

June 1, 2021

To Our Stakeholders: I am pleased to confirm that DeFlores, LLC reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption. In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

José Alejandro Flores

President

## HUMAN RIGHTS

Assessment, policy and goals

Description of the relevance of human rights for the company (i.e. human rights riskassessment).  
Description of policies, public commitments and company goals on Human Rights.

### 1. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Obeying the law, both in letter and in spirit, is the foundation on which DeFlores, LLC (the “Company”) ethical standards are built. All employees and officers must respect and obey the laws, rules, and regulations of the cities, states, and countries in which we operate. Although employees and officers are not expected to know the details of each of these laws, rules and regulations, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

### 2. CONFLICTS OF INTEREST

A “conflict of interest” exists when a person’s private interest interferes in any way, or even appears to interfere, with the interests of the Company. A conflict situation can arise when an employee or officer takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when an employee or officer (or a member of his or her family) receives improper personal benefits as a result of his or her position in the Company. Loans to, or guarantees of obligations to, employees and officers and their family members by the Company may create conflicts of interest and in certain instances are prohibited by law. It is a conflict of interest for a Company employee or officer to work for a competitor, customer or supplier. You should avoid any direct or indirect business connection with our customers, suppliers or competitors; except as required on our behalf. Conflicts of interest are prohibited as a matter of Company policy, except as approved by the board of directors. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your supervisor or follow the procedures set out in Section 19. Any employee or officer who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager, or other appropriate personnel or consult the procedures provided in Section 19 of this code.

### 3. INSIDER TRADING

All non-public information about the Company should be considered confidential information. Employees and officers who have access to confidential information about the Company or any other entity are not permitted to use or share that information for trading purposes or for any other purpose except for the conduct of the Company’s business. To use non-public information

for personal financial benefit or to “tip” others who might make an investment decision on the basis of this information is not only unethical, but also illegal.

#### 4. CORPORATE OPPORTUNITIES

Employees and officers are prohibited from taking opportunities that are discovered through the use of corporate property, information or position for themselves without the consent of the board of directors. No employee or officer may use corporate property, information or position for personal gain and no employee or officer may compete with the Company directly or indirectly. Employees and officers owe a duty to the Company to advance the Company’s interests when the opportunity to do so arises.

#### 5. COMPETITION AND FAIR DEALING

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner’s consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee and officer should endeavor to respect the rights of and deal fairly with the Company’s customers, suppliers, competitors and employees. No employee or officer should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice. No employee or officer is permitted to engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal activities. To maintain the Company’s valuable reputation, compliance with our quality processes and safety requirements is essential. All inspection and testing documents must be handled in accordance with all applicable specifications and requirements. The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. No gift or entertainment should ever be offered, given, provided or accepted by any Company employee or officer, family member of an employee or officer, or agent unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is reasonable in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws, regulations or applicable policies of the other party’s organization. Please discuss with your supervisor any gifts or proposed gifts that you are not certain are appropriate.

#### 6. POLITICAL CONTRIBUTIONS

Except as approved in advance by the Chief Executive Officer or Chief Financial Officer, the Company prohibits political contributions (directly or through trade associations) by the Company or its business units. This includes: (a) any contributions of Company funds or other assets for political purposes; (b) encouraging individual employees to make any such

contribution; or (c) reimbursing an employee for any contribution. Individual employees are free to make personal political contributions as they see fit.

#### 7. DISCRIMINATION AND HARASSMENT

The diversity of the Company's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment based on race, color, religion, sex, national origin or any other protected class.

#### 8. HEALTH AND SAFETY

The Company strives to provide each employee and officer with a safe and healthy work environment. Each employee and officer has the responsibility for maintaining a safe and healthy workplace for all employees and officers by following environmental, safety, and health rules and practices and by reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are not permitted. Employees and officers are expected to perform their Company related work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances. The use of illegal drugs in the workplace will not be tolerated.

#### 9. ENVIRONMENTAL

The Company expects its employees and officers to follow all applicable environmental laws and regulations. If you are uncertain about your responsibility or obligation, you should check with the Administration for guidance.

