

# ETHICS AND CONDUCT CODE





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# Introduction

## **Ethics and Conduct Code Objectives**

In AVIOMAR S.A.S. we have been characterized by complying with regulations in a transparent way. In this document you will find different policies that by business decision or by legislation AVIOMAR S.A.S. has committed to accomplish. Therefore, the purpose of this Code is to facilitate the action and delimit the behavioral parameters of every person who interacts with the organization, its environment, and stakeholders. The above regulates the daily facts or decisions that may directly or indirectly could affect the Organization.

## **Managers Responsibilities**

As leaders of the organization, it is their responsibility that all employees of the Organization have access to this Code as well as facilitating training and its understanding of it. Likewise, in their relationship with every stakeholder, they must act accordingly to this code and lead by example the application of it.

# Introduction

## **Employees Responsibilities**

People who make part of AVIOMAR S.A.S. as employees must to read, understand and apply this code every time and on any situation. Likewise, they should express their concerns regarding the code and its application to managers or failing that to the human capital area, for more information they can consult the rules of conduct, since any violation of this code would have disciplinary consequences as stipulated in the internal labor regulations or the current labor law.

## **Corporate Values**

Our Employees and all interested parts, should keep in mind the action of corporate values since they are basic for coexistence inside and outside of it:

1. Integrity as conduct
2. Productivity as a result
3. Punctuality, loyalty and transparency as a way of life
4. Excellence in customer service as north of our management
5. Ethics as a professionalism



**AVIOMAR S.A.S. as a company always aim to act with transparency and implements all actions in order to accomplish with all applicable legislation, and informs all its employees these for the good performance of its functions.**

## **Accomplishment**

AVIOMAR S.A.S. Standards meets with applicable national and international standards to the organization in our industry.

## **Corruption, Bribery**

AVIOMAR S.A.S. requires that all negotiations with public officials be conducted with full transparency. Therefore, the Organization refrains from providing or offering directly or indirectly payments or delivery of items in order to influence a decision. **The above is based on commitments in our Policy.**

## **Competence**

AVIOMAR S.A.S. requires to its managers and employees to accomplish with the regulations applicable to competition, so written and verbal trade agreements go according to the commitment made to the **FIDI Antitrust chapter.**

## **Use of insider information**

The use of insider information for transactions with monetary value is prohibited in AVIOMAR S.A.S. and therefore employees should refrain from sharing the organization's privileged information with acquaintances, family members, customers or Suppliers.

# Ethics in the commercialization of our services

## **Good Practices**

AVIOMAR S.A.S. carries out all its advertising and promotion of services in the applicable rules, establishing in it offers the conditions and scope of the services to be provided, that is why a Quality Policy was established in the organization.

## **Contractual Excellence**

In AVIOMAR S.A.S. employees may not commit to the Organization in a contractual manner, beyond the capacity of authorization according to its function manual. In the same way, we guarantee that we comply with the accounting standards applicable to our organization according to IFRS standards and the inner policies.

## **GIFTS**

In order to make the decision-making process more transparent, AVIOMAR S.A.S. asks its suppliers to abstain from handing over any kind of gifts and/or invitations to our collaborators, because this may influence their judgment or conduct.

AVIOMAR S.A.S. will provide gifts of non-ostentatious advertising material, as well as invitations that do not generate excessive expenses, only for reminder purposes.



## Ethics providing our services

### **Political Contributions**

Contributions made by AVIOMAR S.A.S. at the political level must be according to the applicable law and must be authorized by the CEO of the organization.

### **Conflicts of Interest**

Employees of AVIOMAR S.A.S. may not make investments or ventures that generate their own or a third party's benefit against the interest of the Organization, in order to avoid potential conflicts of interest with natural and legal persons to the detriment of AVIOMAR S.A.S. or for the personal benefit of one of our collaborators. In case there is a potential conflict this should be reported to Management immediately.

# Aviomar and society

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## Environment

All the actions of the Companies will always be carried out with the highest sense of commitment and responsibility to society and the environment. This guiding principle is broadly found in our **environment policy**.

## Donations

AVIOMAR S.A.S., consents to its role in society may make contributions in services or monetary through non-profit entities at home or abroad, since in this way we can positively impact the society where they are made our operations. Donations will be authorized only by the CEO of the organization.

## Corporate Social Responsibility

AVIOMAR S.A.S. is an active part of LACMA's corporate social responsibility program, the Latin American and Caribbean Association of Moving Companies, giving back to those most in need. If you want to know more, you can access the **Aviomar Social Responsibility Videos**.

## Information Protection

AVIOMAR S.A.S. is aware of the importance of sensitive information from all interested parts in the organization, which is why, taking as a reference the current legislation and in the DGPR, **Data Protection Policy**, **Informatic Security Policy** and procedures for data management have been established.



## **Labor law accomplishment**

The Human Capital of AVIOMAR S.A.S. is a fundamental part of the success of the business cycle and in compliance with the current regulations it regulates the relationship with our employees. Likewise, we do not use child or forced labor which we categorically reject.

## **Inclusion and Diversity**

AVIOMAR S.A.S. will ensure that the work environment is inclusive and therefore for the Organization any type of discrimination protected by the Law is not acceptable, as well as any type of harassment according to current labour law. In the case of such situations can be reported through the transparency email, to the coexistence committee or the area of human capital, where procedures have been established for the process of analysis and treatment of these reports is impartial and objective.



## Compliance with the ethics and conduct code

The manager or employee who fails to comply with any provision contained in his Code, whether actively or by omission of your duties, you will incur a serious breach of your employment contract with the legal consequences that this entails. In accordance with the disciplinary procedures established in the Internal Labor Regulations.

Based on the above, this Code and the documents it gives are strictly enforced for members of the organization and related ones.

### **Videos RSC**

- Lacma Bogotá
- Un techo para mi país
- Lacma NEXT-RSC
- Lacma NEXT
- Techo Lacma NEXT 2018
- Lacma NEXT un techo para mi país

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