



POLICY ON DIALOG



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1. PURPOSE / OBJECTIVE

- 1.1. This Policy establishes the rules governing the administration of the Dialog Program.
- 1.2. Compliance with this policy will help ensure that:
 - 1.2.1. there is a safe alternative channel for everyone – including employees, customers, vendors, business partners – to communicate with higher management regarding questions, suggestions, criticisms, and complaints, and expects all stakeholders to report actual, potential or suspected impropriety, fraud, misconduct, abuse, waste, and conflicts of interest, confidentially, anonymously and without fear of retaliation. The availability of this channel serves to discourage wrongdoings, while getting everyone involved
 - 1.2.2. issues can be freely brought to the attention of management, and thus allow the latter to address them and/or make improvements in the business
 - 1.2.3. reports are raised, responded to and addressed in a timely, confidential and neutral manner
- 1.3. This Policy is not intended to be all inclusive. In instances where something is not stated in this Policy, it should be interpreted with the purpose/objective of this Policy, along with the Company's values, Code of Ethics, and other related Policies.

2. SCOPE

This Policy applies to Concepcion Industrial Corporation, all its subsidiaries and affiliates (the "Company" or "CIC"), and their respective directors, executive officers, employees, and business partners.



3. POLICY

CIC welcomes questions, suggestions, criticisms, and complaints, and expects all stakeholders to report actual, potential or suspected impropriety, fraud, misconduct, abuse, waste, and conflicts of interest.

For the Company to be successful and improve its way of conducting business, it is important to keep the lines of communication open and provide alternative means of communication.

Dialog is an alternative to traditional management communication channels (such as the managers or a Human Resources representative), that enables one to communicate with management without disclosing his or her identity and without fear of retribution.

Any form of retaliation against employees or third parties who make good faith reports (i.e., made with the honest and reasonable belief that misconduct may have occurred) or who participate in the investigation of an actual or potential violation of the Code of Ethics is prohibited.

The Company must provide a guarantee that reporters are protected from retaliation – which could take the form of discrimination or undue disciplinary action. They must also be encouraged to report if they feel they are suffering from retaliation. Retaliation must be treated as an offense subject to disciplinary action.

3.1. PLATFORM

The Company shall use a third-party administered anonymous internet-based communication and reporting platform where all reports (questions, suggestions, criticisms, and complaints, and expects all stakeholders to report actual, potential or suspected impropriety, fraud, misconduct, abuse, waste, and conflicts of interest) and responses shall be posted, and which should have the following features:

- a. Accessible to all employees regardless of rank or employment status, and non-employees including business partners, providers, stockholders, so as not to limit the type of information that can be gathered through the system;
- b. Anonymous and confidential, i.e., should protect the reporter's identity and the confidentiality of the report, to avoid possible retaliation against



the reporter by the persons involved, and enable the users to trust the system; and

- c. Automatically direct all reports to at least two recipients.

3.2 MATTERS THAT MAY BE RAISED VIA DIALOG

The following may be raised via Dialog:

- a. fraud, violation of COE/company policy, waste of Company property
- b. conflict of interest
- c. questions or suggestions

whether:

- actual / potential / suspected
- personal knowledge / hearsay

3.3 MATTERS THAT MAY NOT BE RAISED VIA DIALOG

The following will not be entertained:

- a. CBA related matters – which will be referred to the appropriate channel
- b. product complaints – which will be referred to the appropriate channel
- c. personal attacks

