



# *BUSINESS* **ETHIC CODE**

*It presents the fundamental Policies and Directives that govern relations within the company and with other related parties*

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## **INTRODUCTION**

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*We are a company based in Panama with more than 10 years of experience offering promotional items in Central America and the Caribbean, for leading brands in the market. Our mission is "To design and develop innovative promotional products aimed at increasing the sales of our clients through their brands, being their best alternative in price, quality, delivery time and responsible business management".*

*We offer a business solution by unifying the purchase of promotional items in a single supplier, saving time and costs, promoting innovation, savings and quality, achieving increased sales for our clients. Our business vision is "To be the commercial advisor to our clients, being their best ally and alternative in the market, with world-class standards; committed to the sustainability of our collaborators, suppliers and communities".*

*We have commercial partners in China and Hong Kong for the development of our products, which have ISO 90001 and FDA certifications, meeting the highest quality standards.*

*We promote responsible sustainability, for which we audit the ethics of our business and that of our suppliers through SEDEX –Ethical Trade Audit- (Empowering Responsible Supply Chain) and we will evaluate since 2017 our performance in responsible management through ECOVADIS - Sustainable Supply Management.*

*We develop our business under the following principles of action:*

- *Excellence y quality*
- *Integrity and transparency*
- *Innovation, with a comprehensive approach*
- *Social responsibility*
- *Development of our human capital and our suppliers*

*In this framework, we present below our Code of Business Ethics. It presents the integrity policies and directives of GBP that govern relationships within the company and in our relationships with other key parties in the operation of our business such as business partners, customers and suppliers.*

*We understand that it is the responsibility of each one of us every day to continue consolidating GBP's ethical reputation firm, which results in our competitiveness and business sustainability.*

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## **BUSINESS ETHIC CODE**

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*Our Code of Business Ethics contains the rules related to the responsibilities towards our employees, clients, suppliers; as well as our expectations of ethics and conduct from our suppliers.*

*GBP conduce sus negocios bajo los siguientes parámetros de gestión responsable:*

- *Compliance with laws, rules and regulations (including laws regarding the use of inside information)*
- *Protection of confidential information and any other in the private domain, and that of our customers and suppliers*
- *Protection and proper use of company assets*
- *Respect for human rights in our sphere of influence*
- *Proper handling in case of conflicts of interest*
- *Environmental care*
- *Reporting and remediating any illegal or unethical behavior*

### **REPORT ABOUT VIOLATIONS**

*Employees, business partners and suppliers are encouraged to inform GBP managers of any conduct that they consider, in good faith, to be in violation of the laws of the country or this Code of Business Ethics. If the person directly responsible is involved in the situation or is unable or has not sufficiently worried about the suspicions, collaborators are advised to inform a senior manager or follow the procedure established at the local level for handling these situations.*

### **RESPECT FOR HUMAN RIGHTS**

*In order to respect human rights in our sphere of influence and to promote fair working conditions, job security, responsible management of environmental issues, our Code of Ethics applies to our entire value chain: production, supply and delivery of the promotional products that we offer to our clients.*

*All people working for GBP must be guaranteed respect for their human rights. You may not, in any way, be forced to suffer physically or psychically as a result of your work.*

*All GBP employees are free to create or join peaceful and legal associations of their own choosing and have the right to bargain collectively.*

*As part of its commitment to the elimination of child labor, GBP does not accept underage labor in its operation. Likewise, no collaborator should be discriminated,*

*among other reasons, by their race, color, sex, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic origin, social origin, social status, HIV / AIDS, disability, age, or union membership.*

## **CONFLICT OF INTERESTS**

*We encourage our collaborators to make independent decisions based on the best interests of GBP.*

*We must avoid any situation where our personal interest may be, or may even appear to be, in conflict with GBP's interests.*

*Below, we present examples of situations that could arise:*

*Business opportunities - It is not accepted to take advantage of business opportunities that you discover while carrying out your obligations in the company, if such act could go against the interests of GBP. Furthermore, you cannot use the property or information of GBP or your position in the company to obtain personal benefits.*

*Gifts, benefits, refunds and entertainment - Employees may not offer or accept gifts, benefits, refunds or entertainment to or from third parties that may constitute a violation of the laws or that may affect, or appear to affect, professional judgment on the performance of work. Relevant for GBP to a third party.*

*Bribes, blackmail, etc. - No one may, directly or indirectly, ask for or accept, offer or give any kind of illegal or unethical bribe, blackmail or any other benefit to GBP employees or other representatives or associates or third parties.*

*Disclosure of conflicts of interest - Employees are required to indicate situations or transactions that could reasonably be expected to cause a conflict of interest. If you have any suspicion and think that you are involved in a transaction or any other agreement that represents a conflict of interest or in something that others could reasonably understand as a conflict of interest, you should inform the directors so that they take the appropriate measures of the case.*

## **PROTECT INFORMATION**

*We protect the confidential and privately owned information of GBP, our business partners, customers and suppliers. Unauthorized access, use or disclosure may also constitute a violation of laws, including privacy regulations. If in doubt about your authorization, ask your managers for instructions.*

## **ETHICS AND CONDUCT FOR SUPPLIERS**

*Our commitment to Responsible Sustainability requires that the ethics and conduct of our suppliers or interested third parties be consistent with our values and principles of action.*

