



# CODE OF ETHICS AND CONDUCT

Montes   
del Plata



# CODE OF ETHICS AND CONDUCT

1. Our Principles and Commitments
2. Sphere of Application and Scope
3. Regulation Compliance
4. How to Report Ethical Issues
5. Ethics Committee
6. Behavior Related to the Job and Workplace
  - Behavior Integrity
  - Non-discrimination
  - Respect for Employee's Physical and Emotional Integrity
  - Occupational Health and Safety
  - Alcohol and Drug Consumption
  - Weapons
  - Responsible Vehicle Driving
7. Conflict of Interest
  - Personal Financial Interests Outside the Company
  - Hiring Family Members
  - Gifts, Entertainment and other Benefits
  - Hiring Suppliers for Personal Needs
  - Work Outside the Company
8. Protecting Company Assets
  - Company Information
  - Use of Electronic Media
9. Environmental Responsibility
10. Third Party Relations
  - Community Relations
  - Supplier Relations
  - Client Relations
  - Relations with Public Officials and Politicians
  - Relations with Competitors and Promotion of Free and Just Competition
11. Prohibited Practices
  - Bribery
  - Improper Payments and Corrupt Practices
  - Fraudulent Activities - Theft
  - Money Laundering
12. Commitment to Adhere to the Code of Conduct

1

# Our principles and commitments

Montes  
del Plata

## Management Policy

Montes del Plata is committed to managing its activities in a social, environmental and economically responsible manner to produce wood, pulp and energy while respecting the following guidelines:

### Legal and regulatory compliance

Comply with existing regulations and the requirements of national and international standards to which the organization adheres, including the Principles and Criteria of FSC® - Forest Stewardship Council®.

### Creation of economic value and competitiveness

Create economic value for our shareholders, managing production processes efficiently and proactively to ensure competitiveness of our operations.

### **Responsible corporate behavior**

Manage the business ethically and be an attractive and reliable business partner, ensuring the efficient and responsible use of resources.

### **Healthy working environment**

Create an atmosphere of motivation and commitment based on respect, honesty, participation and non-discrimination. Manage occupational health and safety proactively, through risk prevention and appropriate training for the professional development of employees.

### **Environmental responsibility**

Use the best applicable practices and technologies, to enable responsible management in the conservation of soil, water, air and biodiversity, as well as the rational use of energy and supplies, to prevent and control potential negative impacts on the environment.

### **Contribution to local development**

Be a responsible neighbor. Contribute to the economic and social development of communities in the areas of influence of Montes del Plata operations by proactively working with various social stakeholders and promoting the hiring of local workforce. Establish partnerships with farmers to develop forestry in synergy with other agricultural produces, while respecting local values.

### **Communication and dialogue**

Establish effective, transparent and close communications which encourage participation and constructive dialogue with all stakeholders.

This policy is the base upon which we sustain our processes in the quest of continuous improvement to ensure health, safety and well-being of the people, natural resources and competitiveness of the business.



## Sphere of Application and Scope of the Code of Conduct

The Code of Conduct describes the basic obligations of directors, executives and employees of each of the companies comprising Montes del Plata.

The Code will be disseminated among all employees of Montes del Plata and is publicly available on the web page: <https://www.montesdelplata.com.uy/english/sustentabilidad-5>  
The persons subject to the Code are responsible for fully knowing, observing, complying with and enforcing its provisions.

The Code was not conceived as a summary of all laws and regulations pertaining to the company, therefore, under no circumstance should this Code be seen as a replacement or elimination of other policies or internal procedures, but rather as something that complements and supports them.

Montes del Plata, may, when considered appropriate, update or amend this Code and notify of said changes through the regular communication channels.

The rules contained in this Code may, at times, imply demands that are greater than or in addition to the law itself. In cases when there are no special regulations within the Code, current legal provisions shall be applicable to cover the Code's absence or to complement its contents.

