

CODE OF
ETHICS



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CHARACTER COMMITTEE

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If the problem involves a member of this committee, please speak directly to CEO Pablo Vargas.

BRITT'S CODE OF ETHICS¹



1. IN GENERAL

Britt is a company committed to doing business according to the law and accepted standards of business conduct.

To have “integrity” means to live according to our moral and social values. Integrity is a fundamental value in our decision making processes and in dealing with coworkers and customers. An “integral” person is made of only one piece. He/she is neither two faced nor of double morality.

THIS CODE IS DESIGNED TO HELP US:

- *Understand the principles of working with integrity.*
- *Understand how those principles are present in the rules we follow at work, and*
- *Know when and how to ask for advice.*

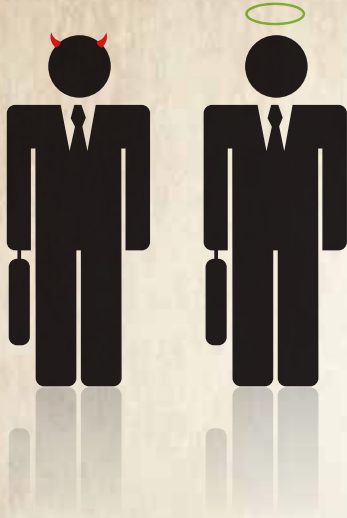
All **Britt** employees (the meaning of Britt, or The Company, covers CBCC Holdings N.V. and its subsidiaries in any territory) must respect this Code.

All of **Britt** employees in all countries of operation must practice the standards defined in our Code and use The Code as a guide any time we're representing the company.

Britt employees are responsible for ensuring that our suppliers, consultants and temporary workers are familiar with The Code.

¹The Code doesn't change the terms and conditions of employment. On the contrary, it helps each of us understand what is expected of every coworker to ensure we all practice the type of integrity and ethics defined by the value of Character in the Company's Quality Statement. The latest version of The Code is posted on the Web site.

PERSONAL COMMITMENT TO COMPANY POLICY² AND TO “DOING THE RIGHT THING”



Working for **Britt** means agreeing to this commitment, understanding The Code, respecting company policies and following them, always.

When employees fail to follow these standards, they place themselves, their coworkers and **Britt** at risk.

Violators will also be subject to disciplinary actions, including termination, depending on the seriousness of the offense.

Those who supervise others have additional responsibilities under The Code, including:

- *Setting the example*
- *Ensuring that subordinates understand The Code.*
- *Ensuring compliance.*
- *Making sure standards are met.*
- *Supporting employees who have questions or concerns.*

STANDARDS I NEED TO UNDERSTAND

The Code is the cornerstone of our commitment to integrity and ethics at **Britt**.

- Every work group, department or company has policies and procedures to put the standards of The Code into practice. In some cases, these rules may be even more strict than The Code, itself, and must be obeyed.
- The countries in which we operate have their own laws, which we must also respect.³

² Refer to company policy posted on the Internet.

³ Refer to the norms unique to each country and to Retail's Code of Ethics.



2. WHERE TO GO FOR HELP

At **Britt**, we maintain and encourage an atmosphere of openness and honest, simple, sincere and timely communication. That's why:

IT IS EACH AND EVERY EMPLOYEE'S RESPONSIBILITY TO SEEK ADVICE BEFORE TAKING ACTION ON OR REPORTING VIOLATIONS OF THE CODE.

WE ASK BEFORE TAKING ACTION:

Before taking action or making a decision about anything in life or work, let's first ask ourselves:

- Is it legal?
- Does this follow **Britt** policy?
- Is this proper?
- How would someone outside of **Britt** view the action? Our customers? The people of the community where we live and work? The general public?

If we're not sure or if we have any doubt, we ALWAYS seek advice. **Britt** does business in many countries, and it is everyone's responsibility to follow applicable laws and regulations of these countries. Ignorance of the law is never an excuse for a violation. If you would like to learn more about these laws or **Britt** policies:

- Visit "**Integrity**" on the Intranet
- Consult with your supervisor
- Send your concerns to character@cafebritt.com

If the problem involves anyone on the Character Committee, please direct your complaint to Pablo E. Vargas, CEO, email: pablo@cafebritt.com

OUR DUTY TO REPORT:

Our commitment to the principle of *Character* and to *Britt's Safety Policy* obliges us to report on or complain about some situations. In addition to knowing the rules and the law, it's our duty to report any situation in which:

