



**Our Code of Ethics
represents the principles
and values of CORONA.**

Somos **lo que hacemos**

corona



Ask

*Seek
Guidance*



Trust



When uncertain, ask questions



*Think about
the future*



*Say NO
to indifference*



Report



Dear friends,

Our Code of Ethics originates on the historic commitment of CORONA with honesty and integrity, legacy of our shareholders that have defined who we are as a company and how we relate among ourselves, with our providers and clients.

The code defines what CORONA expects from its business activities and from its people. We all, without exception, must understand it and fulfill its requirements.

It is very important that each one of us takes part of CORONA's commitment with ethics and integrity, maintaining the highest standards of behavior and being an example for others through our words and actions.

Let's continue working to maintain confidence, the good working environment and the good name of the Organization. Let's make sure that we can continue to be proud of belonging to CORONA and that we are from our working position an example of the fight against corruption and the defense of ethics that today's world so much needs.

We invite our providers, clients, consumers, authorities and all the individuals that relate with CORONA to accompany us to make this purpose true everyday.

Cordially,

A handwritten signature in black ink, appearing to read 'Carlos Moreno', written over a light blue circular stamp.

Carlos Enrique Moreno
President

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PURPOSE AND SPIRIT

Our Code of Ethics defines the principles and values of CORONA and of its shareholders to the daily business management activities. It describes the ethical environment that the Organization intends to reach, and for such purpose, it integrates reflection, experience and practice of a long-lasting organization that has become an important cornerstone in the topic of entrepreneurial ethics, which has been a constant commitment. The approach herein contained constitutes our performance and behavior guide, and provides orientation, even in those events that are not expressly considered.

This Code reflects, in addition, the commitment with sustainability that CORONA has made integral part of its business strategy and of its daily operations. By virtue of this commitment, the Organization intends decisively and measurably to generate value in all its interest groups through the optimization of financial profitability, the generation of social equity and the protection of the environment.

Given the complexity and dynamics of the entrepreneurial and business world, the content of this Code must be constantly implemented, contemplated and developed. The General Managers and the Integral Human Resources Managers of the business and service units comprising CORONA must guide and carry out all the actions tending to make ethics part of daily life and strengthen the Organization. Therefore, we will contribute to consolidate ethical management, not only within the Organization, but also outside of it, in order to achieve a more integral society; determination with which we are committed.

WHO MUST COMPLY WITH THIS CODE?

All the collaborators of all the business and service units, the filial companies, branches and others in which CORONA has more than 50% participation.

CORONA expects its distributors, suppliers and final consumers to make determined contributions to strengthen its ethical culture, in fulfilling the relevant aspects of this code.

Therefore an email address has been provided; mansfieldethicsline@mansfieldplumbing.com found on the web page www.corona.co and in which you may report any situation that threatens the integrity or that may constitute an infringement of our Code of Ethics.

RESPONSIBILITIES AND OBLIGATIONS WITH CORONA

CORONA has placed its good name and reputation in service of society. Therefore, an elementary obligation of its partners is to make their best efforts to make sure that always and everywhere it is consistent in its principles and values, according to the legitimate aspirations of its shareholders and adding value to their investment.

Thus, it is our responsibility to:

- Manage our commitments with high ethical standards, transparency, honesty and responsibility, protecting its good name and entrepreneurial tradition.
- Make diligent, careful and reasonable use of the capital resources that have been confided to us.
- Honestly contribute to achieve the business goals.
- Provide reliable and truthful information.



1. Acting with Integrity

- Foolproof integrity
- Zero tolerance to ethical failures
- Not to be interested party
- Strict compliance with the law
- Make yourself visible
- Confidentiality and not retaliation



1.1. What is expected from each one of Corona's collaborators?

All collaborators must respect the following principles:

Be honest: act with honesty and transparency at all times and everywhere.

In all your actions use your good judgment and common sense, considering if your behavior is ethical and legal, and if it reflects the good name and image of CORONA and your own, which are important to protect and preserve.

Report and make yourself visible: report the situations that go or may go against the principles and guidelines of behavior of this Code, through the channels that CORONA has available.

Your concerns will be addressed. If you consider that the matter has not been managed, or you have not received an answer to your report, inform it with confidence. Therefore, you will be contributing to the consolidation of the company's and our country's ethics.

To proceed in this way it is not necessary to provide evidence or be right, it is only necessary to provide precise information.

Similarly, be careful and refrain from presenting complaints or reports with a spirit or intention different from that of being honest. Acting in a reckless manner also attempts against CORONA's ethics.

Trust: CORONA has channels, means, policies and procedures to deal with incorrect and unethical behaviors, ensuring the necessary confidentiality regarding the information delivered.

CORONA's commitment, no retaliation: there will not be retaliation under any circumstance as a result of the information provided.

Do not forget to be precise and truthful.

Act with austerity: this is one of the essential elements of CORONA. Make reasonable use of the resources that CORONA has available for fulfilling your responsibilities and functions.

Fulfill your commitments and honor the word given:

your reliability as CORONA's partner depends on the honesty with which you attend the commitments acquired. When you commit with something, fulfill it.

Be transparent and demand transparency:

base your relationships with fellow workers, managers and third parties on good faith and transparency. Avoid hiding information, having second intentions in your behavior or words, manipulating, saying half-truths, or inducing into error or to the wrong perception.

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

Declare your independence and commitment with ethics:

use the document designed for this purpose and as guide by the content of the chapter on "Conflict of interest".

Consider that the Code cannot contemplate all the possibilities that exist regarding a real or apparent conflict of interest. Use your good judgment and be aware of your behaviors.

Declare your conflicts of interest:

report the real or apparent existence of any situation in which

your interests may be in conflict with those of CORONA.

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

Respect the law: this is the basic assumption of CORONA's behavior and its partner.

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

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

Be exact and truthful: in the reports regarding your work secure truthfulness regarding budgets, costs, expenses, production, sales, quality, fulfillment, inventory, prices, salaries, time worked and paid, accident rates, performance (I Know How I Am Doing) and other applicable elements.

Support with exact and precise documents the transactions that imply contracting or provision of resources of the Organization.

At CORONA we understand that to make mistakes is human and that in daily management mistakes may

arise. If you make one, inform your immediate supervisor. He/She, as responsible of the process, must help you to find a solution that must satisfy the criteria contained in this Code at all times.

