevent the unauthorized access, use, alteration, or disclosure of information, ensuring its integrity, confidentiality, and availability according to business needs.

All collaborators are responsible for protecting company information, as well as any information entrusted to us by suppliers, customers, and other third parties. This information must be used solely for legitimate purposes related to our roles and corporate objectives.



The obligation to maintain confidentiality does not end with the termination of the employment relationship. It is strictly prohibited to disclose confidential information to third parties—whether internal or external—without the company's express authorization.

For more details, refer to the guidelines established by mabe's Information Technology (IT) and Cybersecurity departments.

- To handle all information you access with responsibility, confidentiality, and in accordance with established protocols.
- To use systems and data exclusively for work purposes and avoid sharing them with unauthorized individuals.
- To protect confidential information even after your relationship with mabe has ended.
- To report any risk situation, unauthorized access, or data breach to the corresponding channels immediately.





The way we guide our interactions with others makes a difference when it comes to building positive, lasting relationships—and has a direct impact on our business.

# A. CONSUMERS: WE HONOR THEIR TRUST

At mabe, our primary commitment is to our consumers and users. We strive to deliver products and services that exceed their expectations, ensuring quality, timely delivery, and fair pricing—always in accordance with the agreed terms and conditions.

We act with integrity, transparency, and a genuine focus on the needs of those who trust us, aiming to build strong, lasting relationships based on trust.

#### What do we expect from you?

• To place the consumer at the center of your decisions, ensuring your actions contribute to delivering high-quality products and services.

- To act with integrity, responsibility, and professionalism in every direct or indirect interaction with consumers.
- To respect the commitments made by the company, fulfilling service standards, delivery timelines, and agreed conditions.
- To report any situation that may compromise the consumer's experience, safety, or trust.

# B. TRANSPARENCY IN THE PRESENTATION OF OUR PRODUCTS

At mabe, we are committed to honestly communicating the actual features of our products, highlighting their quality and performance clearly and accurately. We firmly believe our offering represents an excellent choice for consumers, but if any doubts arise, it is essential to clarify them with the responsible party or immediate supervisor.

We respond with humility when a consumer points out areas for improvement or product flaws. We understand that no product is perfect, and we strongly believe in the power of feedback to strengthen our processes, technologies, and quality standards. The trust we've built in millions of households is grounded in transparency and in delivering on our promises.

#### What do we expect from you?

- To contribute—within your role and function—to maintaining and elevating the quality standards our consumers deserve.
- To document and channel any comments or feedback that can help improve our products or processes, ensuring follow-up with the appropriate area.

• To communicate our product qualities honestly, without exaggeration or unrealistic promises, thus avoiding expectations that could harm consumer trust or mabe's reputation.

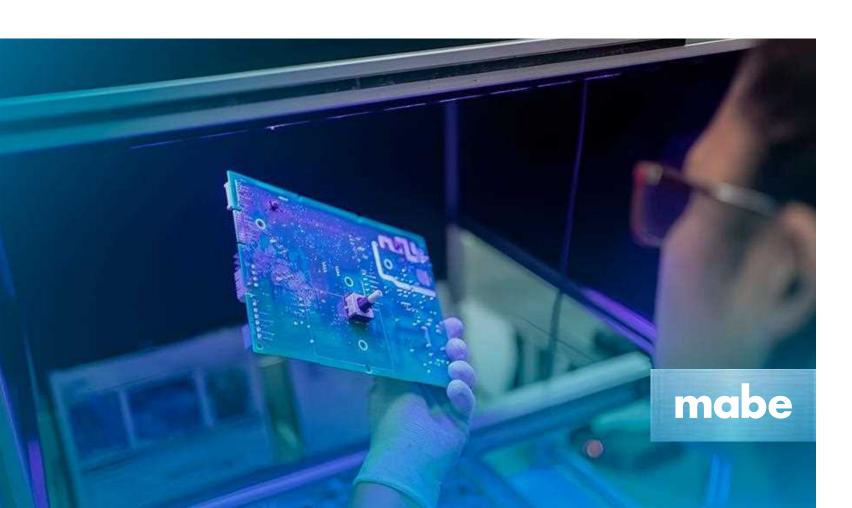


# C. CUSTOMERS: HONESTY AS A STARTING POINT

We act with transparency and sincerity. Our goal is not to persuade the customer, but to show them that we are a strategic ally with whom they can build mutually beneficial business relationships. Trust and collaboration are the foundation of our commercial relationships.

