



Code of Ethics ●



Message from our President of the Board and CEO

All decisions and activities of a company and its employees must be aimed at the satisfaction and needs of society, above the interests of an individual or external to the company's well-being and of the countries in which it operates. The Code of Ethics is not only used to establish guidelines, values and principles but also it is a reflection of who we are and what we want to be.

This Code of Ethics sets clear and precise rules governing our acts as employees of INTERCERAMIC, as well as the relations with our clients, coworkers, suppliers, competitors, authorities and society in general.

The behaviors that are described below have been based on our model of values and our operations philosophy in order to serve faithfully, honestly and responsibly to those who trust in our work and to those with who we assume the commitment to perform our operations efficiently and according to the principles of corporate social responsibility.

I invite you to know these guidelines, to read them carefully and to recognize the importance to living them in our daily actions which is consistent with the reason for being *Simply the Best*.

Víctor D. Almeida García
President of the Board and CEO

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INTRODUCTION

Since beginning its operations in October 1979, INTERCERAMIC has guided their actions by specific values that, over time, have been integrated into an operations philosophy, which today serves as guide to its personnel and allows shaping its own organizational culture which is reflected in all of the company business units.

Interceramic, seeks that all its information and activities are transparent to ensure its accuracy.

There is a commitment made by the members of the Board, executives and employees of the company to revise the relevance, clarity, precision and amplitude of any report or information generated and provided to their interest groups such as authorities, customers, suppliers and investors and shareholders, among others.

The Code of Ethics has been written within a frame of reference based on the reason of existence of our organization (Mission), the perspective of the near future (Vision), as well as the basic principles that inspire us (operation philosophy and values).

The commitment of those who work at INTERCERAMIC is and will be to bring to life these concepts, through the application of the principles, through our actions and behaviors, which have being established here and that will contribute to the continuous increase of the value of this company for all those with whom we interact.

I. PURPOSE

The Code of Ethics is the guide that provides the behavior and values that INTERCERAMIC employees should share and practice daily.

This document was created with the intention to raise awareness in every employee so that they perform their activities while adhering to honesty, legality and morality, guaranteeing a responsible, serious and objective job.

However, this instrument is not a contract or a manual that covers every situation that could occur at INTERCERAMIC. Situations not provided in this Code of Ethics, must be resolved in accordance to a fair criteria. In the case of doubt, it is necessary to contact the Human Resources Department, or with the Interceramic Ethics Committee

II. FUNDAMENTALS

MISSION

Exceed the expectations of our clients in the market of ceramic tile, natural stone and installation materials offering designs, more innovative products of the highest quality worldwide by means of a highly trained team offering an excellent level of service through our efficient distribution network to raise the standard of living of our clients.

VISION

Be simply the best company in our industry at a global level. Be a leader in quality, innovation and service living on a daily basis our core values of respect, loyalty, humility and honesty through a commitment to teamwork, excellence in communication, and a high degree of responsibility always to please our customers.

INTERCERAMIC CORE VALUES

- **Respect**

It is the ability to treat others as important people, avoiding prejudices, being tolerant, patient, sympathetic, compliant and responsible for our participation in the

- **Loyalty**

It is the sense of belonging that is reflected to be honorable, faithful, honest, and committed to ourselves, with our daily activities and with others.

- **Humility**

It is a virtue of modest people to act in a simple way and recognize without prepotency or arrogance what they possess. We should never feel more important or better.

- **Honesty**

The degree to which our actions and behaviors are congruent with what we express. It is shown behaving and speaking always with sincerity and according to truth and justice.

OPERATIONS PHILOSOPHY

- **Communication**

Communication should be direct, honest, open, and positive; it should flow between people and teams, becoming an element of coordination, positive feedback and information that will benefit the organization.

- **Responsibility**

We must keep our commitments and take action in accomplishing them. These commitments must be aligned with goals and strategies of our company.

- **Teamwork**

It is the integration of efforts and cooperation to achieve a common goal. It is necessary the productivity in the daily work of everyone in the company, to create an environment of trust, respecting diversity and contributions of each one of us.

III. RESPONSIBILITY

All of the people who work at INTERCERAMIC should commit themselves to ensure that their actions comply with the Code of Ethics and with the responsibilities of their job, so it is important to consider that any failure to comply with the above will take the company to take disciplinary measures, which they can lead the employee to a job termination.

