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CODE OF CONDUCT

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WELCOME!

The importance of a business code of ethics lies in the fact that with its implementation, the company transforms its activities to adhere to its values and principles.

By adopting values and principles, a company ensures that all of its processes and decisions are oriented to the benefit of its employees, providers, shareholders, and the society in which it participates.

The respect and compliance of the code of ethics allow us to put an end to corrupt practices that destroy and damage the company, the company's values, and social values.

Companies' efforts to have an ethical conscience in our activities allow us to generate trust, loyalty, and sustainability in the long term.

That is why in Pronto BPO we want to make room for all of our circle of influence to reflect on their actions and reinforce the use of the contents of the code of ethics for their daily actions in pursuit of a better society.

PRONTO BPO

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## MISSION

Our commitment as a Contact Center and BPO is to make a difference by simplifying processes with qualified and committed staff and performing our work with excellence.

## VISION

To be recognized, in the Contact Centers and BPO industry, as the best option in innovation and service.

## OUR PRONTO BPO VALUES

### HONESTY

Do the right thing with the right attitude.

### RESPONSIBILITY

To carry out a task, striving for excellence.

### TEAMWORK

Work towards achieving the team's common objectives

### RESPECT

Promote the coexistence rules at all times.

### ORDER

Take care of the work environment, always following the organization's rules.

### PASSION

Invest efforts in a sustained manner and allow the acquisition of new skills to develop one's natural strengths.

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Our code of conduct at Pronto BPO is our guide for conducting business and organizational interactions that reflect our highest standards of promoting the right behaviors that encompass our corporate values.

It includes all issues related to ethics and Integrity in our work relationships with our customers, suppliers, and employees for daily decision-making; demonstrating our commitment to the development of our organizational culture.

Human Resources Manager  
Pronto BPO  
Work Relations Manager

## Compliance with the Law

### Compliance with Legislation

Pronto BPO operates by the laws and regulations in each country in which it is established. Also, with the internal guidelines established by management. Compliance with the law is part of our culture. All employees must adhere to the laws, regulations, and internal guidelines that apply to the situation. The applicability of legislation may vary depending on the country in which we operate.

### Legal Jurisdiction

The success of a company lies largely in the ethics of its leaders and employees, seeking at all times respect for employees, and legal regulations, but especially to the people who are the basis of its development, Pronto BPO is a company that is committed to defending the rights of its employees, and enforce the laws.

### Bribery, corruption and confidential information

Bribery and corruption end legitimate business activities that distort competition. For Pronto BPO the anti-bribery and anti-corruption policy has a zero-tolerance approach that contemplates compliance with the laws of each country in which it operates. We do not disclose privileged or confidential information of employees, suppliers, and customers.

## WHAT WE EXPECT FROM YOU

Legally comply with everything you do

### Human Rights

Pronto BPO is committed to integrating policies and actions, strictly respecting the human rights contained in the universal declaration. We share the freedom, security, and justice of everyone, based on the recognition of dignity, equality, entity, and inclusion of all workers, customers, and suppliers. Respecting the current work legislation of each country in which we operate, based on the different agreements of each work organization.

Some applicable laws include the political constitution of each country in which we operate, criminal codes, work laws, commercial laws, and tax laws.

### Employee's Legal Matters

You can approach the human resources area to get advice on how to deal with legal matters or use the communication tools that Pronto BPO places at your disposal.

Do not forget that at any time you can contact the Ethics Committee for advice on any legal aspects about which you may have doubts.

Compliance with the law

## CASE 1

Legal issue: Marriage leave

In the next few days you will get married, depending on the country the work legislation allows some days off. However, you have asked your supervisor how to proceed, but he has not given you any answer. You don't know what requirements you must complete for this right to be effective.

## CASES

+ What can I do about it?

You can solve your doubts with Pronto BPO's internal communication portal or contact the Human Resources area for guidance on the requirements to be completed before the enjoyment of this work right. Do not forget to always communicate with your immediate supervisor.

## Confidentiality and use of information/assets

### Privacy and confidentiality

Personal data refers to any information that can be associated with an identifiable individual. Examples include, but are not limited to, names, e-mail addresses, locations, dates of birth, medical records, opinions about individuals, and religious beliefs, among others.

Intellectual property refers to inventions, business methods, trade secrets, patents, copyrights (literary and artistic works, software, videos, or designs), and trademarks (names and logos).

## WHAT WE EXPECT FROM YOU

You are an authentic, integrated, and ethical person in everything you do, both inside and outside the company, and protect everyone's privacy.

### Customers

Pronto BPO is committed to complying with international data protection laws that have been established to protect personal information from third parties, as we are PCI DSS certified. Whenever Pronto BPO has to share personal data with third parties as a result of a contractual need, we make sure that they comply with the same strict terms and confidentiality obligations with which we comply.

