

# CODE OF ETHICS

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# CODE OF ETHICS

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## CODE OF ETHICS

### 3. MESSAGE OF THE GENERAL DIRECTOR:

The operations of ICACSA have as a base foundation, principles, and values that have allowed us to establish long-term business relations and establish ourselves as leaders in the Metal-Mechanical and Civil industry sector.

Since our establishment, we have characterized ourselves as an enterprise that respects our social, cultural, and environmental surroundings; showing transparency in our businesses and creating a surrounding of trust with you as employees, with our clients, shareholders, authorities, and the community in general.

To continue along this path, I have decided to publish the Code of Ethics, a document that shall serve as a framework for action to guide our behavior and all the actions that we perform with our interested parties.

Therefore, I commit myself together with my board of directors to maintain, develop, and sustain diverse activities that can be shown and identified as ways of applying for our work.

I encourage you to know it and live it in our daily activities, I am convinced that it will help us continue to maintain the quality, service, safety, and environmental responsibility standards that characterize us.

A handwritten signature in blue ink, consisting of a circular loop followed by several horizontal and diagonal strokes.

MANAGEMENT.



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### 4. PURPOSE:

To establish a set of ethical standards that regulate the activities and actions of ICACSA workers in the performance of their technical-professional activity to comply with its labor responsibility inside and outside the enterprise.

To prevent misconduct through ethical behavior based on our principles and values.

### 5. SCOPE:

It applies to all our operations and core and subcontracted employees.

**Note:** The regulations contained in this code are mandatory and directly applicable for all ICACSA workers and indirectly for all those who, in a way or another, interact in the development of their business activities such as shareholders, suppliers, clients, authorities, community and other interested parties.

### 6. MISSION, VISION, AND VALUES OF ICACSA:

#### MISSION

We are a Mexican enterprise that produces infrastructure for the energy sector; that contributes to the generation of trust in the organizational environment; and sustainable development for the storage, distribution, and processing of the hydrocarbon or its derivatives; through innovation in standardization, new methods of productions, labor competence; providing aggregated values to its collaborators.

#### VISION

To position ourselves as an enterprise of high excellence and satisfaction of new clients and collaborations for the next 10 years, focused on the development of new products, entering new markets; within of the scope of the organization and a technological transcendence or the transformations of the public and private energy sector.