- ***I am not sure about how to act, or I need advice.***
- ***I believe that someone, acting in Britt's name, is breaking or about to break the law or go against our own Standards of Integrity.***
- ***I believe that someone in my team, or even myself, have done something wrong, or participated in poor conduct.***

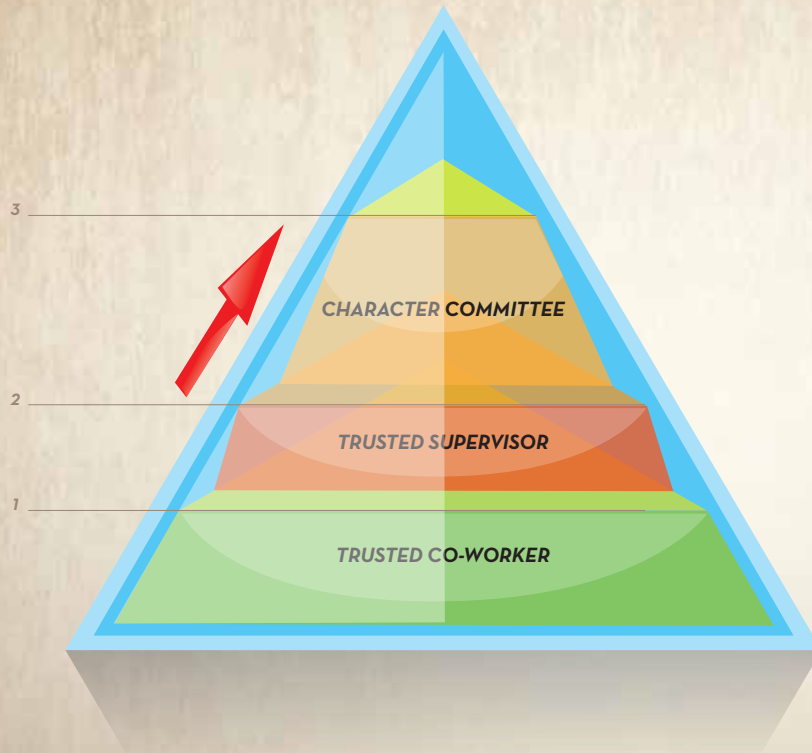
¿TO WHOM DO YOU GO FOR HELP?

Britt's "Character Committee" is a group of people selected by the Company's CEO. This committee is responsible for:

- *Providing guidelines for complying with laws, regulations and Company policies to create a positive and ethical work environment for everyone.*
- *Supervising and following through with the processes of complaints, and offering guidance, regarding integrity, ethics and conduct.*
- *Communicating and training all employees on the principle of Character..*
- *Organizing periodic meetings to follow through with programs, and keeping a record of recurring problems to determine corrective action in regards to ethics and integrity*



THE PYRAMID OF TRUST



We should direct all our complaints or concerns to the **Character Committee**. If for any reason we aren't comfortable directing the concern to the committee, seek answers/redress according to the *"Pyramid of Trust."* First, relate the concern to a trusted coworker at **Britt**. The coworker may reserve your anonymity, if you wish. Bound by the *"Duty to Report,"* this coworker must report the matter to a trusted supervisor or, working up the pyramid, to the committee.



Britt regards all complaints with utmost seriousness. All complaints are investigated and an appropriate course of action taken. Inquiries or complaints are kept confidential to the extent that they remain consistent with the interests of the coworkers involved, the Company, and its legal obligations.

Any one of us who acts in good faith to raise a concern or report violations to **The Code** is doing the right thing. **Britt** will not allow retaliation against these people. Individuals who seek to retaliate will be sanctioned. If we know of someone who is the victim of retaliation for having reported a problem, we seek support through the **Pyramid of Trust** or directly with the **Character Committee**.

Britt seeks to ensure honest and fair treatment in all business dealings. We also encourage our external contacts, such as suppliers or customers, to report any concerns about business ethics to character@cafebritt.com

3. WORK ENVIRONMENT

As Britt coworkers, we must observe the following guidelines:



UNDESIRABLE CONDUCT

Discrimination based on sex, race, color, religion, illness, age or disability

Offensive jokes or insults, threats, requests for favors in exchange for something, undesired physical contact, repeated unwelcome comments, sexist or racial jokes

Failure to use protective equipment or using work equipment for unintended purposes⁴

Use of alcohol, illegal drugs or improper use of medicines

Carrying weapons anywhere on Britt property (not including security guards)

DESIRABLE CONDUCT

Respect and support for others, exceeding expectations, treating others as you would like to be treated

Preserving a healthy, fair and friendly workplace

Correctly using all provided safety equipment. Heeding security practices

Being alert to suspicious or risky activity, and reporting this activity.

