

## **SOCIAL RESPONSIBILITY & POLICY OF BEHAVIOR AND ETHICS IN BUSINESS**

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Since inception back in 2000, Mainstream Global has worked tirelessly to create an organization and reputation that conveys our commitment to maintaining a high level of integrity and ethics.

Preserving this reputation is critical and will not be compromised; principles cannot be sacrificed for results. The responsibility to apply legal and ethical principles in our daily conduct and broad relationships begins with our executive leadership and extends to all our team members at every level of the organization globally.

We are committed to demonstrating and supporting responsibility and active contribution toward our environment, employees and their families, customers, suppliers, and our communities. We foster an environment that ensures our employees a safe workplace where they are valued and supported in an environment of integrity and respect.

We pride ourselves on the stellar reputation we have created as an organization and understand this extends to public perception which is critical to our overall success as well as those who chose to partner with us.

A single act of misconduct can bring irreparable consequences and can cause damages that lead to undue hardship, civil and even criminal consequences for our company and partners. All without the employee's act reflecting the overall behavior, code of conduct and ethics of Mainstream Global.

If any employee has questions, concerns or doubts about any situation that may arise, the employee(s) have been trained and instructed to seek immediate guidance from their direct supervision or Human Resources.

Employees are aware that the violation of any Mainstream Global policy will bring disciplinary consequences that may lead termination of employment, immediate violation and breach of any contracts and if required notification to legal authorities.

These are the policies to be fulfilled:

### **1. Competition and antitrust laws**

Mainstream Global complies with national and international laws and regulations related to fair competition and the defense of competition, which is why we consider illicit behaviors that tend to reduce competition or restrict free trade. We do not participate in formal or informal agreements with competitors in relation to the following matters: (a) price; (b) issues that affect the price; (c) production levels; (d) inventory levels; (e) offers in bids; (f) division of sales territories, products, customers or suppliers; (g) marketing; or (h) mutual customers.

### **2. Anti-corruption laws**

Representative or employee of Mainstream Global are not allowed to receive directly or indirectly offers payment of bribes, or gifts to obtain or retain business, as well as influence a commercial or legal decision. Consequently, Mainstream Global does not offer or deliver sums of money or items of value, either, directly or indirectly, through its employees or third parties, with the intention of obtaining or retaining business, or achieving an improper commercial advantage in any way.

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Mainstream Global strictly prohibits any form of bribery. Mainstream Global prohibits its representatives and employees from offering or delivering gifts in cash, in kind, bribes or commercial attention, for any improper purpose such as influencing an employee or another individual to adopt a certain line of action. This extends to immediate family members of employees or representatives of Mainstream Global.

### **3. Accuracy in the records**

Mainstream Global keeps books and accounting records complete, accurate and reliable in relation to all sales services and/or products, as well as all commercial transactions. False or deceptive accounting practices, clandestine funds and any other financial practices are prohibited by the company and could constitute a violation of applicable laws, therefore, employees of Mainstream Global should not deal with any kind of deceptive transactional documentation, inaccurate or falsified.

The transactions must be implemented in accordance with all local laws and regulations and according with what is authorized by management. The transactions are recorded in such a way as to allow the exact preparation of the reports, financial and accounting statements, without secrets or suspicious transactions.

Concerning deliveries or provision of services will be made as requested without intentionally omitting any requirement, so it may be subjected to a comparison between the requests and delivered by the client.

All types of records, documentation or information that employees provide internally or externally must be true, precise, and accurate without suspicion of altered information.

### **4. Relations with third parties / interested parties**

Mainstream Global does not enter into contracts on behalf of its partners with any entity or individual that is involved or suspected of being involved in the payment of bribes, kickbacks or other similar improper or illegal payments. As an example, Mainstream Global must ensure that all its contractors and representatives observe standards of ethics and conduct policy.

No employee or representative of Mainstream Global is authorized to make use of funds or resources of the company, in order to contribute to political parties, candidates for public dignity, or public figures. Employees who wish to participate personally in contributions or events of political parties must communicate to Executive Management to be aware that such activities do not violate their responsibilities with Mainstream Global. These activities must be made in the employee's free time and has to be clear to interested parties that the person is acting on their own behalf and not on behalf of the company.

Employees should communicate to the interested parties with whom they interact about Mainstream Global's ethics in business policy, in case of concerns raised by the interested parties. If employee has the answer to resolve the concern must answer, if not, ask their supervision line to grant the appropriate response. All employees must inform their supervisory line, Human Resources or Executive Management about interested parties that violate our standards.

### **5. Conflict of interest**

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The representatives or employees of Mainstream Global must not have investments or relationships with external organizations that may place them in a position of conflict of interests with the company. In addition, the representatives or employees of Mainstream Global must not participate in legal actions in which the employee or his family members are counterparts of the company or have an adverse interest to the company.

It is considered a conflict of interest when an employee owns or is a partner of a company that intends to do business with Mainstream Global if the employee may have any influence on the decisions made regarding Mainstream Global's business with that company.