### Employees

Being a company based on human resources, Pronto BPO's employees must safeguard the information not only of customers not only of clients but also of the employees that are part of Pronto BPO. Example: When working with people who are our partners, Example: When working with people who are our partners, we know about their personal lives by sharing with them; this does not allow us to disclose sensitive information about other people outside the project and the company itself.

## Confidentiality and use of information/assets

### Company Assets and Information

Mentioned below for clarity on the subject:

#### Digital Data

- Personal
- Financial
- Legal

#### Tangible assets

- office laves
- Electronic mail
- Financial

#### Intangible assets

- Licenses
- Patents
- Business Reputation

#### Software Application

- Proprietary development
- Client
- DB Tools

#### Operating Systems

- Servers
- Network devices

#### Physical Assets

- Data Center
- Desktops
- Identification device

#### INFORMATION TO BE PROTECTED:

- Accounting information
- Investments and investment plans
- Business strategies and plans
- Mergers and acquisitions information
- Organizational changes
- Management controversies
- Product development research
- Patents
- Customer information
- Employee medical information
- Salary and benefit information
- Supplier information

## Assets

### Computer Equipment

- + All equipment provided by the company to the employee belongs to Pronto BPO, so it should be treated in a good way.
- + If for any reason, the employment relationship is terminated and the equipment used for the job was given by Pronto BPO, it must be returned complete and in good condition.
- + Any theft of the computer equipment must be reported and the person will be sanctioned.
- + The computer equipment may consist of: Desktop computer (monitor, CPU, (monitor, CPU, mouse, keyboard), Laptop (computer, charger cable, mouse), Headsets, Internet cable, etc.
- + All computer equipment must be used for work purposes and not for personal use.

### Office supplies and equipment

- + All library tools provided by Pronto BPO must be used for company purposes and not for personal use.

### Promotional items

- + Any promotional item given to the employee must be used in a good way since it represents the company (Badge holder, badge, uniform, etc.).

### Classification according to Confidentiality

Confidentiality refers to information not being available or disclosed to unauthorized individuals, entities, or processes. This should be defined according to the characteristics of the assets handled in each entity.

### RESERVED PUBLIC INFORMATION

Information that's available only for a company process and that if known by third parties without authorization, might have a negative impact of a legal, operational, image, or economic nature.

### CLASSIFIED PUBLIC INFORMATION

Information that's available for all company processes and in case of unauthorized disclosure could harm the entity's processes. This information belongs to the company or third parties and may be used by all the entity's employees to carry out tasks related

to the processes, but may not be disclosed to third parties without the owner's authorization.

#### PUBLIC INFORMATION

Information that can be given or published without restrictions to any person inside and outside the entity, without this implying damage to third parties or the activities and processes of the entity.

#### UNCLASSIFIED

Information assets that should be included in the inventory and that have not yet been classified should be treated as PUBLIC RESERVED INFORMATION.

## Confidentiality and use of the information/assets

### Internal client

If there were a situation that's not on the code of conduct, each professional should look for the best way to face the conflictive situation based on what's detailed in the company's code of conduct

### Anticorruption

- + Avoid seeking advantages by using Pronto BPO's information for personal gain or as a way to harm the company

### Information to outsiders

- + Do not disclose confidential, personal or business information in public conversations with third parties (e.g. friends, family).

- + In the event of requests for information from the media or regulatory agents, these should not be made without first being approved through the company's corresponding areas.

- + All contacts with media and public persons should be made through the appropriate channels.

## Communication

- + Represent Pronto BPO everywhere with honesty and maximum objectivity when giving facts or opinions
- + Any communication about Pronto BPO will be done accurately, honestly, and responsibly.
- + If a Pronto BPO employee receives a request to speak on behalf of the company publicly or make any kind of comments on any kind of professional aspect, he/she must first consult the information to the department in charge (Market, Communication Department); or they will do so by offering solid and objective data and arguments as the company communicates.

## Respect to the competitor's information

- + Do not resort to competitive tactics that may damage the reputation of Pronto BPO for wanting to gain an advantage, this includes the disclosure of information about the competition.
- + Understand that the reputation of the industry is also our reputation and that of our competitors, so it is important not to damage their image or prestige by disclosing information.

## Creating document retention Pronto BPO

- + Maintain complete and accurate records of all projects in which we are part of so that we comply with veracity to customers or comply with the requirements of our company.
- + Any new information that is carried out, to create content for customers, suppliers, or employees must be protected from third parties.
- + Preserve the confidentiality of any information obtained during the services given to the company, treating it with responsibility, control and protection.
- + It is forbidden to share confidential or restricted information to anyone outside the organization, including information from a specific project to another one within Pronto BPO to safeguard the honesty of the clients.
- + Any Pronto BPO's information or its customers cannot be used for personal gain or for anyone outside the company.
- + Any privileged information obtained through Pronto BPO work must be used for professional purposes.

## Confidentiality and use of information/assets

### Risk Matrix

Information is a valuable asset on which the proper functioning of an organization depends. Maintaining its integrity, confidentiality, and availability is essential to achieve business objectives.