#### What do we expect from you?

- To act with honesty and transparency in your relationship with customers.
- To build connections based on trust and mutual benefit.
- To represent mabe as a strategic partner, without resorting to manipulative or dishonest practices.



# D. COMPLIANCE WITH SALES PROCESSES AND COMMERCIAL AGREEMENTS

The execution of mabe's sales strategy requires strict adherence to the policies, terms, and guidelines established for each product. Integrity and compliance are essential to maintaining transparent, fair, and sustainable business relationships.

No commercial agreement should serve the personal interest of any individual; all agreements must reflect the general interest of the company, always in line with ethical practices and in accordance with this Code.

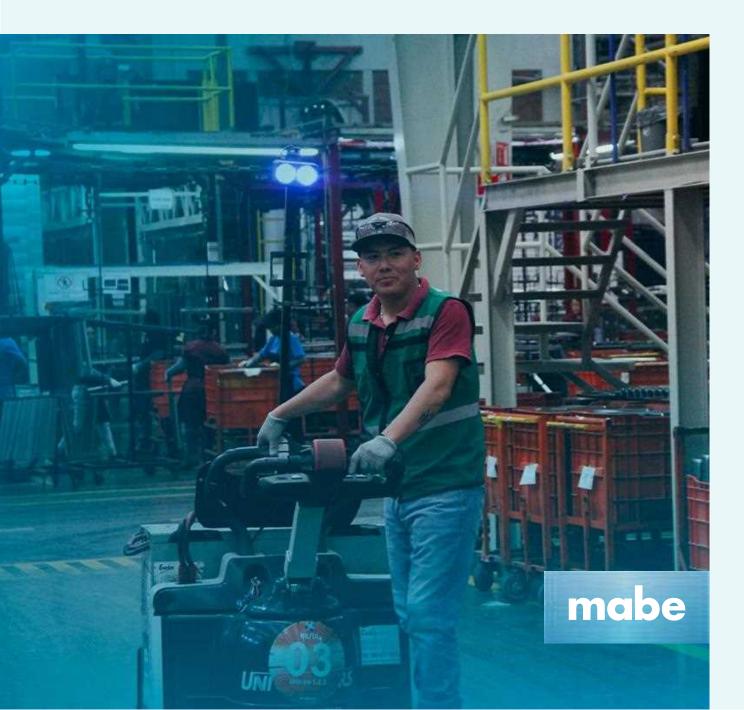
In your relationship with customers or prospects, you must consider the following:

- **Discounts:** Only discounts that have been previously approved within the sales plan authorized by the Commercial Vice Presidency may be offered. Granting additional discounts without proper authorization is strictly prohibited.
- Agreement Formalization: All negotiations with customers must be documented in writing, following the established process. Verbal agreements are not permitted under any circumstances.

- Conflict of Interest: It is forbidden to make arrangements or agreements with customers that do not comply with the company's current policies, whether for personal benefit or through third parties. Any such action will be considered a conflict of interest.
- Impartiality: Favoritism or granting privileges to customers in exchange for personal or financial benefit is not permitted. All decisions must be made objectively and in accordance with our commercial policies.

- To understand and comply with commercial policies, sales processes, and the current terms for each product, always acting with ethics and responsibility.
- To formalize all customer agreements in writing, ensuring they are properly authorized and aligned with company guidelines.
- To reject any practice that could represent a conflict of interest or imply a direct or indirect personal benefit.

- To maintain an impartial and professional stance in all commercial relationships, without granting undue privileges or accepting external pressure that could compromise your integrity or that of mabe.
- To consult with your immediate supervisor or the corresponding area in case of any doubts regarding commercial terms, discounts, or decisions that could impact the company's interests.



# E. THE BEST CHOICE FOR OUR CUSTOMERS

At mabe, we have built a strong reputation based on the quality of our products, the competitiveness of our prices, and our commitment to a broad range of social and economic segments. To remain a market leader, it is essential that all of our business relationships are conducted with integrity, ethics, and transparency.

With this in mind, please consider the following:

- Clear-background relationships: mabe does not engage in commercial relationships with customers—whether individuals or legal entities—who have a criminal history, unclear backgrounds, or who may pose a risk to our reputation.
- Ethical contracts: Under no circumstances should suspicious, dishonest, or corrupt agreements be accepted. Our Code strictly prohibits any form of irregularity in commercial dealings.
- Living our values: It is essential to communicate and reflect mabe's values in every interaction with customers so they can understand our ethical culture and foster an environment of trust, transparency, and mutual respect.
- Respect for human rights: We expect our customers to share our commitment to human rights and reject unfair practices such as discrimination,

harassment, exploitation, or child labor. Failure to uphold these principles may result in termination of the business relationship.

