
PATAGONIA CNC MACHINES LLC

225 Camo Dr • Centre AL 35960 • Alabama • United States

+1 (256) 406 7859 • Info@patagoniacnc.com

Business Ethics Policy

Our Mission

The mission of PATAGONIA CNC MACHINES S.A. is to be technological partners of our customers in the automation of their industrial processes, providing solutions from design to implementation and after-sales service in production. Ensuring a profitability that meets the expectations of management and enables growth as a company to meet the social commitment of participation in the generation of jobs.

Our Vision

In PATAGONIA CNC MACHINES we seek to improve day by day becoming absolute leaders in our market. We are constantly evolving in the design and manufacture of assembly lines, welding devices, in the development of applications and peripherals for robotic systems, provision of standard and special laser cutting machines and manufacture of CNC routers, as well as we strive to achieve excellence in technical support to our customers.

Our Values

They are ethical conduct, responsibility and commitment to continuous improvement. The values of Patagonia CNC Machines S.A. are the basis of our common culture, they commit us to maintain the trust, the fulfillment of the obligations with our value chain and the attitude with which we face every day our actions in all the areas where we perform. We conduct our activities with honesty, integrity and professionalism, being transparent in our actions and communications to promote trust and minimize ambiguity. We are passionate about the metallurgical and automation industry, we seek to provide the best results to our customers. All based on sustainability and environmental care. We want to be an example of excellence in the industry.

BUSINESS CODES OF CONDUCT

Based on our Mission, Vision and Values, and in accordance with applicable laws, we have established this Code of Conduct.

We are honest and act with integrity

This statement applies to everything we do at Patagonia CNC Machines S.A. Our daily interactions must begin and end with honesty and integrity. We hold ourselves to a high standard of ethical behavior. We treat each other with respect and do not accept intimidating, discriminatory or harassing behavior in the workplace. When the actions of one person cause others to feel intimidated, offended, or their dignity violated, we are all affected. We must treat each other with courtesy and professionalism.

We insist on promoting a positive work environment and raising our voice whenever someone jeopardizes that goal. We encourage success based on merit and ability, regardless of any other personal circumstances or characteristics. We support and comply with laws prohibiting discrimination and harassment wherever we do business.

We create a safe and secure workplace

We keep up to date with workplace health and safety laws, regulations and practices and comply with these requirements and practices.

We are environmentally responsible

We are committed to operating in an environmentally responsible, sustainable and socially responsible manner. We keep up to date with the environmental laws, regulations and practices applicable to our company. We comply with these legal requirements and those established by the company itself.

Data privacy

We are committed to protecting the security and confidentiality of data entrusted to us by companies. This includes personal information you provide to the Company, as well as information we receive from our customers, suppliers and other third parties with whom we do business. We comply with all relevant privacy and data protection legislation.

We maintain the integrity of our financial reports and business records.

We strive to generate reliable financial reports and business records. We are committed to ensuring the integrity, fairness, timeliness, accuracy and transparency of the reports and documents we produce.

We do not engage in insider trading

We must maintain the confidentiality of all information that is not and should not be in the public domain. This information may be written information in documents, in electronic media or any other support, or even information that has been accessed verbally.

We support fair competition and comply with antitrust laws.

Patagonia CNC Machines S.A. competes in the market in an aggressive but loyal way. Our work speaks for its own merits. We do not misrepresent the quality of our work, mislead our customers, or engage in any other unfair practices. Patagonia CNC Machines S.A. does not seek to eliminate or reduce competition through illegal agreements with competitors.

We conduct business with integrity and outperform our competitors with fairness and honesty.

Prevention of criminal behavior.

We carry out ethical business practices in all our dealings with officers, customers and companies with whom we do business. The disbursement of funds (whether or not from Patagonia CNC Machines S.A.) that are intended for any form of illegal payment for the direct or indirect benefit of the company is strictly prohibited.

Patagonia CNC Machines S.A. rejects any form of bribery, kickbacks, influence peddling or extortion, and declares itself against influencing the will of people outside the Company to obtain any benefit through the use of unethical practices.

