



Our Code of Ethics reflects Corona's principles and values

We are **what we do**

corona



Ask questions

Ask for orientation



Trust



When in doubt, reflect



Think about the future



Say NO to indifference



Report issues



Dear friends,

To face today's volatile and challenging business environment, we need a strong culture based on the legacy that our shareholders have built over 140 years, which is clearly reflected in our Code of Ethics. Values such as integrity, honesty, and respect guide us to behave and interact in the right way in all the scenarios in which we operate and with all the stakeholders with whom we have contact.

Our Code of Ethics is one of the most important assets we have in the Organization. It is reflected in our history, values, and principles. It underpins our reputation, and the sustainability of our business, and it is a source of pride and the sense of belonging for all of us who work here and also for those who are our partners and strategic allies in all the regions where we are present.

Beyond strictly complying with any applicable law, we are committed to the highest standards of corporate integrity. We absolutely reject any form of corruption or bribery, money laundering, or the financing of terrorism and weapons of mass destruction.

Achieving results does not justify using any means to achieve them. Our ethics are the source of our rights and duties. They are present for all of us in each of the decisions we make in our daily tasks, as well as in our actions.

We invite our suppliers, customers, consumers, authorities, and everyone who has a relationship with Corona to join us in making this purpose a reality.

Cordially yours,



Roberto Junguito Pombo
President
Organización Corona

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PURPOSE AND SPIRIT

Our Code of Ethics transmits the principles and values of Organización Corona S.A. (hereinafter "Corona") and its shareholders in its daily business management. It describes the ethical standards that the organization aspires to achieve, and to this end, it integrates the Business Ethics System through reflection, experience, and practice of an enduring organization. Corona has become an important benchmark of honesty, transparency, and compliance with the law. The approaches contained herein constitute our guide to performance and behavior, and to provide guidance even in those events that are not expressly contemplated.

This Code also reflects the commitment to sustainability that Corona has made into an integral part of its business strategy and daily operations. Under this commitment, the Organization seeks to decisively and measurably generate value for all its stakeholders by optimizing financial profitability, generating social equity, and protecting the environment.

At Corona, we are committed to respecting human rights understanding that they are inherent to all people, regardless of nationality, gender, geographic location, ethnicity, color, religion, language, or any

other condition. This is why we work to defend and promote them within the organization and in our value chain.

Given the complexity and dynamics of the corporate and business world, the content of this Code of Ethics and the policies that complement it must be constantly deployed, supplemented, and developed. It is the responsibility of the General Manager, the Human Resources Leader for the business divisions, and the business units. These are transversal functions that encompass Corona to lead and advance all the actions aimed at making ethics a part of daily life and strengthening the organization. In this way, we will contribute to consolidating ethical management, not only within the organization but also outside of it, to achieve an increasingly integral society; this is an endeavor to which we are committed.

WHO MUST COMPLY WITH THIS CODE?

All employees, which includes members of the Board of Directors. It applies to all subsidiary companies of Organización

Corona S.A. provided they do not have their own code of ethics as stipulated by their Board of Directors. Corona expects its counterparts and end-consumers to make decisive contributions to strengthen its ethical culture in compliance with the relevant aspects of this code. To this end, Corona offers you an ethics line through which you can report any situation that violates the integrity of the company or that may constitute a violation of our Code of Ethics. You will find more information about our Ethics line in Section 5.4 of the Code.

RESPONSIBILITIES AND OBLIGATIONS TO CORONA

Corona has placed its good name and reputation at the service of the community.

Therefore, an elemental duty of its collaborators is to make their best efforts to ensure that it is always and, in all places, consistent in its principles and values in accordance with the legitimate aspirations of its shareholders and adding value to their investment

Therefore, it is our responsibility:

- To manage our commitments according to high ethical standards, transparency, fairness, and responsibility while safeguarding its good name and business tradition.
- To make diligent, careful, and reasonable use of the capital resources entrusted to us.
- To contribute honestly to the achievement of business goals.
- To provide reliable and truthful information.



1 Acting with integrity

- Uncompromising integrity
- Zero tolerance to ethical misconduct, wrongdoing, corruption, and bribery
- Do not be judge and jury
- Strict compliance with the law
- Make yourself noticed
- Confidentiality and non-retaliation



All employees must honor the following principles

1.1. What is expected of each of Corona's employees?

Have integrity: Act with honesty and transparency at all times and in all places.

In all your activities, use good judgment and common sense while considering whether your actions are ethical and legal and whether they reflect the good name and image both of Corona and your own, which are important to protect and preserve.

Report and make yourself heard: Report situations that go or could go against the principles and conduct guidelines of this Code through the channels that are made available by Corona.

Your concerns will be addressed. If you consider that the matter has not been handled, or you have not received a response to your report, report it with confidence. In this way, you will be contributing to the ethical consolidation for our company and for our country.

To submit a report, it is not necessary to provide evidence or to be right; it is enough that the information is accurate.

In the same manner, be careful and refrain from filing out complaints or reports with a different purpose or intention than that of being honest since acting recklessly is also a violation of Corona's ethics.

Trust: Corona has the channels, means, policies, and procedures in place to deal with improper and unethical behavior by ensuring the necessary confidentiality with respect to the information you provide.

Corona's commitment, no retaliation: In no case and under no circumstances will there be retaliation of any nature because of the information you provide.

Remember to be accurate and truthful.

Act with austerity: This is one of Corona's core values.

Make reasonable use of the resources that Corona has provided for the fulfillment of your responsibilities and functions.

Keep your commitments and honor your word: your reliability as a Corona employee depends on the rigor with which you fulfill the commitments you make. When you make a commitment, keep it.

Be transparent and demand transparency: base your relationships with colleagues, managers, and third parties on good faith and transparency.

Avoid concealing information that is relevant to Corona, such as disclosing confidential company information, having ulterior motives in your actions or words, manipulating, telling half-truths, or misleading or misperceiving, and in general, any other behavior that may be related to criminal acts. For example, acts of corruption and or bribery.

Report when you perceive any of these behaviors and set an example.

State your commitment to uphold the code of ethics: use this document that is designed for this purpose and refer to the contents in the chapter on "Conflict of Interest".

Keep in mind that the Code cannot cover every possibility of a real or perceived conflict of interest. Use good judgment and be aware of your actions.

Declare your conflicts of interest: report the real or apparent existence of any situation in which your personal interests could be in conflict with those of the Corona.

None of your activities and relationships may jeopardize the good name of the Organization.

Respect the law: this is the basic premise for the conduct of Corona and its employees.

We seek to go beyond its provisions to be better corporate citizens and contribute more to society.

Therefore, we develop objective criteria to apply the law, consulting its real essence, and its most noble purpose.