Knowing Company policy⁵, emergency plans and escape routes⁶

⁴ Refer to the "Improper Use of Work Equipment" section of the Employee Manual

⁵ Refer to "Company Policies" on the Intranet

⁶ Refer to the "Emergency Manual" on the Intranet

4. CONFIDENTIALITY



All employees must keep company information confidential. Official public information is available on the company Web sites. For academic purposes, the Protocol for *Serving Student Requests should be followed*⁷.

GUIDELINES

- A) Never** give a customer technical information beyond what is explained in the *Coffee Tour*, on the **Britt** Web sites or what is already part of a routine company price quote or special offer
- B)** If they require additional information, they must request it in writing
- C) Authorization** by the sales manager is required to release any commercial information in writing to a commercial customer. Written authorization from the country manager or the CEO is required to release any other information
- D) Never release** personal information about any coworker, customer or supplier without previous authorization by the country manager or the CEO

⁷Refer to the Employee Manual on the Intranet

5. CONFLICTS OF INTEREST

A conflict of interest occurs when personal interests conflict with or oppose Company interests. Common conflicts of interest:

OUTSIDE EMPLOYMENT AND RELATIONS

If you have a second job with, provided services to, or serve as director or consultant to a competitor of **Britt**. The same applies when you work for an organization that seeks to become a competitor, client or supplier of **Britt**.

JOBS INVOLVING RELATIVES

Inform your immediate supervisor if you have a close relative who works or provides services for a customer or supplier of **Britt**. Likewise, notify an immediate supervisor if a close relative is seeking to work for Britt or already works for the Company.

INVESTMENTS:

Don't invest in companies or activities that create an economic interest that could influence decision making at work. Before investing, consider the following:

- Will the investment affect decisions that I make at work?
- What would coworkers at Britt think about the investment? Would they think the investment would influence the way I do my job?
- What would a customer, supplier, shareholder, the media or anyone else outside the Company think of the investment? Again, in case of doubt, use the Pyramid of Trust or the Character Committee.





6. GIFTS AND GRATUITIES

- Before receiving any gift or gratuity from a supplier, tell him/her that the Company would prefer a better price or improved quality for the standard product or service offered.
- Inform everyone who is or seeks to do business with Britt of our Gifts and Gratuities Policy.
- Gifts that have already been received must be handed over to Human Resources and will be raffled. Acceptable and unacceptable gifts are described, below.

ACCEPTABLE GIFTS

- The Company's Directors and managers may receive invitations to cultural or sporting events, as long as the gifts total less than \$25 per month from a single supplier. (These events must not be consecutive). A Business meal may exceed this amount.

UNACCEPTABLE GIFTS

- Gifts or gratuities that are illegal.
- Cash payments or the gift's equivalent in cash.
- Something in exchange for something.
- Anything that we know is violating the standards of the supplier's/ giver's own employer.

To determine if previous authorization is needed to accept a gift, always ask yourself:

- Will the gift or gratuity will tend to influence my objectivity?
- If the gift or gratuity has a business purpose, for example, will business be discussed during part of a gifted event?
- What type of precedent will be set for coworkers?
- What appearance or perception will the gift or gratuity give coworkers or people outside the Company?



- **NEVER** offer gifts to government entities without prior authorization **IN WRITING** from the Corporate General Manager.
- Offering payments to government officials to facilitate processes or paperwork is prohibited.
- Obey all of **Britt's** anti-fraud measures.
- We may offer gifts or gratuities only when they don't violate the recipient's policies.

Any behavior that violates any of the guidelines expressed here will be grounds for a formal warning, unpaid suspension or termination, depending on the severity of the infraction.

7. DOING BUSINESS

At **Britt**, we are transparent in our business dealings. We always apply the principle of "*Fair Play.*"

COMPETITION

At **Britt**, we're objective with and respectful of our competitors. However, we're cautious in our relations with them, as well as with the information we receive from them or are requested to give them. Our relationship with our competitors will always be based on the strengths of our products and services.

COOPERATION WITH AUTHORITIES

At **Britt**, we are careful and intent when cooperating with authorities charged with strengthening the legality of commerce. We remain alert to suspicious or potentially illegal procedures or offers from customers, suppliers and coworkers. We report suspicious activity.