*Next, we list the relevant ethical issues required by suppliers*

- 1. Health and Safety at Work.*
- 2. Working conditions.*
- 3. Freedom of association and non-retaliation.*
- 4. No to forced labor.*
- 5. No to child labor.*
- 6. Nondiscrimination.*
- 7. Compliance with environmental regulations.*
- 8. Management of environmental impacts.*
- 9. No to Bribery and corruption - fight against money laundering.*
- 10. Transparency and integrity.*
- 11. Maintain standard business practices regarding gifts, services and other courtesies.*
- 12. Seek equality and justice in the relationship with suppliers.*

### **Application of the code of conduct:**

- 1. Health and safety at work.**
  - a. Occupational health** *Suppliers must provide a safe and healthy workplace for their employees and contractors. Suppliers must comply with local and national laws and regulations in the places where they operate on occupational health and safety and must have the permits and licenses required by local and national authorities. Suppliers must have policies and mechanisms for managing worker safety and health, as well as adequate infrastructure and safety equipment. When located on company sites, suppliers must fully comply with applicable policies and directives.*
  - b. Security.** *Suppliers will ensure that they have all the necessary security elements to protect their workers, as well as the suppliers' own assets. In particular, providers are expected to have an actionable crisis management policy to respond to emergencies in a timely and efficient manner.*

## **2. Working conditions**

Suppliers must maintain fair and decent working conditions. Workers will receive at least the minimum wage stipulated by national legislation and will benefit from social security systems in accordance with national legal regulations. If there was no legal minimum wage in the country of operation, fair and decent conditions imply that suppliers must pay their workers taking into account the general level of wages in the country, the cost of living, and social security benefits and relative living standards.

## **3. Freedom of association and non-retaliation**

Suppliers will not interfere with workers' freedom of association. Employee representatives will not be subject to discrimination or termination of the contract in retaliation for exercising employees' rights, filing complaints, participating in union activities, or reporting alleged legal violations.

## **4. Forced labor**

Suppliers will not use any work performed under threat of penalty, including forced overtime, human trafficking, debt bondage, prison labor, slavery or servitude. Suppliers will not retain identification documents of migrant workers.

## **5. Child labor**

Providers should not employ children at an age where education is still compulsory. Children and youth under the age of 18, or under the legal minimum age, will never be employed.

## **6. Non-discrimination**

Decisions related to employment will be based on relevant and objective criteria. Providers will not make distinctions for reasons including, but not limited to, age, disability, gender, sexual orientation, political or other opinion, ethnic or social origin, or religion. Decisions related to employment include, but are not limited to, hiring, promoting, firing and relocating workers, training and skills development, safety and health, or any policy related to working conditions.

## **7. Compliance with environmental regulations**

Suppliers must respect and comply with environmental regulatory requirements at all levels (local, national and international). In all their activities, they will be covered by the required environmental permits and licenses, and will support a precautionary approach to environmental challenges.

## **8. Management of environmental impacts**

Suppliers must systematically manage their environmental impacts with respect to, *inter alia*, problems related to energy, materials and climate change, water, waste, chemicals, air pollution and biodiversity, and establish goals and objectives to reduce such impacts.

## **9. Bribery and corruption - fight against money laundering**

*Suppliers must comply with all applicable anti-corruption laws and regulations and, for this purpose, must have clear guidelines against any form of bribery, corruption, extortion and embezzlement. In particular, suppliers will not pay bribes or make any other incentives (including bribes, facilitation payments, excessive gifts and hospitality,*

*grants or donations) in connection with their business with customers and public officials. Suppliers are expected to conduct all business deals transparently and these deals will be accurately reflected in their business books and records. When necessary, based on a reasonable risk assessment, suppliers must carry out the required verifications to know their clients in accordance with the applicable anti-money laundering legislation.*

#### **10. Transparency and integrity**

*Suppliers are expected to provide relevant information and documentation on the above topics, when required, safeguarding integrity and a relationship of mutual trust. While this does not include any commercially sensitive information, all information that suppliers can provide to demonstrate commitment to sustainable supply chain principles will be treated discreetly and confidentially, in order to increase opportunities for further improvement in all the fronts.*

#### **11. Maintain standard business practices regarding gifts, services and other courtesies**

*Gifts, services and other courtesies from current or potential GBP providers are acceptable only if they are given for legitimate business reasons. In all cases, these courtesies must be legal and must stay in line with standardized, low-cost business practices.*

*GBP provides equal opportunities for all providers to participate and win contracts. We always carry our supply process in a consistent, respectful and confidential manner. In all cases, GBP bases the evaluation of proposals for the selection of suppliers on the criteria established by the company.*

## **ETHICS COMMITTEE**

*The Ethics Committee is a council made up of members of the company, who stand out for their integrity and high ethical standards. They are in charge of complying with the code of ethics by their collaborators and suppliers, creating a clear, transparent and rigorous guide on how to act with your different stakeholders.*

*You must channel complaints and manage conflicts of interest that may threaten compliance with this code, safeguarding the integrity and reputation of GBP.*

## COMMUNICATION CHANNEL

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*Suppliers must sign a document of commitment to ethical conduct to comply with what is defined in this document.*

*Employees must sign as a sign of understanding and agreement to comply with the code of ethics.*

*Any activity that is contrary to what is described in this code must be informed to the Ethics Committee in order to be treated and resolve conflicts.*

## TRAINING

*Every year our collaborators will be trained on these topics to be informed and updated.*

*I confirm that I have read and understood this document*