Report on: the opportunities that, as a result of your position or as a result of your condition of collaborator, may seem of interest to CORONA.

Manage the conflict: disagreements with actions, decisions and activities, individual and organizational, form part of the real nature of work. Do not remain silent. Manifest them with respect and truthfulness.

Respect dissent: a good working environment is characterized by spontaneous, open and honest dialogue, in which confidence and respect permit to manifest disagreement in an open and transparent manner. Respect different opinions.

When you commit with something fulfill it.

1.2. What is expected from the Leading Manager?

In addition to the behaviors that CORONA expects from its partners, the Leading Manager is called to personify the principles and values of the Organization. He/She must be honest at all times, places and circumstances; orient his/her partners under his/her responsibility through example and be their mentor in the daily activities and results as well as in the affairs that have to do with ethics; Therefore:

- Establish relationships based on respect and confidence with the partners under your responsibility and your fellow workers.

Take into account that CORONA rejects all behaviors that question coherence with corporate values on which your work is supported, including, but not limited to, all forms of harassment at work, whether of labor, sexual or any other nature that may threaten the dignity and respect due to all partners.

- Propitiate the establishment and consolidation of spaces of participation and dialogue that promote and facilitate the following in the partners under your responsibility;
 - understanding of the essential elements of corporate philosophy, as well as the Main and Audacious Goal (MEGA) that we have set to reach.
 - understanding and fulfillment of CORONA's Code of Ethics.
 - responsible and truthful presentation of concerns regarding behaviors that may be contrary to entrepreneurial ethics.
- Pay attention to the observations made by your partners regarding labor practices that may imply ignorance of principles concerning interpersonal socialization, work shift, rest, compensation, health and security at work, among others. Do not underestimate these observations.
- Integrate in the performance evaluation criteria, the ethical assessment of the behavior of the partners under your responsibility.

- Promote the permanent improvement of individual and group performance, considering the fulfillment of this Code, the values, the organizational culture and the applicable legal norms.

- Answer the concerns formulated by your team. Provide the pertinent answers and, in case of doubt or if you do not have an answer, contact the Ethics Committee of your business or service unit. Report said situation to the ethical line: Mansfieldethicsline@mansfieldplumbing.com

- When contracting goods and services, select suppliers that observe the mandates of the labor legislation, human rights at work, protection of the environment and, in general, the law. For taking decisions, in addition take into consideration the following criteria: the quality of the relationships with your collaborators, social responsibility, organizational environment and competition.

- Avoid behaviors tending to obtain improper advantage or profit for yourself, your relatives or friends, or for the collaborators under your responsibility.

You, as Leading Manager, are a reference of behavior and a mentor for many individuals that consider what do you an example of behavior to follow.



We all have the obligation to fulfill CORONA's ethical standards.

If you observe a behavior which concerns you or that represents an infringement of our Code, report it as soon as possible. When doing so, you give the Organization the possibility of correcting the problem on time; for example, before the law is infringed or a risk to the health, security and the good name of the Organization is impacted.

- **Report immediately:** through the channels that CORONA has implemented, any inappropriate behavior observed or that you are aware of. Do not permit the Organization to ignore these situations, or try to solve them alone. If you consider that no measures have been taken to remedy the situation reported, seek support through another available channel.

1.3. How to Present an ethical issue and what to do?

- **It is your decision to identify yourself or not:** CORONA binds itself to maintain your identity in confidentiality, unless it is absolutely necessary to make it known to the individuals responsible of solving the problem for the correct attention thereof, case in which you will be timely informed.

- **Confidentiality:** The information you report will be strictly confidential and will be used only with the purpose of safeguarding the interests of the Organization, according to the ethical framework contained in this Code.

- **Consequences and sanctions:** CORONA will adopt the measures tending to correct the situation or problem identified, and to prevent their future occurrence, applying the sanctions applicable.

- There will not be any retaliation for the information you report: CORONA only expects you to be truthful and appreciates your interest to protect the Organization and its good name.

QUESTION: I have had family difficulties and I asked a fellow worker to lend me money. He helped me, and we agreed that I would pay him interests. At first I thought they were high, but since I needed the money, I accepted to pay them. Every month I pay the amount agreed, but practically all I do is pay interests. What should I do?

Contact the Integral Human Resources Manager of your business or service unit and tell him/her the situation and look for the Organization's support. CORONA has means that could contribute to solve this situation. Offering, requesting and receiving loans of money may compromise the socialization quality that has characterized the relationships among CORONA's collaborators. Avoid asking your fellow workers for money because this may lead to improper or inconvenient practices or affect the quality of the working environment that we want and which we enjoy everyday.



2. Integrity within the company

- Environmental control
- Self-control
- Fair labor practices
- Equity and no discrimination
- Care of the environment
- Health and security responsibility
- Truthfulness of commercial and financial registers
- Performance of other remunerated activities



At CORONA, self-management, self-regulation and self-control characterize the working environment.

Be the first one to preserve the transparency of the activities performed, the decisions taken and the relationships you construct.

Depend on Audit
and share your
processes with it

2.1. Environmental Control and Internal Control

Depend on Audit and share your processes with it and therefore you will obtain greater control of your functions.

Consider audit from the point of view of prevention and improvement.

Turn to it also if you identify any situation of risk or failure to comply, implement the actions agreed and communicate the changes to the collaborators of all the areas that must be notified.

Request periodic revisions to determine the effectiveness of the measures adopted, implement the corrective actions that have been advised and manage the consequences of the failure to comply.



2.2. Fair Labor practices:

Work is an important part of our life and a determining factor to obtain the dignity, well-being and development as human beings. Compliance with the law does not differentiate us from other companies because we all are, as members of society, called to obey it in order to have a harmonic coexistence. But we go even further. Our interest is that labor practices permit CORONA's collaborators to work with liberty and in conditions of security and dignity, and thus, improve their lives integrally. We work to achieve this goal everyday.

QUESTION: My supervisor treats my area fellow workers with respect, consideration and warmth. However, in dealing with me he/she uses expressions that hurt me, he/she uses offensive words regarding my performance and contribution, he/she has rejected me permits to attend personal situations without any justification and I have to work extensive shifts to satisfy his/her constant and sudden demands. I feel unmotivated and upset, but I fear to lose my job if I tell his/her immediate supervisor. To whom can I go to present my particular case?