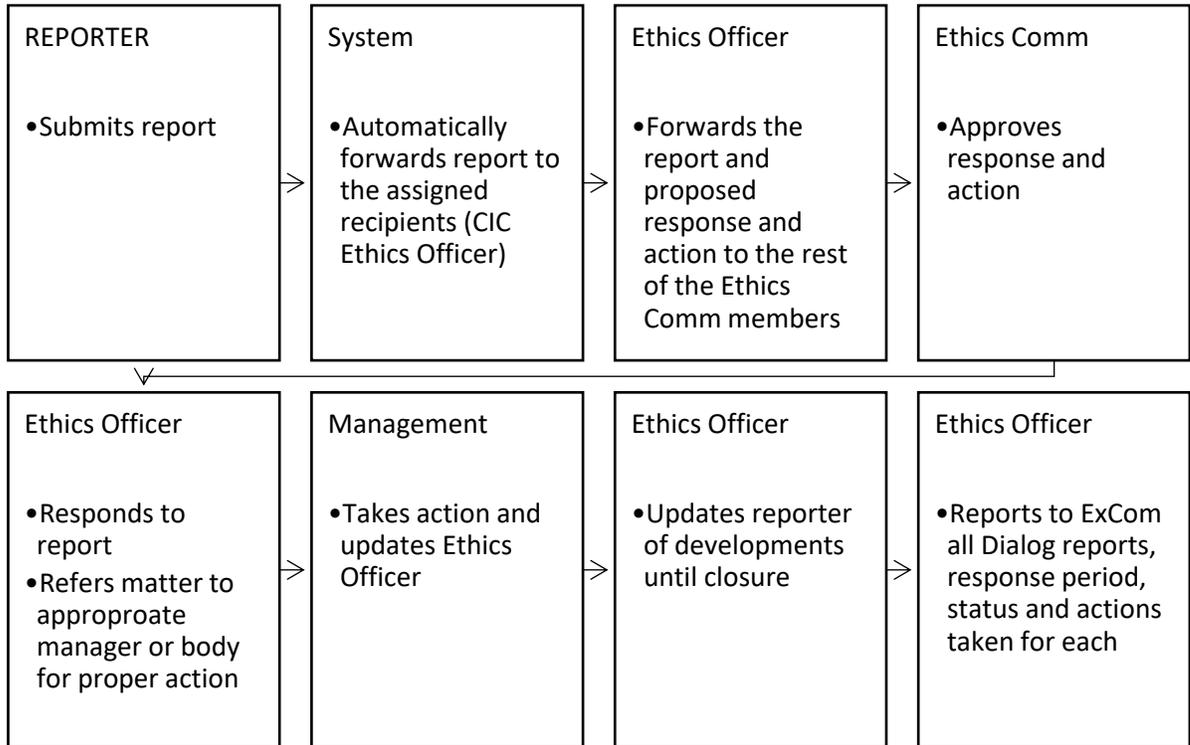
3.4 WHO SHOULD REPORT AND BE REPORTED

3.4.1 Everyone may report using Dialog.

3.4.2 Everyone may be reported, including fellow employees, top management, suppliers, providers and business partners.



PROCESS FLOW



The Ethics Officer shall ensure timely consideration, response and closure of Dialog reports.

3.5 RESPONDING TO A DIALOG REPORT

3.5.1 Responses to Dialog should be made in the following fashion:

a. Communicate

In the response, first thank the employee. In letter format, a clear, concise and courteous response should be provided. Where a suggestion or change has been requested, specifics should be provided as to implementation if appropriate. Specify any corrective action to be taken and include a timeline and/or estimated completion date.

b. Be Objective

Demonstrate that the question submitted was treated objectively and thoughtfully.

c. Project Confidentiality

Complete confidentiality and anonymity fosters a level of candor that otherwise might not be possible, and encourages communication from employees who otherwise might not be heard. By handling all Dialog information carefully, the guarantee of confidentiality and anonymity can be maintained.

d. Respond in a Timely Manner

e. Investigate

Where necessary, an investigation should be conducted so that the question can be addressed as specifically as possible. In the response, the reporter should be informed that the facts were investigated.

3.6 HANDING DIALOG REPORTS

3.6.1 The Ethics Committee, as the only body which receives Dialog reports:

- a. Should as much as possible safeguard the confidentiality of all Dialog reports.
- b. Should not involve people that are not needed to facilitate a response.
- c. Should follow through on the action points as communicated in the response.
- d. Should not delay a response pending issuance of a communication made as part of corrective action.
- e. Should not leave Dialog questions, answers and research material unattended.



4 **NON-CONFORMANCE**

4.1 Any non-conformance with this Policy by an employee of the Company shall be dealt with as a violation of the Code of Ethics, punishable by up to termination, and without prejudice to civil and/or criminal action as may be warranted by the circumstances.

5 **DEVIATION**

5.1 Any deviation from this Policy should be approved in advance by the CEO, CFO, General Manager or Managing Director, and Group Ethics Officer.