Likewise, it must be taken into account that there is no Code of Conduct that foresees all possible ethical situations or dilemmas that employees may face. Therefore, when in doubt, the recommended course of action is to consult with the direct supervisor, a member of People and Organizational Culture or the Ethics Committee.

Montes del Plata has a Supplier Code of Conduct which is applicable to suppliers and contractors with whom Montes del Plata maintains business relationships.



# Regulation Compliance

All Montes del Plata employees, regardless of position or location, are obligated to comply with this Code of Conduct, as well as its guiding principles, current legislation and any specific provisions or procedures related to their work area.

Enforcement of this Code at the workplace is also compulsory as is the reporting of any violation.

Non-compliance with the Code's provisions shall be considered a labor violation. Therefore, various disciplinary measures, including dismissal, may be applied.

This shall be upheld regardless of any infractions that may stem from legislation or any civil or criminal responsibility in the case.

It is the obligation of all Montes del Plata's employees to report the facts or conducts that may be in violation of the present Code.

Montes del Plata has confidential information channels available for those reporting facts or conducts of employees, suppliers or contractors that ensure diligent procedures without retaliation.



## How to Report Ethical Issues

Anyone who detects a possible irregularity must inform this to any of the following channels:

- immediate boss or superior,
- any member of the Ethics Committee,
- any member of People and Organizational Culture area,
- or through the Anonymous Channel Reports available on the web page of Montes del Plata. In all cases, reports are to be treated with strict confidentiality and reserve.

Reports may be made by letter, e-mail, phone call, in person or online through the Anonymous Channel Reports.