CORONA expects all its collaborators to feel motivated and enjoy the work they do. Take into consideration that CORONA rejects the behavior of your supervisor because he/she ignores the type of leadership we promote. Contact immediately the Integral Human Resources Manager, the Ethics Committee of your business or service unit or report it to mansfieldethicsline@mansfieldplumbing.com

It is our responsibility to respect individuality. CORONA's public and private practices must be coherent with the principles universally accepted regarding non-exclusion and no discrimination as a result of race, nationality, sex, religion, beliefs, age, political affiliation, origin, social class, physical appearance, way of dressing, physical or health limitations.

Therefore, its recruitment, selection and promotion processes are based on objective criteria and factors of knowledge, training, experience, performance and merits.

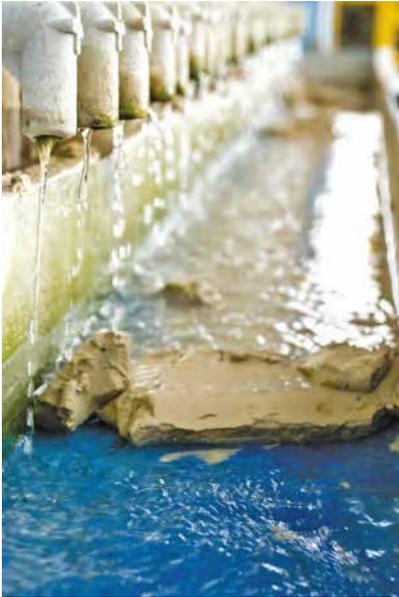
2.3. Equity and no Discrimination

QUESTION: I participate in an internal invitation to cover a vacancy in an area in which I have always wanted to work. I meet all the requirements of the position. However, the decision does not favor me, and my fellow workers tell me that the opinion of my supervisor influenced the result because my religious beliefs are different from his/hers. What should I do?

You have the essential right to profess the religious faith of your choice or not to profess any. CORONA respects and promotes diversity in its collaborators. Contact the Integral Human Resources Manager or the Ethics Committee of your business or service unit or report the situation to mansfieldethicsline@mansfieldplumbing.com

QUESTION: I have been diagnosed with HIV. What must I do? What right do I have?

Even though you can keep the topic confidential and be responsible for handling your personal situation, we advise you to inform the Integral Human Resources Manager, who must offer you the services that CORONA has available in matters of health and take the precautions necessary to protect your integrity and that of your fellow workers. CORONA warrants the correct handling of your information, and also that you will not be subject of discrimination as a result of your disease.



We are characterized by the commitment with sustainability through the generation of economic, environmental and social values for our groups of interest.

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

2.4. Environment:

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

We responsibly assume the effects that our activities might cause on the environment, undertaking actions to restore ecological balance in our manufacturing plants and operation sites.

QUESTION: I guide the project team that plans to improve the productive process in one of the plants of the Organization. In the design I identify that a source of water from which the community in which we operate takes its water could be affected.

Report the situation to the team and to the Manager of the area and the business interested in the project. Make sure the adjustment of the design is executed preserving said source of water and include in the values thereof, the greatest value in the budget required for the execution thereof.

2.5. Health and Security at work



The creation and preservation of a safe working environment for all is a priority at CORONA and we are called to contribute so that we all can return home safe and sound at the end of the day.

QUESTION: Must I operate equipment of which there is no evidence that preventive maintenance has been made to it? I am worried to be at risk when operating it. What must I do?

Work in safe conditions is a priority at CORONA. The Total Preventive Maintenance methodology or TPM strengthens this pillar. Inform your immediate supervisor your concerns and request to discuss the topic in the Primary Small Group (PGP) to implement this way of working, in order to have additional information about the real condition of the equipment and, if your concern is correct, the equipment must be examined by the Maintenance collaborators.

You are the first person responsible of taking care of your health and adopt the security measures indicated to prevent accidents and diseases at work.

In turn, CORONA is responsible of identifying, evaluating, preventing and mitigating the health and life risks and to disclose in an appropriate and effective manner the existence and nature of said risks and of the result of the studies and research carried out regarding the matter to the individuals interested and the pertinent authorities.

QUESTION: In the process in which I work there is equipment whose operation demands training because its incorrect use may cause accidents and affect the quality of the products of the Organization. My supervisor tells me that we have to fulfill the program agreed with the client and has asked me to replace one of my fellow workers in the operation of said equipment. I have not received the necessary training to operate it correctly. What must I do?

Do not permit that the pressure to meet the program endangers your security. Your supervisor must look for a different solution that permits to satisfy the agreement with the client and, in turn, ensure the physical integrity of the complete team of collaborators and the quality of the products. Inform the situation to the Integral Human Resources Manager or the Ethics Committee of your business or service unit, or report it to mansfieldethicsline@mansfieldplumbing.com

QUESTION: My supervisor has entrusted me the performance of a specific task that demands the use of personal protection elements that have been timely given to me. I am an expert in the profession and sometimes I do not use them because I rely on my skills. If I suffer a work accident one of those days in which I do not wear the personal protection elements and that is in fact the cause of the accident, may I be summoned to a disciplinary process?

You are the first person responsible of taking care of your health and security at work. CORONA has the obligation of providing periodically the personal protection elements and equipment that the task demands to be executed in safe conditions. If you do not use them, and even in the case in which an accident does not occur, your immediate supervisor may summon you to file the pertinent explanations and, if you do not have a clear and objective justification he/she will, establish a disciplinary sanction. Self-protection is essential for you, your family and CORONA.

2.6. Commercial and Financial registers:

These must reflect the reality of the situation to which they refer. Do not alter the data of the reports to hide situations that must be acknowledged by CORONA, not even with the argument of favoring the Organization.

This is a responsibility that includes whoever incurs in an expense of any nature and amount on behalf and in representation of the Organization, the personnel of accounting and financial processes and those responsible of their approval.

Assets of the company: make use of them according to your responsibilities and functions in CORONA and take care of them as if they were your own.

