

BECLE

CODE OF CONDUCT

LOCAL ROOTS

WORLDWIDE REACH

GLOBAL VISION

Org. 1758

BUSHMILLS

Jose Cuervo


PROXIMO



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LOCAL ROOTS
WORLDWIDE REACH
GLOBAL VISION

INTRODUCTION

A SOUND LEGACY

Dear Colleagues:

We are proud of our 250-year heritage and our portfolio of iconic brands. To help preserve our legacy, protect our reputation and safeguard our future, it's important that everyone in the Company always acts ethically, honestly and transparently.

Our business and our culture are founded on six Values that define who we are and how we conduct business:

At Bece we have a strong **Business Sense**, adding value to all our activities.

Our activities are focused on **Continuous Improvement**.

Through **Teamwork** we improve individual and Company performance.

We maintain a **High Quality of Life** that allows us to grow and develop, thus improving our overall performance.

In our Company we treat people with **Respect**. We believe in and promote Integrity.

Communication and **Commitment** are fundamental elements of our work culture.

These Values are what set us apart, and we have an ethical obligation – to ourselves, to the Company and to one another – to uphold and promote these Values.

Our Code of Conduct is an important tool in bringing our Values to life in our work. It explains the Company's expectations in areas that could cause ethical or legal issues if mishandled.

Take time to read our Code and apply it to your decisions and actions, along with your local policies and procedures. If you have questions or suspect misconduct, talk to your immediate supervisor or to one of our ethics resources, like the Ethics and Compliance Department or Ethics Committee.

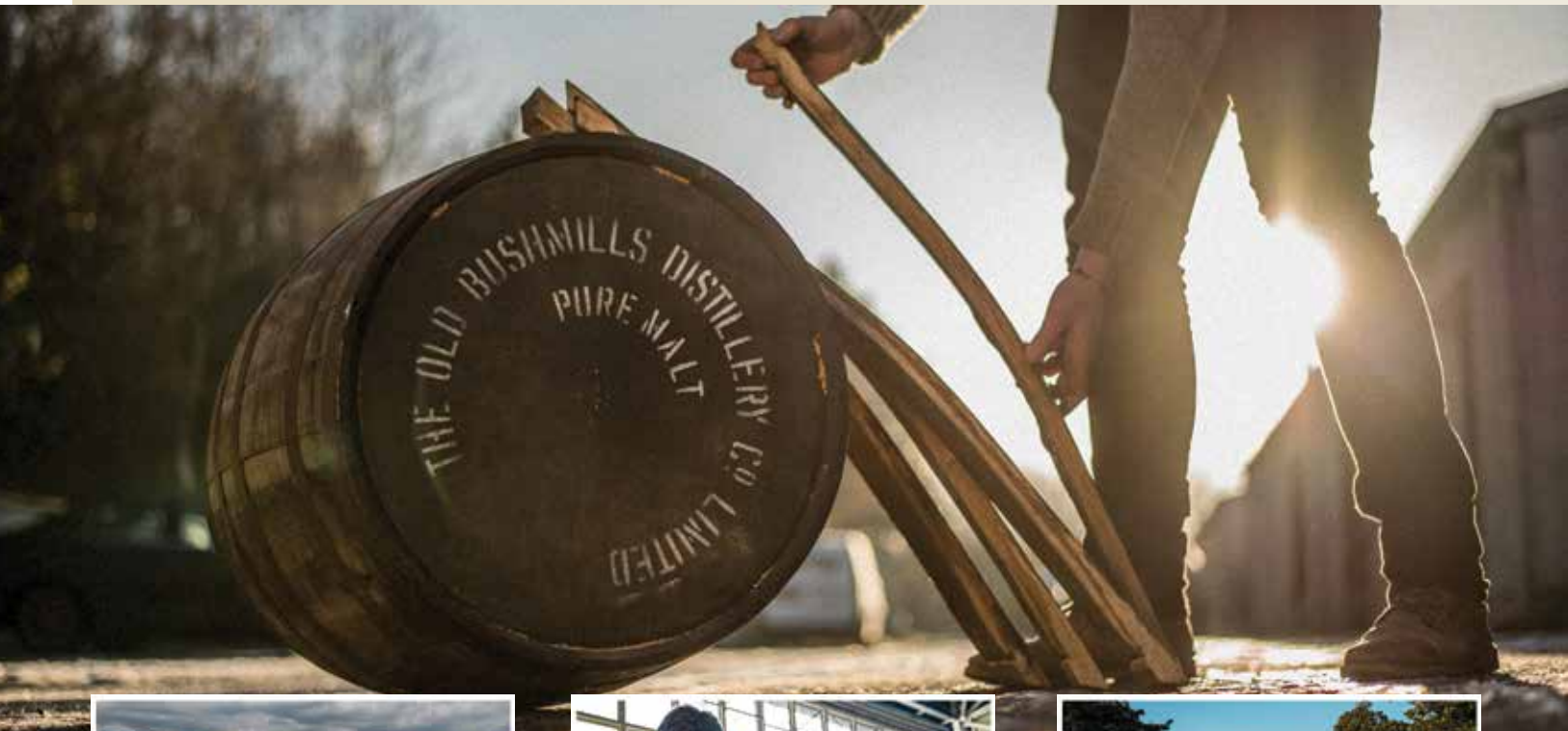
I am proud of what we have accomplished together so far.