Be accurate and truthful: in the reports related to your work, ensure accuracy in terms of budgets, costs, expenses, production, sales, quality, compliance, inventories, prices, salaries, time worked, and paid, accident rates, performance, (I Know How I'm Doing) and other elements that may be applicable.

Support your work with accurate and precise transaction documentation that implies contracting or any disposition of the Organization's resources.

At Corona, we understand that making mistakes is human and that mistakes can occur in daily activities. If you make a mistake, inform your manager immediately. He, as the person responsible for the process, must help you find the solution, which must comply, in any case, with the criteria contained in this Code.

Report on: Opportunities that, because of your position or your status as an employee, seem to be of interest to Corona.

Manage conflict: disagreements over actions, decisions, and activities, both individual and organizational are part of workplace reality. Do not remain silent. Manifest them with respect and truthfulness.

Respect disagreement: a good work environment is characterized by spontaneous, open, and honest dialogue, in which trust and respect allow disagreement to be expressed openly and transparently. Respect differences of opinion.

**When you
commit to
something,
stick to it.**

1.2. What is expected of the senior leader?

At Corona, the Senior Leader is a model for our principles and values by being an agent of change in our Culture. He/she promotes our ethics and values by acting with integrity at all times, places, and circumstances. Accompanies each team member's experience and development and drives their performance within the framework of our Culture. For this reason:

- As a leader, you are a role model and a mentor for many people who consider what you do as an example of the conduct to follow.
- Keep in mind that Corona rejects all conduct that challenges the consistency with the corporate values on which its work is based; especially, but not limited to, all forms of workplace harassment, whether of a labor, sexual, or any other nature that could undermine the dignity and respect due to our employees.

- Encourage the establishment and consolidation of spaces for participation and dialogue that promote and facilitate the employees in their charge:
 - The understanding of the essential elements of the corporate philosophy, as well as of the Big and Audacious Goal (MEGA) that we have set out to achieve.
 - The understanding of and compliance with Corona's Code of Ethics.
 - Responsible and truthful reporting of concerns related to conduct that may be contrary to business ethics.
- Pay attention to observations made by your collaborators regarding work practices that may imply disregard for principles regarding interpersonal relationships, working hours, rest, compensation, occupational health, and safety, among others. Do not overlook these observations.
- Include in your performance evaluation criteria on the ethical behavior of the employees under your responsibility.

- Promote the continuous improvement of individual and group performance by taking into account compliance with this Code of ethics, the values, the organizational culture, and the culture of the organization and the applicable legal norms.
- Address the concerns raised by your team. Give the relevant answers and if you have any doubts or do not have the answer, contact the Ethics Committee responsible for your business division or location. Report the situation through the ethics line provided by Corona (see Section 5.4).
- When contracting goods and services, choose suppliers that comply with the mandates of labor laws, human rights at work, environmental protection, and in general, the law. When making decisions, also take into account the following criteria: the quality of relations with employees, social responsibility, organizational climate, and competitiveness.
- Avoid conduct that is intended to obtain an undue advantage or benefit for yourself, your family members, or close associates, or for the employees under your responsibility.

As a leader, you are a role model and a mentor for many people who consider what you do as an example of the conduct to follow.



We all have an obligation to comply with Corona's ethical standards.

If you observe behavior that concerns you or represents a violation of our Code, report it as soon as possible through the Ethics line provided by Corona (see Section 5.4). By doing so, you give the Organization a chance to prevent or correct the problem in a timely manner; for example, before it breaks the law or creates a risk to the health, safety, and good name of the Organization.

- **Report immediately:**

Through the available channels provided by Corona, any inappropriate behavior that you observe or become aware of. Do not allow the Organization to be unaware of these situations, nor try to solve them alone.

If you believe that no action has

1.3. How to report an ethics violation and what steps to follow?

been taken to resolve the reported situation, please seek support through another available channel.

- **It is your decision whether or not to be identified:** Corona is committed to keeping your identity confidential, except if it is absolutely necessary to disclose it to the people in charge of solving the problem for the proper attention of the matter, in which case, you will be informed in a timely manner.

- **Confidentiality:**

The information you report will be strictly confidential and will be used for the sole purpose of safeguarding the interests of the Organization according to the ethical framework contained in this Code.

- **Consequences and sanction:**

Corona will adopt measures to correct the situation or problem identified, and to prevent its recurrence by applying the appropriate sanctions.

- In no event will Corona retaliate against you for the information you report and will not tolerate retaliation by others. Corona only expects you to be truthful and thanks to you for taking an interest in protecting the Organization and its good name.

QUESTION: I have been having family difficulties, and I went to a colleague to borrow money. He helped me, and we agreed that I would pay him interest. At first, I thought it was high, but since I needed the money, I agreed to pay it. Every month, I pay the agreed amount, but in reality, all I do is pay interest. What should I do?

Go to the Human Resources Leader of your business division, business unit, or cross-functional unit, tell him/her about the situation and seek support from the organization. Corona has ways to help resolve this situation. Offering, requesting, and receiving loans of money may compromise the quality of treatment that has characterized Corona's employee relationships. Avoid soliciting money from colleagues as this may lead to improper or inconvenient practices, or affect the quality of your work environment, which we cherish and enjoy on a daily basis.



2 Integrity at Corona

- Human Rights
- Controlled environment
- Self-control
- Fair labor practices
- Diversity and inclusion
- Sustainability
- Health and Safety Responsibility
- Accuracy of business and financial records
- Performance of other remunerated activities



At Corona, self-management, self-regulation, and self-control characterize the work environment. Be the first to ensure the transparency of the activities you carry out, the decisions you make, and the relationships you build.

Count on the Auditing Department and share your processes with them.

2.1. Human Rights

At Corona, we are committed to respecting, promoting, and defending human rights in our organization and throughout its value chain.

As we carry out our operations, we act with due diligence and expect the members of our organization and those with whom we interact to avoid adverse impacts on human rights by taking preventing and mitigating measures. In this regard, we seek to ensure that our suppliers and customers share our values and commitment to human rights. We reject all forms of forced labor and advocate for the abolition of child labor.

Corona establishes an ethics line (see Section 5.4) to report possible human rights violations in order to review the situation and take remedial action when necessary.

QUESTION: I have a potential supplier that offers me services with attractive conditions but last month several media reported that it uses minors in its production chain. What should I do?

Go to Human Resources, tell them about the situation, and seek the support of the Organization.

2.2. Controlled environment and internal control:

Trust the Auditing Department and share your processes with them because this way you will achieve greater control of your functions.

Look at the auditing from the perspective of prevention and improvement.

If you identify any situation of risk or non-compliance, implement the

agreed measures and communicate the changes to the employees of all the areas that should be aware of them.

Request periodic reviews to determine the effectiveness of the measures adopted, implement the recommended corrective actions, and manage the consequences of non-compliance.