The following are considered assets of the company: money, equipment, raw materials and elements, products, time of work and the fruit of it, information systems, telephones and other means of communication, computers and other tools, vehicles, confidential or patented information, trademarks, patents and other commercial registers and, in general, all intellectual property rights.

Take into consideration that it is not permitted to have software not licensed or illegal.

Its use threatens the responsibility of CORONA and may imply criminal behaviors.

Theft, destruction, extraction of product, equipment or information from the company or embezzlement and false information intentionally given are infringements as serious as theft of goods of collaborators in the place of work.

QUESTION: According to my responsibilities in the Company, I have been assigned a mobile phone to which I also give personal use. I want to know what is the limit authorized to make personal calls in said mobile phone?

Take into consideration that the mobile phone has been assigned basically for the faithful compliance of your responsibilities. If for any reason you have to use it for personal purposes, take care of this resource as if it were your own. CORONA depends on your good judgment and common sense. Be reasonable in the consumption and austere in expenses.

QUESTION: Walking around the plant, I see that a fellow worker does not have enough care with the storage of a specific product and that it could deteriorate, which would imply that it would not have the quality expected by consumers. What must I do?

Being alert to situations such as this one is essential so that together we correct the processes and improve them continuously.

You can talk to your fellow worker and help him/her understand that what he/she is doing is not correct, and you must inform the manager of the process so that he/she, as directly responsible, analyzes the causes of this behavior and implements the corrective plan of action.

Intellectual property: This is one of the most important assets of CORONA. All the collaborators must make the effort to protect it and respect the intellectual property rights of third parties. To act otherwise could affect the reputation of the Organization and generate several damages and even claims against the company and its collaborators.

- CORONA's intellectual property includes patents, commercial trademarks, rights, secrets, formulas, information, inventions and developments performed by the collaborators and, in general, any intangible subject to property right.
- With the purpose of ensuring our intellectual property, periodically supervise, with the advice of the corporate legal area, the existing registers in the countries in which we operate.
- Seek advice from the corporate legal area regarding any application filed by a third party to have access to related information, directly or indirectly, with rights of the Organization.

QUESTION: I work in development processes of new products and I have overheard a conversation in which a fellow worker offers to deliver information regarding a project in which we are working in exchange for money and other benefits. What must I do?

The information regarding the present products and those being developed and the products themselves is a right of CORONA. What your fellow worker tries to do is improper. Report the situation to the Integral Human Resources Manager or to the Ethics Committee of your business or service unit or report it to mansfieldethicsline@mansfieldplumbing.com

Use of confidential or privileged information: protect CORONA's information that is not of public use, including agreements, price information, marketing plans, technical specifications and that related with collaborators.

- Take into consideration that the information to which you have access as collaborator of CORONA is property of the Organization, which is confided to you as a result of your functions and that the responsibility for the use of the same one continues, even though your labor relationship has ended.
- Meet the confidentiality agreements that your participation in business or development projects of products demands.
- Do not provide information of the Company to third parties, binding to overhear conversations or invade someone's privacy, much less under the offer of bonus or any other benefit.

QUESTION: I participate in the team of the project to improve the performance of a product. These improvements are so important that they would give us a significant advantage regarding market competitors. I have received a call from the technical manager of one of them and he/she has told me that he/she wants to talk to me about the project in which I am working. What must I do?

The information of the project is confidential and of high strategic value for CORONA. You must not share it or talk about it with third parties without express authorization from the General Manager of the Business Unit. Reject the invitation respectfully. Report the situation to the Integral Human Resources Manager or the Ethics Committee of your business or service unit or report it to Mansfieldethicsline@mansfieldplumbing.com

QUESTION: I form part of a virtual community of ceramic topics. Some of the participants work for the competition. One of them invites me to analyze jointly the performance of a product that has characteristics similar to one of us and regarding which he/she seems to be well informed. May I share the information available in the Company regarding the topic?

Be careful. The design of products and the information regarding our way of doing things are assets of the Company and, therefore, they must be protected. Ask your direct supervisor or, otherwise, the Ethics Committee of the business or service unit for help regarding this situation, in such way that, without losing the opportunity to learn and improve, you avoid the competition to have access to reserved information and that neither you nor CORONA incur in disloyal practices.



CORONA expects that, within the legal limits, you devote your time and talent to the full fulfillment of your labor commitments with it.

2.7. Second job or remunerated out-of-labor activities:

Exceptionally, and with prior and express authorization from the General Manager of your business or service unit, the President of the Organization, of the Executive Committee or of the Corporate Board, as applicable, collaborators may participate in boards of directors or teaching or union activities, without adversely affecting their responsibilities and taking care of not incurring in conflicts of interest.

In case any type of compensation (payment, reimbursement of expenses or any other acknowledgement) is offered when invited to give a lecture or make a presentation as part of your responsibilities with the Company or by virtue of your knowledge or experience in the position held at CORONA, report the Ethics Committee of your business or service unit and obtain prior authorization to accept said compensation.

If you decide to make any complimentary activity different from those herein expressed or for whose purpose you do not require prior authorization share this decision with your immediate supervisor. Take into consideration that, by virtue of your labor commitment with CORONA, you are acquiring responsibilities that may mean some limits or restrictions in your personal life.

QUESTION: I work during the day and study at night. Sometimes I dedicate parts of my working shift to do some tasks of the university.
¿Is it correct to use my working time for these activities?

CORONA acknowledges your effort to study and continue your professional development process. You can use the resting periods during your day shift to attend your academic commitment, but it is not correct to do so if this affects the normal flow of your work or that of your work team.



3. Negotiation with External parties

- Relationships with suppliers, channels, distributors, consumers and competitors
- Transparency, objectivity and responsibility
- Zero improper practices
- Against money laundering, assets and corruption



3.1. Improper Payments:

Payments to obtain advantages, influence a decision or accelerate a procedure are not permitted, even in the event in which the decision represents an interest or legitimate right of CORONA.

Any doubt about the nature of a payment must be reported to the Ethics Committee of your business or service unit to receive the prior corresponding authorization. This is a delicate matter that may threaten your responsibility and corporate reputation of the Organization, and even lead to the perpetration of a crime.

Business dynamics necessarily implies the relationship with external public at different levels or in different countries.

CORONA expects you to build and strengthen relationships with them based on transparency and good faith.