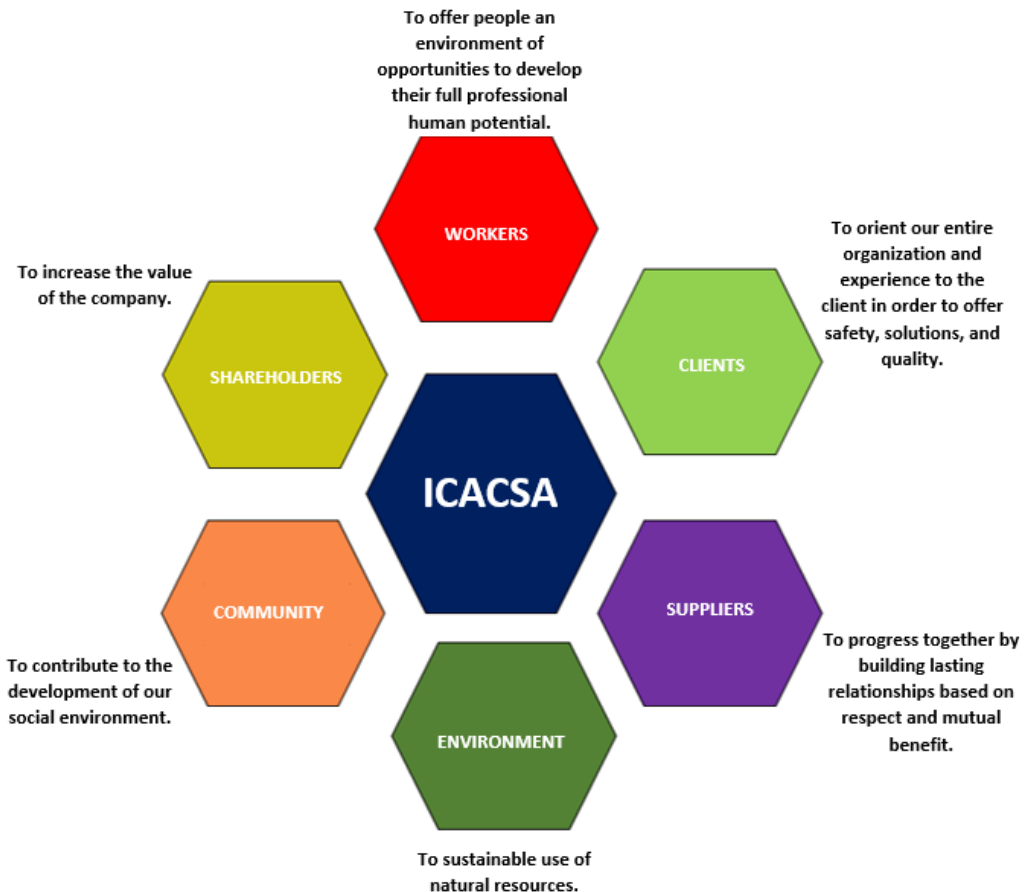
# CODE OF ETHICS

## VALUES OF OUR ORGANIZATION

At **ICACSA CONSTRUCCIONES**, it is assumed the obligation within its responsibilities the commitment to practice and enhance the values of the conducts and actions of the organization's policy of the integrated management system; acting as a driving force, guide, and example to our personnel, clients, suppliers, and society:

- **MULTI-SKILLING**
- **COMPETENCE**
- **HONESTY**
- **LIABILITY**
- **LOYALTY**
- **EQUALITY**

## 7. OUR COMMITMENT:





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### A) Commitment to Workers:

- The personnel is the fundamental base and the most important asset for ICACSA, therefore, we consider vital that the relation that we maintain between all people who form ICACSA is a relation based on trust and mutual respect.
- To treat all workers with equality, dignity, respect, and honesty, as well as fostering mutual trust relations and establishing adequate communication channels.
- To respect and comply with labor legislation, strictly following its obligations regarding the prevention of labor risks, health, and safety.
- To promote actions and policies that allow creating a work environment to foster the integration of the workers in the enterprise.
- To develop actions to facilitate the reconciliation of labor and family life, establishing concrete and equitable measures.
- To respect criteria of equal opportunities, transparency, and non-discrimination of any kind in:
  - Selection and recruitment based on the academic, personal, and professional merits of the candidates.
  - Commitment to evaluate and if it is the case to integrate people with some type of disability or who are at risk of exclusion whenever the conditions of aptitude to perform the work are given.
  - Training plans that contribute to the personal development of the employee and the achievement of the ICACSA's general objectives.
  - Career plans and internal promotion policies.
  - Equitable remuneration policy and based on the performance of its workers and professionals.
- To ensure the confidentiality of the information of the private nature of its workers and to which it is accessed conforming to its business activity.
- To guarantee the distribution of the present Code to all levels of the Company, at the same time to evaluate that this is a document of public dissemination to the entire society, through our website or any other means of communication that is considered.



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### **Regarding Human Rights and Non-Discrimination:**

- ICACSA respects, above all, the individual and personal rights of all the people who make up the workforce and is committed to upholding a work environment free from any type of intimidation and harassment, attending to the dignity and privacy of every person.
- Our commitment to respecting people covers all dimensions of the labor activity and carries the duty of all personnel regardless of their position in the organization.
- Equality of opportunities and non-discrimination as well as absolute respect for Human Rights and Universal Principles.
- All people who are part of ICACSA enterprises, without exception, have an inescapable obligation to respect the principles of the Universal Declaration of Human Rights.
- For this reason, ICACSA ensures that none of the employed people is complicit in the violation of the Rights set forth below and encourages its suppliers and clients to ensure that their actions are also governed by them:

### **Regarding Human Dignity:**

- Every person has the right to be respected and treated with dignity, regardless of race, color, sex, language, religion, political opinion, or any other nature, national or social origin, economical position, birth, or any other condition specified in the Universal Declaration of Human Rights.
- ICACSA and all its member personnel commit to have a correct relation and offer dignified treatment to all people, both internally and externally to the enterprise.