- To ensure that the customers you engage with comply with the ethical and legal principles that govern mabe.
- To reject any suspicious agreement or one that compromises the company's integrity.
- To clearly convey mabe's values in every commercial interaction.
- To act as a guardian of our reputation, promoting responsible relationships aligned with respect for human rights.

# F. THE KEY TO BUSINESS: CUSTOMERS WHO SHARE MABE'S PHILOSOPHY

At mabe, we believe that successful business relationships are built on shared values. For this reason, we seek to establish relationships with customers who align with our mission, vision, and ethical principles—and who pursue objectives that are consistent with ours.

To support the development of such relationships, it is essential to consider the following:

- mabe avoids doing business with customers who are—either directly or indirectly—linked to practices such as forced labor, child exploitation, non-compliance with applicable laws, or any activity that contradicts ethics and integrity.
- When evaluating a commercial relationship, you must responsibly assess the customer's legality and morality, particularly if their products or services:
- Are linked to illicit financial sources (e.g., drug trafficking, money laundering, smuggling, illegal imports, or theft of goods).
- Cause significant harm to the environment or ecological systems.
- Have a negative impact on society or on specific individuals.

- May result in harmful consequences to public health, whether in the short, medium, or long term.
- Conceal defects, flaws, or involve deceit regarding the quality, safety, or durability of their products.

Establishing relationships with ethical, responsible customers who are committed to social and environmental well-being is key to protecting mabe's reputation and long-term sustainability.

#### What do we expect from you?

- To ensure that the customers you work with share mabe's values, ethical principles, and vision.
- To assess the legal, social, and environmental context of each commercial relationship with sound judgment and responsibility.
- To avoid establishing ties with customers whose practices could affect

mabe's reputation, integrity, or sustainability.

• To report any indication of irregularity or conflict with the principles outlined here.

### G. SUPPLIERS: ETHICAL, STRATEGIC, AND SUSTAINABLE RELATIONSHIPS

At mabe, we recognize that our suppliers are an essential part of the company's success. The acquisition of quality raw materials, accompanied by efficient service, fair conditions, and a professional relationship, allows us to continuously strengthen the manufacturing of our products.

For this reason, we aim to build strategic, honest, long-lasting, and mutually beneficial relationships, based on respect, professionalism, and a shared commitment to our values.



#### Responsible selection and evaluation

We are committed to selecting the best supply options based on quality, legal compliance, and ethical alignment. To do so:

- Multiple proposals must always be submitted, in accordance with the current policies of the Value Chain or Procurement Vice Presidency.
- The selection of suppliers must not be based on price alone. Other key factors must be considered, such as:
- 1. Quality of products or services.
- 2. Compliance with agreements and contracts.
- 3. Reliability, professionalism, and post-sale support.
- 4. Willingness to collaborate with mabe.

#### Selection and exclusion criteria

We select suppliers who:

- Are legally established.
- Have a clean fiscal and commercial record.
- Offer transparent contracts and reliable services.
- Use cutting-edge technology.
- Share mabe's philosophy and aim for a win-win relationship.

We avoid working with suppliers who:

- Promote or tolerate practices such as forced labor or child labor.
- Violate applicable laws or are involved in illicit activities (e.g., drug trafficking, smuggling, money laundering).
- Cause serious harm to the environment or public health.
- Conceal information about the quality of their products.
- Have a negative impact on society or our customers.

#### **Procurement conditions**

- All negotiations must be formalized in writing. Verbal agreements are not valid.
- Agreed conditions must be strictly met, both in quality and service.
- It is strictly prohibited to establish agreements with suppliers for personal gain or for the benefit of third parties.
- Favoritism or granting of undue privileges is not permitted.
- We reject any contract that involves corruption, dishonesty, or opaque practices.

#### What do we expect from you?

- To foster relationships with suppliers who share mabe's values, vision, and ethical principles.
- To apply clear and responsible criteria when evaluating or recommending suppliers.
- To reject any agreement that compromises mabe's integrity, reputation, or sustainability.
- To report any irregularity or conflict of interest in supplier relationships.
- To act with professionalism and transparency at every stage of the procurement process.