#### 10. RECORD-KEEPING, FINANCIAL CONTROLS AND DISCLOSURES

The Company requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions. All business expense accounts must be documented and recorded accurately in a timely manner. If you are not sure whether a certain expense is legitimate, ask your controller. Policy guidelines are available from your controller. All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail; must appropriately reflect the Company's transactions; must be promptly disclosed in accordance with any applicable laws or regulations; and must conform both to applicable legal requirements and to the Company's system of internal controls. Business records and communications often become public and we should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to e-mail, internal memos and formal reports. Records should always be retained or destroyed according to the Company's record retention

policies. In accordance with those policies, in the event of litigation or governmental investigation, please the Administration.

#### 11. CONFIDENTIALITY

Employees and officers must maintain the confidentiality of proprietary information entrusted to them by the Company or its customers or suppliers, except when disclosure is authorized in writing by the chief financial officer or required by laws or regulations. Proprietary information includes all non-public information that might be of use to competitors or harmful to the Company or its customers or suppliers if disclosed. It includes information that suppliers and customers have entrusted to us. The obligation to preserve proprietary information continues even after employment ends.

#### 12. PROTECTION AND PROPER USE OF COMPANY ASSETS

All employees and officers should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. All Company assets are to be used for legitimate Company purposes. Any suspected incident of fraud or theft should be immediately reported for investigation. Company assets should not be used for non-Company business. The obligation of employees and officers to protect the Company's assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information, and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Company policy. It could also be illegal and result in civil or criminal penalties.

#### 13. PAYMENTS TO GOVERNMENT PERSONNEL

The U.S. Foreign Corrupt Practices Act (FCPA) prohibits giving anything of value (directly or indirectly) to officials of foreign governments or foreign political candidates in order to obtain or retain business. While the FCPA does, in certain limited circumstances, allow nominal "facilitating payments" to be made, any such payment must be discussed with local management and the Administration before any such payment can be made. In addition, the U.S. government has a number of laws and regulations regarding business gratuities, which may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate Company policy but will also commit a civil or criminal offense. State and local governments, as well as foreign governments, often have similar rules.

#### 14. TRADE ISSUES

From time to time, the United States, foreign governments, and the United Nations have imposed boycotts and trading sanctions against various governments and regions, which must be obeyed. Advice regarding the current status of these matters must be obtained from the Chief Financial Officer.

15. WAIVERS OF THE CODE OF BUSINESS CONDUCT AND ETHICS

Any waiver of this code for executive officers or directors may be made only by the board of directors and will be promptly disclosed as required by law or regulation.

16. REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about observed behavior that they believe may be illegal or a violation of this Code of Conduct or when in doubt about the best course of action in a particular situation. It is the policy of the Company not to allow retaliation for reports made in good faith by employees of misconduct by others. Employees are expected to cooperate in internal investigations of misconduct.

17. IMPROPER INFLUENCE ON CONDUCT OF AUDITORS

It is prohibited to directly or indirectly take any action to coerce, manipulate, mislead or fraudulently influence the Company's independent auditors for the purpose of rendering the financial statements of the Company materially misleading. Prohibited actions include, but are not limited to, those actions taken to coerce, manipulate, mislead or fraudulently influence an auditor: (1) to issue or reissue a report on the Company's financial statements that is not warranted in the circumstances (due to material violations of generally accepted accounting principles, generally accepted auditing standards, or other professional or regulatory standards); (2) not to perform an audit, review or other procedures required by generally accepted auditing standards or other professional standards; (3) not to withdraw an issued report; or (4) not to communicate matters to the Company's audit committee.

18. FINANCIAL REPORTING

As a private company, the Company's policy is to comply with all financial reporting and accounting regulations applicable to the Company. If any employee or officer has concerns or complaints regarding accounting or auditing matters of the Company, then he or she is encouraged to submit those concerns by one of the methods described in Section 19.