All members of the Company shall act in a manner consistent with national and international provisions for the prevention of bribery, among which are the provisions of the Argentine Criminal Code and the Law on Criminal Liability of Legal Entities. Additionally, all members of the organization in the performance of their professional duties shall ensure compliance with the internal control established to prevent irregularities and undue advantages in the relationship of Patagonia CNC Machines S.A. with third parties.

Gifts and hospitality

No employee of Patagonia CNC Machines S.A., nor any person performing services for or on its behalf, should offer, promise, give, solicit, agree to receive or accept excessive or inappropriate invitations, gifts,

meals or entertainment that could create or imply improper influence or create an obligation to any recipient thereof.

No employee shall enter into relationships to, directly or indirectly, obtain an undue advantage, or to influence or motivate a particular decision or action. PATAGONIA CNC MACHINES employees may give and accept entertainment such as meals (lunches or dinners) or courtesy invitations to events and other benefits generically considered hospitality, as well as gifts of a commercial nature and customary year-end gifts, provided they do not exceed a value of fifty U.S. dollars (u\$s 50.00-).

Under no circumstances may cash or goods easily convertible into cash be given or accepted. Invitations received to participate in business events, conferences, conventions, commercial presentations or technical courses must be authorized by the Internal Manager and by the appropriate levels of supervision. The granting of commissions, discounts, credits and bonuses must be implemented in accordance with current legislation and with the corresponding supporting documentation. Any commercial incentives must be aligned with market practices, at authorized values and following applicable procedures.

Retaliation

We do not tolerate acts of retaliation for any legally protected activity against anyone who in good faith reports or participates in an investigation or complaint.

Conflict of interest

Outside interests and activities should never interfere with the ability to make the right decisions for PATAGONIA CNC MACHINES. Situations that conflict or even appear to conflict with the best interests of the Company should be avoided.

Forgeries

We strive to ensure that all our products are of the highest quality and reliability. We prevent the use of counterfeit parts in our products by having processes in place to detect and report counterfeit parts, real or suspected, that may appear in the supply chain.

All our sales comply with local legislation and we ensure that the products sold will be used in a legal manner.

International Trade Laws and Regulations

We comply with all relevant national and multinational import and export laws, as well as applicable trade restrictions involving specific countries, regions, companies and individuals.

Our Products

We develop products that meet our quality standards and report if we discover an actual or potential product quality problem or safety issue. We comply with all relevant legislation, regulations and product standards governing product and process specifications.

Policy on labor conditions and human rights

In PATAGONIA CNC MACHINES we are firmly committed to the care of the working conditions of all our workers.

Our main premise is to understand that the welfare and satisfaction of our employees has a direct impact on the quality of our products and services they offer.

We are committed to comply with the human rights recognized in national and international legislation and to promote responsible labor practices, providing a work environment of maximum respect for the dignity of people, avoiding at all times:

- Not to discriminate or tolerate any practice of discrimination based on nationality, race, color, age, sex, marital status, sexual orientation, ideology, political opinions, religion or any other personal, physical or social condition.
- Any form of manifestation of violence, threats, intimidation, physical, sexual, psychological or moral harassment, abuse of authority at work and any other conduct that generates an intimidating or offensive environment.

-We promote decent employment, respecting the right of people not to be victims of forced labor, rejecting and expressing zero tolerance to any form of direct or indirect labor exploitation, child labor and/or slavery.

-We are committed to always verify the processes of hiring and incorporation of employees in order to ensure that all employees are above the minimum legal age to work according to current legislation, respecting the freedom of association and collective bargaining and the rights of minorities, as well as the exercise of union activity and the protection afforded to workers' representatives, in accordance with labor legislation.

-We take care of occupational health and safety, offering a safe and healthy working environment in all our facilities, complying with legal requirements and adopting rules and procedures for the prevention of occupational health and safety risks.

We pay special attention to promoting equal treatment between men and women in terms of access to employment, training, professional development, compensation, including minimum wage, working hours and overtime compensation according to current laws, mandatory benefits and merit-based career advancement, encouraging fluid and transparent communication.

-Every member of PATAGONIA CNC MACHINES must be aware of the need for equality and respect for diversity.