2.3. Fair labor practices:

Work is an important part of our lives and a determining factor in attaining dignity, well-being, and human development. Compliance with the law does not differentiate us from other companies, since all of us, as members of society, are called to obey the law in pursuit of harmonious coexistence. But we go even further, we want our labor practices to allow Corona's employees to work freely and under conditions of safety and dignity, thus improving their lives in a comprehensive manner. Every day we work to achieve this goal. We constantly promote participation and dialogue with our employees.

QUESTION: My boss treats my colleagues with respect, consideration, and warmth. However, in his relationship with me, he uses expressions that hurt me, he speaks in derogatory terms about my performance and contribution. He has denied me leave to attend to personal matters without any justification, and I have to work long hours to meet his constant and sudden requirements. I feel unmotivated and upset, but I am afraid of losing my job if I tell his immediate boss. **Who can I contact to present my particular case?**

Corona aspires for all its employees to feel motivated and enjoy the work they do.

Please note that Corona rejects the behavior of your boss because he does not recognize the leadership style we promote.

Report it immediately to your Human Resources Leader, the Ethics Committee of your business division, business unit, or transversal function, or report it through the Ethics line provided by Corona (see Section 5.4).

2.4. Diversity and inclusion:

Corona welcomes human diversity in all its forms and promotes an inclusive work environment in which all employees are valued and have the opportunity to reach their full potential. We believe that a diverse organization contributes to the realization of our purpose.

Corona does not tolerate discrimination or harassment of any kind, which includes sexual harassment, hostile environments, and bullying.

Unequal treatment of employees and third parties on the basis of race, nationality, sex, sexual orientation, gender, gender expression or identity, pregnancy, marital status, immigration status, physical or mental disability, military status, religion, creed, age, political affiliation, origin, social class, physical appearance, manner of dress or state of health is prohibited at Corona.

Corona offers employment opportunities without discrimination. Therefore, its recruitment, selection, promotion, and advancement processes are based on objective criteria and factors of knowledge, training, experience, performance, and merit.

QUESTION: I am participating in an internal process to fill a vacancy in an area I have always wanted to work in. I meet all the requirements of the position. However, the decision does not favor me, and my colleagues tell me that my boss's opinion influenced this result because my religious beliefs are different from his. What should I do?

You have the fundamental right to practice any religious faith of your choice or not to practice any faith at all. Corona respects and promotes diversity among its employees. Contact the Human Resources Leader or the Ethics Committee of your business division, business unit, or cross-functional area, or report the situation to: ethicalandanti-corruptionline@corona.com.co

QUESTION: I have been diagnosed with HIV. What should I do, and what am I entitled to?

Although you can keep the matter confidential and take responsibility for handling your personal situation, we recommend that you inform the Human Resources Leader, who should offer you the health services that Corona has available and take the necessary precautions to protect your integrity and that of your colleagues. Corona guarantees that your information will be handled correctly and that you will not be discriminated against in any way on the basis of your illness.

QUESTION: One of our clients continually makes comments with sexual connotations to one of the people on my team and that seems to make her feel uncomfortable. Should we accept this behavior in order to maintain the relationship with the client? Is there anything I can do even if my colleague does not complain?

Corona rejects any kind of harassment even from third parties with whom you may have business relationships. You can report the situation through the channels provided for Corona to analyze the situation.

QUESTION: My male boss sometimes says that my reactions at work are emotional, dramatic, or aggressive. When faced with similar behavior from my male co-workers, he never says the same thing. This makes me uncomfortable, and I'm not sure if I should feel this way. Should I do something about it?

Corona recognizes that some behaviors that may be the same in men and women may go unnoticed in men and be highlighted in women. Your boss should not treat you differently because you are a woman. If you feel confident, you can discuss the situation with your manager or report it through ethical channels.

QUESTION: I am a married gay man. When I meet co-workers from other business areas and they see my wedding ring, they often ask about my wife and children. This situation is frequent and makes me uncomfortable. Could I speak to someone?

Corona wants all its employees to feel included in the work environment. Occasionally, some employees, out of ignorance and without bad intentions, may make others feel uncomfortable. Feel free to share your discomfort with your manager so that the organization can promote diverse and inclusive spaces.



We are committed to sustainability through the generation of economic, environmental, and social value for our stakeholders.

We preserve the environment through the continuous improvement of our processes and products.

2.5. Sustainability:

Corona is committed to sustainable development in economic, social, and environmental terms. In developing our strategy, we seek to make efficient use of natural resources and create positive impacts on society.

We preserve the environment through the continuous improvement of our processes and products so that they make increasingly efficient use of natural resources and generate the least possible environmental impact

We responsibly assume the effects that our activities may have on the environment by undertaking actions to restore the ecological balance in our manufacturing plants and operating sites.

QUESTION: I lead the project team that plans to make improvements to the production process in one of the Organization's plants. In the design, I identify that it could affect a water source that supplies the community in which we operate.

Report the situation to the team, the area, and the business manager interested in the project. Ensure that the design adjustment is made respecting the care of that water source and include in the budget the highest value required for the execution.



We improve lives, promoting mutual care, integrated health, and a healthy environment for the sustainability of the business.

QUESTION: I have to operate a piece of equipment for which there is no evidence that any preventive maintenance has been performed.

I am concerned about putting myself at risk by operating it. What should I do?

Workplace safety is a priority at Corona. The TPM or Total Preventive Maintenance Methodology reinforces this pillar. To ensure that this way of working becomes a reality, report your concerns to your immediate supervisor, and ask that the issue be discussed in their Primary Group (PG) so that you have additional information about the real condition of the equipment and, if your concern is true, the equipment will be reviewed by the Maintenance staff.

2.6. Workplace health and safety:

Through your self-care, you are primarily responsible for taking care of your health and adopting safety measures indicated to prevent accidents and illnesses at work.

For its part, Corona is responsible for the identification, evaluation, prevention, and mitigation of health and life risks, as well as the timely and effective disclosure of the existence and nature of such risks and the results of the studies and investigations it conducts in this regard to interested parties and the relevant authorities.

QUESTION: There is certain equipment associated with the area where I work, whose handling requires training and instruction because its incorrect use can cause accidents and affect the quality of the organization's products. My boss tells me that we have to comply with the customer's agreed program and has asked me to replace one of my colleagues in the operation of this equipment. I have not received the necessary training to do this well. **What should I do?**

Don't let the pressure to meet the deadline jeopardize your safety. Your manager must find a different solution that will allow you to comply with the customer's agreed-upon schedule and, at the same time, ensure the personal safety of the entire team of employees and the quality of the products. Report the situation to the Human Resources Leader or the Ethics Committee of your business division, business unit, or transversal function, or report it to Corona's Reporting Channels (see Section 5.4).