This Code of Ethics by itself, does not guarantee the professional behavior of INTERCERAMIC employees. It shall only be to the extent that each employee can live by these guidelines and lead by example.

All the people who are part of INTERCERAMIC through their behaviors are expected in both words and in actions, to act as promoters and role models of this Code of Ethics.

Conflicts of interest that may arise in the context of the standards of this Code of Ethics may also be punished by the provisions of the workplace, employee handbook, and other applicable labor laws.

IV. RELATIONS WITH STAKEHOLDERS

RELATIONS WITH EMPLOYEES

INTERCERAMIC recognizes that its personnel makes the difference and is the key to its success. For this reason, promotes an ethical acting in all relationships respecting the dignity of the human being.

For this reason the company offers employees work conditions that encourage their professional and personal development that allows them to maintain a quality of life to be more balanced, happy, and thus more productive.

Hiring

At INTERCERAMIC the process of recruitment and selection of personnel will be made in a framework of respect and trust, without creating false expectations.

Hiring decisions will be based on competencies, ability to do the job and professional experience. Interceramic is committed to provide equal employment opportunities to all personnel regardless of race, color, religion, sex, age, marital status, national origin, disability, sexual orientation or veteran status. We value diversity and respect individuality.

To avoid any conflict of interest, employees will not be supervised or work in the same department with any related family member*; they shall not be assigned

or stay in jobs where there is direct control of one over another with respect to remuneration, expenses, atmosphere at work and promotions accounts of the company.

In the event this situation arises, employees are encouraged to inform Human Resources. All cases must be analyzed in particular by the Ethics Committee and they will be subject to authorization.

** We mean by family relations of first and second degree*

First degree - to mention a few - parents, siblings, children, wife

Second degree – to name a few - direct uncles, grandparents, parents in-law, cousins, and brother or sister in-law.

Commitment to Employees

INTERCERAMIC is interested in creating a favorable, stimulating, safe, creative, non-discriminatory and participatory work environment; promoting human development, professional and personal fulfillment. Likewise, the company focuses on promoting conditions, habits and healthy work practices, where employees have not only the opportunity, but also the obligation to perform to maintain their own safety and well-being.

Interceramic will:

- Respect and encourage diversity.
- Build and maintain a healthy and productive environment, where full potential can be developed.

- Encourage team player attitude.
- Comply with labor regulations and local laws.
- Provide competitive compensation and benefits to all employees.
- Provide tools for professional development.
- Recognize and promote based on merit.
- Safeguard our personnel and our facility with the installation and use of safety equipment.

INTERCERAMIC prohibits all forms of discrimination and harassment. In all cases, the company will act according to this Code of Ethics as well as applicable laws.

The differences that arise in terms of compensation, benefits and promotions to employees are governed by the compensations and salary policy.

Any conflict generated as a result of safety issues must be reported to Human Resources.

Employees' commitment

Employees should:

- Contribute to achieve our Mission and Vision through daily practice of our operations philosophy and values as well as the principles established in this code.
- Focus our talent, commitments and efforts to the success of Interceramic.
- Share knowledge and experience with team members to build a successful environment.
- Promote collaboration and teamwork.
- Be responsible for our own development.
- Fulfill responsibilities.
- Set an example within the company and the community.
- Report to work free of illegal substances.
- Inform Human Resources or immediate supervisor of any misconduct that violates this Code.

An INTERCERAMIC employee cannot force another employee to express a contrary view to their personal belief or contribute to political, religious or charitable causes.

Employee inconsistencies in our Mission, Vision, Values, Operational Philosophy, teamwork, and lack of commitment and responsibility may be sanctioned according to what has been defined in this Code as well as by local labor laws or any legal jurisdictions that apply.

Relationship among employees

Employees are to treat each other with respect in all circumstances.

Base all relationships with in the standards and principals established by this Code of Ethics.

People who occupy a position of leadership must know and manage of an impartial manner the standards established in this Code of Ethics and be responsible to provide necessary guidance and information to employees regarding the conduct or acceptable ethical standards, as well as for the necessary clarification in case of matters of questionable behavior.