Thank you for your support, dedication and commitment in building our culture of integrity.

Juan Domingo Beckmann Legorreta

CHIEF EXECUTIVE OFFICER





Why do we have a Code of Conduct (“Code”)?

Our Code is an important tool that can help us build trust, protect our reputation and promote the success and sustainability of the business. The Code is an essential element of our Integrity Program.

Any global company must contend with and follow a complex array of laws, regulations and public expectations. The Code highlights expectations in key areas of the business and helps with better decision making, so we can avoid actions that might cause legal risk or damage our reputation.

Does the Code apply to everyone at Beclé?

The Code applies everywhere we do business. It applies to everyone who works here, including full- and part-time employees, consultants and temporary staff.

How should I use the Code?

Read it so you know what’s expected of you. Then use it as a reference if you have questions about what’s right.

If, after reading the Code, you’re not sure of the right course, talk with your immediate supervisor. If you need additional guidance, you can also consult a Company resource like the Ethics and Compliance Department or Ethics Committee.

Responsibilities for Managers and Supervisors

While all employees have a responsibility to act with integrity and protect our reputation, our supervisors, managers and executives have additional responsibilities under the Code.

We expect supervisors, managers and executives to show a visible commitment to promoting ethical conduct and compliance with legal requirements, our Code of Conduct and Company policies.

In keeping with this commitment:

Be a positive role model. Actions speak louder than words, so let our actions demonstrate our belief that business goals

and profits are never more important than compliance with the law and our ethical principles.

Set the right “tone from the top.”

Be comfortable talking with your team members about the importance of acting legally and ethically.

Lead by example. Never abuse our position or influence.

Know our resources. Become familiar with the Code of Conduct, internal policies and the laws that apply within our Company, and make sure your teams know them too.

Promote speaking up. Create a positive environment where team members feel comfortable asking questions or raising concerns without fear of reprisal.

Report misconduct. Understand your special obligation to report behavior that you know, or suspect, is illegal or violates our Code of Conduct or Company policies.

Celebrate success. Recognize and reward team members whose behavior exemplifies our Values and ethical principles, and respond swiftly and appropriately to misconduct.

To obtain more information about Bece's internal policies and procedures, as well as levels of authorization, all employees and officers should consult the Company's intranet, their immediate supervisor, the Human Resources Department or the Ethics and Compliance Department.



Making Ethical Decisions

We want Integrity to guide our decisions. If you face a situation where you're not sure what's right, ask yourself:

“Is there a chance this action or decision is...”

- Contrary to our Values, this Code or the Company policies?
- Unethical or against the law?
- Something I would NOT be proud of if it was revealed publicly?

If you answered “yes” to any of these questions, don't do it!

Instead, seek advice from your immediate supervisor or the Ethics and Compliance Department on better ways to handle the situation.

ROOTED IN...

RESPECT AND COLLABORATION

As individuals and as team members, our actions every day demonstrate our Values and define who we are as a Company.

- Respect and Non-Harassment
- Wellbeing, Security and Health
- Information Data Privacy
- Human Rights and Working Conditions

Respect and Non-Harassment

At Becele, we believe in treating others with dignity and respect. We practice open and honest communication, work together to create an environment of collaboration and inclusion, and help each other achieve personal and professional success.

We grow by:

- Treating one another with respect.
- Promoting an environment of openness, teamwork and trust.
- Accepting diversity, evaluating people as individuals and avoiding discrimination on the basis of irrelevant personal factors.
- Sharing our commitment to diversity and equal opportunities with suppliers, customers and other business partners.
- Prohibiting harassment and abusive or intimidating treatment in the workplace.
- Adapting the workplace or public areas where possible for employees with a disability who notify us of their need.





What do you mean by “irrelevant personal factors”?

The following factors have no bearing on a person’s ability to do their job well:

- Race
- Religion
- Age
- Disability or health conditions
- Sex
- Marital status
- Political affiliation
- Sexual preference

We do not consider these characteristics when making job and career decisions.

What do you mean by “harassment”?

For the purposes of our Code, harassment means any actions or comments that create, encourage or permit an offensive or intimidating work environment.

We do not allow:

- Sexual harassment
- Verbal or physical harassment
- Racial harassment
- Bullying
- Any other actions that create an intimidating, unfair, hostile or offensive work environment for someone else

Wellbeing, Security and Health

We promote a healthy and secure working environment in line with high international standards, and follow all local occupational health and safety laws that apply.