QUESTION: My manager has assigned me to perform a specific task that requires the use of personal protective gear that has been provided to me in a timely manner. I am skilled in my trade, and sometimes I do not use them because I am confident in my abilities.

If I have a workplace accident on one of those days when I was not using my personal protection equipment and the cause is precisely that, **can I be summoned before a disciplinary process?**

You are primarily responsible for your workplace health and safety. Corona is under the obligation to periodically provide you with the personal protection elements and equipment that your job requires to be performed under safe conditions. If you do not use them, and even if an accident does not occur, your immediate supervisor may summon you to present the pertinent explanations. If you do not have a clear and objective justification, you may be subject to disciplinary action. Self-care is fundamental for you, for your family, and for Corona.

2.7. Commercial and financial records:

They must reflect the reality of the situation to which they make reference to. Do not alter the data in the reports to hide situations that should be known to Corona, not even on the grounds of favoring the Organization.

This is the responsibility of anyone who incurs an expense of any nature and amount on behalf of or in the representation of the Organization, the personnel involved in the accounting, other financial processes, and those in charge of approving them.

Company assets: Use them in accordance with your responsibilities and functions at Corona, and take care of them as you do your own.

The following are considered company assets: Money, equipment, raw materials, supplies, products, work time, the fruits thereof, information systems, telephones, other means of communication, computers, other IT tools, vehicles, confidential or privileged information, trademarks, patents, other commercial records, and, in general, all intellectual property rights.

Please note that you are not allowed to have unlicensed or illegal software. Its use compromises Corona's liability and may involve criminal conduct.

For Corona, theft, destruction, product, equipment, or company information misappropriation, embezzlement, and intentionally providing false information are offenses that are just as serious as the theft of employees' property in the workplace.

QUESTION: In accordance with my responsibilities in the Company, I have been assigned a cellular phone that I also use personally. **I want to know what is the authorized limit for making personal calls on that cellular phone?**

Keep in mind that the cell phone has primarily been assigned to you for the proper fulfillment of your responsibilities. If for any reason you need to use it for personal purposes, take care of this resource as you would if it were your own. Corona relies on your good judgment and common sense. Be reasonable in your consumption and austere in your spending.

QUESTION: While walking through the plant, I notice that a colleague is not handling a certain product properly while storing it and that it could be damaged, which would mean that it would not be commercialized with the quality expected by our consumers. **What should I do?**

It is essential to be aware of situations like this so that together we can correct processes and continually improve them.

You can talk to your colleague and help him understand that what he or she is doing is not correct, and you should inform the process manager so that he or she, as the person directly responsible, can analyze the causes of this behavior and implement the corrective action plan.

Intellectual property: This is one of Corona's most important assets. All employees must strive to protect it, as well as respect the intellectual property rights of third parties. Failure to do so could affect the reputation of the Organization, as well as generate substantial damages and even lawsuits against the company and its employees.

- Corona's intellectual property includes patents, trademarks, copyrights, secrets, formulas, information, inventions, and developments made by employees and, in general, any intangible subject to property rights.
- In order to secure our intellectual property, we advise you to periodically review with the corporate legal department the existing registrations in the countries in which we operate.
- Consult the corporate legal area for any request submitted by a third party for access to information related, directly, or indirectly to the Organization's intellectual property rights.

QUESTION: I am working on new product development processes, and I overheard a conversation in which a colleague offered to hand over information about a project we are working on in exchange for money and other incentives. **What should I do?**

Information about current and in-development products and the products themselves are Corona's intellectual property. What your co-worker is trying to do is inappropriate. Report the situation to the Human Resources Leader or the Ethics Committee of your business division, business unit, or cross-functional area, or to Ethics lines provided by Corona (see Section 5.4).

The use of confidential or privileged information: Protect Corona's information that is not for public use, which includes contracts, pricing information, marketing plans, technical specifications, and any information related to employees.

- Keep in mind that the information to which you have access as a Corona employee is the property of the Organization, that has been entrusted to you because of your duties, and that the responsibility for its use continues even when your employment relationship has ended.
- Comply with the confidentiality agreements that your participation in business projects or product development may require.
- Do not provide Company information to third parties by engaging in eavesdropping or invading someone's privacy, much less under the offer of financial compensation or other benefits.

QUESTION: I am part of a project team involved in improving the performance of a product. These improvements are so important that they would give us a very big advantage over our market competitors. I received a call from the technical manager of one of these competitors and he said he wants to talk to me about the project I am working on. **What should I do?**

Project information is confidential and of high strategic value to Corona. You should not share it or discuss it with third parties without the express authorization from the Business Unit General Manager. Respectfully decline the invitation.

Report the situation to the Human Resources Leader or the Ethics Committee of your business division, business unit or cross-functional area, or Reporting Channels provided by Corona (see Section 5.4).

QUESTION: I am part of a ceramic virtual community. Some of the participants work for a competitor. One of them invited me to jointly analyze the performance of a product that has similar characteristics to one of ours and about which he seems to be very knowledgeable. **Can I share available company information on this topic?**

Be careful. Product design and information regarding the way we do things are Company assets and, therefore, you must protect them. Ask your direct manager or in his absence, the business division, business unit or cross-functional Ethics Committee for instructions to assist you in this situation. This way, without losing the opportunity to learn and improve, you can prevent competitors from gaining access to proprietary information and you and Corona from engaging in unfair practices.



Corona expects that, within legal bounds, you will devote your time and talents to fully performing your work commitments

2.8. Second job, side job, or other paid activities:

Exceptionally, and with prior expressed authorization from the Vice President of their business division, commercial (sales) unit or transversal support function, the President of the company or the President of the Organization or the Corporate Counsel, as applicable, employees may participate on boards of directors or teaching or guild activities without the detriment to their responsibilities and taking care not to incur in any conflicts of interest.

In the event that you are offered any type of compensation (payment, reimbursement of expenses, or any other recognition) when you are invited to give a talk or make a presentation as part of your responsibilities with the Company or by virtue of your knowledge or experience in the position you hold at Corona, inform the Ethics Committee of your business division, commercial (sales) unit or transversal support function, and obtain their prior authorization to accept such compensation.

If you decide to perform any complementary activity other than those expressed here or for which you do not require prior authorization, share this decision with your immediate supervisor. Keep in mind that, by virtue of your work commitment to Corona, you are acquiring responsibilities that may place some limits or restrictions on your personal life.

QUESTION: I work during the day and study at night. Sometimes, I spend part of my workday doing some college work. *Is it appropriate to spend time at work on these activities?*

Corona recognizes your efforts to train and continue your professional development process. You may use breaks during the workday to attend to your academic commitments, but it is not correct to do so if this affects the normal flow of your work or that of your work team.