Relationships involving employees of Interceramic who are married and establish relationships within the company, with singles or people other than their legal spouse, are strictly prohibited.

Any employees that have a formal relationship must not be assigned or remain in jobs where there is direct control of one over another with respect to remuneration, expenses accounts, work environment and promotions of the company.

The Human Resources Department will be the conduit for cases submitted to the Ethics Committee and inform the people involved about the decisions to be taken with respect to conflicts of interest.

INTERCERAMIC promotes work relations to encourage the achievement of its mission, vision and values through a work philosophy based on communication, teamwork and responsibility.

Interceramic works on building relationships that aim to achieve a common goal.

Take actions which are focused on:

- Help out wherever needed. Teamwork.
- Interceramic Mission before any other interest.
- Permanent solutions, not quick fixes.
- Timely communication, responsibility, clarity and honesty in ideas and concerns, while giving constructive feedback.
- Avoid prejudice.
- Listen attentively, accept constructive feedback.
- Try to recommend alternative solutions.

Harassment

Interceramic prohibits all forms of illegal harassment of employees by managers, fellow employees, employees of outside vendors, or visitors.

Any form of harassment related to an employee's race, color, sex, sexual orientation, religion, national origin, age, physical or mental disability, or marital or veteran status is a violation of this policy and will be treated as a disciplinary matter.

For these purposes, the term “harassment” includes, but is not necessarily limited to, slurs, jokes, or other verbal, graphic, or physical conduct relating to an individual's race, color, sex, religion, national origin, sexual orientation, age, physical or mental disability, or marital or veteran status.

Harassment also includes unwelcome sexual advances, requests for sexual favors, and other verbal, graphic, or physical conduct of a sexual nature. Harassment does not refer to occasional comments of a socially unacceptable nature. Harassment is a form of inappropriate conduct that undermines the employment relationship. Employees who violate this policy will be subject to disciplinary action up to and including termination of employment.

If an employee of INTERCERAMIC considers that is subject to some kind of harassment, must report it to the immediate supervisor, the Human Resources Department or to the Ethics Committee, so they can conduct a pertinent investigation and if proceeds, establish and implement disciplinary actions.

Human Rights

It is also Interceramics commitment to provide fair and equal employment opportunities as well as providing training and professional development, grant recognition and promotions based on competencies, and promote the open communication through channels of dialogue enabling an effective feedback.

We comply with applicable labor laws in all countries where we operate, including the proper payment of wages and compensation. Additionally, we reject and avoid forced labor performed by children at any age. The regulation for providers of services prohibits children from entering the company facilities to perform any work or service.

Interceramic rejects and sanctions the use of corporal punishment, mental or physical coercion, and verbal abuse by managers or supervisors to their subordinates. We will reject all forms of forced labor. Any violation of this nature should be reported to the Department of Human Resources I to the Ethics Committee.

At INTERCERAMIC we are committed to encourage and promote the respect to the human rights in its entirety. This is why our company promotes:

- Highlight the fulfillment of basic rights and comply at all times with legal prohibitions regarding to forced labor and child labor, as well as avoid any act of discrimination.
- Reject any distinction, exclusion or favoritism for reasons of gender, sexual orientation, age, social status, ethnicity or personal characteristic that adversely affect the equality of opportunity or treatment in employment or position of the employee.

To achieve business objectives and perform our operations, it is of vital importance that all who are part of INTERCERAMIC stick to the fundamental principles of human rights. It is also our responsibility to report any possible violations of these rights, this includes any act of injunctive relief that someone could have experienced by defend his own human rights or of others. To report a violation regarding this issue, contact the Ethics Committee or the Human Resources Department through the ETHOS Program

RELATIONS WITH CUSTOMERS AND SUPPLIERS

Relations with customers

INTERCERAMIC has the firm intention to provide total satisfaction to its customers, through maintaining and complying with the highest standards of quality, safety and competitiveness of its products. We continually strive for innovative ways to exceed our customer's expectations, maintaining our competitiveness and the development of our long-term vision.

Employees must provide exceptional service to our customers from the time of purchase to the time of product is delivered. The service excellence is and has always been an important feature of INTERCERAMIC.

Relations with suppliers

INTERCERAMIC seeks to develop local suppliers, thus fostering growth of the economic activity in the countries where the company operates. Relations are conducted in an atmosphere of respect under a win-win relationship and always within the framework of the current laws.