It's our goal to have an injury-free workplace everywhere we operate.

We grow by:

- Participating in all required safety training.
- Taking personal responsibility for complying with all applicable safety rules and policies.
- Speaking up if there are workplace hazards or if you see unsafe behavior.
- Making sure visitors (including contractors) know the rules and what's required.

Information Data Privacy

Like any business today, we collect and use large amounts of information from our stakeholders, including clients, suppliers, employees and other third parties to carry out our day-to-day responsibilities. When this includes personal data about individuals, we have both a legal and an ethical responsibility to handle it properly and prevent it from misuse.

We grow by:

- Making it a priority to protect the confidentiality and integrity of personal data – including from employees, clients, suppliers, consumers or anyone else doing business with the Company.
- Following our data privacy policies and any privacy regulations that apply, such as the European General Data Protection Regulation (GDPR) or the Mexican Federal Law on Protection of Personal Data Held by Private Parties (LFPDPPP).
- Using personal data only for legitimate purposes, giving the proper privacy notice.
- Not collecting or using sensitive information, except in exceptional circumstances where the data subject has given specific approval.

What's my role in ensuring a safe workplace?

We all have an essential role in promoting a safe and secure workplace for everyone.

Make sure you know and follow the safety policies and procedures of the Company and local laws that apply to your job. Everything begins with us.

What do you mean by "sensitive information"?

Certain information about individuals must be handled with special care, including:

- Health conditions
- Race
- Political opinions
- Religion
- Sexual life
- Criminal records or suspected criminal activity
- Union membership (in some countries)

Our Resources

If you have questions about handling sensitive personal information, formal requests by individuals to access personal information or any other privacy-related topic, contact your local Data Supervisory Officers or the Ethics and Compliance Department.



Human Rights and Working Conditions

As responsible corporate citizens, we only do business with partners who follow the law and operate fairly and ethically at all times.

We grow by:

- Respecting human rights of those we work and interact with, and encourage our business partners to follow similar standards.
- Supporting human rights and respecting fair labor laws, including prohibitions against child labor.
- Watching for and reporting any signs of human trafficking or forced labor.
- Properly compensating workers and respecting their right to collectively bargain.



ROOTED IN...

FAIR BUSINESS PRACTICES

We want to build and maintain fair and lasting business relationships where our actions reflect high standards of ethical business behavior.

- Anti Bribery and Anti Corruption
- Gifts and Hospitality
- Anti Trust and Fair Competition
- Anti Money Laundering

Anti Bribery and Anti Corruption

Governments recognize that bribery harms societies and people – and increasingly, civil society and regulatory bodies are prosecuting companies that engage in it. We want to win business by acting ethically and honestly — based on the strength of our products, not because we have taken or encouraged corrupt actions.

WE GROW BY:

- Never giving or accepting bribes.
- Never paying facilitating payments.
- Recognizing that strict anti bribery rules apply to any interactions with government officials.
- Being careful with anything that could be interpreted as a bribe, including gifts, entertainment and donations.
- Monitoring the actions of third parties, making sure they know our anti bribery rules apply to their work for us.

If someone asks you for a bribe, report it to your immediate supervisor or the Ethics and Compliance Department or Ethics Committee immediately.





What is a bribe?

Accepting or offering something of value that might unduly influence the recipient's decision or actions or obtain an undue or illegal advantage in favor of the Company.

What is a “facilitating payment”?

A payment to government officials to influence only the timing of their actions (i.e., a payment to expedite the issuance of a visa or the release of goods in customs), but not the outcome.

Who is a government official?

A public servant is an official or employee of a government or government agency (secretary or agency) or of a company that is wholly or partially owned or controlled by a government.

It also includes representatives or employees of international organizations (for example, the World Bank) and representatives of political parties and candidates for political office.

Gifts and Hospitality

Gifts, meals and invitations to events can commemorate or contribute to a good business relationship – but they can also create the perception of improper influence. It's important to use good judgment and to avoid offering, promising or accepting anything if it could look like it creates an obligation for the recipient. We can look to the Code, our policies, the law and industry codes for guidance.

WE GROW BY:

- Never offering or accepting anything of value that goes beyond what's necessary to establish a good commercial or business relationship.
- Only accepting, giving, or offering gifts of a promotional, occasional and symbolic nature.
- Never giving or accepting cash and following established guidelines for gifts during the year-end holiday season.
- Keeping records of all gifts and entertainment that you give or accept.

Anti Trust and Fair Competition

At Bece, we promote fair and free competition. We want to win the right way, and not because we took unethical actions to gain an unfair advantage. As a result, we avoid unfair practices, agreements or understandings that could affect price, violate our price setting policies or affect the assignments of clients or sales territories. We comply with the competition laws of all the locations where we operate.