Information security then becomes an obligation for the company to guarantee confidentiality starting from the processes that are carried out in the operation of the business.

Risk is the probability of a security incident occurring, materializing a threat, or causing losses or damage to the organization's assets; it is measured assuming that there is a certain vulnerability to it.

In information risk management, vulnerabilities will be identified as the weaknesses that the operational and administrative areas have in terms of asset management, while threats are the occasions that a vulnerability is used to attack the security of the organization.

All employees, internal and external customers, as well as operational partners must consider risk management when it comes to handling the company's information and assets.

To prevent information and asset risks, an analysis will be made through a risk matrix, where the frequency and impact on the materialization of risks will be evaluated.

The probability of the risk happening will be categorized as

	Meaning	Value
Frequent	Near certainty of occurrence	5
Probable	It is likely to occur	4
Occasional	Probability of occurrence	3
Possible	It may occur at some point in time	2
Impossible	It can never happen	1

And the impact:

	Significance	Value
Catastrophic	Critical, there are important errors, severe non-compliance with the regulatory framework that has an impact on the operation.	E
Probable	Continuous significant errors, non-compliance with internal control points and legal provisions.	D
Occasional	Occasional significant errors, non-compliance with internal control points.	C
Possible	Operational errors, there are noncompliances in some internal control points, but they do not constitute violations.	B
Impossible	Operational errors, there are noncompliances in some internal control points, but they do not constitute violations.	A

### Confidentiality and usage of information and goods

People and entities that take part in the company are responsible for analyzing risks that goods are exposed throughout their usage presenting correct practices.

It is necessary to keep privacy policies that allow access to retrieved information to the entities identified as information owners from the company's digital platforms.

To eliminate not-longer-needed information, such as old data from commercial associates, clients, and providers; as well as information that is irrelevant for the company's operations.

Equipment must be up-to-date when it comes to cybersecurity tools, software versions, and operative systems, amongst others.

Passwords must be confidential, and equipment must be used exclusively and individually.

Personal devices used for operations must be identified and approved by the employees' immediate authority and/or the responsible entity of the process.

## Cases

### Case 1

I saw a co-worker compiling data that is not usual for our project about people that we contact, such as credit and debit card numbers. Due to this situation, I reached asking them to understand the reason why this information is being compiled and I got "mind your own business" as an answer, nevertheless, I understand that this information is classified as confidential.

What can I do about it?

Because asking my co-worker did not contribute to understanding the situation, I must come close to any higher ranked employee to discuss the situation to protect our customers' privacy, maintaining the integrity of the information that we use for the project that we manage.

Conflicts of interest

Family business

It is for each of Pronto BPO employees to avoid conflicts of interest, and inform higher-ranked employees when there is a possible or real conflict of interest. For instance, they have to avoid conflict of interest by not working with commercial entities that may have a personal connection, any interest, or may have financial benefits in any other way.

Pronto BPO employees must never allow their interests to influence work-related decisions; even when there is no malice, the mere appearance of a conflict of interests may impact our reputation and the company's image negatively.

Hiring family members and relatives of shareholders representatives, contributors, or any other related people, for them to work with, or give any service to, any of the subsidiaries or company's related entities must require the absolute unanimity of votes in a board meeting and will be decided to take into consideration the previously established profile for the position inside the group and will be evaluated periodically through the previously defined requirements for the position.

What do we expect from you?

Any of the contractual relationships referred to in this clause shall be governed by the principle of full competence (Arm's Length) and shall be subject to the following guidelines:

1. The profile and market salary defined for the respective position must be complied with, or adjust to the quality of services required by the company.
2. That the hiring complies with all of the company's rules and policies.
3. That there is a need to hire for the position or an effective need to hire the service.
4. The hiring may only be carried out by the person legally authorized to do so, or who has this function, following the normal procedure for the hiring of employees, services, etc.
5. At the time the hiring decision is made, the shareholder or director who has a conflict of Interest, shall excuse himself/herself from the meeting while it is being resolved.

In case of doubt as to the application of this clause and the appropriateness of any contracting, the approval of the board of directors must be obtained. the General Shareholders' Meeting or the Board of Directors, as the case may be, must be approved.

Conflict of interests

#### Outside Influences for Doing Business

Do not offer or accept any type of gift or benefit that could personally compromise you and/or may affect the company directly, or indirectly.

No employee shall receive or ask for gifts without prior authorization from the Management System Committee of Ethics.

If any Customer wishes to offer any type of incentive, it must be previously approved and the reason, frequency, and value of the incentive must be informed. The following are allowed: food, gifts (promotional merchandise, gift cards, travels, coupons, etc). Regarding cash, an amount must be established.

#### Business or Commercial Activities with Competition

As team members, our first loyalty in business should be to Pronto BPO.

We must avoid situations or relationships that are at odds with the interests of the Corporation and our responsibility towards Pronto BPO.

A conflict of interest may occur when a team member derives a personal benefit from a business relationship with a supplier, customer, or competitor of Pronto BPO.