19. COMPLIANCE PROCEDURES

We must all work to ensure prompt and consistent action against violations of this code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate

every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind: (a) Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible. (b) Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is. (c) Discuss the problem with a Supervisor. This is the basic guidance for all situations. In many cases, a Supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is a Supervisor's responsibility to help solve problems. If one is uncomfortable discussing the problem with a supervisor, one can talk to a general manager or human resources manager. (d) Seek help from Company resources. In a case where it may not be appropriate to discuss an issue with a Supervisor or local management, call 210-880-5049 which will put you in direct contact with the Chief Executive Officer at Company headquarters. If you prefer to write, address your concerns to the Chief Financial Officer and anonymous reports can be made through the internet to [info@deflor.es](mailto:info@deflor.es) or for calls originating in the United States 1-844-482-8353; for calls originating from foreign countries follow the normal collect call procedures for your country and ask to be connected to 1-844-482-8353. (e) You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. The Company does not permit retaliation of any kind against employees or officers for good faith reports of suspected violations. (f) Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act. (g) All employees and officers are subject to the Company's code, which describes procedures for the internal reporting of violations of the code. All employees and officers must comply with those reporting requirements and promote compliance with them by others. Failure to adhere to this code by any employee or officer will result in disciplinary action up to and including termination.

## 20. ANNUAL ACKNOWLEDGEMENT

To help ensure compliance with this Code of Business Conduct, the Company requires that all exempt salaried employees and officers review the Code of Business Conduct and the United Nations Global Compact and acknowledge their understanding and adherence in writing on an annual basis.

### Implementation

Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.

## 1. INTRODUCTION

Under the DeFlores, LLC (the “Company”) Human Rights Code, every person has a right to equal treatment by the Company, its agencies, boards and commission with respect to services and facilities, accommodation, contracts and employment. The Company adopted this Human Rights and Anti-Harassment Policy to ensure ethical and respectful service and employment practices that incorporate equitable treatment for all employees. The goal of the Human Rights Code is to create a climate of understanding and mutual respect where each person feels a part of the community and is able to contribute fully to the development and well-being of the Company. The Company will not tolerate, ignore, or condone any form of discrimination or harassment and is committed to promoting appropriate standards of conduct at all times. All employees are responsible for respecting the dignity and rights of their coworkers. Discrimination and harassment are serious forms of employee misconduct which may result in disciplinary action up to and including discharge. Any member of the public, including visitors to Company facilities or individuals conducting business with the Company, are expected to adhere to this policy, including refraining from harassment of employees and persons acting on behalf of the Company. If such harassment occurs, the Company will take any steps available to ensure a harassment-free workplace, including barring the harasser from its facilities, where appropriate, or discontinuing business with contractors or consultants.

## 2. SERVICES AND FACILITIES

Every person has a right to equal treatment with respect to the Company, without discrimination or harassment because of the following prohibited grounds and any combination of these grounds:

- race
- citizenship
- sexual orientation
- political affiliation
- ancestry
- creed
- age
- level of literacy
- place of origin
- sex (including pregnancy, breast feeding and gender identity)
- marital status
- color
- family status
- ethnic origin
- disability
- receipt of public assistance

### 3. OCCUPATION OF ACCOMMODATION

Every person has a right to equal access with respect to the occupancy of Company-owned accommodation, without discrimination because of the following prohibited grounds and any combination of these grounds:

- race
- citizenship
- sexual orientation
- political affiliation
- ancestry
- creed
- age
- level of literacy
- place of origin
- sex (including pregnancy, breast feeding and gender identity)
- marital status
- color
- family status
- ethnic origin
- disability
- receipt of public assistance

### 4. CONTRACTS

Every person having legal capacity has a right to contract on equal terms without discrimination because of the following prohibited grounds and any combination of these grounds:

- race
- citizenship
- sexual orientation
- political affiliation
- ancestry
- creed
- age
- level of literacy
- place of origin
- sex (including pregnancy, breast feeding and gender identity)
- marital status
- color
- family status

- ethnic origin
- disability
- receipt of public assistance

## 5. EMPLOYMENT

Every person has a right to equal treatment with respect to employment with the Company without discrimination or harassment because of the following prohibited grounds and any combination of these grounds:

- race
- citizenship
- sexual orientation
- political affiliation
- ancestry
- creed
- age
- level of literacy
- place of origin
- sex (including pregnancy, breast feeding and gender identity)
- marital status
- color
- family status
- ethnic origin
- disability
- receipt of public assistance

## 6. RESPONSIBILITIES

This policy applies to all Company employees and their staff and to all aspects of the employment relationship. All staff are expected to abide by this policy and the United Nations Global Compact by refraining from any form of harassment and discrimination and by fully co-operating in any investigation of a harassment or discrimination complaint. Human rights are a shared responsibility.