WE GROW BY:

- Recognizing the risks of interacting with competitors and knowing how to handle such situations.
- Avoiding any discussion with competitors of price or elements that might affect the market.
- Immediately exiting the conversation if any competitor raises any of these matters.
 - If this happens, walk away and report it to your immediate supervisor, the Legal Department, the Ethics and Compliance Department or through the Ethics Line.
- Gathering competitive information appropriately – such as from public sources – and not through deception, spying, taking it from a former employer or accepting it from a competitor or third party.
 - If a competitor or third party gives you competitive information or tries to give you competitive information, inform Legal Department immediately.

Someone offered me a gift and I didn't feel I could politely decline. What now?

If you're in a situation where you're offered a gift and can't decline it, talk to Human Resources and the Ethics and Compliance Department. You will need to disclose:

- The gift type
- The approximate value
- Who gave it
- When it was received

I work with government officials. How do our gifts and entertainment rules apply?

We do not allow gifts or entertainment to be given to government officials, either directly or through a third party.

What activities can lead to contact with competitors?

Be alert for interactions with competitors during benchmarking activities or when attending seminars or industry or trade association meetings.

And be careful not to use a trade association meeting as a forum for discussing or agreeing to a shared approach to a customer or other commercial matter.

What do competition or anti trust laws prohibit?

Competition laws generally prohibit anti competitive practices, like price-fixing, boycotting suppliers or customers and the exchange of information that may harm competition.

Never discuss prices with a competitor or service offerings, profits, market share, business strategies, distribution methods or any other topic that might reveal confidential or financial information about our Company.



Anti Money Laundering

Sometimes, people or organizations may attempt to launder money through our business using common business transactions to help disguise criminal or improper sources of funds. Becele supports the laws against money laundering. To do our part, we do business only with customers that are engaged in legitimate business activities and get their funds through legitimate sources.

WE GROW BY:

- Following all due diligence procedures before working with business partners, including customers, suppliers, distributors and agencies.
- Being familiar with warning signs of money laundering, like:
 - A refusal to provide information or providing false information
 - Payments in cash or cash equivalents (like money orders, travelers checks)
 - Requests to pay to or through a third party
 - Requests to overpay invoices
 - Locations associated with terrorism or drug trafficking
 - Transactions that seem intentionally structured to avoid recordkeeping and reporting requirements.
- Reporting any warning signs to the Legal Department, the Internal Audit Department and the Ethics and Compliance Department or Ethics Committee.



ROOTED IN...

GOOD PROFESSIONAL JUDGMENT

We believe that acting ethically, honestly and transparently strengthens trust in business relationships, helps to protect our reputation and guarantees the success and sustainability of the business in the long term.

- Responsible Consumption of Alcohol
- Company Assets (Including Intellectual and Industrial Property)
- Confidential Information
- Social Media

Responsible Consumption of Alcohol

We encourage our employees and consumers to drink responsibly. At Beclé we are proud of our products and the way we conduct our business. Our employees are our key ambassadors and must take care of our reputation, showing a moderate and responsible attitude regarding the consumption of our products. Drinking irresponsibly or behaving recklessly due to abuse or excessive consumption can create health and safety risks for our employees and others, and compromise the prestige and image of our Company.

We grow by:

- Understanding the nature and effects of drinking alcohol.
- Respecting alcohol-related regulations, including local drink-driving limits and the legal drinking ages in the countries where we do business.
- Never showing up to work drunk or under the influence of alcohol. Never allowing our judgment or work to be compromised by the consumption of alcohol.
- Promoting responsible alcohol consumption at all business events, including those celebrated within our facilities.
- Encouraging someone to seek medical advice if they have difficulty drinking responsibly. Contact your local Human Resources representative for advice.





What are the expectations for company events?

All events organized by Becele, whether internal or external, must feature responsible alcoholic consumption.

We are all ambassadors for the Company, and no matter our role, we all have a responsibility to protect our reputation and demonstrate respect and integrity at all times.

For instance, use designated drivers to avoid driving under the influence of alcohol, including during tastings, parties and conventions.

Company Assets (Including Intellectual and Industrial Property)

We all play a role in helping to safeguard Beclé's assets, goods and resources – from buildings and equipment to computer networks to trademarks, patents and product ideas. These assets are essential to our Company, our work and our business.

We grow by:

- Using Company assets and resources only for authorized business purposes.
- Reporting to the Legal Department any bootlegged or counterfeit products, and other violations of our trademarks or patents.
- Keeping the Company's business secrets confidential and never disclosing them to people outside the business. Employees working with new products should talk to Legal before launching samples or discussing the product publicly.

What is intellectual property?

Our intellectual property includes very valuable assets protected under local and international intellectual property laws.

These include: trademarks, patents, trade secrets, confidential information, copyrights and industrial property.

What are trade secrets?

Trade secrets are commercial or industrial information that we want to keep secret, often because they allow us to offer unique products and maintain a competitive advantage.

They include: formulas, production processes, unique technologies, price lists, customer lists and similar non-public information about our business.