### **Abolition of Forced Labor:**

- Every person has the right to develop their work freely and voluntarily, under the legal precepts established in Mexico, without their activity being carried out under forced labor or by means of coercion.
- ICACSA declares itself contrary to any form of slavery, as well as any type of forced labor declared in the fourth principle of the UN Global Compact.



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### **Abolition of Child Labor:**

- ICACSA works in favor of the eradication of child labor, not allowing hiring in its operations, adhering to the conventions and recommendations of the International Labor Organization regarding child labor in its worst forms.

### **Regarding Labor Health and Safety:**

- Safety and Health at work is a permanent concern for ICACSA, which works to ensure an integrated preventive culture in all the levels of the enterprise.
- Through the application and compliance with Safety and Health regulations as well as the implementation of prevention programs, our commitment is focused on eliminating the avoidable risks and minimizing those that cannot be avoided, providing necessary training and information regarding any situation of risk to our workers and work teams.

### **Commitment of the Workers:**

- To dedicate their talent and best effort to the enterprise, making appropriate use of the enterprise's assets and facilities, optimizing the resources at their disposal to benefit the company's efficiency and the environment.
- In cases of harassment, whether physical, sexual, psychological, moral or other, abuse of authority at work, any behavior that creates an intimidating or offensive environment, or that a worker feels discriminated regarding the reception of training or professional promotion, the affected person may contact their immediate superior, Human Resources, Management Committee (under strictly confidential conditions), utilizing the agreed means and explaining the reasons that they consider to be the cause of discrimination.
- ICACSA employees may not participate or influence -directly or indirectly- in the requirements, negotiations, decision processes with clients or suppliers with whom they have a family relationship (spouse, children, parents, siblings, brothers-in-law, parents-in-law and uncles).
- ICACSA workers may not, in the course of their professional activity, give or receive gifts or presents, or any form of bribery or commission from clients or suppliers. Exceptionally, the delivery and acceptance of gifts and presents shall be allowed if they respond to usual business attentions such as the end of the year or the start of the year, working meals, etc.
- Workers who in the future join and become part of ICACSA, will expressly accept the principles, values, and standards of action of the present document that is delivered at the beginning of the employment relation, along with the labor contract, keeping evidence of it, being everyone's responsibility to ensure compliance of the present code, both in personal behavior and in the reporting bad practices.





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### **B) Commitment to Clients:**

- ICACSA´s raison d'être is to offer the maximum quality, attention, and excellence in the service that offers to its clients, requesting all of its workers the maximum attention to them in order to satisfy their needs and expectations.
- To act with the maximum respect, integrity, responsibility, legality, and transparency with all and each of its clients throughout the entire contractual process, for this the Management shall assume the forms of action of each activity.
- To make an exhaustive identification of the need and demand of our clients, and describe clearly and comprehensive way the characteristics of the services that are offered, including the necessary technical means to respond those needs and establish with the client the contractual conditions, so that both parties are fully aware of the responsibilities they assume.
- To guarantee the defense of the legitimate and ethical rights of the clients, ICACSA shall maintain its Quality Management System in proper operation, as well as admit and process the complaints that the client considers appropriate to make, including the response to them. In case of complaints or claims for conduct contrary to the ethical standards of this code, said claims should be transferred to the person in charge of the Management System.

### **C) Commitment to Suppliers:**

- The suppliers form a basic link for ICACSA since they are a piece of great importance because, without them, we would not be capable to offer products and services of quality to our clients.
- The relation between any ICACSA member and its suppliers must be based on mutual respect and benefit in order to forge long-term relations. They will be developed within a framework of impartiality, legality, transparency, and mutual respect, managing the purchases by seeking for the best market opportunity, promoting social responsibility.
- ICACSA may demand from the supplier the same conditions that it offers to its clients and that guarantee the quality as well as legal and commercial security of commercial transactions, in addition to ethical integrity throughout the process.
- To comply with the timely payment on time and any incident that could affect the conformity of invoices shall be communicated immediately so that it can be responsibly resolved in the shortest possible time.



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### **D) Commitment to the Environment:**

- ICACSA is aware of the importance of natural resources and the environment, therefore it is everyone's obligation to respect the environment, fostering, and promoting environmentally respectful actions.
- The Company will adopt an environmental management policy that prioritizes the prevention and the training of its workers over risk management for environmental degradation as well as health and safety, that is committed to sustainable development, establishing a prevention plan of environmental risks, as well as a plan for saving, optimization, and recovering of resources for their workplaces.