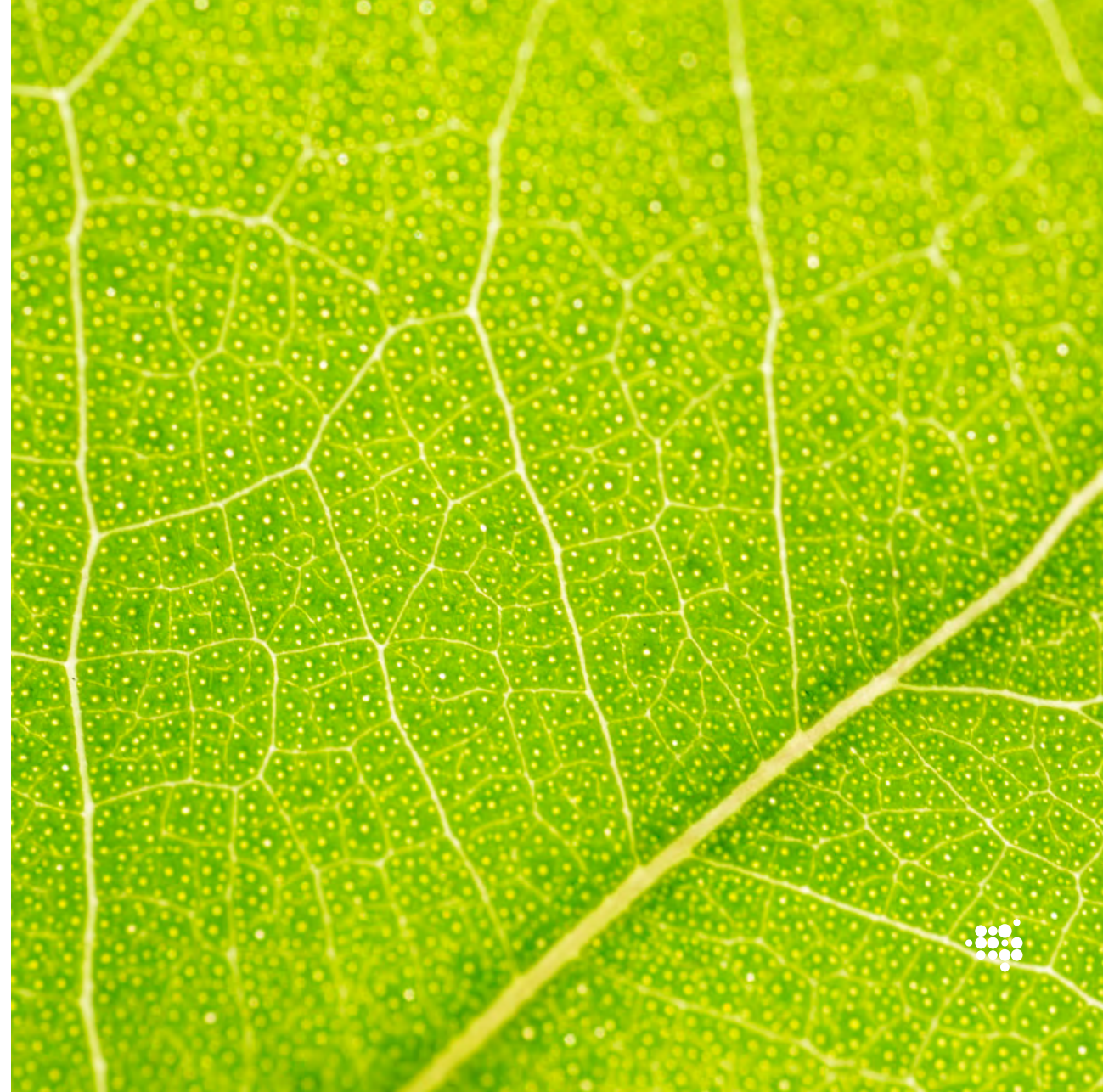
### Ethics Committee

The Ethics Committee is the team responsible for determining the sense and scope of the provisions of the Code, as well as ensuring its proper dissemination and application.

### **Ethics Committee Activities includes:**

- Promoting values and behavior encouraged by the Code
- Becoming the consultative and clarification body for the contents of the Code
- Updating, correcting and modifying the Code
- Researching, routing and documenting cases
- Promoting consistency for the interpretation and application of the Code

Members of the Ethics Committee are appointed by the General Manager and their names are to be reported through the usual internal communications channels. The Ethics Committee shall be appointed every two years and members shall include the General Manager as well as representatives from the Legal, Internal Audit, People and Organizational Culture, Communication and Sustainability areas.



# Behavior Related to the Job and Workplace

The policies and conducts of Montes del Plata shall be within a framework of respect of Human Rights and compliance of the national and international applicable regulations.

## Behavior Integrity

The behavior of Montes del Plata employees must be exemplary, honest and responsible in all spheres of daily activities, especially when representing the company.

## Non-discrimination

Montes del Plata demands the respect of the dignity of all current and future employees. The company rejects any discriminatory attitudes in terms of race, religion, age, nationality, heritage, marital status, sexual orientation, physical disability or any other aspect.

To ensure fairness and objectivity, employee selection must be performed in accordance with Montes del Plata's established People and Organizational Culture procedures.

## Respect for Employee's Physical and Emotional Integrity

No physical or verbal behavior will be tolerated that leads to a hostile workplace that negatively affects the physical or emotional well-being of an employee, client or supplier.

Any inappropriate sexual behavior aimed at any Montes del Plata employee, client or supplier is especially unwelcome.

Unpermitted behavior includes the use of inappropriate language, whether it is in person or through any means of communication.

### Occupational Health and Safety

Montes del Plata believes the health and safety of its employees is a top and inalienable priority and acknowledges that each person working at the company is permanently accountable for their own safety and that of their co-workers.

Montes del Plata has specific Occupational Health and Safety procedures and guidelines that aim to reduce to a minimum the existence of on the job accidents or professional illnesses.

All persons working at Montes del Plata must be aware of safety rules before starting their activities, as well as knowing all guidelines and recommendations specific to their tasks. Each employee is responsible for complying with and enforcing these prioritized Occupational Health and Safety regulations in terms of each task performed.