Confidential Information

Our information is one of our most valuable assets and we all have a responsibility to protect it and to manage it appropriately. A loss or improper disclosure of our information could take away an advantage, help competitors or otherwise harm the business.

We grow by:

- Protecting all confidential and sensitive Company information and never disclosing it outside the Company or using it for personal gain – even after we leave the Company.
- Classifying information according to the Information Security policy (confidential, internal use or public).
- Properly handling and retaining information based on its classification and the guidelines defined in the Information Backup and Storage policy.
- Making sure that confidential information is only shared with employees who need it to do their jobs.
- Reporting any incident of breach in the protection of our information to your local IT Help Desk or Security Officer.

What is confidential information?

Information that is not in the public domain and whose disclosure, alteration or loss involves a business risk that could affect the integrity of the organization, its market position or its good image, or seriously violate current legislation.

How can I help protect confidential information?

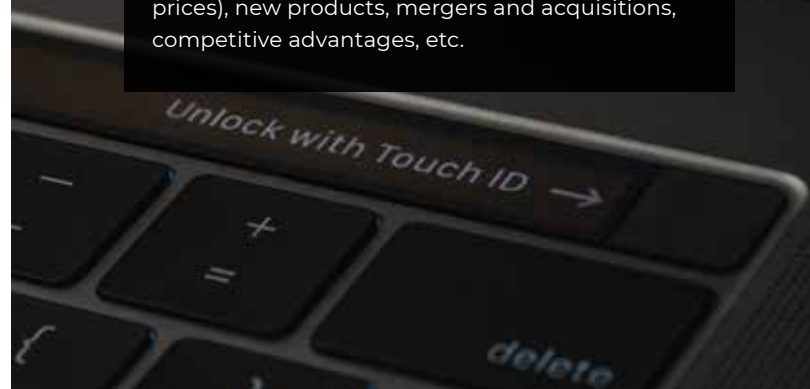
Never discuss in public sites or with unauthorized persons confidential information such as strategic plans, financial information (margins, costs, prices), new products, mergers and acquisitions, competitive advantages, etc.

Social Media

We are aware of the relevance of social networks today in people's lives and about the relevance they have as one of the main channels to improve the commercial interactions of the organizations. At the same time, we must be especially careful of what we say, as technologies like email or social media can broadcast information to wide audiences instantly and may last online forever, which could damage our reputation.

We grow by:

- Recognizing that our own actions online can reflect on the Company, even posts that have nothing to do with work.
- Not disclosing confidential or non-public information about Becele or any of our customers or business partners while using social media.
- Being clear that your opinions are your personal views, and not the views of our Company.
- Never speaking publicly for the Company online unless designated as an official spokesperson.
- Showing good judgment when using social media – don't forget that anything you say could be seen and commented on by millions of people.



ROOTED IN...

HONESTY AND TRANSPARENCY

Our investors put their trust and money in us and we strive to deliver sustainable performance and create long-term value. We maintain that trust by safeguarding their investment as well as Becele's reputation and financial assets.

- Company Records and Accounts
- Conflicts of Interest
- Insider Trading
- Redes Sociales.

Company Records and Accounts

The integrity of our financial statements and other regulatory filings and disclosures are critical to the successful operation of our business and to maintaining the confidence and trust of our investors, shareholders, customers, suppliers and other stakeholders. Being accurate and complete in our reporting not only helps us comply with legal and regulatory requirements, but also to meet our shareholder responsibilities and make informed decisions about the business.

- Always being correct, precise, accurate and objective in our reporting, whether the information is financial or non-financial.
- Recording all transactions in the true and proper amount and in the correct accounting period.
- Supporting all financial transactions with accurate documentation in reasonable detail.
- Never making false or misleading statements in reports, records or expense reports.
- Following all internal controls and never circumventing them or pressuring someone else to compromise the controls in place.





What happens if someone provides false or inaccurate information?

We will not accept false or misleading statements in reports, records or expense reports.

Any attempt to alter, modify or untruthfully overstate sales or earnings in the financial statements may lead to disciplinary action including termination of employment.

Falsifying books, records and accounts or misrepresenting facts may also be considered a crime.

What is our policy on travel and entertainment expenses?

Our Company expects to incur travel and entertainment expenses as part of its business negotiations. However, we do not allow or reimburse travel and entertainment expenses incurred for personal benefit or to influence or receive an improper commercial advantage.

Report travel and entertainment expenses following your local travel and expenses policy.

Conflicts of Interest

Our behavior, both on the job and outside the workplace, must not conflict with Becele's best interests. A conflict of interest arises when your personal activities, investments or associations, or those of your family or friends, compromise your judgment or ability to act in the Company's best interests. This includes situations where the prospect of personal gain causes someone to misuse their position with the company.