QUESTION: I work on a rotating shift system. When I finish my shift, I drive a cab that I purchased for additional income. Some days, I feel that I have not shared time with my family, and I feel tired before my next shift.

You can have an outside work activity as long as it allows you to take care of your family and get the rest you need to fulfill your work commitments.



3 Negotiation with external parties:

- Relationships with suppliers, channels, distributors, consumers, and competitors
- Transparency, objectivity, accountability, and
- Zero improper practices
- Anti-money laundering, anti-terrorist financing, anti-proliferation of weapons of mass destruction, anti-corruption and anti-bribery.



Business dynamics always involve relationships with external audiences at different levels or in different countries.

Corona expects you to build and strengthen these relationships through good faith and transparency.

3.1. Improper payments:

Payments to obtain advantages, influence a decision or expedite a process are not permitted even if the decision represents a legitimate interest or right of Corona. Any doubt or concern about the nature of payment must be reported to the Ethics Committee of your business division or business unit for prior approval. This is a sensitive matter that may compromise both your professional credibility and the reputation of the Organization, and may even lead to the commission of a crime. Any donation or sponsorship must be both transparent and in compliance with the law, and thus reflected in the accounts. It must be ensured that they are not used to generate an improper commercial advantage or act of corruption.

Corona considers an act of corruption any illegal behavior carried out by its customers, suppliers, employees, or any other counterparty in order to obtain benefits on behalf of itself or other parties. Therefore, it is forbidden to give, offer, promise, or receive directly or indirectly: sums of money, valuables, any benefit or utility in exchange for any public or private servant to perform, omit or delay any act related to their functions and in connection with a business, national or international transaction. Nor should you accept, conceal, or sponsor any act that could be considered a violation of the law.

QUESTION: I suspect that a carrier is giving money to one of my co-workers to secure the load and dispatch before the other carriers. I have noticed the carrier representative and my colleague acting suspiciously, **what should I do?**

Offering, requesting, and receiving money in exchange for preferential treatment is an improper practice that undermines the trust and transparency on which Corona's client relationships are built.

In particular, the transportation process is based on the needs of our customers and relies on an objective sequence of product allocation for the corresponding shipment.

Altering any of the operating conditions of the process for a personal motive or interest is unethical conduct that you must report to Corona. Report your suspicion immediately to the Ethics Committee of your division, business unit, or transversal function.

3.2. Prevention of money laundering, financing of terrorism, and proliferation of weapons of mass destruction:

Corona is committed to the fight against money laundering, the financing of terrorism, and the proliferation of weapons of mass destruction. For this reason, it adopts preventative measures such as verification in lists legitimately prepared by government authorities to ensure that the commercial agreements entered into and transactions with counterparties, customers, suppliers of goods, and services, among others, are carried out by persons and entities free of suspicion, and that they are not used as an instrument or means for the legalization, concealment, management, investment, or use of money, resources, goods from criminal activities, or any behaviors related to terrorist acts.

Likewise, Corona considers as an act of corruption, any illegal behavior carried out by its customers, suppliers, employees, or any other counterparty in order to obtain benefits on behalf of itself or others. Therefore, it is forbidden to give, offer, promise, or receive directly or indirectly: sums of money, valuables, any benefit or utility in exchange for any public or private servant to perform, omit or delay any action related to their functions and in connection with a business, national or international transaction. Nor should you accept, conceal, or sponsor any activity that could be considered a violation of the law.





We are interested in having suppliers of goods and services that, in addition to complying with the law, provide fair treatment to their employees and are committed to protecting the environment.

When in doubt,
consult your direct
superior.

3.3. Relations with suppliers:

Pay close attention to negotiations with suppliers or those who aspire to be suppliers, especially those who:

- Directly or covertly offer any benefit that is not applicable to the entire working community or exceeds a modest value.
- There is a real or apparent conflict of interest.
- There is information that calls into question your compliance with laws and fair labor practices.
- You are the sole supplier or participant, except with the prior approval of the Ethics Committee of the business division, business unit, or cross-cutting function in question.
- You are asked to omit requirements defined in the contracting and purchasing policies.

QUESTION: During a trade mission in another country, a local supplier offers me services that, although they are accepted by the business community there, I do not think it is right to accept them. **What should I do?**

Remember that what we expect from our suppliers, wherever they are, is to provide us with quality goods and services at appropriate prices, and to comply with commercial agreements. Accepting the services may compromise your ability to decide objectively.

If in your good judgment the service offered makes you doubt the above, respectfully decline and explain Corona's standards. Report the situation to the Human Resources Leader, to the Ethics Committee of your business division, business unit, cross-functional, or Corona ethics line (see Section 5.4).

QUESTION: In my search for suppliers, I have found several suppliers abroad

that could provide us with tempting prices and advantageous delivery terms. However, I just received information that they use children in their workforce. **What should I do?**

Corona condemns all forms of forced labor, especially child labor. Under no circumstances should you go forward in the process with these suppliers. Doing so violates Corona's fundamental principles and could result in harm of various kinds. Report the situation to the Ethics Committee of your business division, business unit, or transversal area to make the appropriate inquiries and, if this information proves to be true, definitively exclude them from the list of potential suppliers.



3.4. Relations with government authorities:

As a corona representative, it is essential that you:

- Act with absolute integrity and transparency in the activities carried out on behalf of the Organization.
- Establish serious, honest, and professional relationships with representatives of official entities, so as to create an unprejudiced and disinterested working environment.
- Carry out administrative procedures before governmental entities in strict compliance with the requirements established by the law.
- Refrain from offering or receiving money, gifts, benefits, discounts, employment opportunities, and any consideration that could be construed as a bribe. Remember that even if Corona is a beneficiary of, or interested in, a process or decision in which it has a legitimate right or interest, making such payments is unacceptable conduct.
- As a general rule, avoid contracting directly with the government and direct the business opportunity towards Corona's various distribution channels. If for any reason it is imperative to contract with the government, the authorization for this contracting must be given exclusively by the Vice President of the business division, business unit, transversal function, the President of the company, or the President of the Organization. As members of today's society, we have witnessed unethical and even criminal behavior by some who, acting in the name of the State, have defrauded the public trust and finances.

Be prudent, confirm Corona's interest in participating in this type of process, and expressly request prior authorization to represent the Organization.

- Corona agrees to carry out lobbying activities for matters of public interest, public policy, and/or associations that have a high impact on the development of the Organization's operations. In any case, these activities must be carried out based on the values of Transparency, Honesty, Integrity, and strict respect for the Law, and, therefore, must not be used for corrupt or illegal purposes, nor to inappropriately influence any decision that represents an advantage for the Organization.