QUESTION: I suspect that a transporter is giving money to one of my fellow workers to assure the load and delivery before the other transporters. I have observed strange attitudes in both of them. What should I do?

Offering, requesting and receiving money in exchange for a preferential treatment is an improper practice that attempts against the transparency in the relationships that CORONA establishes with the different public with which it relates.

In particular, the transport process is based on the needs of our clients and it is supported by an objective sequence of assignment of products for their corresponding delivery.

Altering any of the operation conditions of the process as a result of any personal reason or interest is an unethical behavior that you must inform CORONA. Immediately communicate your suspicion to the Ethics Committee of your business or service unit.

3.2. Money Laundering prevention

CORONA is committed to the fight against laundering of assets. Therefore, it adopts prevention measures such of: verification in lists legitimately elaborated by the governmental authorities so that the commercial agreements entered into and its transactions with distributors, subdistributors, suppliers of goods and services, contractors, among others, are performed with individuals and entities free from any suspicion and that are not used as instrument or means for the legalization, concealment, handling, investment or use of money, resources or goods arising from criminal activities.



We are interested in depending on suppliers of goods and services that, in addition to comply with the legislation, provide a fair treatment to their collaborators and are committed with the protection of the environment.

QUESTION: In developing a commercial mission in another country, a local supplier offers me attentions that, although admitted in said country by the business community, I do not feel it is correct to accept. What must I do?

Remember that we expect our suppliers to provide us with quality goods and services with adequate prices, and that they comply with the commercial agreements. Accepting attentions may compromise your capacity to decide objectively.

If according to your good judgment the attention offered makes you doubt regarding the above, reject it respectfully and explain the norms of CORONA. Report the situation to the Integral Human Resources Manager or the Ethics Committee of your business or service unit, or Mansfieldethicsline@mansfieldplumbing.com

3.3. Relationships with Suppliers:

Pay special attention to negotiations with suppliers or with those who intend to be, in which:

- To participate you are offered in a direct or covered manner a benefit that is not applicable to all the working community or exceeds a modest value.
- There is a real or apparent conflict of interest.
- There is information that questions your compliance with the legislation and fair labor practices.
- There is only one supplier or participant, unless it is unique and there is prior authorization from the Ethics Committee of the particular business or service unit.
- You are asked to omit requirements defined in the organizational contracting policies.

QUESTION: In the search of suppliers, I have found several abroad that may provide us attractive conditions of price and opportunities in deliveries. However, I have information that they use children in their labor force. What must I do?

CORONA rejects all forms of hard labor and, specially, child labor. Do not continue in the process with these suppliers. Doing so attempts against the essential principles of CORONA and could generate damages of different nature. Report the situation to the Ethics Committee of your business or service unit so that it makes the pertinent search and, if said information is certain, finally exclude them from being potential suppliers.



In the event in which you have any doubt or concern, contact your direct supervisor.

QUESTION: I am carrying out a proceeding in a government entity to obtain an environmental license. The officer in charge insinuates that he/she may speed the process, activity which would be very simple, if I give him/her a gratuity. CORONA is interested in obtaining said license as soon as possible because the process that needs it must begin operations as soon as possible. ¿What should I do?

CORONA pays the taxes and contributions foreseen in the law, reason why consenting with this type of requests constitutes a corruption practice that the Organization rejects. Not even in an event as the former, in which it has a legitimate interest in obtaining the environmental license, CORONA pays, offers sums of money or gives gratuities or bonus to speed the proceedings it must carry out. Do not pay the gratuity requested, communicate the officer the practices existing at CORONA regarding the matter and immediately report the situation to the Ethics Committee of your business or service unit.

3.4. Relationships with Governmental authorities:

It is essential that you, as a representative of CORONA:

- Act with absolute honesty and transparency in the activities executed on behalf of the Organization.
- Establish responsible, honest and professional relations with the representatives of official entities, in order to create unprepared and disinterested bonds.
- Carry out the administrative proceedings with governmental entities rigorously complying with the requirements established in the law.
- Refrain from offering or receiving money, gifts, benefits, discounts, employment opportunities and any consideration that may be interpreted as bribe.
- Remember that even in the case in which CORONA benefits or is interested in a proceeding or decision regarding which it has a right or legitimate interest, making this type of payments is an unacceptable behavior.
- As a general rule, avoid contracting directly with the government and orient the business opportunity towards the different distribution channels that CORONA has.
If for any reason it is imperative to contract with the government, the authorization of this transaction must be exclusively given by the General Manager of the UEN or the President of the Organization. As members of the present society, we have witnessed unethical or even criminal behaviors of some individuals that, acting on behalf of the government, have defrauded the confidence and public finance.
Be prudent, confirm the interest of CORONA in participating in this type of processes and request prior and express authorization to represent the Organization.
- In the event in which you have any doubt or concern, contact your direct supervisor or the Ethics Committee of your business or service unit before making a decision.

3.5. Political Activity:

CORONA supports democracy and respects the political and administrative structure of the countries in which it operates, as well as their authorities. Therefore, it does not participate in any way in political activities or supports any political party or movement in the candidacies to public positions or popular election office.

It respects the essential right of its members to belong to political parties, vote and actively participate in politics. Consequently, they will not be restricted from contributing economically, participating or supporting party, political or electoral activities unless these are of compulsory acceptance by legal or constitutional mandate, such as acting as poll supervisors in case of being summoned by the corresponding authority.

If you participate or want to participate in political activities, take the following into consideration:

- Notify the Ethics Committee of your business or service unit so that it may verify if, in case of being elected, any conflict of interest may arise between CORONA and the entity to which you aspire, or between your political activities and your responsibilities to Mansfield Plumbing.
- Do so on your own behalf.
- Refrain from using the assets of the company for said purposes.
- In case of being elected to hold public office, such as Municipal Councils, Departmental Assemblies, or any other, immediately report said fact to the Ethics Committee of your business or service unit.

It is important that CORONA has the opportunity to adopt the measures that are necessary to protect your work in the Organization and the exercise of your responsibilities in the public sector.



QUESTION: I am candidate to hold public office. I have my first meeting with possible voters to present my ideas. May I hand out pens marked with CORONA's logo to those present?