This personal benefit may take the form of an ownership interest in, or a role as a director, officer, or employee of, an entity that has a business relationship with Pronto BPO.

- Team Members may not:
- Engage in any negotiations or transactions on behalf of Pronto BPO with partners, suppliers, customers, clients, contractors, consultants, agents, distributors, and others, in which the team member has a personal, commercial, or financial interest, or as a result of negotiations or transactions that are not related to their position at Pronto BPO.
- Making adjustments to your accounts or services or those of your family members or friends from Pronto BPO.
- Serving on the board of directors of an entity with which Pronto BPO has direct commercial competition in any of the products or services that Pronto BPO offers.

These guidelines do not prohibit team members from owning publicly traded stock, and in privately held companies of no more than 10%, of an entity with which Pronto BPO has a business relationship with or a competitor, as long as the team member does not have a significant investment in the entity and does not acquire the shares based on undisclosed material confidential information obtained in the employee's contract with Pronto BPO, or by being a member of the board of a Pronto BPO company.

#### Doing Own Business

An employee may not use his or her work time to conduct his or her own business.

This jeopardizes the work activity and the focus of efforts centered on business objectives.

Therefore, it is not permitted to conduct any type of negotiation within Pronto BPO facilities, nor during working hours.

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## Conflict of interests

Case

1:

A contract is proposed between Pronto BPO and a company in which a member of your family or you have financial or personal interests.

Cases

What should I do about it?

You shall not get involved in the acquisition process of said company, nor try to influence the decision. Neither can you discuss details about the company or the acquisition process with any of the employees of Pronto BPO.

You must declare that there is a conflict of interests with any regular and major Pronto BPO supplier to the Business Ethics Management System Committee.

## Responsibility

### Creating a culture of responsibility

Our code of ethics is a personal responsibility, it is required that every employee knows, lives, and promotes the company values.

From the high directives down to the rest of the organization, our culture of responsibility is based on honesty, responsibility, order, respect, teamwork, and passion.

Our values are in front of any decision. In pronto BPO we do things the right way, and we take extra efforts in improving every day. We are recognized for our integrity and teamwork.

What do we expect from you?

We, as individuals, team, and organization, are responsible for our actions and decisions.

Organization's responsibility over each employee  
(Human Resources Principles)

- We are committed to offering salaries and benefits in compliance with the law.
- Provide employees with the needed equipment and material for their optimal performance.
- Comply with current legislation regarding health and safety.

Confidence and security when informing or communicating

- Our employees must feel confident and protected when informing about situations in discrepancy with business ethics without being concerned about retaliation and guaranteeing the option of anonymity.
- Pronto BPO protects and takes actions to keep and protect any confidential information that might be given to us, unless there is authorization, or there is a law that demands or allows it to be disclosed, and it does not go against our professional right and duty.
- All information we have about our clients, employees, and internal and external providers must be protected, avoiding personal and third parties' benefits.

## Responsibility

### Social responsibility

- Be a responsible company, constantly training and preparing our employees.
- Guarantee an inclusive working environment and steady employment.
- Have an eco-friendly approach, promoting recycling materials like paper, plastic, aluminum, and others.
- Be responsible with our electronic wastes, having a system to repair, reuse, and recycle.
- Make periodical donations.

#### Conscious at work

- + The employee must be guided by the company's values and ethics at all times, but especially in their relations with other employees, suppliers and customers.
- + Refrain from using their position, function, or privileged information in situations that may incur in abuse of power or authority.
- + Be an ethical leader that reflects credibility and respect, for themselves as well as for his team, and organization.
- + Be an example of integrity for others in the organization.

#### Responsibility towards our clients and associates

In Pronto BPO, we are committed to each and every one objective that our clients may have, we guarantee success, and we are responsible for the information that we use. We focus on our clients main needs and we transform them into an added value experience for the industry to grow. It is our responsibility to reach success for our allies and maintain a high standard of satisfaction.

Our customized service generates trust and creates a loyalty connection. We are responsible for the satisfaction of our associates' clients.

Daily, I have to submit a report stating that someone's performance is not at its best, and I risk being penalized. Should I add information in favor of the outcome?

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What can I do about it?

It is my responsibility to turn in the correct information without any manipulation so that all of our client's data is safe and so that they believe in our truthfulness.

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Honesty

What is honesty?

To do the correct thing with the right attitude.

What do we expect from you?

As an employee for Pronto BPO, we will always expect personal integrity living the company values:

Honesty  
Order  
Teamwork  
Passion  
Respect  
Responsibility

Zero tolerance towards frauds and detected deception

In simple terms, fraud is doing something wrong for a benefit, may it be financial or personal, whereas corruption includes offering or receiving something of value to influence other people's actions, regularly in a wrong way.

Some examples of fraud and corruption are:

- Stealing or misappropriating funds, resources, or goods. Presenting fake information knowing that it is not true to receive benefits or subsidies.
- Presenting fake receipts from health insurance, travel expenses, hotels, taxis, food, or petty money expenses.
- Requesting or offering bribes in exchange of contracts related to products, services, or other favours.
- Forging documents, signatures or statements. Misusing clients' sensitive information.