If services are contracted for this purpose, the persons or entities must have a strong professional reputation, likewise, the collaborator authorized to make these approaches with external parties must know the anti-corruption guidelines established in the Compliance Manual of the Business Ethics Program, and must sign a consent and commitment agreement with the same; in no case are payments and/or gifts to public officials allowed.

In the event that you have any doubts or concerns, consult your direct manager or the Ethics Committee of your business division, business unit, or cross-functional function before deciding.

QUESTION: I am doing a procedure at a government entity in the hopes of obtaining an environmental license. The official in charge hints to me that he can expedite the process, which would be very simple if I give him a tip. Corona is interested in getting this license as soon as possible since the process that requires it must start operations as soon as possible.

What should I do?

Corona pays the taxes, contributions, and fees required by law, so agreeing to this type of request is a corrupt practice that the Organization rejects.

Not even in an event such as this, in which you have a legitimate interest in obtaining the environmental license should Corona representatives offer money, give tips, or bonuses to expedite the application process. Do not pay the requested gratuity, inform the officer of Corona's practices on the matter, and immediately report the situation to the Ethics Committee of your business division, business unit, or cross-functional function.



3.5. Political activities:

Corona supports democracy and respects the political and administrative structure of the countries in which it operates, as well as its authorities. For this reason, it does not participate in or finances political activities of any kind, nor does it support any political party, movement in candidacies for public corporations, or popularly elected positions.

It respects the fundamental right of its employees to belong or not to belong to political parties, to vote, and to actively participate in politics. Therefore, they will not be constrained to contribute financially, to participate in or support partisan activities, political or electoral activities, except for those that are of obligatory acceptance by legal or constitutional mandate, such as acting as a voting jury in case they are summoned to a voting jury in the event of being summoned by the corresponding authority.

If you participate or want to participate in political activities, keep in mind:

- Inform the Ethics Committee of your business division, business unit, or cross-functional area, so that it can verify whether, if elected, any conflict of interest may arise between Corona and the corporation you are applying for, or between your political activities and your responsibilities with Corona employees, so that it can resolve the situation in a timely manner.
- Do so under your personal capacity.
- Refrain from using company assets for these purposes.
- In case you are elected to public corporations, such as municipal councils, departmental assemblies, or any other, immediately report this to the ethics committee of the business division, business unit, or transversal function.

It is important that Corona has the opportunity to take the necessary measures to protect its work in the Organization and the exercise of its responsibilities in the public sector.



QUESTION: I am a candidate for elected office. I have my first meeting with potential voters to present my ideas. **Can I hand out pens marked with the Corona logo to the attendees?**

No, you may not. Keep in mind that this is an activity that you are doing in your personal capacity and that you must not use any of the Organization's resources and assets. Doing so could be misinterpreted by the community as direct support and endorsement of your campaign, as well as taking undue advantage of Corona's name and reputation.

**Refrain from using
company assets for these
purposes.**



As essential allies of Corona, they must be treated in good faith, and with respect, loyalty, and transparency.

3.6. Customer affairs:

Therefore, we adopt objective commercial criteria in client recruitment, we guarantee equal access to the required information for those who aspire to be a client, and we expect that their way of doing business does not go against the purpose and spirit of this code.

No employee, much less those who have the power to decide whether to enter into business arrangements with customers or potential customers, may accept, directly or indirectly: hospitality, gifts, presents, gifts, or any other benefit or advantage for themselves or their family members, except for the usual business or marketing materials given to any person, such as diaries, pens, or notebooks.

Whoever has the power to decide about entering into commercial agreements with distributors or with those who aspire to be distributors, shall promptly report any practice that could affect the Organization's ethical culture.

Report this situation to the Human Resources Leader, to the Ethics Committee of your business division, business unit, transversal function, or through the Reporting Channels provided by Corona (see Section 5.4).

Report any conduct that may affect the Organization's Ethical Culture.

3.7. With Consumers:

Only products that strictly comply with quality standards, performance, and social responsibility that characterize us should be brought to market.

Consumers and society, in general, expect us to fulfill our promise to improve their lives with our products and services

Therefore, as the final recipients of our work, they are the ones who determine whether we have fulfilled our promise. Each of us, with our daily contribution, is responsible for delivering on our promises and commitments to consumers.

The respect and the highest consideration we owe to our customers and to society, in general, are based on our integrity and strict compliance with our ethical principles.

Consumers expect us to deliver on the promise that we improve lives with our products and services.



We guarantee that Corona's products are manufactured to respect the attributes to which we are committed in order to satisfy the needs of consumers.

3.8. With competitors:

The globalized economy, in which Corona participates, requires the adoption and permanent practice of the soundest criteria and principles of free and fair competition wherever it operates. For this reason, Corona:

- Abstains from adopting practices that tend to discredit, disorganize, or divert the clientele of its competitors, or to confuse, or deceive clients, consumers, and the public in general.
- It does not perform acts that generate illegal or misleading comparison, imitation, or inducement to the rupture of agreements entered into.
- Accurately communicates the features of its products to consumers and the general public.
- Do not enter into or promote the execution of exclusivity agreements or pacts in violation of the law.
- It conducts market and competition intelligence within the limits that loyalty and commercial morality impose on sound business management. The benefit that accessing a competitor's confidential information would bring to the Organization does not constitute a legitimate argument for the violation of the company's integrity.

QUESTION: Corona has hired a third party to carry out an advertising campaign to promote its products. I am the Organization's representative in this process. When I receive the supplier's proposal, I find that it is, indeed, very well designed, but it characterizes the products by discrediting those made by our competitors. **What should I do?**

Corona exercises free competition with ethical criteria. For this reason, it does not resort to unfair practices intended to confuse consumers or discredit its competitors. Rather, it focuses on promoting the attributes of its products. Reject the advertising proposal, explain Corona's commercial practices to the supplier, and report the situation to the Ethics Committee of your business division, business unit, or transversal area.



QUESTION: Corona has hired a former employee of a competitor. I know he has knowledge about the other company that could give us ideas about new business and materializes opportunities that we have not taken advantage of so far. **Can I get information about the competitor through this new colleague?**

Corona has an interest in accessing information from its competitors using fair practices.

Do not attempt to obtain competitive information if doing so would violate the Organization's business loyalty and ethics.



4 Conflicts of interest

- What is it?
- Family and friends
- Client gifts and expenses
- Affective relationships
- Personal investments
- Being judge and jury
- In the face of a possible conflict of interest: reflect and report



4.1. What are conflicts of interest?

When your personal family activities and interests, or those of your friends and associates interfere or may interfere with your independence in making decisions in the best interests of Corona, you may have a conflict of interest. Report this situation.

By doing so, you protect yourself, you protect Corona, and you help minimize the impact of a conflict of interest.

The Code cannot monitor every situation in which you may be faced with an actual or apparent conflict of interest.