All management staff has the following general responsibilities with respect to human rights:

- Not engaging in behavior that would constitute discrimination or harassment under the policy
- Setting and enforcing standards of appropriate workplace conduct
- Having thorough knowledge of the policy

- Being able to clarify what constitutes harassment and discrimination
- Being able to advise staff of their rights and responsibilities under the policy
- Taking all reasonable steps to deal with alleged workplace discrimination and harassment that they are aware of or reasonably should have been aware of (even if a direct complaint has not been made), in a timely fashion while maintaining as much confidentiality as possible.

Management staff are encouraged to contact the Human Rights Office for guidance to address human rights complaints if need be.

- Measurement of outcomes
- Description of how the company monitors and evaluates performance.
- The Human Rights department was set up to provide advice and explore allegations of harassment and discrimination confidentially and impartially for any DeFlores, LLC (the “Company”) employee. The Human Rights departments staff does not advocate, act on behalf of or represent any party in dispute (complainant, respondent, management). All complaints to the Human Rights department are dealt with in an unbiased manner. The focus of the department is to prevent, correct and remedy harassing and/or discriminating behaviors that are contrary to the Human Rights Policy. When investigating allegations, Human Rights department staff may explore the conduct of parties beyond the complainant and respondent (including management) to ensure Policy compliance.

Responsibilities include:

- Interpreting and implementing the Human Rights Policy.
- Policy research, development and advocacy.
- Developing education and communication strategies.
- Providing independent, unbiased, confidential advice.
- Assessing the merits of a complaint and determining appropriate complaint investigation and resolution options.
- Undertaking neutral, independent informal and formal investigations.
- Providing mediations.
- Retaining external consultants if needed. DeFlores, LLC (the “Company”) is committed to providing training and education to ensure that all Company staff has knowledge about their rights and responsibilities under the Human Rights Policy. A variety of resources to educate employees about policy expectations are available. All staff is expected to be familiar with policy provisions.

Resources include:

- Human Rights training is offered to employees and to supervisors/managers at the Company corporate offices on a periodical basis.

- Customized training for specific issues/workplaces is available through the Human Resources department.
- Confidential Human Rights inquiry line: 1-844-482-8353

## **LABOUR**

Assessment, policy and goals

Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities). Description of written policies, public commitments and company goals on labour rights.

Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities). Description of written policies, public commitments and company goals on labour rights. DeFlores, LLC supports and aligns with all of the Declaration of the International Labor Organization (ILO) as below can be referenced the written company policy respecting Labor Rights and preventing potential abuses.

### **LABOR RIGHTS POLICY**

DeFlores, LLC (the “Company”) is an equal opportunity employer and is committed to enhancing the diversity of the organization’s staff. In addition, hiring and other employment-related decisions are made on the basis of an individual's qualifications, past experience, overall performance and other employment-related criteria. It is the policy of the Company to provide equal opportunities for employment and advancement for all individuals regardless of age, gender, race, religion, color, disability, veteran status, sexual orientation, national origin, or any other legally protected category. Any employee of the Company who believes that he/she has been a victim of some form of discrimination in violation of the above policy should report the incident immediately to his or her supervisor and to the Director of Human Resources.

Persons submitting complaints of discrimination are assured that a thorough investigation of such complaints will be conducted. Information collected during such an investigation will be considered confidential and will not be disclosed to persons not involved directly in conducting the investigation and determining what action, if any to take in response to the complaint. No adverse action will be taken against any employee because he or she reports an incident of discrimination unless it is found that the report was made in bad faith.