A violation of this policy is the use of Mainstream Global assets for personal benefit, as well is a violation of the policy when the employee allows a third party to make use of the assets of the company without a previously authorized agreement or if it has not been paid for such use. When a representative or employee has to make decisions related with the acquisition of assets, the employee must ensure the interests of Mainstream Global and its recommendations will be oriented towards the benefit of the company, not the personal benefit.

It is considered a labor conflict of interest when an employee is member of the board of directors, has a labor relationship or personal contracts with suppliers, competitors or customers of the company.

When a Mainstream Global employee observes a conflict of interest, whether real or potential, he must report all the details he knows to a representative or partner.

## **6. International trade laws**

The representatives and employees of Mainstream Global must comply with the legal requirements in force governing international business between countries that are involved in commercial practices, including and not limited to: export control laws, economic sanctions, anti-embargo, corrupt practices abroad, laws on money laundering, tax and customs regulations.

Considering that in some circumstances Mainstream Global can hire local agents to facilitate customs procedures, it is possible that there may be a violation of the laws, so all agreements with agents, whether renewals of existing agreements or new agents, should be requested for review by the lawyers hired to represent Mainstream Global in each location.

## **7. Intellectual property and industrial secret**

The representatives and employees of Mainstream Global will protect the intellectual property of the company and will not violate the rights of Mainstream Global or third parties with respect to their intellectual property.

Intellectual property is considered any idea, process, mark identity, invention or improvement created by an employee in relation to the business of the company and that has been developed or acquired with resources of the company.

The industrial secret is considered all the information that has economic value for a company because of its secret and that represents an advantage over its competitors, is not limited to something that requires patent or copyright, may include technology, business methods, databases, processes, business knowledge, among others.

The employees of Mainstream Global will not seize, infringe, discredit or make improper use of trademarks, patents, trade secrets or texts that are not of their authorship. In addition, Mainstream Global does not participate in storage or sale of counterfeit products.

In order to comply with this policy, employees must take special care and physically secure of all the information of exclusive property of the company while it is not monitored, as for example, they should not leave computers with open access. You should also delete boards, whiteboards or any means that have been used in meetings to avoid misuse of shared information.

All unauthorized access by employees or third parties to computer or application systems must be reported immediately.

#### **8. Confidential information, information and data security / appropriate use of the computer, equipment, computer systems and applications**

No employee is authorized to share or disclose internal information of Mainstream Global. All employees are required to execute the "MSG-012 Confidentiality Commitment" and understand and respect our "MSG-013 Data backup and security policy."

Confidential information may include prices, customer's information, marketing strategies, financing plans, agreements, possible acquisitions, organizational changes, among others.

Employees are responsible for the security and integrity of the computer equipment and computer systems to which they have access. You should be aware that if a third party wants to harm Mainstream Global it can take advantage of weak points such as intercepting conversations, transported documents or information shared by mail, so caution should be exercised in shared information.

When conducting business abroad, special caution must be exercised in the internet networks accessed because the information could be spied or recorded, so it is better to hold meetings in secure public places without leaving documents with sensitive information to the sight.

The use of computers and equipment of Mainstream Global owned by the company must be used exclusively in labor matters, and this includes and does not limit the proper use of the Internet or telephone lines.

Texts that are used from external or internal sources cannot be copies, so the source of the information and copyright must be expressed.

The use of electronic mail should be limited to work purposes, as it is one of the communication tools provided by the company and may be subject to audit, as well as the information shared by this means, depending on its sensitivity, must have authorization prior to the diffusion.

The information for business intelligence must also respect the confidentiality policies of the interested parties, so that the employees of Mainstream Global do not have authorization to induce anyone to violate its confidentiality policy, cannot spread confidential information of competitors.

#### **9. Equal Opportunities**

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Mainstream Global provides equal employment opportunities to all people regardless of race, color, religious tendency, sex, sexual orientation, identity, nationality, ethnic status, union or political affiliation, age, marital status, disability, pregnancy status or any other condition.

The only exception to this policy is the hiring of a person that requires essential physical abilities for the performance of the primary functions of the work, for which if such physical capacities should be considered. As part of the equality of opportunities, Mainstream Global is concerned with the well-being and health of its employees, which is why it follows the medical recommendations for the relocation of position, both in temporary and permanent functions in cases that merit.

#### **10. Human rights, non-discrimination and fair work practices**

Mainstream Global complies with industrial hygiene and safety standards, protection of the rights of people with disabilities, fair workplace practices and labor laws. In the locations where Mainstream Global is present, it complies with local requirements regarding minimum wages and maximum working hours.

Mainstream Global says no to the use of; forced labor, prison labor, involuntary or captive work, slavery, work under non-restructured contracts, work in payment of debts or continuous renewal of contracts with modality of temporary contracts, nor is the work of minors accepted.

Forced labor, involuntary work or in captivity, it is understood those situations in which, a sentence forces the worker to perform tasks without receiving remuneration in return, or situations in which the work contract imposes legal limitations or unreasonable practices to the employee's ability to leave his job.