Our company's position towards fraud and corruption

Pronto BPO has a zero tolerance towards any kind of fraud or corruption, meaning that any alleged action of fraud and corruption will be investigated thoroughly, and that any inappropriate activity may incur into:

- A disciplinary process for Pronto BPO's employees, including destitution in high impact cases.
- Termination of contractor other sanctions for those who are not members of Pronto BPO or contractors.

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Honestidad

Negotiating with honesty (Safe-keeping clients and potential clients' information)

We must remain honest when we deal with our clients' information and each one of us, as employees, is responsible for the actions taken related to sensibility and trustworthiness as an organization. Joint actions focused on protecting and safe-keeping ensure mutual benefits as much for Pronto BPO as for our clients.

Internal processes are managed with honesty and justice. With our values as a banner, I use the company's resources correctly, since they are for work-related activities.

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Cases

Case 1

Today I had a hard experience at work. I saw a co-worker saving credit card details from a client to use for his own benefit later on. How should I proceed?

What can I do about it?

To protect the client's privacy and the company's integrity, we must report immediately to our immediate boss or team leader to act on the spot and avoid any harmful action to the company and client.

Case 2

Today I had the opportunity to be the leader for a group of co-workers that disagree with internal processes in search of personal benefits and letting it known to an external client.

What can I do about it?

We must assume processes with responsibility and balance, managing solutions internally to properly solve any question without involving third-parties.



#### WHAT WE EXPECT FROM YOU

Learn about the processes to act correctly in the event of an issue related to Environmental Occupational Safety so that you can communicate if you feel at risk or if someone of your colleagues is at risk at work.

3. Posture: One of the main conditions in the workplace are pathologies related to body posture, which is how your body is maintained when moving, whether it is walking, bending, lifting, and also refers to the posture of the body when sitting or standing. A correct ergonomic posture is achieved when you support your body so that your spine is fully aligned. This type of work is known as static work or work performed using only a small muscle mass, such as that of the hands. It is precisely this type of work that is one of the main causes of musculoskeletal disorders. Therefore, as a company we adhere to the five basic rules for the personnel to adopt good ergonomics, which are: Adopt a good posture, choose an ergonomic seat, optimize the work surface, Adapt the position of your screen, Check your ergonomics at work.

4. Equipment: Ergonomics proposes that people and technology work in harmony. Thus, as a company, tools and utensils are used that, thanks to their characteristics, satisfy human needs and make up for their limitations. These, therefore, make it possible to avoid or reduce injuries and illnesses related to the use of technology and artificial environments.

## Occupational and environmental security

What should be the compromise of our employees?

- Communicate if they feel at risk: Communication is a discipline inherent and inseparable in work risk prevention inside of an organization, where active listening and dialogue with interest groups is fundamental for its prevention. If you feel at risk or so does one of your comrades, please don't hesitate in communicating with us.
- Emergency orders: If you feel vulnerable or at risk, we as Pronto BPO support you. If you have an emergency and need specific help, we will bring you the emergency numbers to which you can talk. See Anex.

## Guatemala

Institution	Telephone
Volunteer firefighters	122
Municipal firefighters	123
Red Cross	125/ 2381-6565
PNC	110
Attention to victims against the women	1572
Denounce violence to the human rights attorney 1555	
Attention to the victim	2329-0088 / 4012-6777
Suicide prevention line	5392-5953
Line for information about HIV and AIDS	1540

## El Salvador

Institution	Contact	Telephone
PNC	Emergencies	911
	Santa Tecla Delegation	2529-0200
	Emergencies	2278-6689
	Transit	913
Firefighters	Emergencies	2529-0251
	Central	25277300
	Old Cuscatlan	222243-2054
Green Cross	Central	2242-5735
	Santa Tecla	2532-8086 / 7398-5247
Red Cross	Santa Tecla	2288-5558
	Central	2228-5155
Medic Emergency system	SEM	132
San Rafael Hospital	Santa Tecla	2530-3500
Command of salvaments	Old Cuscatlan	2243-4979
	Central	2221-1310
Civil Protection	Emergencies	918
	Santa Tecla	2527-7298 / 2281-0888
	Santa Tecla	2500-1323 / 2500-1324
CAM		
Salvadorian institute of social security (ISSS)	Santa Tecla	2228-0946 / 2228-1028
Electrical distributor ABBUZZO	Zaragoza	2314-4515
Electrical distributor SUR	Merllot	2233-5600
ANDA	Emergencies	915

## Occupational and environmental safety

### Mental health in the workplace

Mental health is a state of well-being in which a person can develop his or her capabilities, cope with the normal stresses of life and work productively. Therefore, it is clear that the state of mind of our employees will significantly affect their work results, which is why we will apply effective measures to promote mental health in the workplace, thereby increasing productivity and at the same time improving the quality of life of our employees. In this way, by implementing better interpersonal relationships, we will also avoid behaviors such as discrimination, verbal or physical intimidation that may jeopardize the mental health of each one of them. As a company we will sensitize the employees, to modify risk factors of stress at work, to be flexible and perceptive to the needs of employees.