### Alcohol and Drug Consumption

The consumption of alcohol or drugs at the workplace or while performing work related tasks is strictly prohibited, with the exception of medications prescribed by a doctor for therapeutic reasons as long as they do not interfere with the employee's own safety or that of others. Any business events where alcohol is served are excluded. In these cases employees representing the company shall use reasonable criteria when consuming alcohol and must ensure that it is done in moderation and as long as he or she will not be driving a vehicle afterwards.



### Weapons

Carrying weapons by both employees and employees of suppliers or contractors is prohibited, either on the company's premises or that of third parties where Montes del Plata performs operations, excluding from this prohibition those tools required due to the type of work carried out by the employee.

### Responsible Vehicle Driving

Montes del Plata's own or rented vehicles may only be driven by the people to whom the vehicles were assigned.

Anyone driving Montes del Plata vehicles on a permanent basis must attend a defensive driving course, obey all related rules (seat belt use, abiding by maximum speeds, no alcohol consumption, valid driving license, etc.) and must drive carefully to minimize any probability of accidents that may endanger the life of the driver, his or her companions or third parties and the integrity of the vehicle.

All regulations stipulated in the specific People and Organizational Culture procedures must be followed.

# Conflict of Interest

A conflict of interest occurs when any aspect of an employee's personal life interferes or may inappropriately influence work at Montes del Plata.

"Inappropriately influence" refers to a decision or task that may be performed different to normal. As a general rule, if in doubt, refer to the above mentioned channels.

## Personal Financial Interests Outside the Company

A conflict of interest may arise when Montes del Plata employees, (including boyfriends, girlfriends and significant others) and close relatives hold a significant investment or a high level or managerial position in a company with which Montes del Plata has or is in negotiations to have a business relationship.

In the case of conflict of interest, the Montes del Plata employee in that situation must refrain from taking any decisions on behalf of the company. Likewise, the employee must report this situation to his or her supervisor or the Ethics Committee so that all hiring and price negotiating decisions are made by a person that is not involved in a conflict of interest situation.

Any exceptions will be analyzed and must be approved by the Ethics Committee.

## Hiring Family Members

The company wishes to ensure that our workplace is fair and not affected by favoritism.

Hiring family members is allowed in the organization as long as it does not involve any potential or assumed conflict of interest and the current staff recruitment steps have been followed.

Family members are not permitted to work in the same area, cannot be in a subordinate position nor may they be in a position when one has any sort of control over any aspect of the family member's position.

Any exceptions will be analyzed and must be approved by the Ethics Committee.

## Gifts, Entertainment and other Benefits

The objective of Montes del Plata is to manage third party relations in a transparent manner. We do not seek to unduly influence any decisions to be made by public or private officials, suppliers or clients by offering gifts, entertainment or other benefits (hereinafter "gifts"). Likewise, we demand that all decisions made by our employees are not affected by these types of favors.

All collaborators must refrain from supplying or receiving gifts, benefits or favors that may condition the company's relation to third parties.

Invitations (invitations to hotel stays, restaurants, events sponsored by suppliers, whether current or potential, trips, sports events, etc): the person who receives an offer of Courtesy Gifts must communicate it to the first line Manager of the corresponding area, who, in all cases, must submit the decision to the Ethics Committee.

Other gifts (excluding invitations): Montes del Plata employees may receive baskets of goods, merchandising and other gifts, when said action is common practice and up to a maximum of USD100. Should that limit be exceeded, the person receiving the gift must communicate it to the first line Manager of the corresponding area. In case of doubt, the first line Manager must consult with the Ethics Committee.

Likewise, all Montes del Plata employees must abstain from influencing suppliers to obtain personal benefits (discounts, special attention, etc) that they would not have if they did not work for Montes del Plata. When in doubt, the recommendation is to consult with the Ethics Committee.

## Hiring Suppliers for Personal Needs

Any employees who wish to hire company suppliers or contractors for personal reasons must pay market prices for the goods or services received.

Additionally, they must report their intention to hire a supplier or contractor for personal reasons to their immediate supervisor. In general, employees should turn down any offers from suppliers or contractors to provide free or specially priced products or services, even when a friendship exists. When in doubt of the price received or of a suspected favor, employees are to refrain from making the operation or submit the issue to the Ethics Committee.