Therefore, it is vitally important that you be vigilant, use good judgment, and seek advice from the Ethics Committee of your business division, business unit, or transversal function if you have any doubts.

4.2. Business relationships with friends and family:

The employment of family members and friends in Corona companies must be done in accordance with the current policies regarding recruitment, selection, hiring, and other applicable policies. There must be no relationship of dependence, subordination, or influence between you and your friend or relative. Therefore, hiring must be done in different companies or functional areas, and independence must always be maintained. In the case of suppliers or distributors, the organizational policy governing the objective hiring of suppliers or distributors must be strictly applied and adhered to. The terms FAMILY or RELATIVES used in the Code and in the policies that develop or complement it refers to spouse, parents, siblings, grandparents, children, grandchildren, in-laws, and partners, as well as any other family member not expressly, included here, who is financially dependent on you or on whom you depend.

In the course of your career at Corona, you may establish relationships with family members, or with friends and associates that go beyond what is indicated.

Exercise caution and ensure that your personal relationships do not interfere or give the appearance of interfering with your independence.

QUESTION: My cousin is participating in a call for applications for a position that has opened in my area of work. **Do I have to declare my relationship with him?**

Although it is permissible for family members to work for Corona as long as current policies are applied, do not underestimate the possibility that there may be ties between you and your cousin that could affect either or both of you in terms of your independence or autonomy in making decisions in the best interest of the Company. Report the relationship to the Human Resources Leader, the Ethics Committee of your business division, business unit, or transversal function. They will analyze the situation in light of the Organization's policies and make the necessary decisions. Remaining silent on the matter could create a conflict of interest that you should and can avoid.

4.3. Payments, gifts, meals, and hospitality:

Payments, gifts, meals, and special treatment are not necessary to strengthen the relationships we've already built

Do not accept or offer payments, gifts, entertainment, or travel to third parties. Do not accept any benefits in exchange for favoring current or aspiring distributors or suppliers.

You may accept symbolic gifts and public recognition of your performance on behalf of Corona, such as promotional or marketing material.

It is important for Corona that you inform your immediate supervisor, or the manager in charge of the process, in any situation in which you are offered special attention so that he or she can guide your actions with the highest ethical criteria.



The relationships you establish with third parties on behalf of the Organization must be based on transparency and on ensuring the best interests of Corona within the ethical framework outlined in this Code.

4.4. Emotionally involved working relationships:

It is part of the human condition to establish effective relationships, and the workplace is no stranger to this type of bond.

If this happens to you, report the situation to the Human Resources Leader or the Ethics Committee of your business division, business unit, or cross-functional area, so that the situation can be analyzed and a decision can be made to help protect the best interests of the Company and the work of the people involved in the relationship. Conduct your relationship seriously and take care not to affect the normal and efficient performance of your colleagues or, in general, the organizational climate.

Those situations in which one of the parties involved is in a relationship of dependence, subordination, or influence with respect to the other, may affect its independence to make decisions, generate conflicts of interest and even cause damage to the Organization.

In these cases, the Ethics Committee of the business division, business unit or transversal function will take the necessary measures to avoid these potentially damaging effects.



Your activities in this area should not affect your ability to make decisions based on the best interest of Corona.

4.5. Personal investments:

If your investment exists or is made in companies that are suppliers of goods and services, distributors, competitors, or others that could be related in any way to the Organization's activities, a conflict of interest could arise.

Therefore, you must promptly disclose your involvement with such companies to the Ethics Committee of your business division, business unit, or cross-functional function.

QUESTION: My family has long owned a logistics operations business. I own a portion of that business. The manager of the firm, who is a third party, has been contacted by Corona to participate in a bidding process in which routes for the transportation of finished products will be awarded. What should I do?

You are facing a clear case of a conflict of interest. The fact that you have a personal investment in the company contacted to participate in the bid could influence or affect your independence to decide in favor of Corona's best interest. Report the existence and nature of this family business and this particular situation to the Ethics Committee, and refrain from participating, in any way, in the bidding process.

4.6. Being both judge and jury:

When you are faced with an actual or potential conflict of interest and do not effectively remove yourself from decision-making, you become both judge and jury. Corona rejects this behavior.

Avoid situations in which you might:

- Make reports and also approves it.
- Defines an investment, makes payment arrangements to third parties and approves payments
- Simultaneously invests the Organization's resources and approves the same payments.
- Uses others to hide, disguise, or cover up his or her personal interests and give them the appearance of the Organization's interests.
- Makes decisions or approves procedures influenced by or influencing people with whom he/she is in conflict.

QUESTION: I do the finished product inventory, and I see inconsistencies in the report generated by the information system. **Can I correct that report myself?**

Be careful. Corona makes decisions based on its reports, and they can be as accurate as the information on which they are based is reliable and precise.

Do not make the correction yourself and report the situation to your immediate supervisor. He or she should, in turn, adopt the work plan to correct it and report its occurrence to the appropriate superior.

4.7. If you are facing or believe you are facing a conflict of interest:

Immediately report the situation to the Ethics Committee of your business division, business unit, transversal function, or through the Reporting Channels provided by Corona (see Section 5.4)

Refrain from making any decisions related to the reported situation while waiting for the Ethics Committee to provide you with a response.

Refrain from any activity or action that harms or may harm Corona's interests, for the benefit of the personal interest that opposes you. In particular:

- Use or provide, in any capacity whatsoever and for your own benefit or that of third parties, information relating to Corona, its companies, or businesses.
- Use their influence or position to divert Corona's opportunities or business for their own benefit or that of third parties, or to prevent or hinder the Organization from competing freely for the placement or procurement of goods and services in the market.
- Use Corona's personnel, facilities, equipment, information, and resources of any nature for their own benefit, that of third parties, or for purposes other than those that are proper to its corporate purpose.

Refuse any type of remuneration, loan, commission, profit-sharing, or any other type of economic compensation offered by persons or entities with which Corona has or may have business relations.

Give priority to the interests of the Organization clearly and effectively.



QUESTION: I work in the Marketing area, and I have the possibility of ordering the purchase of promotional material for the campaigns that the company carries out. My sister has a bag factory that could be used by Corona for the next campaign. **Can my sister be the supplier of this material?**

It is important that she maintains the independence and autonomy for Corona that will allow her to make decisions in the best interest of the Organization. Your sister cannot participate, either directly or through a third party, in this process even if her company offers its products at the lowest rate.

Refrain from any activity or management that is detrimental to Corona's interest.