Relations with suppliers must always operate with transparency. We strive for an honest relationship with our suppliers, not generating false expectations, giving the same respect and opportunity to everyone.

Interceramic does not allow employees to be a supplier for the company. In the event that the employee's business is the only option available or that offers Interceramic the best conditions, it will require the authorization of the Executive Committee to proceed with the business transaction.

Interceramic employees will not participate or influence directly or indirectly on the requirements, negotiations or decision process with customers or suppliers with whom they have a relationship with.

As Interceramic employee's we must inform our immediate supervisor if we have a relative who is or plans to be a supplier for the company; Also if we have a relative who plans to be a customer. Action should be taken to prevent a possible conflict of interest.

RELATIONS WITH THE GOVERNMENT

We respect and comply with all applicable laws and government regulations.

INTERCERAMIC employees must verify that it is within their responsibilities interact with government officials, on behalf of the company, before engaging in any negotiations or relationship.

To manage business, employees must seek to comply with the laws of the different countries where the company operates, including consideration of the traditions, habits and particular uses.

Only authorized employees will interact with government personnel. Before closing any agreement/contract, employees must consult with our legal advisors to make sure that is based in the compliance with any applicable laws.

If you have any doubt or question about the legality of any action, contact your immediate supervisor or the Legal Department.

RELATIONS WITH THE COMMUNITY

INTERCERAMIC is actively involved with the community in the search for solutions to their problems. The objective is to contribute to the development of communities, creating awareness of the needs of others and develop better citizens.

The company serves society by providing high quality products and services that improve life, at a fair price, in accordance with national and international standards applicable to its industry.

In INTERCERAMIC, the employees are committed to participate directly or indirectly, through recognized organizations, in programs and activities to promote integration, development, and the improvement in the quality of life of their communities, without involving create dependencies or interfere with the performance of their work.

The relationship with the community should be clear, looking always for support without generating a dependency. This relationship should be a way by which community-company and government can work as a team to meet their needs.

RELATIONS WITH COMPETITORS

Illegal or not ethical methods must not be used to obtain information about the competition.

Compliance with antitrust laws

INTERCERAMIC employees must comply with the laws against monopolies and unfair competition in all the countries where the company does business.

It is prohibited to obtain privileged information from the competition directly or indirectly by unlawful means such as bribery of employees of the competition or government institutions. It is permitted, and is considered a legitimate business activity search and gathering of information on the competition when this is performed in a legal and ethical manner.

Any action of competition should be justified with arguments for business reasons.

If by mistake, you get information that might represent a commercial secret or other business confidential information, or you have questions about the legality of the gathering of information or any commercial action of competition, you must verify with the legal firm that advises Interceramic and inform the Ethics Committee.

V. OPERATIONS AND NEGOTIATIONS

Purchase and sale agreements must be documented, clearly identifying the service or product to provide, the basis on which the payment will be held from rates or applicable fees. The payment amount should correspond to the services or products provided.

Agreements and commitments established will be always respected. The copyrights must be respected. The employees of INTERCERAMIC cannot establish business relations with customers, contractors or suppliers who show no evidence that are duly authorized for use or marketing of products and services that are subject to payment of fees or copyrights to a third party, as well as their authenticity and legality. There will only be business legally and ethically, not accepting the receipt or payment of bribes or compensation in any case.

MARKETING AND ADVERTISING

INTERCERAMIC will show integrity in all its marketing and advertising, with accurate and real information. Also the company seeks to always verify the respect for human dignity in the manufacture, marketing and advertising of its products and services.

INTERCERAMIC will not accept deliberate deceptive messages or omit important facts about the availability or quality of its products, as well as the terms of sale. The company will analyze the content of its campaigns and advertising, to assure they are fundamental before its implementation, and to validate they are aligned with the legal requirements and the values of the company and the community.

ANTI-BRIBERY AND CONFLICT OF INTEREST

Anticorruption

INTERCERAMIC is a transparent company that adheres to all state and federal laws as well as international regulations and anticorruption principles. It is strictly prohibited to offer, solicit, give or receive any type of bribery. Employees must not give or receive anything in return for a negotiation that could favor or represent an advantage for the parties involved.