No, you cannot. Take into consideration that this is an activity that you undertake on your own behalf and that you must not use any of the resources and assets of the Organization. If you do so, this may be interpreted mistakenly by the community as direct support to your campaign, in addition to the fact that you would be taking undue advantage of the name and reputation of CORONA.

Refrain from using the assets of the company for these purposes.



As CORONA's essential allies, distributors must be treated in good faith, and with respect, loyalty and transparency.

Notify any practice that may affect the ethical culture of the Organization.

3.6. Relationships with channels and Distributors:

Therefore, we adopt objective commercial criteria in their selection, we assure access to the information required in conditions of equality for those who want to be and we expect from them that their way of doing business does not contradict the purpose and spirit of this code.

No employee, and much less the one who has the power to decide about entering into commercial agreements with distributors or with those who want to be, may accept, directly or indirectly, attentions, gifts, compliments or any other benefit or advantage for him/her. If or his/her relatives, unless it refers to the common commercial or marketing material given to any individual, such as agendas, pens or notebooks.

Whoever has the power to decide about entering into commercial agreements with distributors or those who want to be will appropriately notify any practice that may affect the ethical culture of the Organization.

Report this situation to the Integral Human Resources Manager or the Ethics Committee of your business or service unit or Mansfieldethicsline@mansfieldplumbing.com

3.7. With Consumers:

Only the products that strictly satisfy the standards of quality, performance and social responsibility that characterize us must be launched into the market.

Consumers and society in general expect that we comply with the promise of improving their life with our products and services.

Therefore, as final addressees of our work, they are the ones that determine whether we have complied with said promise. Each one of us, with his/her daily contribution, is responsible for satisfying our value proposal to consumers.

Respect and highest consideration that we owe our clients and society in general originate on the fact that we are honest individuals and on the strict compliance of our ethical principles.



We assure that CORONA's products are manufactured respecting the attributes with which we have committed for the satisfaction of consumers' needs.

Consumers expect that we fulfill the promise of improving their life with our products and services.

3.8. With the Competition:

The globalized economy in which CORONA participates demands the permanent adoption and practice of the most healthy criteria and principles of free and loyal competition in all places in which CORONA develops operations.

Therefore, CORONA:

- Refrains from adopting practices tending to discredit, disorganize or deviate the clientele of its competitors, or confuse or deceive clients, consumers and the public in general.
- Does not perform acts that generate illegal or ambiguous comparison or imitation or induce to breach agreements entered into.
- Communicates specifically consumers and the public in general the attributes of its products.
- Does not enter into or promote the execution of agreements or covenants of exclusive rights which infringe the law.
- Makes market and competition intelligence within the limits that loyalty and commercial morality impose on the healthy business management. The benefit that access to information from competitors would report the Organization ignoring these principles of action does not constitute legitimate argument for its violation.

QUESTION: CORONA has hired a third party to perform an advertising campaign to promote its products. I am the representative of the Organization in this process. When receiving the proposal of the supplier, I find that in fact it is very well designed, but characterizes the products damaging the reputation of those of the competition. What must I do?

CORONA exercises free competition with ethical criteria. Therefore, it does not resort to disloyal practices that intend to confuse the consumer or damage the reputation of its competitors. It rather concentrates on promoting the attributes of its products. Reject the advertising proposal, explain the supplier the commercial practices of CORONA and report the situation to the Ethics Committee of your business or service unit .



QUESTION: CORONA has hired an ex-employee of a competitor. I know he/she has knowledge of the other company that could give us ideas on new business activities and materialize opportunities that so far we have not taken advantage of. Can I obtain information from the competition through this new fellow worker?

CORONA is interested in having access to information from its competitors making use of loyal practices.

Do not attempt to obtain information from the competition if, when doing so, the commercial loyalty and ethics of the Organization may be violated.



4. Conflicts of interest

- What is conflict of interest?
- Relatives and friends
- Attentions
- Personal relationships
- Personal investments
- To be an interested party
- If you face a possible conflict: ponder upon and report



4.1. What is Conflict of interest?

When your personal and family activities and interests, or those of your friends and relatives interfere or may interfere with your independence to take decisions in order to obtain the best interest for CORONA, you could be facing a conflict of interest. Report this situation.

When doing so you protect yourself, protect CORONA and contribute to minimize the impact that its materialization could generate.

The Code cannot consider all the situations in which you could find yourself regarding a real or apparent conflict of interest.

Consequently, it is vitally important to be alert, make use of your good judgment and seek advice from the Ethics Committee of your business or service unit regarding any doubt.

4.2. Entailment of Relatives and friends:

Labor entailment of family and friends to companies of CORONA must be made according to the policies in force in matters of recruitment, selection, hiring and others applicable. There must not be any relationship of dependence, subordination or influence between you and your friend or relative. Therefore, hiring must be made in functionally different companies or areas and it is always necessary to maintain independence. If it refers to suppliers or distributors, the organizational policy that regulates objective contracting thereof must be strictly applied.

The terms FAMILY or RELATIVES used in the Code and in the policies that develop or complement it refer to the spouse, parents, brothers, sisters, grandparents, sons, daughters, grandchildren, in-laws, companions, as well as any other member of the family not expressly included herein, that depends economically from you or from whom you depend.

It is possible that in the exercise of your responsibilities with CORONA you establish relationships with family members, or friends or relatives that go beyond what is indicated.

Act wisely and make sure that your personal relationships do not interfere or give the impression of interfering with your independence.

QUESTION: My cousin participates in an invitation to hold a position that has arisen in my area of work. Should I declare my relationship with him?

Although the entailment of relatives to CORONA is permitted provided the policies in force are applied, do not underestimate the possibility that between your cousin and you there might be bonds that may affect you or both regarding the independence or autonomy to take decisions in order to obtain the best interests for the Company. Report the existing relationship to the Integral Human Resources Manager or the Ethics Committee of your business or service unit. They will analyze the situation in the light of the policies of the Organization and will take the decisions applicable. To remain silent regarding the matter could materialize a conflict of interest that you must and can avoid.

4.3. Payments, gifts, dinner invitations and attentions:

Payments, gifts, dinner invitations and attentions are not necessary to strengthen the relations thus constructed.

Do not accept or offer payments, gifts, dinner invitations and attentions or trips in exchange for favoring present or future distributors or suppliers.