### **E) Commitment to the Community:**

- I. The dialogue and cooperation with the community are the goals to be achieved in the daily relations of the enterprise with their social environment. ICACSA assumes its business commitment to society, through activities aimed at fostering the development of jobs, education, and training for welders, support for the education and training of members of the community, and diverse actions of social, cultural, and environmental nature. Besides, we will evaluate the support for migrants.

#### **II. Commitment to Competition:**

- Our competitors are an essential part of the market so that there can be free competition as a basis for adding value to our clients. We will maintain an attitude of respect at all times, on all those occasions that coincide with them in the free market and concurrence contracts, refraining from making statements and opinions regarding them and their behavior.
- We will not, under any pretext, disseminate false or biased information against competitors and we will avoid decisions or actions that violate the rules of good faith and "fair play".
- In all commercial relations with companies in the different sectors where we operate, fostering a climate of collaboration, tolerance, and mutual respect, favoring the associations as well as the professional and national forums between such enterprises.



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### III. **Commitment to Public Administrations:**

- Public administrations play a fundamental role in shaping the business environment.
- All the groups that make up the members of ICACSA have the obligation to respect the legal precepts and recommendations of public entities, in all matters that affect them, either directly or indirectly.
- To act responsibly with all the administrations involved, be they local, state, and national, collaboration positively with their goals, putting their influence, experience, and knowledge at service of the common good.
- To do not influence the decisions of officials through gifts or perks of some kind.

### **F) Commitment to Shareholders:**

- The shareholders are the owners of ICACSA, we maintain a commitment of loyalty and honesty towards them, as the basis of a lasting and professional relation.
- To base relations with shareholders on the principles of trust and honesty, complying with their reporting and management obligations with transparency, loyalty, dialogue, and spirit of cooperation.
- To conserve, protect and increase the assets of the owners, seeking the maximization of benefits and the value of the investor, always from the respect for current legality and compliance of the principles and standards contained in this Code.

### **8. ETHICS COMMISSION:**

All ICACSA members have the duty to inform the enterprise of any situation or behavior that infringes on the ethical principles of this code and irregularities of potential importance, including the financial and accounting ones.

To this end, an Ethical Channel has been established as a communication vehicle, with the objective of dealing with any claim made to this effect.

They can do it anonymously or by specifying their name, position, and explanation of the case or topic. Any doubt regarding the legal and/or ethical nature of a situation are expected to be reported; therefore, the following alternatives are counted on:



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- Mailbox of complaints and suggestions
- IMS
- Human Resources
- General Management

### **9. PENALTIES:**

Living our values intensely benefits us personally and those around us are encouraged by the enterprise, which is why when a person incurs in conduct that is harmful to the organization, there will be a consequence that can range from a warning to dismissal without prejudice to any action obligation or penalty that results according to the signed employment contract.

Remember that the General Management has the responsibility to set an example by practicing and promoting Values; this implies giving recognition to its team, as well as applying timely penalties in the event that personnel has incurred in undesirable conduct.



# CODE OF ETHICS



## COMMITMENT LETTER OF THE CODE OF ETHICS

I certify that I have read the Code of Ethics and Conduct of ICACSA and that I fully understand the Mission, Vision and Values of conduct that govern our company.

I understand that its compliance is mandatory for all the ICACSA personnel and that, by complying with the Code of Ethics, we all contribute to create a better work environment in which we can grow as professional people.

I manifest that I am in compliance with the standards of conduct establish therein, including the exemption of any conflict of interest, whether current or potential. Additionally, I understand that the Code of Ethics is available and I ought to consult it whenever I have any question or doubt.

Place and Date:	
Full name:	
Signature:	
Process:	
Name and signature of the person responsible for the process:	

### 10. CHANGES AND IMPROVEMENTS CONTROL LOG.

REVISION	MODIFIED SECTION	CHANGE DESCRIPTION	MODIFICATION DATE
Initial 00	NONE	NEW CREATION IN ACCORDANCE WITH ISO 9001:2015 e ISO 14001:2015	January 08, 2018