# H. COLLEAGUES AND COLLABORATORS

At mabe, our workplace relationships are based on mutual respect, collaboration, and integrity. We firmly believe that a healthy work environment is built through our everyday actions, and for that reason, we want to remind you of some key principles that guide how we interact:



# I. RELATIONSHIP WITH GOVERNMENT

At mabe, we are firmly committed to acting with respect, ethics, and transparency in all interactions with government authorities, in full alignment with this Code.

Any dispute with government authorities must be addressed through the appropriate legal channels, exercising our right to defense in accordance with applicable law.

In the event of investigations or legal proceedings, mabe will fully cooperate with the relevant authorities—unless regulatory restrictions prevent it. This cooperation does not preclude the exercise of our constitutional rights.

### J. CONFLICT OF INTEREST

At mabe, we recognize that conflicts of interest can compromise the objectivity and integrity of our decisions. For this reason, each collaborator is responsible for identifying and disclosing any situation that could be perceived as a potential conflict of interest.

A conflict of interest arises when there is a relationship—family, personal, commercial, social, financial, political, or otherwise—that could influence or appear to influence your decisions or loyalty to the company.

We understand that some situations may not always be obvious. If you face a potential conflict of interest, you must promptly notify the Compliance team. If you observe such a situation involving someone else, you may report it through the official reporting channels (see Chapter 4).

We have a Conflict of Interest Policy that expands on the guidelines in this Code and establishes a formal procedure for reporting and managing such cases. We also encourage you to review the sections on Gifts and Preferential Treatmentand Fraud Prevention and Anti-Corruption, as they are closely related to this topic.

### K. GIFTS AND PREFERENTIAL TREATMENT

At mabe, we aim to ensure independence in our business decisions and to avoid any situation that could represent a conflict of interest. For this reason, it is prohibited to accept gifts, gestures, invitations to meals, or any form of preferential treatment that could influence—or attempt to influence—our decisions by placing personal interests ahead of the company's. This rule is governed by the exceptions outlined in the corresponding policy.

Likewise, mabe collaborators must not offer gifts or preferential treatment to suppliers, customers, or other individuals, except in specific cases as part of a corporate strategy previously authorized by senior management and validated by the Compliance team.

We trust each collaborator's judgment and sense of responsibility. If you are unsure whether it is appropriate to accept a gift, invitation, or gesture from a third party, please contact the Compliance team immediately.

For more information, refer to mabe's Gifts, Travel, and Entertainment Policy.

# L. FRAUD AND CORRUPTION PREVENTION

At mabe, we are firmly committed to integrity and legality. We maintain a zero-tolerance policy toward fraud and corruption in all their forms, as these practices are not only illegal but also compromise trust and damage the reputation of our company and the broader business environment.

We operate under the highest standards of ethics, transparency, and accountability, and we strictly comply with all applicable laws and regulations related to fraud and anti-corruption. Additionally, we prohibit any conduct that may even create the appearance of undue influence in our business decisions.

Each collaborator is responsible for acting with integrity and reporting any suspicion of fraud, bribery, or corrupt behavior immediately through mabe's official reporting channels.

We have an Anti-Corruption Policy that expands on the principles outlined in this Code and provides detailed rules and procedures to prevent, detect, and respond to risky situations. We encourage you to consult it and keep it as a reference in your daily conduct.



# M. ANTI-MONEY LAUNDERING

At mabe, we only establish commercial relationships with suppliers and customers who conduct lawful activities and whose funds come from legitimate sources. We avoid any association with individuals or entities that could compromise our reputation or negatively impact the company's image.

In some of the countries where we operate, we are subject to specific regulatory frameworks for anti-money laundering. At mabe, we are fully committed to compliance with such regulations and to implementing controls that ensure legal adherence.

We do not act on behalf of our customers. Additionally, we only accept cash payments under exceptional circumstances and solely for specific services—such as after-sales support or in select company-owned stores—always within legally permitted limits.

We have an Anti-Money Laundering Policy that expands upon the content of this Code. We encourage you to review it to understand the detailed guidelines.

- To comply with all laws, regulations, and internal policies related to anti-money laundering.
- To properly apply customer identification and verification processes, in line with current procedures.
- To report any suspicious activity through mabe's official reporting channels.
- To act with honesty, responsibility, and ethical conduct in all your duties.

### N. ANTITRUST PRACTICES

At mabe, we reject and prohibit all forms of unfair competition, as well as any illegal conduct that undermines free competition and market integrity. We are committed to acting under principles of fairness, transparency, and respect for our competitors, and to promoting responsible and ethical commercial practices.

mabe strictly prohibits and condemns all unfair competition practices and any behavior that is illegal or that undermines the protection and preservation of fair competition.