Despite the aforementioned, the company may explicitly negotiate with the company's normal suppliers any agreements that benefit employees and their family members. Examples include corporate rates at hotels, car rentals, etc. These agreements will be duly communicated to all employees.

### **Work Outside the Company**

Parallel work activities that may jeopardize or are incompatible with the company's interests such as working for a supplier, a contractor or a competitor are not permitted.

In case of doubt, the employee should consult his or her immediate supervisor or the Ethics Committee.



7

# Protecting Company Assets

**Montes**   
**del Plata**

Montes del Plata employees are responsible for using the company's assets in an appropriate manner. This includes information, electronic media, work tools, vehicles and money belonging to the company.

Employees are expected to carry out austere behavior in relation to company expenses.

## Company Information

### Confidentiality

Information is a valuable asset for the company and may represent legitimate competitive advantages. Therefore any dissemination of information may affect Montes del Plata's interests. All non-public information related to the company's current or future business dealings must be maintained under strict confidentiality.

Personal employee records must also be protected through storage in a restricted area accessible only to people who have the functional need for it, unless its disclosure is authorized by the employee or demanded by law, regulations or judiciary decision.

The following must not be used for particular needs nor transmitted to others: technologies, methodologies or any type of information belonging to Montes del Plata, even though it may have been obtained or developed by the employee in his work environment.

To preserve the highest degree of trust of our clients, all commercial and business information must remain strictly confidential unless its disclosure has been authorized or legally mandated. This commitment shall continue beyond any work or commercial relationship with Montes del Plata.

Employees are responsible for safeguarding all information accessible to them.

**Each time this information needs to be disclosed for business or regulatory reasons, corresponding counseling and authorization must be obtained from the Ethics Committee or the respective area manager.**

Special care must be taken when having work related conversations in public places, whether in person or by phone.





Confidential documents must not be left on desks nor allow access to reserved files, and be mindful when reading these in public spaces. Confidential information should not be shared with family members or friends.

### Precision in Reports and Registration of Information

Information and financial and accounting data should comply with valid national and international regulations and must be performed in a reliable and exact manner in compliance with our policies and procedures.

All information provided by company employees to their direct supervisors and internal and external auditors, as well as documentation required by others organizations or bodies must be timely, true, serious, clear and transparent.

### External Communication

Montes del Plata is committed to communicating in a transparent and honest manner. Communication should provide clear information.

Third party queries or comments that cannot be responded by the person receiving them must be recorded in the systems created for this objective (Registry System, on the intranet).

All media inquiries will be responded by the Sustainability and Communication Area and through the authorized spokespersons.

### Representing the Company

Montes del Plata employees shall represent the company only in situations for which they have authorization, whether due to the nature of the position or by express consent. Therefore, employees must refrain from acting on behalf of the company when not authorized delegation to do so.

Montes del Plata employees must be careful to clearly state they are acting on their own behalf when their actions could be misconstrued as representing the company. Examples include, but are not limited to joining political campaigns, stating opinions to the media, participating in any type of social and community organization, making donations or submitting requests to officials.

Special care must be taken when interacting with government and public officials. In these cases, it is always necessary to verify whether the employee's responsibilities include interacting with officials in representation of Montes del Plata.

In the case of the media, only officially designated spokespersons, i.e. the General Manager and the Communications and Sustainability Manager, or any persons authorized by the General Management may interact with the media.

### Use of Electronic Media

The use of electronic media will be directed and limited to the objectives of the assigned task. It may exceptionally be used for private purposes taking special care that work performance is not affected, that it does not generate additional expenses to the company and that it does not affect network performance.

Electronic means of communication include: personal computers (PCs), notebook computers, networks, internet, intranet, landlines and cellphones, faxes, video conferencing equipment among others.

Systems used and programs hosted in the machines shall exclusively be those authorized by the company and installed by the Information Technology Area.