If, following a complaint of discrimination, an investigation reveals that some act of discrimination has occurred; the person who has violated the above-described prohibition of discrimination will be subject to sanctions or penalties. The sanction or penalty

administered under this policy will depend on all circumstances, including the offending employee's prior work record and the specifics regarding the nature of the violation. It should be understood that suspension and/or termination of employment may very well be the penalty administered to persons who violate this policy. If the offender is not an employee of the Company, we will take reasonable measures to the extent we can exercise any control over the problem. The Company endorses its Equal Employment Opportunity policy aligning with the United Nations Global Compact, not just because it complies with the law, but because an environment that recognizes the value derived from differences in people is crucial to each employee's ability to succeed and to the Company's long-term success.

### Implementation

Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.

Under the DeFlores, LLC (the "Company") Labor Rights Policy, every person has a right to equal treatment by the Company, its agencies, boards and commission with respect to services and facilities, accommodation, contracts and employment. The Company adopted this Labor Rights Policy to ensure ethical and respectful service and employment practices that incorporate equitable treatment for all employees. The goal of the Labor Rights Code is to create a climate of understanding and mutual respect where each person feels a part of the community and is able to contribute fully to the development and well-being of the Company.

The Company will not tolerate, ignore, or condone any form of discrimination or harassment and is committed to promoting appropriate standards of conduct at all times. All employees are responsible for respecting the dignity and rights of their coworkers. Discrimination and harassment are serious forms of employee misconduct which may result in disciplinary action up to and including discharge. Any member of the public, including visitors to Company facilities or individuals conducting business with the Company, are expected to adhere to this policy, including refraining from harassment of employees and persons acting on behalf of the Company. If such harassment occurs, the Company will take any steps available to ensure a harassment-free workplace, including barring the harasser from its facilities, where appropriate, or discontinuing business with contractors or consultants.

### EMPLOYMENT

Every person has a right to equal treatment with respect to employment with the Company without discrimination or harassment because of the following prohibited grounds and any combination of these grounds:

- race
- citizenship
- sexual orientation
- political affiliation
- ancestry
- creed
- age
- level of literacy
- place of origin
- sex (including pregnancy, breast feeding and gender identity)
- marital status
- color
- family status
- ethnic origin
- disability
- receipt of public assistance

## RESPONSIBILITIES

This policy applies to all Company employees and their staff and to all aspects of the employment relationship. All staff are expected to abide by this policy and the United Nations Global Compact by refraining from any form of harassment and discrimination and by fully co-operating in any investigation of a harassment or discrimination complaint. Labor rights is a shared responsibility.

All management staff has the following general responsibilities with respect to labour rights:

- Not engaging in behavior that would constitute discrimination or harassment under the policy.
- Setting and enforcing standards of appropriate workplace conduct.
- Having thorough knowledge of the policy.
- Being able to clarify what constitutes discrimination.
- Being able to advise staff of their rights and responsibilities under the policy.
- Taking all reasonable steps to deal with alleged workplace discrimination that they are aware of or reasonably should have been aware of (even if a direct complaint has not been made), in a timely fashion while maintaining as much confidentiality as possible.

Measurement of outcomes

Description of how the company monitors and evaluates performance.

The Human & Labor Rights department was set up to provide advice and explore allegations of harassment and discrimination confidentially and impartially for any DeFlores, LLC (the "Company") employee. The Human Rights departments staff does not advocate, act on behalf of or represent any party in dispute (complainant, respondent, management). All complaints to the Human Rights department are dealt with in an unbiased manner. The focus of the department is to prevent, correct and remedy harassing and/or discriminating behaviors that are contrary to the Labor Rights Policy. When investigating allegations, Human & Labor Rights department staff may explore the conduct of parties beyond the complainant and respondent (including management) to ensure Policy compliance.