We grow by:

- Recognizing and promptly disclosing any conflicts of interest that apply.
 - Do this by disclosing any potential conflicts to your immediate supervisor and to the Legal or Ethics and Compliance Department. Disclose conflicts as soon as they have been identified.
- Keeping a record of the disclosure made and the actions agreed upon.
- Fulfilling any agreed actions to resolve the conflict completely.
- Refraining from seeking personal benefit or accepting preferential treatment including discounts, credits, goods or services from any third party with whom Becele has a business relationship, unless they apply to all Company personnel.

What does a conflict of interest look like?

Conflicts can include:

- Working for both Becele and a second company that maintains any business relationship with our company, including competitors, clients, distributors, vendors, service providers, contractors and consultants.
- Dealing on Becele's behalf with any company where a friend or family member works, has a role or invests in – whether or not you deal directly with that person.
- Using your position at Becele, or information about our business, to benefit yourself, a friend or a family member.
- Managing, auditing or controlling a friend or family member if you haven't reported the relationship to the Company.





Insider Trading

Insider trading happens when someone who has meaningful, non-public information about a company buys or sells that company's securities – profiting from something they know that the market does not. This is fundamentally unfair, and it's also illegal in most places we do business. We prohibit insider trading based on any information you learn in your job, whether about our Company or another one.

We grow by:

- Observing any blackout dates or securities trading windows established by the Company.
- Recognizing if we know or handle inside or privileged information, for instance as a result of the publication of quarterly financial information.
- Never trading or tipping others to trade if we have inside information.
- Keeping inside information confidential.

What is inside information?

Inside information is any information that has not yet been published and which a reasonable investor would consider important in deciding whether to buy or sell stock, like:

- Unannounced financial information
- Upcoming mergers or acquisitions
- Change in supplier or customer relationships
- Change in senior executive management
- Planned new products

How do I know if I'm an insider?

Generally, the Legal Department will notify you if you are considered an insider, but it's your responsibility for not engaging in insider trading.

ROOTED IN...

OUR COMMUNITIES

Being a responsible citizen means being sensitive to the legitimate concerns of our stakeholders. We communicate and interact responsibly and transparently with society and comply with laws and regulations designed to protect the environment.

- Responsible Marketing
- Donations and Political Contributions
- Product Quality
- Environmental Protection
- Speaking Publicly for the Company

Responsible Marketing

Our communications and activities – like our products – reflect our commitment to integrity, transparency and compliance with regulations applicable where Bece operates. We strive for accuracy and openness with our consumers.

We grow by:

- Marketing, advertising and labelling our products responsibly and accurately.
- Aiming our communications only to adults and complying with the communication standards established in the markets where we do business.
- Never attempting to mislead our consumers with incorrect or incomplete information about our own products or anyone else's.
- Ensuring business partners and agencies that support our advertising and digital activities have the same commitment to this responsibility.



Donations and Political Contributions

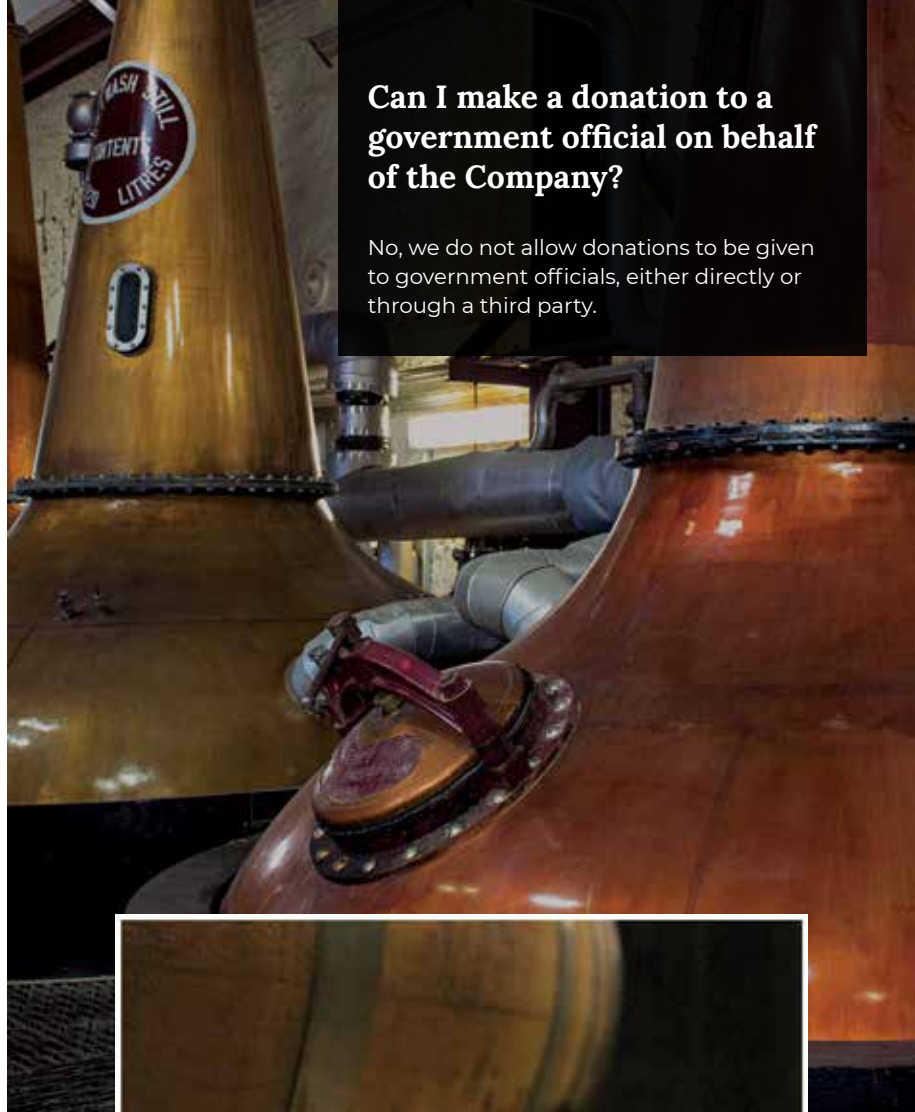
At Bece, we are aware of the impact that our products have on the people, communities and countries where we operate, and we are sensitive to their legitimate concerns. Any contribution for charitable purposes must be transparent and in line with applicable laws, and we support the right of our employees to engage as citizens and participate in lawful and appropriate civic or political activities.