Slavery is understood as, the situation in which the employee becomes the property of the company because their original identification documents were withheld or any document that does not allow them to operate freely in the professional or personal field.

Work under non-cancelable contracts means situations in which the employer prohibits employees from leaving the employment relationship freely and voluntarily.

Debt settlement work suggests situations in which employees work to pay off a debt owed to the employer, which is often incurred by another person, offering in return the employee's labor.

The work of minors is prohibited. The term "minors" refers to any employee under the age of 18 or younger than the minimum age allowed by local laws to be hired. The use of legitimate learning programs in the workplace is allowed, provided they comply with all applicable laws and regulations. Minor workers must not perform dangerous tasks, restricting the night work of these employees in response to their educational needs.

Mainstream Global is committed to maintaining a work environment free from discrimination and harassment, so all employees must be treated with respect and dignity. Harassment is understood as a form of discrimination that will not be tolerated in Mainstream Global's work environment, includes any conduct of slander, threats, intimidation, humiliating jokes, graphic materials aimed at humiliation, hostility, aversion, explicit or implicit hints of sexual nature.

Any type of sexual harassment will not be tolerated in order to obtain employment opportunities, economic improvements, promotions, or situations in which for lack of submission to these sexual harassments are reflected in labor decisions, interference in work performance or creation of an intimidating environment.

Mainstream Global provides and maintains a healthy, pleasant and adequate work environment, providing resources for an auspicious work environment in its physical facilities, social and psychological aspects, creating a dynamic, relaxed, productive, positive and conflict-free work atmosphere, adopting programs of improvements in the prevention of occupational health and safety for their workers.

This policy applies to all employees and persons acting on behalf of Mainstream Global, so any person who suffers or observes an incident that can be consider within the aforementioned parameters, must communicate the matter to the highest-ranking trusted person or directly to Executive Management.

#### **11. Environment, Occupational Health and Safety**

Mainstream Global carries out its operations in a responsible manner, protecting the environment as well as the safety and health of all our employees.

Employees are obliged to comply, without limiting only, with the following aspects:

- Respect and preservation of the environment.
- Commitment to reduce pollution/environmental impact generated by the company.
- Before generating, a waste tries to reuse it or recycle it.
- Commitment to promote recycling even extends it to your home.
- Efficient use of company resources (energy, water, paper, etc.)
- Safe work practice.
- Protection between colleagues, preventing or warning about potential risks.
- Risk analysis before executing tasks.
- Refusing to develop activities that could put your health or life at risk.

#### **12. Focus on the client**

Mainstream Global maintains constant communication with its customers to offer a transparent service, to what it can accomplish, in relation to requirements in contracts, special orders, legal and regulatory requirements, in such a way that our customers will always receive a quality service.

The focus towards the Mainstream Global customer is through the fulfillment of the offered, that no employee is authorized to make false or illegal assertions of the competition.

The employees of Mainstream Global represent the products and services in a fair, accurate and truthful way; in such a way that there are no deceitful offers or that, they involve the brand in suspicious situations with the customer.

Employees of Mainstream Global who are in constant communication with customers, at any level, must analyze the risks and business opportunities for both parties, the "win-win" approaching always to achieve an increase in the customer satisfaction.

#### **13. Donations and volunteer work**

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In order to make donations on behalf of Mainstream Global, must be obtained a prior authorization from Executive Management in writing, although the company is always committed to making efforts that can benefit the community.

Employees of Mainstream Global must not pressure third parties to contribute or join charities, nor, is it considered ethical for an employee to participate in decisions related to charities of which he or she is a member or has any interest.

Employees of Mainstream Global can participate as volunteers in helping the community on their own behalf, if they are clearly identified acting on their behalf or on behalf of Mainstream Global when they have written authorization from Executive Management.

**14. Advertising and corporate image**

In order to advertise on behalf of Mainstream Global, a written authorization must be obtained from the Executive Management, as well as for any participation in promotional or marketing activities that refer to or involve your name, denomination or logo. Advertising, promotional or marketing materials must comply with all laws, regulations and local regulations with truthful and accurate information.

Mainstream Global must not present false statements regarding products, services and prices or make false, misleading, inaccurate or false statements about the offers of the competition or comparative advertising.

The communications made by employees of Mainstream Global, must be in accordance with the authority of the position they perform, so they can not speak on behalf of Mainstream Global in personal communications, social media, forums, blogs, chat rooms or social networks among others, if your authority does not allow it.

**Any alteration, violation or infraction of the aforementioned policies must be communicated to Executive Management.**

References:

- FCPA Foreign corrupt practices act
- UK Bribery Act
- Local anti-corruption laws
- U.S. Anti-Corruption Oversight (Columbia Law)

Document Revision History			
Version (V)	Description of the change	Date	Reviewed By
0	Creation of format	31 Jul 2017	Luis Yépez
1	Included the specific topics about social responsibility	February 24, 2020	President