Responsibilities include:

- Interpreting and implementing the Labor Rights Policy.
- Policy research, development and advocacy.
- Developing education and communication strategies.
- Providing independent, unbiased, confidential advice.
- Assessing the merits of a complaint and determining appropriate complaint investigation and resolution options.
- Undertaking neutral, independent informal and formal investigations.
- Providing mediations.
- Retaining external consultants if needed. DeFlores, LLC (the "Company") is committed to providing training and education to ensure that all Company staff have knowledge about their rights and responsibilities under the Labor Rights Policy. A variety of resources to educate employees about policy expectations are available. All staff are expected to be familiar with policy provisions. Resources include:
  - Human & Labor Rights training is offered to employees and to supervisors/managers at the Company corporate offices on a periodical basis.
  - Customized training for specific issues/workplaces is available through the Human Resources department.
  - Confidential Human & Labor Rights inquiry line: 1-844-482-8353

## **ENVIRONMENT**

Assessment, policy and goals Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection. DeFlores, LLC (the "Company") supports and aligns with the goal of minimizing the organization's environmental footprint especially tied to the VOS brand portfolio for the Company as below can be referenced the written company policy respecting Environmental Issues and preventing potential abuses.

## ENVIRONMENTAL POLICY

The purpose of this policy is to establish safeguards and controls to limit the DeFlores, LLC (the "Company") exposure to potential environmental liability that can be associated with the Company's operation. The Company recognizes that environmental contamination and the liability associated with that contamination may negatively impact the value of operations, in instances where the Company is an owner or operator of contaminated property, the Company may incur significant direct liability.

## ENVIRONMENTAL POLICY

The Company is committed to the protection of health and environment and is determined to minimize any adverse impacts as a result of its activities. The Company is committed to addressing the following issues: PROMOTE AWARENESS We will inform and motivate all our staff and encourage them to play an active role in the Company's commitment to its environmental policy.

## ENVIRONMENT AND THE COMMUNITY

We will continue to work with the local community by initiating environmental initiatives on-site and encouraging local environmental initiatives and reporting on environmental issues of public interest.

## CONTINUOUS IMPROVEMENTS

We will set specific improvement targets, monitor progress and communicate results internally.

## PROPERTY MANAGEMENT

We are always improving our buildings. We will construct, refurbish and manage our buildings in a manner that will reduce the associated environmental impacts and be sympathetic with the external surroundings. By addressing the issue of energy efficiency in our buildings, we will contribute to the reduction of greenhouse gas emissions in line with national and international agreements.

## PROCUREMENT

We will use the Company purchasing policy to favor suppliers and contractors that adopt best environmental practices.

## WASTE MANAGEMENT

We will continue to promote, develop and implement waste prevention, reduction, reuse and recycling on-site in a systematic and cost effective manner. We will use appropriately regulated waste management contractors to ensure safe management of hazardous and non-hazardous waste sent off-site in accordance with best environmental practice. We will work closely with our suppliers and customers towards achieving our environmental policy aims by aligning with the United Nations Global Compact.

## Implementation

Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.

Among the DeFlores, LLC (the "Company") portfolio of brands, VOS is the Company's flagship example of the ongoing example of the aim of constantly improving the Company's energy efficiency of products, services and processes. The commitment made by VOS to be an eco-friendly brand while contributing to communities in need around the globe, drives the goal to raise awareness among suppliers and the marketplace by providing an environmentally friendly consumption option. The Company works to ensure prompt and consistent action against violations of this Environmental Policy. However, in some situations it is difficult to know right from wrong. Since the Company cannot anticipate every situation that will arise, it is important that the Company have a way to approach a new question or problem.

These are the steps:

(a) Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.

(b) Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

(c) Discuss the problem with the Administration. This is the basic guidance for all situations. In many cases, the Administration will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is the Administration's responsibility to help solve problems.

(d) Seek help from Company resources. In a case where it may not be appropriate to discuss an issue with the Administration, call 210-880-4685 which will put you in direct contact with the Chief Executive Officer at Company headquarters. If you prefer to write, address your

concerns to the Chief Financial Officer and anonymous reports can be made through the internet to [info@deflor.es](mailto:info@deflor.es) or for calls originating in the United States 1-844-482-8353; for calls originating from foreign countries follow the normal collect call procedures for your country and ask to be connected to 1-844-482-8353.

(e) You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. The Company does not permit retaliation of any kind against employees or officers for good faith reports of suspected violations.