Workplace wellness is understood as programs that seek to implement measures to improve the quality of life of our employees. Taking into account our values of teamwork and respect, and involving professional, personal and family development, we will maintain wellness practices within the company that will be reflected in various benefits, mainly in increased productivity.

This will result in less absenteeism, more committed employees, a decrease in the number of failures or errors, and better customer service. At a general level, the company's competitiveness and sustainability of the company.

A culture of workplace wellness allows people to integrate their health as part of their daily routine and by being healthier they feel clearer mentally, prevent illnesses, add better ideas, be more efficient and, above all, better able to cope with stress and change stressful and changing situations. Employees are expected to remain suitable for work every working day.

- Drugs / alcoholic beverages
- No weapons

#### Our Commitment to the environment

Corporate Social Responsibility: CSR is an active and voluntary contribution to social, economic and environmental issues. social, economic and environmental axes. It aims to improve its competitive situation, to add value to the company, benefit its employees and the communities within the area of influence in the long term. The development of a CSR plan entails a series of changes in a company, from structure, policies, values, processes, commitments, to even the modification of products and services. Implementing a CSR plan, in addition to being an immense effort, requires a large budget and a long-term commitment.

The shafts for a Good CSR Strategy: A good tactical plan for corporate social responsibility is a good execution of the planned social work.

- Environment: It is fulfilled by the company's commitment to maintain the balance in its operations and the adequate use of natural resources, avoiding any negative impact on the environment.
- Incorporate an internal waste recycling program. Have strategic alliances with other organizations.
- We are a socially responsible company, complying with the regulations, as employees we also comply with environmental license B2 (Pronto BPO).

## Occupational and environmental security

### Case 1

One day in the morning, I came running to work, but while being so entertained with my phone I didn't see the steps that I was supposed to climb and by the end I missed the last one and fell.

- What can I do about it?

That's why I come with spare time to work and pay attention to each step in order to evade any workplace accident.

#### Cases

I'm a new worker and I didn't get the health and occupational capacitation at the start of my job. I'm suffering from a lot of workspace stress and don't know how to channel it.

- What can I do about it?

First, always communicate with your supervisor on how you feel and also talk with the occupational health specialist of the company, so you get help in this aspect and in doing so, continue working in a suitable environment.

## Workplace harassment

### The importance of diversity and inclusion

At Pronto BPO, all the employees have the responsibility of guaranteeing that there's no harassment at work and/or workplace discrimination, considering a zero tolerance towards the next concepts:

- + Discriminations towards race/color: The discrimination because of race consists of treating an employee or work requester in an inappropriate way because they belong to a determined race or personal characteristics associated to their race. (Like hair texture, color of the skin or certain factions)
- + Discrimination because of age: It consists in treating an employee or work requester in a less favorable because of their age.
- + Discrimination because of gender: Gender discrimination consists of any distinction, exclusion or restriction based on sex which has the purpose or result of impairing or nullifying the recognition, enjoyment, or exercise of a right by gender. gender-based right. Everyone is free to adopt a gender, which shall be respected as part of the good will be respected as part of the good principles of coexistence at work.
- +Discrimination because of nationality: Discrimination based on national origin. nationality consists of treating an employee or job applicant unfavorably because he/she is from a because they are from a particular country or part of the world, because of their ethnicity or accent, or because they have a particular ethnic, cultural, religious, or other ethnic, cultural, or religious background.

### What we expect from you

As an employee, you will always have the responsibility of all of your actions and omissions inside of the company, because of that knowing the norms which regulate the conduct of the employees is fundamental. Therefore, avoid incurring in negligence, imprudence's or noncompliance's to our code of conduct, rules, contracts and other work dispositions.

## WORKPLACE HARASSMENT

+ Pregnancy Discrimination: Pregnancy discrimination is considered illegal and consists of treating a woman differently because of pregnancy, labor, or a medical condition related to pregnancy or childbirth. Considering cases where it is so frequent or severe that it creates a hostile or offensive work environment, or when it results in a negative employment decision. If a woman is temporarily unable to perform her job because of a medical condition related to pregnancy or childbirth, the employer or other covered entity must treat her in the same manner as it treats any other temporarily disabled employee.

+ Genetic Information Discrimination: Genetic Information Discrimination consists of treating an employee or job applicant with prejudice against anyone who has or may have a genetic disease. Genetic discrimination may involve being denied employment. In a medical context, it may refer to people receiving treatment depending on their genetic status, rather than other more relevant criteria such as cystic fibrosis, down syndrome, hemophilia, genetic and chromosomal conditions, among others.