5 Code of Ethics Management



- Commitment
- Make statements
- Responsibility
- Reporting Channels
- Procedure

5.2. Corona employees shall sign the Declaration of Independence commitment every two years:

The following criteria will be followed:

- a. Each company, business division, business unit or transversal function shall identify critical positions, understood as those that, due to their content, may generate greater exposure, risk, or the possibility of being exposed to conflicts of interest or deviations from the Code of Ethics.
- b. Employees not included in the previous identification will renew this declaration in collective and periodic sessions dedicated to this purpose, which will be held every two years. For this purpose, the company, business division, business unit or transversal function will dedicate at least one Natural Group every quarter to educating employees on the meaning of corporate values and encouraging their practice in various scenarios. At the end of the two years, all employees must sign the Declaration of Independence and Commitment to the Code of Ethics and report their personal situation regarding conflicts of interest.

This part of the policy will be gradually adopted in all the Organization's businesses.

These changes imply transformations that require the use of complementary strategies that demonstrate the degree of understanding and appropriation of corporate values.

- c. The updated Declaration of Independence and Commitment will be filed by the corresponding Human Resources Leader.

The business divisions, business units, and transversal functions, in association with the negotiations area, will present to their customers and suppliers the Organization's Code of Ethics and will uphold their commitment to comply with its content and spirit. The Declaration of Independence and Commitment, duly signed, will be filed biennially and must be updated according to the definitions of this policy.

If for any reason the content of the Code of Ethics undergoes any relevant modification, the Declaration of Independence and Commitment to the Code of Ethics must be re-signed by all employees, suppliers, distributors, and frequent clients, after, of course, they are made aware of the relevant updates.

5.3. Responsibilities:

Fostering an ethical working environment at Corona is the responsibility of all its members. We have bodies that work harmoniously to ensure that integrity is maintained at all times.

Responsibility of the Departments:

Immediate Supervisor: As the person directly responsible for the processes of the area under his or her responsibility, he or she is obliged to listen to you, provide you with guidance, and address your concerns promptly.

Human Resources Leader: As a representative in your business division, business unit, or transversal function and responsible for ensuring that Corona's talent management model is always rigorously maintained, one of your priorities is to comply with the Code of Ethics. Consult your Human Resources Leader, who will be able to guide you in your concerns and report situations.

Business division's Ethics Committee, business unit, or cross-functional area: Responsible for receiving (through any communication channel) information about doubts and concerns, or complaints about conduct that means, or may mean ignorance, or non-application of the Code of Ethics; perform the corresponding analysis, take appropriate actions to achieve ethical alignment in the Organization, and report its occurrence to the bodies defined in this policy. It is made up of at least three (3) members, of which the General Manager and the Human Resources Leader will necessarily be part.

President's office: Corona's President is committed to organizational ethics and is available to receive your comments through the email presidencia_lineaetica@corona.com.co and will respond within a reasonable period of time.

Corporate Ethics Committee: This Committee will study situations that have not been dealt with in a timely manner in the preceding channels and complaints related to members of the management teams of the business division, business unit, or transversal function and executives who are members of the Organization's corporate team.

It is made up of the President of Corona Industrial, the VicePresident of Integral Human Resources Management, the VicePresident of Corporate Affairs, the VicePresident of Finance, and the VicePresident of Labor Relations.

It will meet regularly, at least once every quarter, and under special occasions as required, and record the matters discussed in the respective minutes.

Corporate council's Audit Committee: This committee monitors compliance with the Organization's general policies and ethical criteria. It seeks to promote actions to strengthen Ethics in the Organization.

5.4. Reporting channels:

The Organization has various means, available to everyone, to facilitate the reporting of conduct contrary to the Code of Ethics or questions about it, as well as other situations related to ethical management. Make use of them.

You should know that you have:

Personal declaration of conflicts and renewal of commitment: This document evidences your commitment to ethics at Corona. It is the opportunity to inform the Organization of your particular situation regarding current or potential conflicts of interest, and to renew your commitment to comply with the Code of Ethics.

By filling it out honestly and transparently, you are setting an example of integrity to others, and confirming that ethics begins with each of Corona's employees and requires our individual cooperation.

Immediate supervisor: As the person directly responsible for the processes in your area, he/she is obliged to listen to you, provide you with guidance, and address your concerns promptly. Direct communications with the Lead Manager must be based on trust and good faith. It is the leader who, by being closer to his collaborators, can offer them a safe space to share their doubts and concerns.

Your natural group: is the space in which the difficulties and problems of the job are dealt with in order to solve them in a timely manner. This is the first space for encouraging reflection and ethical behavior based on cases, videos, readings, and other material that, aligned with the content of the Code, generates purposeful discussions on the subject.

Ethics and anti-corruption line: This is the channel provided by the Organization for anonymous or self-reporting of queries and complaints available on the Organization's website: empresa.corona.co. You can also write your complaints and queries to the email account ethicalandanti-corruptionline@corona.com.co audited by Audilimited. You will find support and help for your queries and independence and autonomy for the attention of ethical cases.

Human Resources Leader and Vice Presidents of each business division, business unit, or transversal function: As leaders of Corona, they are sources of consultation and advice that allow decisions to be made in accordance with the Organization's ethical guidelines.

Consult your Strategic Partner, who will be able to guide you in your concerns and report situations.



The Organization has different channels to facilitate the reporting of doubts and concerns.

5.5. Procedure:



Corona has defined the following procedure to investigate situations reported through any of the channels provided for ethical and integrity issues

Upon receipt of the information, verbal or written, anonymous or not:

- The matter is assigned to a team in charge of its clarification.
- The investigation of the situation is carried out in an impartial manner by relying on documents and testimonies of the persons to be contacted.
- The team, in a prudent and timely manner, will report the existence or not of violations to the Code of Ethics and will present the recommendations that may be applicable, so that the issues that arise can be dealt with
- The President of the Organization, the President of the company, the Vice President and the Integral Human Resources Management of each business division, business unit, or transversal function, will implement the decisions leading to ethical consolidation in Corona, apply disciplinary sanctions

and termination of the employment contract of those involved, if applicable.

- If a situation raises doubts as to whether it is exclusively disciplinary or whether it has to do with Integrity, the Human Resources Leader must ensure that it is brought to the attention of the Ethics Committee of the business division, business unit, transversal or corporate function, which will make a decision applying the highest ethical criteria in order to protect the Organization.
- The Ethics Committee of the business division, business unit, or transversal function will inform the person, who has reported any situation, of the outcome of the investigations.
- Exceptions: Exceptions to the contents of this Code must be previously authorized by the Corporate Council, which states the ethical reasons for doing so.

5.6. Complementary policies:

The content of the Code of Ethics is complemented and developed with general corporate policies that you should be aware of. You can find them on the corporate portal. If you do not have access to this media, talk to your Lead Manager and the Human Resources Leader of your business division, business unit, or transversal function, who will guide you on the topic of your interest.

Not reading the Code of Ethics policy, the Code of Ethics or the policies that develop it, or not making the Declaration of Independence and Commitment to the Code does not justify ignorance or violation.

We are **what we do** | **corona**