We reject bribery in all forms, rigorously avoiding money, gifts, donations, and invitations that commit to the company, any situation of this type is considered illegal and unethical, so it must be reported, and if is proven, appropriate disciplinary measures will be applied and even legal implications will take place.

Preventing money laundering

Interceramic prohibits any transaction, operation or negotiation that is made to hide the real origin of illicit funds or that have been obtained in an illegitimate manner.

Conflicts of interest

All the employees of INTERCERAMIC must assume responsibility avoiding incurring in situations that may give rise to conflicts of interest. A conflict of interest arises when any economic or personal interest influence interferes with the personal judgment and integrity of a decision or an action. In INTERCERAMIC the employees are not allowed to be suppliers of our company at the same time. Therefore, any business owner who works in this company should refrain from providing INTERCERAMIC of their products and services. None employee can participate or have direct or indirect influence on the requirements, negotiations and decision-making with customers or suppliers with whom have a family relationship. The employees can purchase our products for personal consumption, always sticking to the Policy of Sales to Employees. INTERCERAMIC reserves the right to audit sales and verify the final destination of the purchased product. A person who works at INTERCERAMIC must not have a business dedicated to marketing, distribution, transportation or processing of our products or services.

Political participation

INTERCERAMIC respects freedom of participation of its employees in political activities provided they do not interfere or engage with their work or responsibilities with the company. However, employees must not be involved in political activities, or associate them any way with INTERCERAMIC, brand, logo or any other symbol that relates to the company. It is neither permitted to engage in activities of a political nature within the premises of the company.

It is forbidden to accept or make contributions or donations directly or indirectly on behalf of INTERCERAMIC, political parties, electoral campaigns and any physical or moral person, association, organization, Trade Union, or any other public entity or private related political activities, the countries where the company has operations. Employees should avoid in the performance of their activities, situations in which personal interests are contradictory with the interests of the company. In case of any doubt or a situation of this type must be notified to the Human Resources Department or directly to the Ethics Committee through the ETHOS program.

Receiving gifts

The selection process for a vendor/supplier is very important. Interceramic does not allow employees to receive commission, gifts, bribes or payments of any sort from vendors/suppliers. This is strictly prohibited because it compromises or appears to compromise, objectivity to make decisions on current or future negotiations. The only acceptable gifts are promotional items as well as legally and commercial entertainment practices with supervisor authorization.

Offering gifts / entertainment

Gifts, hospitality or other courtesies on behalf of the company, can be offered as long as they are legal, are authorized by your immediate supervisor and respond to the interests of the company. The costs arising from this should be reported in precise and specific way. Employees must have authorization from immediate supervisor before any money is spent on entertainment. Actions for entertainment should comply with any applicable laws. Interceramic considers entertainment as: dinner, lunch, golf games, theatre events, and sporting events. Conditioning any negotiation to giving or receiving a gift is prohibited.

VI. HEALTH AND SAFETY

In Interceramic the safety and health of employees is of vital importance, it is the company's commitment to prevent incidents, illnesses and safeguard the integrity and welfare of employees while they are working in the company's facilities. INTERCERAMIC promotes a culture of zero accidents so the employees are committed to perform their operations and activities safely and efficiently according to safety regulations, demonstrating behaviors that promote safety and health.

It is responsibility of the employees, suppliers and contractors to participate actively in identifying, preventing and reporting of any accident, damage, condition, operation, or unsafe acts, which could represent a potential or imminent risk for them. In addition, any act of illegal possession of prohibited substances must be reported; as well as cases of personnel or contractors who are working under the influence of drugs and alcohol since this could result in severe situations that threaten the safety of the employees.

INTERCERAMIC is responsible for providing to all its employees without exception, training on safety, health and cleanliness, this is accomplished through the areas of Training and Safety at Work.

Supervisors, managers and directors have the responsibility to ensure that all the employees have the proper information and training in health and safety and that all operations and activities are performed within the law, regulations and the standards of safety and health.

VII. COMMITMENT TO THE ENVIRONMENT

Interceramic is committed to the conservation of the environment. We comply with all environmental laws that apply in the countries in which we operate.

We continuously seek minimize the environmental impact of our operations and promote the sustainable and restrained use of natural resources. INTERCERAMIC has the responsibility to promote and participate in campaigns and environmental practices complying with provisions of the environment policy, as well as international environmental laws and standards.