## Types of Workplace Harassment

- + Verbal: Refers to sexual advances, propositions or pressure for sexual activity, insistence to have encountered outside the workplace, suggestive or obscene comments, after it has been stated that such conduct is annoying.
- + Non-verbal behavior of a sexual nature: Refers to the display of sexually suggestive or pornographic photos, objects, or written materials, lewd looks, whistles, or gestures that generate thoughts of a sexual connotation. These behaviors can make those affected feel uncomfortable or threatened, affecting their work situation.
- + Psychological or Moral: This refers to exposure to conduct of intense psychological violence, directed in a repeated and prolonged manner over time towards one or more persons, by another/s acting against them from a position of power - not necessarily hierarchical but in psychological terms - with the purpose or effect of creating a hostile or humiliating environment that disturbs the victim's life. This conduct is an attack on the dignity of the person and a risk to his/her health.
- + Sexual blackmail: This refers to the active subject of the harassment and sexual harassment conditions access to employment, an employment condition or the termination of the worker, to the performance of an act of sexual content. Therefore, sexual blackmail is always vertical, that is, between the active subject and the victim or passive subject there is a hierarchical relationship. In turn, sexual blackmail can take various forms: Attending to the form, a distinction is made between explicit or implicit blackmail:
  - + Explicit blackmail: direct and express position of sexual request when the will of the assaulted worker is not disregarded or sexual request, also express, accompanied by physical compulsion.
  - + Implicit, indirect or tacit blackmail: occurs when the worker has never been sexually solicited or required, but other workers of the same sex, in identical or similar professional circumstances, are promoted in category, improve their salaries or receive benefits or work improvements for accepting conditions of sexual blackmail, which implicitly incites their acceptance.
- + Cyberbullying: This refers to harassment and attack in any of the forms of harassment through communication technologies. It refers to the way it is exercised. All the defined harassment can be carried out using this form.

## WORKPLACE HARASSMENT

Our standards are also applied in a company activity

It is to comply with our obligations, responsibilities, and duties in our workplace, to maintain good conduct, and a positive attitude, to perform our activities correctly and responsibly, to promote a positive and harmonious work environment for all, to treat without discrimination (race, religion, sexual preference or nationality) to the workers of the company, to respect and promote good relations among all, not to encourage envy, quarrels or destructive criticism. To provide training for personal and professional development, to keep personnel updated on Colombian legislation, to provide employees with the necessary supplies and tools to perform their work, and to carry out work welfare activities.

### Employees with co-workers

Listen to and respect the ideas and opinions of others, allowing an equitable and fair interaction for everyone, it encourages compliance with rules as a means for a productive coexistence, respect of others as individuals, and values their knowledge and potential as members and coworkers provide gentle, respectful and kind treatment with coworkers do not disclose private and personal information of coworkers respect the privacy and intimacy, avoid making judgments and generating comments that may affect the work team be supportive in situations that do not have to do with our specific functions, but that we can provide support to help our coworkers overcome the situation. Respect and value the time of others, avoiding unnecessary interruptions to everyone's work.

### Rules for a better coexistence in the workplace

Greet others in a friendly manner say THANK YOU and PLEASE, control the tone of voice when answering the telephone keep the workstations clean and in optimal conditions consume food in the places designated for this purpose deposit waste in the established places organize the chairs and tables when finishing lunch make good use of the shared spaces within the company assume the consequences of our actions at all times with ethics, use a moderate amount of soap when washing our hands make rational use of paper and water do not go to the workplace under the influence of alcohol and/or psychoactive substances.

## CASES

### Caso 1

We have two days since we started work and we are in the phase of training. We have been introduced to our new supervisor who's responsible for providing training to us in the operation. The supervisor is a very affectionate person, which is shown to us in: hugs, inappropriate caresses on the shoulders, back, head, face, and hands, as well as very colloquial words queen, darling, mommy, daddy, etc. As a team, we are not used to this kind of treatment. As it creates an uncomfortable environment for all of us and we feel upset and harassed.

+ What can I do about it?

At the beginning of the contract, the company shared a document with us, where we were told that this behavior was inappropriate, so we went to the human resources department to expose these situations.

So the human resources department must speak with the supervisor to reinforce our code of ethics which he is also aware of, and that was signed at that moment. Problem already exposed, the Human resources team decides to take action on the matter, since the supervisor does not consider that these actions are negative, the human resources department decides to make him see the seriousness of the situation, mentioning those inappropriate behaviors and based on code of conduct he may receive his first verbal call for attention, followed by giving indications of how the proper treatment of his team should be.

## WORK RELATIONS

How to work with others in the workplace?

Our values identify us and challenge us to be better every day. These help us define our way of seeing things, thinking, and acting as individuals and employees.

It is important to have an open mind to know and understand the cultural, social, and moral values that define each human being, where mutual respect guarantees we coexist harmoniously. Taking into consideration:

- + Foster a culture and work environment where our Employees will be treated with respect, courtesy, and fairness and promote equal opportunities for all.
- + Value the diversity of each of our employees, points of view, talents, and experiences to improve our way of working.
- + Create inclusive work environments that not only cover the individual needs of each project; but also allow our employees to use their strengths on their job.