We grow by:

- Separating personal political activity from the Company – we do not use Company funds, assets, facilities, equipment or trademarks in connection with personal charitable causes or political interests.
- Making donations transparently to authorized charitable associations in line with the Jose Cuervo Foundation program and applicable laws.
- Seeking approval from Corporate Affairs and the Legal and Tax Departments, as well as the Jose Cuervo Foundation before making a donation or contribution on behalf of the Company.
- Maintaining adequate supporting documentation and accounting records for any donations or political contributions.

Can I make a donation to a government official on behalf of the Company?

No, we do not allow donations to be given to government officials, either directly or through a third party.



Product Quality

Becle has a philosophy of quality throughout the Company, which contributes to the strength and reputation of our portfolio of iconic brands. We all are responsible for operating and administrating internal processes and developing our activities with the highest quality standards, focusing on the customer's satisfaction.

We grow by:

- Adhering to a quality program that ensures our products meet our quality standards across all business activities, comply with applicable laws and industry regulations and are safe for consumption of our customers.
- Ensuring that business partners carry out their activities in line with existing quality programs and standards.
- Reporting to your immediate supervisor and the operations team any situation that does not meet our quality standards.



Environmental Protection

As a socially responsible Company, we act to preserve and protect our environment. We are committed to achieving continuous environmental performance improvement focusing primarily on the areas of highest impact on the development of our products and the supply chain. We follow all applicable laws and regulations and give our stakeholders objective information regarding the environmental impact of our operations and products.

We grow by:

- Considering the environmental consequences of any major corporate decisions made and identifying the risks that may be involved in the operations.
- Working to significantly reduce the environmental impact of our operations through the efficient use of renewable and non-renewable resources, waste reduction and carbon emissions, as well as the use, management and treatment of hazardous substances.
- Encouraging our business partners and suppliers to act in environmentally responsible ways.

Speaking Publicly for the Company

We communicate consistently, accurately and truthfully when we speak with the public about our Company. Steady, truthful and reliable communication is what enables our customers and the public to trust us.

We grow by:

- Only speaking with the media, the public or investors about our Company if you have the appropriate authority or written authorization to do so.
- Referring any inquiries from the media, investors/analysts or the public about Becele to the Director of Corporate Affairs.
- Following the Company's lead when talking about our Company on social media – if our Company posts something, feel free to repost it; if we have not posted about a topic, do not share it yourself.



ASK QUESTIONS AND REPORT CONCERNS

Most large, global companies will experience misconduct – sometimes intentional and sometimes by people making honest mistakes.

If you know about something that doesn't seem right, or which violates our Values, we want you to speak up. This is especially important if you think someone is not complying with the law, our Code of Conduct or our Company policies.

Oftentimes, early reporting can help resolve an issue quickly and minimize the consequences of ethical or legal misconduct to a colleague or the Company.



How Do I Raise a Concern?

You have four ways to express a concern.
You can talk to:

1. Your immediate supervisor.
2. A relevant functional group, like Human Resources, Legal or the Ethics and Compliance Department.
3. The Ethics Committee.
4. The Ethics Line.

Ethics Line

The Ethics Line is a third-party reporting system that you can use to report a potential violation of the Code, our policies or the law.

Website:

<https://www.tipsanonimos.com/ethicsline>

E-mail:

ethicsline@tipsanonimos.com

Tips Móvil-App ID:

0589

Fax:

00 52-55-5255-1322

Can I Report Anonymously?

Yes, through the Ethics Line.

However, we encourage you to identify yourself when making a complaint. This allows the Company to obtain all facts, properly investigate your report and enter into a confidential dialogue with you.