#### What do we expect from you?

- To respect our competitors and refrain from engaging in any practices that could restrict, distort, or eliminate fair and free competition.
- To remain informed about applicable competition policies and act in accordance with them.
- To consult the Legal department in your region if you have any questions or require guidance.

# O. COMMUNITIES AND SOCIETY

At mabe, we understand that social and environmental responsibility is key to sustainable development and long-term success. That is why we are committed to acting ethically, consciously, and responsibly—not only in our core business, but also in how we engage with communities and the environment.

### 1. COMMITMENT TO SOCIETY

We recognize our role as an active agent in society and work continuously to contribute to the well-being of the communities where we operate. We support local initiatives, community development projects, and foster an internal culture of respect, safety, health, and education as the foundation for growth.

We strongly believe in giving back to society a part of what we receive, generating a positive and lasting impact.

# 2. COMMITMENT TO THE ENVIRONMENT

Our environmental responsibility translates into concrete actions to reduce our ecological impact. This includes:

- Implementing sustainable practices in our operations.
- Reducing our carbon footprint.
- Using natural resources efficiently.
- Promoting product recyclability and reuse.
- We aspire to lead by example, showing that it is possible to achieve business success without compromising the planet.

# 3. TRANSPARENCY AND RESPONSIBLE MANAGEMENT

We have a Sustainability Committee that channels our social and environmental initiatives, ensuring transparency in our actions and reporting. In addition, the Social Committee monitors and follows up on social practices within the company.

We remain open to dialogue and public scrutiny—including from collaborators, customers, suppliers, and communities—in order to ensure fair, sustainable practices that are aligned with our values.

- To act as an ambassador of our sustainability culture by actively participating in social and environmental initiatives.
- To adopt sustainable practices in your daily work, minimizing the environmental impact of your functions.
- To promote social and environmental awareness among your colleagues and teams.





# Chapter 4 **Compliance System** We all comply **5** principles for leading the Culture of Compliance 1. Let's be good human beings, living in accordance with our principles and values and contributing positively to society. 2. Aligning our actions with mabe's goals and objectives to support its long-term success. 3. Sharing mabe's Values with commitment and dedication, and putting them into practice in every professional and personal aspect. 4. Being responsible citizens: fulfilling our civic and ethical duties to contribute positively to society. 5. Working ethically and responsibly, acting with integrity, honesty and transparency.

### **5 PRINCIPLES FOR "WE ALL COMPLY"**

As part of a new phase in strengthening mabe's culture of ethics, integrity, and compliance, the Compliance Department has been created. Its objective is to guide and support the company toward the next level of maturity in Compliance and Governance—shifting mabe from a reactive to a proactive and preventive compliance culture.

Without being exhaustive, its main responsibilities include:

### A. ETHICS:

Responsible for guiding and supporting a culture of integrity, ethics, and compliance across the company. This includes:

- Managing the Ethics Line.
- Leading investigations into potential breaches of this Code and/or internal mabe policies.
- Reporting findings to the Compliance Committee and other corporate governance bodies, as needed.
- Implementing awareness campaigns and training strategies on compliance matters.

# B. CORPORATE GOVERNANCE:

Responsible for overseeing internal compliance, including:

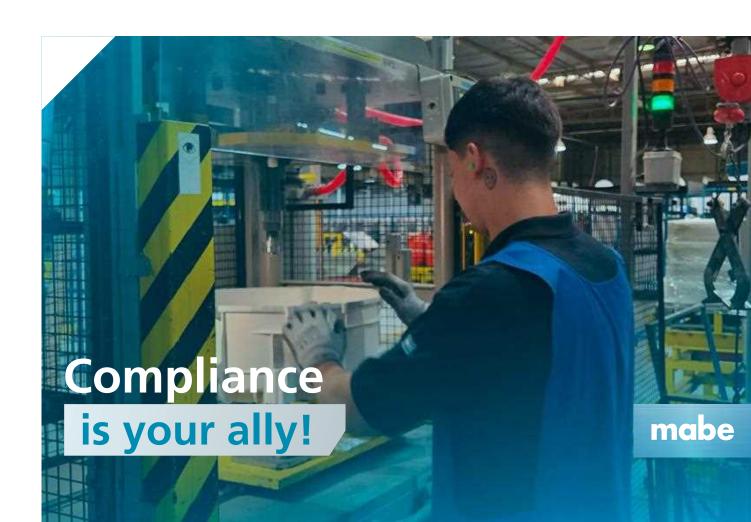
- Developing, implementing, and managing this Code and mabe's internal compliance policies.
- Approving and monitoring the enforcement of other mabe policies and procedures.