When using electronic media, Montes del Plata expects the following criteria to be followed:

- Not to install software without authorization
- Be careful in the use of language when communicating on behalf of the company
- Respect guidelines that protect copyright laws
- Avoid any defamatory or discriminatory actions
- Follow security rules regarding confidential information

Montes del Plata expects its employees not to use these means to play, chat, download, watch and/or distribute movies, music, sound or other images as well as for other uses not permitted by the applicable law.

Montes del Plata reserves the right to monitor the use of electronic media and data transmission made available to its employees in order to protect the interests of the company.

## Environmental Responsibility

Montes del Plata is strongly committed to environmental care. Employees must perform their activities while trying to minimize the impact on the environment and fully complying with the current legislation, Montes del Plata's Management policy and other regulations to which the company adheres.

Employees must acknowledge and apply procedures and guidelines related to their own tasks to ensure the responsible management of natural resources.

Furthermore, employees are expected to fully collaborate to achieve the efficient use of resources and mitigation of any environmental impact of our activities by, for example, sharing the use of vehicles to reduce greenhouse gas emissions and turning off any equipment when possible (air conditioning, lights, computers, etc.).

## Third party relations

### Community Relations

All Montes del Plata employees must show respect towards the culture, customs and values of local communities and society where they are working. Their actions should contribute to the social and economic development of the towns where the company operates and minimize all negative impacts that the company's activities could create.

As a responsible neighbour, Montes del Plata promotes active participation in the spheres of community work, community rapprochement and dialogue with actors.

Every Montes del Plata employee has the responsibility of being a company ambassador in the communities and is responsible for transmitting, through his or her actions, the company's values and implementing the principles established in our Management Policy.

Donations and sponsorships or endorsements shall comply with the Donations Procedure of Montes del Plata (available on the Intranet), which includes that all donations - financial or in-kind - to third parties must have the express approval of the Sustainability and Communications area.

### Supplier Relations

Relations between Montes del Plata employees and suppliers must be based on the highest principles of honesty and integrity in a context of respect of the current legislation and the adherence to sustainable business practices.

Commercial relationships should only be selected and maintained with suppliers who adhere to this philosophy and demonstrate ethical behavior.

Montes del Plata employees must maintain total independence from suppliers. When an employee has an outside connection to a supplier, he or she must report this situation to his or her immediate supervisor and the Ethics Committee and will thus not be able to take any commercial decisions applicable to negotiations with such supplier.

Supplier election and hiring shall always be based on technical, professional and ethical criteria as well as the needs of the company and must be conducted by using objective factors, such as competency in the matter, usefulness, price and quality.

Likewise, employees must provide all relevant information so that suppliers can submit proposals in the best manner possible.

In the case of a bidding process, all bidders must receive the same information. If any bidders present a specific query, the reply must be sent to all bidders to ensure a fair and transparent process. There shall be no personal meetings between Montes del Plata employees and bidders outside the context of the official bidding process. There must be at least two Montes del Plata representatives present during official bidding process meetings or in meetings where contract's commercial conditions are discussed with suppliers. In case this can not be complied, the representative must inform the situation to the superior who can authorize the exception.

## Client Relations

Montes del Plata client relationships must be based on respect for their rights, needs and customs. Montes del Plata's commitment to client satisfaction must reflect the constant search for solution that meet their interests, in accordance with the company's development and profitability objectives.

Montes del Plata promotes and respects free competition, enabling to establish just and fair rela-

tions with whom the company forges commercial ties, mainly with its customers and suppliers of goods and services.

All employees of Montes del Plata must promote the principles outlined above when sharing information, participating in negotiations, drafting and signing agreements or contracts, or carrying out business activities of any kind.

When in doubt, the Legal Department of Montes del Plata must first be consulted.



## Relations with Public Officials and Politicians

Montes del Plata establishes transparent and open relations with government and public officials by contributing with the information necessary to ensure that the business and sector needs within the political processes related to its activities are taken into account.

Employees may not act as company representatives in political or governmental matters unless duly authorized by the area Manager, except for employees whose positions naturally imply contacts with government officials.