Even if you identify yourself, every effort will be made to keep your identity strictly confidential within the Company.

What Happens After I Raise a Concern?

Once you make a report, the Ethics Committee will work to investigate it.

Becle does not tolerate anyone retaliating against a person for making a good faith complaint of improper behavior, regardless of the outcome of the investigation.

The Company will conduct an objective, detailed and fair investigation on alleged wrongdoing before determining any potential sanction.

Disciplinary measures will be applicable to those employees who fail to comply with this Code of Conduct and internal policies and applicable laws.

The disciplinary measures include, but are not limited to, warnings, temporary suspension or full termination of the work relationship without liability, apart from the complaint brought to the competent authorities.





**Thank you for your commitment in building
our culture of integrity.**



Fill out, clip and hand over the coupon to your Human Resources representative.

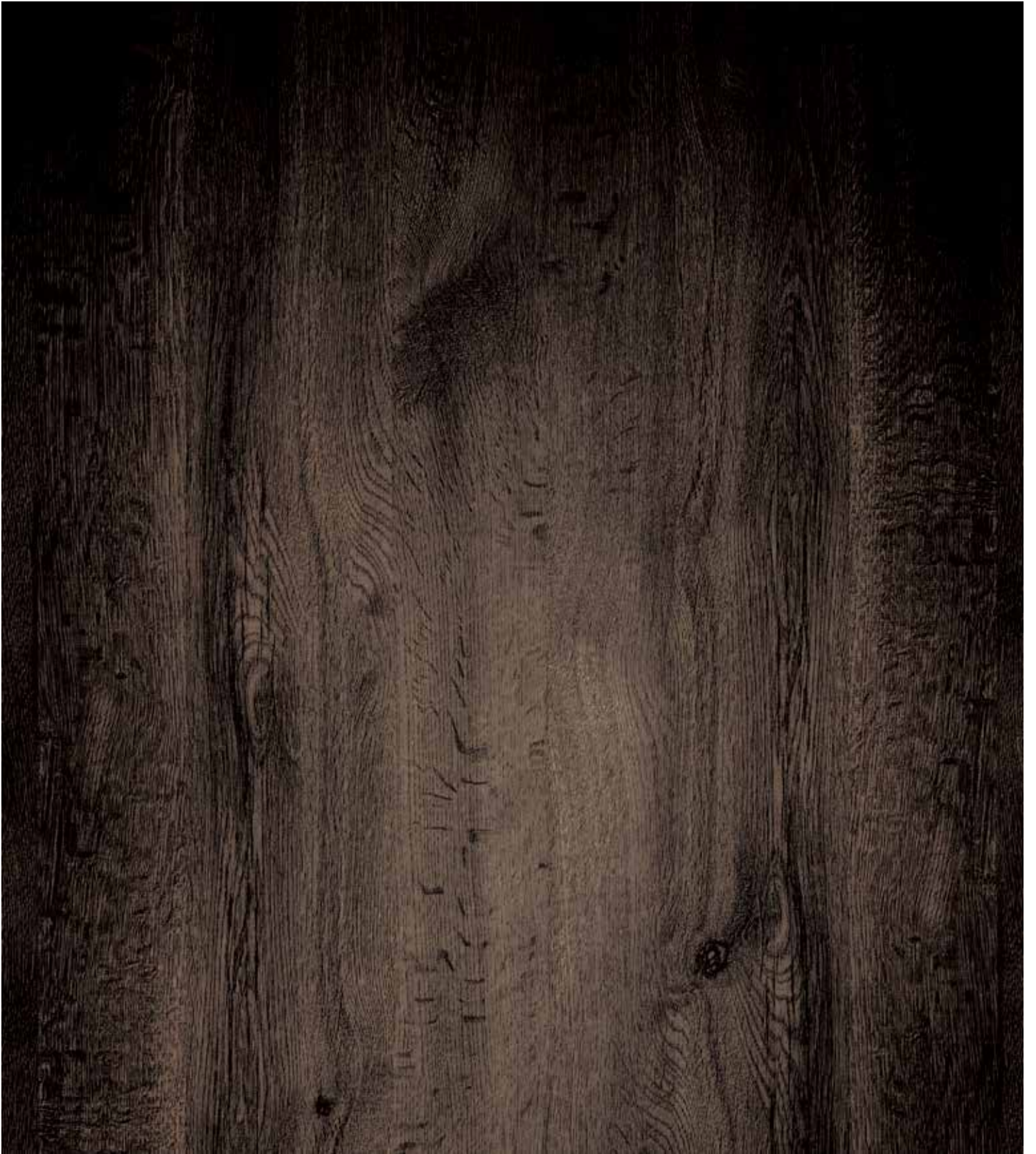
**I acknowledge and accept
the content of the Code of Conduct.**

Full name

Signature

Date





BUSHMILLS

Jose Cuervo


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