Employees must comply with the obligation to identify, prevent and control events that affect the environment, participating actively in know and spread the obligations and apply actions to meet the requirements of legal regulations which applies to processes, products and services.

It is the responsibility of supervisors and managers to define roles and responsibilities to protect the environment, measure, audit and improve the environmental performance of the company.

Conflict situations which are related to environmental aspects will be channeled and assisted by the area of Health and Safety. This area is in charge to provide the resources to train, and supervise that the employees are performing their operations in accordance with environmental regulations.

VIII. HANDLING OF SENSITIVE INFORMATION

Confidential Information

Interceramic employees must protect information that could give a competitive advantage to our competitors. This includes not only our information but information on suppliers, customers and third party vendors. This information includes: business processes, compensation, machinery specifications, accounting and financial data and technology systems, etc.

It is considered confidential information that is not in the scope of the public in general or that can exert any influence upon the decision of purchase. The sale or retention of values and services of our company in any investor, customer, or supplier. It is prohibited to disclose or make direct or indirect use confidential or privileged information of the company for non-profit or profit.

Our commitment as employees is to preserve this information, even when employment at Interceramic has ended.

This aspect will be governed, in addition, in conformity with the Policy for the Use of Computer Resources and the Agreement of Confidentiality.

Both documents set out the guidelines that employees have a responsibility to follow at the moment of receiving, managing and transmitting any information (verbal, written, or electronic) released by the company.

Books, records and financial accounts must reflect the transactions and events with accuracy and comply with accounting principles as well as systems and INTERCERAMIC internal control policies, counting always with the supporting documentation that sustains them legally.

It is the responsibility of the company to provide systems and infrastructure that enable to safeguard and protect the information trying to maintain its confidentiality, availability and integrity.

It is classified as exclusive and confidential information of the company:

- Organizational movements.
- Records of employees' personal information.
- Competitions, assignments or particular experience of employees.
- Non-public information available to employees on the intranet.
- Policies and commercial and operational practices.
- Accounting, financial and strategic planning information of the company

- Non-public information about innovation and new product development.
- Trademarks, patents and copyrights.
- Pricing policies.
- Lists of customers and suppliers.
- Confidential technical knowledge such as processes, formulas, industrial secrets, etc.
- Strategies and results of business, products, services, prices, financial information and accounting that still has not been published or announced.

Controls and financial and accounting records

INTERCERAMIC employees may not perform stock market operations or any other type on the basis of information or knowledge acquired in their job. If that information has not been publicly reported, in accordance with the market values and other applicable regulations.

For any questions about the use or proper handling of confidential information employees can consult their immediate supervisor, the Human Resources Department or Ethics Committee through the ETHOS Program.

IX. HANDLING OF ASSETS

Custody of assets

Interceramic employees are responsible for the proper use of all company assets and custody of those that have been assigned to them.

Under no circumstance will any employee participate, influence, sponsor, or allow any action that may lead to the damage of these assets. In no way will an employee promote the theft, misuse, disposal, sale or loan of any asset assigned to them.

By assets we make reference to: goods, tangible and non-tangible, properties such as buildings, equipment, machinery, inventory, cash, receivable accounts as well as information, copyrights, business plans, brands, commercial and product names, corporate image and information technology.

Property of Interceramic is used by employees to perform the functions and responsibilities assigned to them. Company property should not be used for other than that reason. You must have proper authorization from your immediate supervisor to perform any other function.

Machinery / Equipment Maintenance

Only trained personnel are authorized to operate machinery/equipment. We as employees are responsible for maintaining company assets as well as safety and accident prevention programs. We must always try to avoid unnecessary risks.

The company is aware of the responsibility of personnel involved in each area to keep such assets in good conditions. Observe the practices of conservation and maintenance as well as to follow safety programs and prevention of risks that are aimed at preserving these assets, looking for continuity of operation and to avoid accidents.

Any situation of loss, damage, misuse, misappropriation, or total or partial destruction of assets, facilities, machinery or equipment owned by the company, must be immediately notified in writing to the immediate supervisor, Area Director, Human Resources or ultimately to the Ethics Committee through the ETHOS program.