The company does not provide economic support to political campaigns or other political activities or events organized by any specific political sector.

As a principle, at least two representatives of the company must be present at all meetings of Montes del Plata with authorities and regulators.

## Relations with Competitors and Promotion of Free and fair Competition

Montes del Plata competes and carries out business by respecting free competition as being a healthy business practice and a fundamental value of any economic sphere and by respecting current national and international regulations.

Montes del Plata believes that competition stimulates efficiency and creativity thus enabling the establishment of fair and just commercial ties.



Employees are accountable for safeguarding the legitimate right to fair competition in such a way as to maintain confidentiality over all information that affects equal market opportunities.

All Montes del Plata employees shall promote an ethical culture of free and fair competition when participating in negotiations, when drafting and signing agreements and contracts, when making calls for bids or when carrying out business activities.

Although contacts with competitors may be necessary, inevitable and perfectly legitimate, employees involved must check with area Managers and always consult with the Legal Department of Montes del Plata.

None of our organization's employees may become involved in any practices or activities that violate applicable laws or that compromise our ethical standards in business.



# Prohibited Practices

## Bribery

Montes del Plata employees are prohibited from requesting, accepting, offering, whether directly or indirectly, any sort of payment, bribe or gift. This includes an inappropriate exchange of money, loans, special privileges, personal favors, benefits or services. In case there are any questions regarding a transaction, please consult your immediate supervisor or the Ethics Committee.

All financial transactions must be clearly recorded in company's registry.

## Improper Payments and Corrupt Practices

No member of the Montes del Plata team may accept fees or commissions from any sort of operation performed on behalf of the company. Nor can they provide, offer, or promote directly or indirectly anything of value that may have an influence on any person with the aim of obtaining inappropriate business dealings or advantages.

Any confidential fee or commission offered must be immediately reported.

All situations that enable these practices or that may look inappropriate must be avoided.

As an example, it is recommendable that at least two representatives of Montes del Plata be present in any commercial transaction on behalf of the company.

## Fraudulent Activities - Theft

Montes del Plata promotes an ethical and responsible sphere for work and business. Any fraudulent activity or theft in relation to Montes del Plata or related companies must be immediately reported to the appropriate channels reporting breaches of the present Code. The Ethics Committee must diligently investigate and take the appropriate measures, preserving the confidentiality of the complainant.

### EXAMPLES OF FRAUDULENT ACTIVITIES INCLUDE:

- Intentionally manipulating financial report data for an employee's own benefit or that of a third party
- Theft of company materials or assets
- Inappropriate use (abuse or manipulation) of company processes or systems
- Fraudulently obtaining company money
- Using company assets for unauthorized personal use

## Money Laundering

Montes del Plata is committed to complying with local and international laws in relation to money laundering. Montes del Plata employees play a significant role in detecting and reporting any transactions that could be linked to money laundering.

As an example, real estate transactions must be performed through banks and supported by the acting notaries.

Any suspicious situation must be reported through the reporting channels mentioned above.



# Commitment to Adhere to the Code of Conduct

Montes  
del Plata

Montes del Plata - Code of Ethics and Conduct

I am fully aware of the MONTES DEL PLATA Code of Conduct and I understand the relevance and context of the rules contained herein. I understand that compliance is mandatory for all MONTES DEL PLATA employees and that by abiding by this Code of Conduct we all contribute to creating a better work environment where we can grow as people and professionals.

I hereby state that I comply with the code of conduct established in this document.

I pledge to consult my boss, immediate supervisor, Human Resources or the Ethics Committee of Montes del Plata in case of any questions regarding the interpretation and application of the regulations and policies included in this Code.

Date: \_\_\_\_\_ Place: \_\_\_\_\_

Immediate superior: \_\_\_\_\_

Full name: \_\_\_\_\_

Signature: \_\_\_\_\_

# Montes del Plata

[montesdelplata.com.uy](https://montesdelplata.com.uy)