# C. REGULATORY RISK MANAGEMENT:

Responsible for overseeing external compliance—that is, compliance with the laws and regulations applicable to mabe's operations. This includes areas such as data protection, cybersecurity, anti-corruption, anti-money laundering, and antitrust. It also leads the initiative to standardize the due diligence process for customers, suppliers, and collaborators across the continent.

We are strongly committed to institutionalizing and automating controls to prevent compliance risks.

**Compliance is your ally!** If you have questions or concerns related to this Code or any topic involving our culture of integrity, ethics, compliance, or internal policies, please contact us. We are here to support you.



### **OFFICIAL REPORTING CHANNELS**

We have established secure channels for submitting ethics reports, so that collaborators can raise concerns about potential violations without fear of retaliation, while ensuring confidentiality and security throughout the process. All collaborators should feel confident to report, in good faith, any violation of this Code, any mabe policy, or applicable law that they become aware of

The report must be submitted by the collaborator through one of the following communication channels:

• Website:

https://www.lineaeticamabe.com/

• Email: <u>reporte@lineaeticamabe.com</u>

• Telephone numbers:

Argentina: 0 800 345 5478

Bolivia: 800 10 4081 Chile: 800 914 501

Colombia: 01 800 5189191 Costa Rica: 0 800 542 5514 Ecuador: 1 800 001 135 El Salvador: +503 2136 6543 Guatemala: +502 2378 4852

Mexico: 800 04 38422 Panama: +507 836 5888 Paraguay: 009 800 542 0164

Peru: (0800) 78424

Dominican Republic: 1 (829) 200 9643

Uruguay: 000 416 205 6395 Venezuela: +58 212 720 2560

• Mobile App (iOS or Android).

- Download the **EthicsGlobal** app from the Play Store or App Store.
- Open the EthicsGlobal app, enter the code or scan the QR, and answer the questions as prompted.
- QR Code:



• Written code:

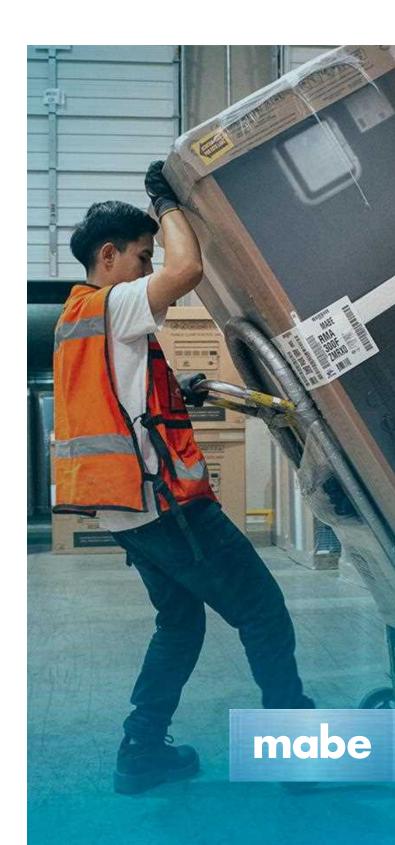
Spanish: MAB-7003-MAB English: MAB-1323-ENG

# CONSIDERATIONS WHEN FILING A REPORT

When submitting a report, collaborators should keep the following in mind:

- Be prepared with all relevant information and evidence, if available. Answer key questions: Who? When? Where? How?
- If submitting the report via phone or the mobile app, you will be connected with a specialist who will listen, provide guidance, and ask relevant questions to ensure proper investigation.
- The specialist will provide you with options for submitting supporting evidence, if applicable.
- You will receive a case tracking number, which is important to keep for future reference.

Reports may be submitted anonymously if desired. mabe guarantees the confidentiality of the report, the parties involved, and the investigation process. Also, mabe promotes an environment where ethics reports are treated with seriousness, confidentiality, and professionalism.



### TRANSPARENT COMPLAINT HANDLING PROCESS

mabe is responsible for addressing and thoroughly investigating all ethics reports received, with objectivity, discretion, and the confidentiality required to support evidence collection.

If, after the investigation, the reported facts are confirmed, mabe will take timely disciplinary and/or corrective actions as necessary, in accordance with the circumstances.