(f) Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

(g) All employees and officers are subject to the Company's policy, which describes procedures for the internal reporting of violations of the policy. All employees and officers must comply with those reporting requirements and promote compliance with them by others. Failure to adhere to this policy by any employee or officer will result in disciplinary action up to and including termination.

Measurement of outcomes

Description of how the company monitors and evaluates environmental performance.

DeFlores, LLC (the "Company") strives to promote change and increase awareness of environmental issues for our staff and our suppliers. Using a holistic approach to issues of sustainability and environmentalism, we promote making the proactive choice to evolve into a green lifestyle. By using our VOS business model in our brand portfolio, we will foster positive environmental initiatives on in the Company, offer outreach and support to the communities we live in and make our staff educated leaders in the campaign to achieve a sustainable existence.

## **ANTI-CORRUPTION**

Assessment, policy and goals

Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.

DeFlores, LLC supports and aligns with the UN Convention Against Corruption as below can be referenced the written company policy respecting Anti-Corruption and preventing potential abuses.

#### FAIR DEALING

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee and officer should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees aligning with the United Nations Global Compact. No employee or officer should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice. No employee or officer is permitted to engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal activities. To maintain the Company's valuable reputation, compliance with our quality processes and safety requirements is essential. All inspection and testing documents must be handled in accordance with all applicable specifications and requirements.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. No gift or entertainment should ever be offered, given, provided or accepted by any Company employee or officer, family member of an employee or officer, or agent unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is reasonable in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws, regulations or applicable policies of the other party's organization. Please discuss with your supervisor any gifts or proposed gifts that you are not certain are appropriate.

#### POLITICAL CONTRIBUTIONS

Except as approved in advance by the Chief Executive Officer or Chief Financial Officer, the Company prohibits political contributions (directly or through trade associations) by the Company or its business units.

#### Implementation

Description of concrete actions to implement anti-corruption policies, address anticorruption risks and respond to incidents.

The Company works to ensure prompt and consistent action against violations of this Anti-Corruption policy. However, in some situations it is difficult to know right from wrong. Since the Company cannot anticipate every situation that will arise, it is important that the Company have a way to approach a new question or problem.

These are the steps:

(a) Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.

(b) Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

(c) Discuss the problem with the Administration. This is the basic guidance for all situations. In many cases, the Administration will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is the Administration's responsibility to help solve problems.

(d) Seek help from Company resources. In a case where it may not be appropriate to discuss an issue with the Administration, call 1-844-482-8353 which will put you in direct contact with the Chief Executive Officer at Company headquarters. If you prefer to write, address your concerns to the Chief Financial Officer and anonymous reports can be made through the internet to [info@deflor.es](mailto:info@deflor.es) or for calls originating in the United States 1-844-482-8353; for calls originating from foreign countries follow the normal collect call procedures for your country and ask to be connected to 1-844-482-8353.

(e) You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. The Company does not permit retaliation of any kind against employees or officers for good faith reports of suspected violations.

(f) Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

(g) All employees and officers are subject to the Company's policy, which describes procedures for the internal reporting of violations of the policy. All employees and officers must comply with those reporting requirements and promote compliance with them by others. Failure to adhere to this policy by any employee or officer will result in disciplinary action up to and including termination.

## Measurement of outcomes

Description of how the company monitors and evaluates anti-corruption performance.

DeFlores, LLC (the “Company”) has developed a range of instruments to help the organization ensure that openness translates into concrete improvements in key activities of the Company. Instruments such as the Principles for Integrity in Public Procurement, the Best Practices for Budget Transparency and the Principles for Transparency -- not only help mitigate corruption risks but also improve efficiency and ultimately contribute to public trust. This promotes accountability, discussion and participation of internal and external staff. The secure e-commerce Internet-based technologies and applications are crucial components for open, transparent and accessible business by the Company. Therefore the Company adopted the highest level of security (EV SSL) to highlight the importance of an open secure Internet to help bolster the free flow of information, freedom of expression and protection of individual liberties. On anti-corruption matters, the Company works with our staff to promote greater transparency as a means to fight corruption.