## WHAT WE EXPECT FROM YOU

Acting with integrity is a fundamental value in work relations. It means that we are careful about how we treat others and the way we communicate. Remember to consider how you might feel about the employees, partners, and customers.

"The respect you give to others is a clear reflection of the respect you give yourself"

Integrity as a key factor for successful work relations

Integrity is defined as the quality of an individual that conditions and gives them authority to make decisions about their behavior and resolve issues related to their actions by themselves. It is related to thoughts, behaviors, ideas, beliefs, and ways of acting. Integrity is maintaining coherence between what you feel, what you say, and what you do, and having the courage to do things the way that seems most appropriate to you

Important topics to act with integrity before actions in an activity or Employment Relationship

+ How to manage Merit with work relations?

+ It is an improper action to favor with economic benefits, direct or indirect, employees, clients, representatives, or people of influence of clients, to, in turn, be favored in acknowledgments, contracts (internal and external), services, tenders, or sales of any kind.

Compliance with facility standards without affecting the image

It is the company's priority to generate conditions for the development of all its members, promoting work environments based on work safety, respect, honesty, professional quality, training, and work team up. To do this, everyone must know and apply the policies and processes that have been established, to minimize the risks related to our activity. Corrective measures will be taken when necessary, providing accurate information and training timely regarding the rules and use of the facilities on issues related to the use of the Company's image.

#### Management of information in work relations

It is the employee's responsibility to provide all information (reports, updates, performance) clearly and transparently. Considering that it must be timely, complete, truthful, and reliable. Under no circumstances is it permitted to hide information and/or provide inaccurate or incomplete data. Exceptions apply according to the terms outlined in the confidentiality of information.

#### Zero Tolerance

Is expected from employees to uphold sound principles in all their actions. This conduct must prevail under all circumstances. No person in the Company may solicit or insinuate any employee to act improperly, following the laws and standards of conduct outlined in this Code.

The Persons who believe that they are being pressured by their supervisors to perform improper actions must make this situation known through the first instance, and if this does not receive a response, through the next instance so that it is known and duly resolved. An improper action under the rules of this Code is not justifiable, even if its purpose or result generates, even if its objective or result generates a benefit for the Company. The permanent search to achieve, day by day, excellence in the work performed is an essential part of the principles and values that must inspire our actions. inspire our actions

## How to manage successful Supplier Relationships?

To have successful relationships we must consider the following points:

1. Values: Within a healthy long-term relationship it is necessary to always interact with values between both parties, taking into account:

- + Respect.
- + Assertive Communication.
- + Empathy
- + Win-win attitude.
- + Responsibility.

2. Relationship: The relationship between supplier and customer should be an opportunity from the beginning of benefit for both parties by establishing the parameters clearly from the beginning, this will guarantee a solid long-term business relationship and will provide opportunities for growth in the future.

3. Supplier selection and evaluation committee: Within the ISO 9001 management, there is a regulation to carry out a supplier selection committee, which must compete based on the requirement established by the area in charge of the project, in addition to which it must be evaluated "Quarterly". Based on functionality, quality of service, prices, and commercial relationships.

## Work relations

### Case 1

Yesterday, at the end of our work shift, we decided several coworkers, to go celebrate the birthday of one of them, we opted for something quiet, in a Bar-Restaurant being already all in the environment, from one moment to another the situation got out of hand; To such an extent that one of our colleagues, fought with a person who was in the place, without realizing that he wore the uniform and badge of our company

## CASES

What can I do about it?

The department in charge took the corresponding disciplinary actions since the company uniform and badge were in use in a personal activity outside and outside the company; therefore, we learned to take care of our behavior when we are using tools such as the company uniform since it has a serious impact on our work reputation.

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METHODOLOGY OF ACTION

In PRONTO BPO we take very seriously every case presented in our organization made in good faith and with valid grounds to proceed, therefore we have several communication channels so that we can support you if you feel you may be related to some of the issues covered in our code of ethics.

We also have a Code of Ethics Management System Committee (CSGCE) that determines the proposed action for each of the cases.

It is also important for you to know that we do not tolerate RETALIATIONS and if at any time you feel any doubt or dilemma please contact the Human Resources and/or Work Relations department. We value your courage to raise concerns and remember that any investigations generated will be handled confidentially.

We encourage you to always inform yourself and know how to proceed in an ethical and integrated manner when asking for help.

#### COMMUNICATION CHANNELS

- + Talk to your Supervisor
- + Talk to the Human Resources Team
- + Anonymous helpline Guatemala +502 2414 4441
- + Anonymous helpline El Salvador +503 2240 6905
- + Anonymous helpline Honduras +504 2512 3650
- + Help email: [codigodeconducta@prontobpo.com](mailto:codigodeconducta@prontobpo.com)
- + CSGCE Code of Ethics Management System Committee