



**CODE
OF ETHICS**

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I. OBJECTIVE OF THE CODE OF ETHICS

To standardize criteria and orient ethical actions and obligations of all GOMSA LOGÍSTICA employees toward the company, investors, customers, creditors, providers, competitors, authorities and community.

The Organization aims to create value in a decisive and measurable way in all its interest groups through the optimization of financial profitability, the promotion of social equality and the protection of the environment.

II. SCOPE

This document is not exhaustive. Situations not accounted for herein shall be resolved in accordance with sound management principles. Any doubts should be referred to the Human Resources or Internal Auditing area, or, as a last resort, the Audit and Corporate Practices Committee.

III. VALUES

Our institutional values provide the regulatory framework for our Code of Business Ethics:

- Creativity
- Justice
- Discipline
- Loyalty
- Spirit of Service
- Prudence
- Honor
- Responsibility

The approach for each value can be found in the Induction and Organization Manual located on the intranet page: www.intragomsa.com

IV. GENERAL ETHICAL STANDARDS

1. We make use of the name and resources conferred upon us by GOMSA LOGÍSTICA responsibly and exclusively for the company.
2. We do not discriminate against any person for reasons of gender, marital status, age, religion, race, political views, socioeconomic status, pregnancy, language, ethnic origin, nationality, sexual preference or disability.
3. We promote and facilitate the detection of unlawful practices and/or inappropriate conduct, through open communication and formal mechanisms implemented in accordance with the Code of Business Ethics.
4. Under no circumstances will we harm the human rights of any person for cooperating in any way with an investigation into an alleged breach of this code or of any Corporate Policy.
5. We comply with all stipulations of money laundering legislation applicable throughout the world, in adherence to the laws in force in the countries where we operate.
6. Any individuals participating in political activities in any jurisdiction must act in a personal capacity and not

on behalf of GOMSA LOGÍSTICA, since the latter does not participate in any way in such activities.

7. We respect the law by not hiring underage persons, and we expect the same of our providers.

V. SPECIFIC ETHICAL STANDARDS

1. Customer Relations

We treat our customers equitably and honestly in all transactions, providing them with the services and information agreed, ensuring quality and timeliness, in accordance with official regulations and internal Policies.

2. Competitors

2.1 We compete actively while complying with all fair competition laws and regulations in force in the cities where we operate.

2.2 Those of us who have contact with representatives of competitors display a professional attitude, adhering to our corporate values and principles, and caring for our personal image and that of GOMSA LOGÍSTICA.

3. Provider Relations

3.1 We guarantee equitable participation and impartial selection of providers, based on principles of quality, profitability and service.

3.2 We treat providers equitably and expect the same from them, always looking after the interests of the company.

3.3 We consider requesting or receiving incentives from providers to select them to be wrongful conduct.

3.4 Each year we ask strategic providers to sign a letter confirming knowledge of and adherence to the terms of the Code of Business Ethics in all their transactions with GOMSA LOGÍSTICA and observance by company personnel with whom GOMSA LOGÍSTICA interacts.

4. Publicity and Marketing

Commercial communications by GOMSA LOGÍSTICA shall be lawful, decent, honest and in accordance with principles of fair competition and good business practices, avoiding any circumstances that are harmful to human dignity and integrity, or that use symbols that are culturally offensive to a gender, race, religion, social class or political preference.

5. Relations with Authorities

5.1 We cooperate at all times with the competent authorities for the full exercise of their powers and we act in accordance with the law, in defense of the legitimate interests of GOMSA LOGÍSTICA.

6. Anticorruption

6.1 We observe fair and transparent business practices in order to ensure compliance with local laws and regulations in the countries where we operate, and we prevent practices of bribery and extortion.

6.2 We do not make payments to obtain advantages, to speed up a process or to influence a decision, even when this represents a legitimate interest or right of GOMSA LOGÍSTICA.

7. Environment

7.1 We protect and conserve the environment as a social commitment, and we respect all environmental laws and regulations in the countries where we have a presence.

7.2 We implement emergency response procedures to minimize the environmental impact of unforeseeable incidents.

8. Community Relations

Our commitment to the community is based on ensuring the simultaneous generation of economic and social value in all our actions, for our growth and sustainability.

9. Occupational Health and Safety

We promote well-being and safety as fundamental conditions for individual development.

10. Conflicts of Interest

Directors, managers and employees are not involved in decision-making processes related to contracts with individuals or companies with whom they have a family relationship; nor do they intervene in or respond to requests from superiors, subordinates, work colleagues, relatives or friends, if doing so would be harmful to GOMSA LOGÍSTICA.

11. Information Handling

We process and protect personal data and information as a company asset, responsibly and in accordance with the laws applicable in each country where we operate, through established systems.

11.2 Employees with access to confidential and privileged information adhere to all legal provisions and

take all measures established to prevent the disclosure or leakage of such information to unauthorized persons. The disclosure or unauthorized use of such information is considered a serious offense warranting disciplinary action up to and including dismissal for just cause.

VI. RESPONSIBILITIES

1. Our associates are expected to act honestly and transparently at all times and places. They are also expected to report any situations that are or may be contrary to the principles and guidelines for conduct set forth in this Code, through the channels that GOMSA LOGÍSTICA places at their disposal. The guidelines for the responsibilities of officers, employees and shareholders are detailed in Appendix 1.

VII. REPORTING PROCEDURES

Notifications of unlawful practices or inappropriate conduct by any company personnel are handled through open, direct communication with the Ethics Committee and Board Chairman, using the complaints and suggestions box on the GOMSA LOGÍSTICA intranet (www.intragomsa.com), or the physical letterbox located in each building of the organization.

VIII. PENALTIES

Penalties may range from a written warning to dismissal to criminal charges filed with the competent authorities, depending on the seriousness of the offenses, and whether they are the product of negligent or willful acts. Failing to impose a penalty constitutes a violation of the code.

Penalties are imposed by the superior of the individual who has committed the offense on the advice of the Legal and Human Resources areas.

The GOMSA LOGÍSTICA Board of Directors, in consideration of the foregoing, approved and authorized this Code of Business Ethics on November 2nd, 2015.

CHAIRMAN OF THE BOARD OF DIRECTORS

APPENDIX 1: RESPONSIBILITIES

BOARD OF DIRECTORS

- To approve and issue the Code of Business Ethics, authorize any modifications thereto, and ensure its dissemination, in coordination with General Management.

BOARD SECRETARY

- To disseminate the Reporting Procedure to the members of the Audit and Corporate Practices Committee for any breach of the Code reported in the Compliance Letters received each year.

DIRECTORS

- To inform the Chairman of the Board of Directors of any aspects of this Code whose interpretation or application they deem to be insufficiently clear, in order to determine a solution.

AUDIT COMMITTEE

- To oversee compliance with the Code and to submit proposals for any modifications to the Board of Directors for their approval.
- To ensure that all directors and managers sign the Code of Business Ethics Compliance Letter each year.

MANAGERS

- To ensure their subordinates are aware of and complying with the Code and to help clarify doubts and resolve difficulties of interpretation or application.

INTERNAL AUDITING

- To report any violation identified to the Code of Ethics to the Audit and Corporate Practices Committee, as well as to Human Resources, and to follow up on the measures adopted.

HUMAN RESOURCES

- To include the Code of Business Ethics and the Reporting Procedure in induction programs and internal communications.
- To ensure that the Purchasing areas distribute the Code and its amendments to their key providers, and confirm the receipt thereof.