You may accept symbolic presents and public acknowledgements to your management on behalf of CORONA, such as promotional or marketing material.

It is important for CORONA that you notify your immediate supervisor, as responsible of the process, of all those situations in which attentions of any nature are offered to you, in such way that he/she may orient your actions with the highest ethical criterion.



The relationships that you establish with third parties on behalf of the Organization must be based on transparency and on assuring the best interest of CORONA within the ethical frame foreseen in this code.

4.4. Personal relationships at work:

It is particular of the human condition to establish affective relationships and the labor space is not foreign to this type of bonds.

If this occurs, report the situation to the Integral Human Resources Manager or the Ethics Committee of your business or service unit in such way that it is possible to analyze the situation and take a decision that contributes to protect

the best interest of the Company and the work of all the individuals involved in the relationship.

Conduct your relationship with responsibility and take care not to affect the normal and efficient execution of your fellow workers or, in general, the organizational environment.

Those situations in which one of the

parties involved is in a relation of dependence, subordination or influence regarding the other one may affect his/her independence to take decisions, generate conflicts of interest and even cause damage to the Organization.

In these cases, the Ethics Committee of the business or service unit will take the necessary measures to avoid these possible negative effects.



The activities that you carry out in this matter must not affect your capacity to decide based on the best interest of CORONA.

4.5. Personal Investments:

If your investment exists or is carried out in companies which supply goods and services, distributors, competitors or others that may be related in any way with the activities of the Organization, a conflict of interest may be generated.

Therefore, you must timely inform the Ethics Committee of your business or service unit your participation in said companies.

QUESTION: My family has had a logistics operations business for a long time. I own part of said business. The manager of the company, who is a third party, has been contacted by CORONA to participate in a bid in which routes for the transport of a finished product will be awarded. What must I do?

You face a clear example of 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 on behalf of the best interests of CORONA. Report the existence of this family business and this particular situation to the Ethics Committee and refrain from participating in any way in the bid process.

4.6. To be an Interested party:

When you face a real or possible conflict of interest and do not set effective margins from taking decisions, you simultaneously become interested party. CORONA rejects this behavior:

Avoid being in situations in which, for example, you:

- Make a report and also approve it.
- Define an investment, make the payment proceedings to third parties and approve the payments.
- Simultaneously invest resources of the Organization and approve the payments thereof.
- Use others to hide, mask or cover your personal interests and give them the appearance of interests of the Organization.
- Take decisions or approve proceedings influenced by the individuals regarding whom you are in a conflict of interest or influencing them.

QUESTION: I make the inventory of a finished product and I see inconsistencies in the report that the system of information generates.

Can I correct this report?

Be careful. CORONA takes decisions based on its reports and they may be as correct as reliable and specific the information which supports them.

Do not make the correction and report the situation to your immediate supervisor. He/She must, in turn, adopt the work plan to correct it and report the occurrence to the corresponding higher authority.

4.7. If you face a Conflict of interest or believe you are facing one:

Report the situation immediately to the Ethics Committee of your business or service unit.

Refrain from taking decisions related with the situation reported while you wait for the Ethics Committee to give an answer.

Refrain from carrying out any activity that damages or may damage the interest of CORONA for personal interest that contradicts it. Especially from:

- Using or providing, on any behalf and for personal profit or that of third parties, information related to CORONA, its companies or business activities.
- Using your influence or position to deviate opportunities or business activities of CORONA for personal profit or that of third parties, or avoiding or making difficult that the Organization freely competes to obtain the placement or obtainment of goods and services in the market.
- Using CORONA's personnel, its premises, equipment, information and resources of any nature for personal profit or that of third parties, or for purposes different from those that are specific within its corporate purpose.

Refuse any type of remuneration, loan, commission, participation in profits or any other type of economic compensation that is offered by individuals or entities with which CORONA has or may have business relations.

Make the interests of the Organization predominate in a clear and effective manner.



QUESTION: I work in the marketing area and have the possibility of ordering the purchase of promotional material for the campaigns the companies executes.

My sister has a plant that produces bags that could be used by CORONA for the next campaign.
Could my sister be the supplier of this material?

It is important that you maintain for CORONA the independence and autonomy that permit you to take decisions on behalf of the best interests of the Organization. Your sister cannot participate, neither directly nor through a third party in this process, not even in the event in which the product offered by her company were the one of lesser value.

Refrain from carrying out any activity or management that damages the interests of CORONA.



5. Administration of the code

- Commitment
- Annual declaration
- Responsibility
- Channels
- Procedure



5.1 Declaration of Independence and commitment

As part of the induction process carried out when entering any unit of business or service, in which training is given in the ethical conception of the company and on what is expected of it, the collaborator must declare his/her commitment with our Code of Ethics subscribing the corresponding document.

The Integral Human Resources area of the business and service unit must supervise the compliance of this process.

5.2. The collaborators of CORONA's business units will subscribe annually THE DECLARATION OF INDEPENDENCE AND COMMITMENT:

For whose purpose the following criteria will be followed:

- a. Each business unit will identify the critical positions, understood as those that as a result of their content may generate in those that execute them greater exposition, risk or possibility of facing conflict of interest or of incurring in deviations of the Code of Ethics.
- b. The collaborators not included in the above identification will sign this declaration in collective and periodic sessions devoted to such purpose that will be held during the course of the calendar year. With this purpose, the business or service unit will dedicate at least a meeting each quarter to sensitize the collaborators in the meaning of the value Seamos Integros and appropriate it, making use of material regarding the topic. At the end of the year, all the collaborators must subscribe the Declaration of Independence and Commitment with the Code of Ethics and report their personal situation regarding a conflict of interest. This clause of the policy will be gradually adopted in all business areas of the Organization. These changes imply transformations that demand the use of complementary strategies that evidence the degree of understanding and appropriation of the value Seamos Personas Integras.
- c. The Declaration of Independence and Commitment thus signed will be filed annually together with the resume of the collaborator.

The business units, through their commercial areas and jointly with the area of negotiations, will present their clients, distributors and suppliers the Code of Ethics of the Organization and will obtain the commitment with the compliance of its content and healthier spirit. The Declaration of Independence and Commitment, duly signed, will be filed annually and must be updated according to the definitions of this policy.