- Be sensitive to the effects caused by our activities and make every effort, within the framework of the law, to prevent and/or mitigate them.

Health, safety and environment policy

In PATAGONIA CNC MACHINES we develop the Company's activities considering people's health, safety and environmental protection as essential values.

We progressively advance towards excellence, carrying out systematic improvement actions, aligned with the challenges and objectives of each business and area.

Our commitments:

- We foster a culture of health, safety, environment, promoting the adequate perception of risk, continuous learning and innovation.
- We ensure proactive risk management throughout the entire cycle of activities in order to prevent damage to people and property, minimizing the impact on the environment.
- We establish adequate means to prevent incidents and/or accidents, as well as to limit their consequences.



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- We implement all the resources through live processes where we identify and solve risk factors to achieve the main goal of zero accidents, providing workers with equipment and personal protection elements as established in current legislation.
 - We generate specific knowledge so that each worker is fully competent in machine safety, fire protection elements and emergency preparedness.
 - We are committed in the activities of our operations to environmental protection including pollution prevention, minimizing the impact of our activities with particular attention to water quality and consumption and air quality, generating sustainable resource management and waste reduction.
 - We seek to reduce greenhouse gas emissions, to optimize energy consumption in an efficient manner and to use renewable energies as much as possible.
 - We are interested in the integral development of our personnel with awareness of teamwork and quality, environmental care and occupational health and safety risks, which allow us to promote responsible behavior.
 - We comply with the legal requirements in force, as well as with the established internal regulations, which are elaborated considering legislative trends and international standards, as well as with other commitments that the organization subscribes with its stakeholders, planning accordingly.
 - We establish objectives and goals for continuous improvement, taking into account the requirements of stakeholders in a systematic way, evaluating performance and applying the necessary corrections to achieve the proposed achievements, defining verification, auditing and control processes to ensure them.

Responsible Raw Materials Sourcing Policy

At PATAGONIA CNC MACHINES we recognize our responsibility in the conservation of natural resources and the support of a sustainable environment as established in our various policies. As a company we wish to generate value and well-being in society and in the communities where we participate.

For this reason we are committed to:

- Promote transparent management of the origin of the raw materials we work with.
- Sourcing in a socially responsible manner.
- To know the origin of the raw materials used in our products, avoiding the supply of dubious, restricted, unknown or unsustainable sources, accepting only those that come from legal sources and have not been subject to illegal trade.
- Not knowingly supply products containing raw materials that contribute to or finance human rights abuses, corruption and ethical violations or have a negative impact on the environment.
- Purchase or acquire raw materials produced, processed and marketed in accordance with the applicable legislation in force.

- Ensure that information on suppliers and sources of material supply is verified.
- We expect our suppliers to engage and embrace our commitment to responsible sourcing of direct and indirect materials and services and to adopt policies or position themselves with respect to responsible sourcing consistent with PATAGONIA CNC MACHINES policy.

Code of Conduct

Our Code of Conduct is in place to protect the employee and ensure that the reputation of PATAGONIA CNC MACHINES is never put in jeopardy. Customers expect us to be a reliable company. We can only be a reliable partner by respecting our values and being true to our principles. The Code of Conduct is a practical document, which sets out our principles and their meaning for us as a company and for you as an employee.

LEADERSHIP

It is the responsibility of managers and those in a supervisory capacity to set a good example by following the Code of Conduct and ensuring that others do so as well. This includes proactively ensuring that those under their supervision know what this means in practice, talking about the issues openly and being available for support and assistance.

BEHAVIORS AND BEHAVIORS

Mutual respect must guide us in our daily conduct with all our colleagues. In this way we will be able to help each other and create a group spirit that is fundamental for our success as a Company and our fulfillment as individuals in a cordial and positive environment. The Company will not tolerate any type of discrimination based on sex or sexual orientation, race, origin, marital status, social status, religious, political or union ideas, age or disability, whatever the motivation, providing equal treatment on all occasions.

If an employee is dissatisfied with his or her working condition, he or she should go to his or her direct superior. If they are unable to obtain a response to their concerns, they can go to the Human Resources area.