When as a result of any circumstance the content of the Code of Ethics suffers any relevant modification, the Declaration of Independence and Commitment with the Code of Ethics must be signed by all the collaborators, suppliers, distributors and channels with greater representation, prior the process of sensibilization and disclosure that ensures the understanding of the changes in the public and, therefore, its incorporation to daily management.

5.3. Responsibility:

Ethics at CORONA is responsibility of all those that integrate it. We have authorities that work in harmony in order to maintain foolproof integrity.

Responsibility of the Authorities:

Immediate supervisor: as directly responsible of the processes of the area under his/her responsibility, he/she must listen, provide orientation and attend concerns with diligence.

Integral Human Resources Manager: as representative in your business or service unit of the area responsible that CORONA's talent management model is always a reality, the compliance of the Code of Ethics is one of your priorities. Contact your Integral Human Resources Manager who may orient you regarding your concerns and reporting situations.

Ethics Committee in the Business or Service Unit: responsible of receiving (through any communication channel) information regarding doubts and concerns, or complaints regarding behaviors that mean or may mean ignorance or non-application of the Code of Ethics; carrying out the corresponding analysis, adopting the pertinent actions to obtain the ethical alignment in the Organization and reporting their occurrence to the authorities defined in this policy. It is comprised by at least three (3) members of whom the General Manager and the Integral Human Resources Manager will necessarily form part.

Presidency: The President of CORONA is committed with the organizational ethics. He is ready to receive your comments.

Corporate Code of Ethics: in this Committee the situations that have not been timely answered in the channels above will be studied and the complaints related with members of the business or service units management teams and of the executive members of the corporate team of the Organization.

It is comprised by the President of the Organization, the Integral Human Resources Vice-president, the Financial Manager and the Labor Relations Manager.

It will meet ordinarily at least once every quarter, and extraordinarily each time it is necessary, spreading upon the record the topics discussed.

Audit Committee of the Corporate Council: this authority will follow up the fulfillment of the general policies and criteria of ethical behavior of the Organization. It intends to promote actions to strengthen the Ethics of the Organization.

Write to presidencia_lineaetica@corona.com.co.
Within a reasonable period of time, you will receive an answer.

5.4. Reporting Channels:

The Organization has different means, within every one's reach, to facilitate the report of doubts and concerns, or other situations related with ethical management. Make use of them.

You must be aware you can depend on:

Personal declaration of conflicts and renewal of commitment: this document evidences your commitment with ethics at CORONA. It is the opportunity to make the Organization aware of your particular situation regarding conflicts of interest, present or future, and of renewing your commitment with the compliance of the Code of Ethics.

When completing it with honesty and transparency, you are giving an example of integrity to others, and confirming that ethics begins with each one of the collaborators of CORONA and commits us all.

Immediate supervisor: as directly responsible of the processes of the area under his/her responsibility, he/she must listen, provide orientation and attend inquiries with agility.

Your natural group: it is the space in which work difficulties and problems are dealt with to solve them appropriately.

Ethical line: it is the mail account Mansfieldethicsline@mansfieldplumbing.com and Contact Line 01-800-CORONA1. You will find support and help to your inquiries, and independence and autonomy for the attention of ethical cases.

Integral human resources management: as area responsible that CORONA's talent management model be always real, the fulfillment of the Code of Ethics is one of its priorities.

Contact your Strategic Partner who may orient you in your concerns and report of situations.



The Organization
has different means
to facilitate reporting
doubts and concerns.



CORONA has defined the following procedure to investigate the situations reported through any of the channels provided for ethical and integrity topics.

5.5. Procedure

After receiving the information, verbal or written, anonymous or not:

- The matter is assigned to a team responsible of clarifying it.
- The investigation of the situation is carried out in an impartial manner, depending on documents and testimonies of the individuals who are considered pertinent to contact.
- The team within a reasonable period of time, but with agility, will inform the existence or non-existence of infringements to the Code of Ethics and will present the recommendations applicable, so that the authority that has initiated the investigation takes the necessary measures.
- The General Managers and the Integral Human Resources Manager of the business and service units will implement the decisions leading to the ethical consolidation at CORONA, will apply the disciplinary sanctions and the termination of the employment contract of those involved, if applicable. This same responsibility is attributed to the President, the Integral Human Resources Vice-president and the Integral Human Resources Manager of the Corporate Center.
- If a situation offers doubts regarding whether it is exclusively disciplinary or whether it has to do with integrity, the Integral Human Resources Manager must ensure that it is known by the Ethics Committee of the business or service or the corporate unit, which shall take a decision applying the highest ethical criterion, in order to protect the Organization.
- The Ethics Committee of the business or service unit will inform whoever has reported a situation the result of the investigations.
- Exceptions: the exceptions to the content of this Code must be previously authorized by the Corporate Council, spreading upon the record the ethical reasons that motivate this behavior.



6. Resources

Ethics management system



The integrity of all and each one of the collaborators of the Organization.

As representatives of CORONA, they are sources of contact and advice.

6.1. CORONA has a system for Managing Ethics of Which the Following form part:

The Natural Group, as first space for the promotion of reflection and ethical procedure as of cases, videos, readings and other material that, aligned with the content of the Code, generates discussions about the topic.

Direct communications with the Leading Manager, based on confidence and good faith. It is the leading manager who, as a result to being close to his/her collaborators, may offer peaceful spaces to share your doubts and concerns.

Permanent dialogue with the Integral Human Resources Manager/General Managers of each business unit. As representatives of CORONA, they are sources of contact and advice that enable to take decisions according to the ethical guidelines of the Organization.

Discipline and perseverance in the operation of the Ethics Committee.

Basic Guide for Managing Ethics at CORONA: it is the brief and simple expression of what you must do to make sure that you take correct decisions at all times and places.

6.2. CORONA's Web Page:

Clients, suppliers and the public in general will find in CORONA's web page link to have access to the ethical line and report situations that may constitute improper practices.

Other policies that complement and develop this Code: the content of the Code of Ethics is complemented and developed with company policies that you must know.

You may find them in the corporate web page.

If you do not have access to this means, contact your Leading Manager and the Integral Human Resources Manager of your business or service unit, who will guide you on the topic of your interest.



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

corona

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