As employees of the Company, but above all as citizens, we are expected at all times to respect compliance with current regulations in all aspects of our actions, both privately and in our relations with customers, suppliers, the public sector and the public in general.

ENVIRONMENT

The preservation, respect and protection of the environment is a commitment of PATAGONIA CNC MACHINES, therefore, employees must be actively and responsibly committed to the preservation of the environment, respecting the legal requirements and trying to reduce, as far as possible, the environmental impact of their activities, contributing to the recycling and reuse of materials and products.

COMPANY ASSETS

PATAGONIA CNC MACHINES makes available to each of us a series of equipment, tools, systems and technologies to facilitate and improve our work efficiency. These assets are the property of the Company and must be used to perform our work tasks. However, their limited and occasional use for personal purposes is permissible as long as we understand that we must act in accordance with Company policy

without affecting its interests and without interfering with our work. It is intended that employees be responsible in the use of these tools.

Attention should be paid to physical safety, which has to do with taking special care of work tools and personal protection elements, ensuring that they are not damaged by misuse or carelessness.

Any person who makes excessive and unauthorized use of any of the company's resources may be subject to disciplinary action, including dismissal.

CONFLICT OF INTEREST

When personnel relationships could affect the interests of the Company, we interpret that there is a conflict of interest.

Each employee must be attentive and, if necessary, formally inform the Company of any family, financial, commercial, personal and/or other connections related to his or her work that may indicate a possible conflict of interest.

The employee must ask for help and/or seek advice from his or her direct superior or the Human Resources area, in order to achieve the best handling and resolution of any doubtful situation.

RELATIONSHIP WITH CUSTOMERS AND SUPPLIERS

PATAGONIA CNC MACHINES employees must work with total integrity, objectivity, transparency, honesty and openness, committing themselves not to receive attentions, benefits or gifts from suppliers and customers, such that an impartial person could not interpret that they were intended to obtain a differential treatment or even a specific benefit (such as, for example, a purchase). The purpose is to prevent situations of potential conflict of interest. It is strictly forbidden to engage in bribery, corruption, extortion or any other illegal or unethical practice.

The Company only allows the receipt of entertainment such as meals (lunches or dinners) or courtesy invitations to events and other benefits generically considered hospitality, as well as gifts of a commercial nature and customary year-end gifts, provided they do not exceed a value of fifty U.S. dollars (u\$s 50.00-). In case of exceeding this amount, authorization must be requested to the Human Resources area or your direct superior.

Both PATAGONIA CNC MACHINES and its employees shall not make payments or gifts of any nature to employees and/or third parties of its customers to obtain a sale.

PROTECTION OF INFORMATION AND CONFIDENTIALITY

PATAGONIA CNC MACHINES handles confidential information, its own and its customers', which is important for the business strategy and the development of operations. In order to preserve this information from any loss or unwanted diffusion, we must be responsible to take the necessary precautions to this end. To this end, we suggest that we safeguard our work documentation. The information that the Company has on its customers must be kept and safeguarded in a confidential manner, taking care and guarding that it is not used in an incorrect manner, such as, for example, its use for our own benefit or for the benefit of a third party.

COMPLAINTS

As a first step, we recommend that you talk to whoever you think is acting against the Company's guidelines, to avoid breaking the law or harming the Company. As a next step, you should contact your direct superior and if you do not feel comfortable, you can go to the human resources area.

COMMITMENT NOT TO RETALIATE

PATAGONIA CNC MACHINES will not retaliate in any way against any employee for reporting in good faith acts that violate the Code of Conduct.

Being an employee of PATAGONIA CNC MACHINES means that you agree to comply with this Code of Conduct. Instances of non-compliance are taken seriously, and will result in disciplinary action, potentially leading to termination.

RECEPTION AND KNOWLEDGE

Being an employee of PATAGONIA CNC MACHINES means that you agree to comply with this Code of Conduct. Non-compliance is taken seriously, and will result in disciplinary action, potentially leading to dismissal. All employees must receive and sign a form (printed or digital) notifying them that they have received, read and understand the Code of Conduct.

Supplier Code of Conduct

The purpose of this document is to establish the minimum guidelines that our suppliers must maintain for the proper development of their activity.

PATAGONIA CNC MACHINES requests all its suppliers to comply with the following guidelines and directives:

- Declare to comply with the laws and regulations in force that are applicable to the area where a service and/or product is performed or provided.
- They do not participate in or allow forced and/or compulsory labor.
- Commit to eradicate the use of child labor and not tolerate or use child labor in any phase of their activities.
- They address their employees with respect and dignity, providing equal opportunities in access to work and professional promotion, ensuring at all times the absence of situations of discrimination based on sex or sexual orientation, race, origin, marital status, social status, religious, political or union ideas, age or disability.
- The remuneration of its workers is carried out in accordance with the applicable and current salary laws, guaranteeing the right of its employees to rest and complying with the labor legislation in force in each of the sectors in which it operates in terms of working hours.
- Facilitate and respect the legally recognized rights of their employees to organize, associate and bargain collectively, subject to the rules applicable in each case and ruling out any type of retaliation for these activities.
- They undertake to perform their activity with total integrity, objectivity, transparency and honesty, without participating in bribery, corruption, extortion or any other illegal or unethical practice. Suppliers shall not



accept, offer or grant to employees of PATAGONIA CNC MACHINES and of any natural or legal person in the service of any authority, entity, public or private, political party or candidate for public office, commissions, gifts or retributions in order to obtain or maintain, illicitly, business or other advantages.

-They shall maintain mechanisms that, in the event of a potential conflict of interest of any of their employees, ensure that the independence of the supplier's performance and its full compliance with applicable laws will not be affected.

If the Supplier or any employee of the Supplier has a family relationship with any member of the PATAGONIA CNC MACHINES Staff, the Supplier must notify the company of this fact by e-mail.

-They undertake to preserve and protect the confidentiality of the information they receive as a consequence of the performance of the commercial activity with PATAGONIA CNC MACHINES and will comply without exception with the legislation in force regarding data protection and intellectual property.

-They declare to comply with the labor laws and the regulations in matters of Hygiene and Safety at work, including the coverage of occupational risk insurance, providing their employees with a safe working environment. The Supplier has the obligation to demonstrate to PATAGONIA CNC MACHINES (in case it is requested) the compliance with the legal and tax requirements and formalities applicable to its activity.

-The preservation, respect and protection of the environment is a commitment of PATAGONIA CNC MACHINES, therefore, suppliers must actively and responsibly commit themselves to the preservation of the environment, respecting the legal requirements, contributing to the recycling and reuse of materials and products, as well as minimizing the impact of their activities with particular attention to the quality and consumption of water and air quality.

-All suppliers must be committed to reducing greenhouse gas emissions, to efficient energy consumption and to the use of renewable energy as much as possible.

-No supplier shall use banned chemicals or raw materials of questionable or restricted origin.

-They shall not ignore international and national laws and regulations on the management, storage and disposal of hazardous waste, or handle chemicals in a manner that is harmful to the environment.

-Establish a system of internal and external communication and information that allows for the incorporation of suggestions and best practices through consultation processes and not to retaliate for any legally protected activity against anyone who in good faith reports or participates in an investigation or whistleblowing.

-All suppliers must at all times comply with applicable international, national or local regulations regarding financial controls, export controls, fair competition, antitrust and counterfeit parts.

This Code is mandatory for all suppliers or subcontractors of PATAGONIA CNC MACHINES. In the event that a breach of the Code is detected, they must send a notification via e-mail to PATAGONIA CNC MACHINES as soon as possible. If such breach is not remedied within thirty (30) calendar days after such notification, the Supplier shall be deemed to be in breach of its obligations and PATAGONIA CNC MACHINES shall be entitled to terminate the contract it may have entered into with such supplier. The Supplier shall promptly inform PATAGONIA CNC MACHINES of any breach or suspected breach of the Code described above. If a supplier knows or suspects activities that may infringe this Code, he shall communicate the information available to him by e-mail.



The Supplier acknowledges having read and understood the conditions expressed in the Supplier Code of Conduct and confirms their acceptance, adherence, and commitment to comply with it while they maintain their supplier status with PATAGONIA CNC MACHINES.