CUSTOMERS AND SUPPLIERS

We're clear and direct when doing business. We tell our customers and suppliers the truth. We protect both our **Company's** and their company's confidential information and procedures. We never seek personal benefit from these dealings. That's why we refuse to pay bribes and reject bribes offered. In this way, we follow the law and do not jeopardize our commercial relations.

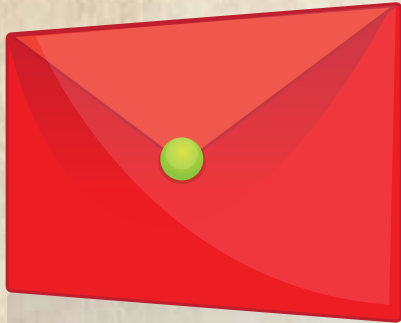
8. DEALING WITH CUSTOMERS⁸

- “We create value for our customers...”
- We treat customers fairly and honestly.
- We offer quality, service and safety.
- We're responsible in our marketing, applying the adequate advertising standards.
- We're concerned about children, farmers, artisans, suppliers, the environment and our customers' privacy.
- We ask permission to obtain information from customers- We comply with government requirements and applicable laws.
- We're responsible for upholding the Company's reputation. We report anomalies, real and potential.

⁸ Please refer to Mission, Quality and Customer Service Statements, Management System (BMS/SiG) Customer Services Documents (SC)

9. COMPANY INFORMATION AND RESOURCES

INFORMATION ABOUT THE COMPANY AND ITS FINANCES⁹



- We create value for our investors.
- We keep honest and accurate reports and ledgers.
- We protect company assets and resources and keep them in proper order.
- We act with honest and integrity.
- We receive approval from our superiors before providing financial information about the Company.
- We follow all financial/accounting guidelines.
- We keep company books according to established standards.
- We keep all records required by law.
- We refer all unsolicited ideas for products, flavors, ingredients, packaging, processes, equipment, methods of business and other topics to the Purchasing or Commercial Marketing departments.

PRIVILEGED INFORMATION

Privileged information = information that is not available to the public and is “material.”

Material = Information that an investor would consider relevant when deciding whether to invest.

⁹ Refer to Financial Area documents (FI) on SiGI.
Accounting Laws applicable by country or territory.



- *We protect privileged information. We don't disclose it to customers, suppliers, spouses, colleagues, family or friends.*

- *Privileged information includes:*

- New product launches.
- Negative comments about a new or existing product.
- New contracts
- Openings of new points of sale.
- Changes in dividends
- Mergers, acquisitions or strategic alliances
- The circumstances of judicial processes
- Earnings, losses and projections
- Anticipated government actions
- Information about other companies (customers, suppliers or related) that isn't already public.
- Britt is not a publicly traded Company, but it has over 100 shareholders.
- Britt has a department in charge of investor relations. We direct all inquiries about investor relations to the e-mail, investor@cafebritt.com

DEALING WITH THE MEDIA¹⁰

- Direct all media inquiries to the Company's designated spokesmen/women: **CEO, Country Managers, Public Relations staff.**
- Refer to Britt's "**Media Crisis Protocol,**" if necessary.

¹⁰ Refer to GG-M-03 in the SiGI in Section E-3, Communication



COMPANY RESOURCES AND PROPERTY

- We make the best use of our and our coworkers time at work.
- We complete our assigned duties.
- In addition to physical objects, all ledgers/registers of information that are created at work are **Britt** property. *Examples:*

- *Marketing plans and strategies.*
- *Ideas*
- *Product designs*
- *Store designs*
- *Business information*
- *Sales, marketing, customer or other data bases*
- *Personnel files*
- *Research and technical data*
- *Proposals*
- *Formulas*
- *All kinds of business secrets*
- *We follow the “Protocol for Serving Students Requests”¹¹*

- Information is considered “public” only when it is:

- *Posted on the Company’s Web sites*
- *Part of Coffee Tour content*
- *On printed material for the public*
- *We don’t use our position for personal gain*
- *We use computer equipment responsibly, for work or business matters.*

¹¹Refer to procedures for Student Attention and Information Disclosure



- We protect the security of our information systems.
- Review the Employee Manual¹² for the correct use of the Internet, e-mail and instant messaging (chats) while at work.
- We protect information to access the Internet (user names and passwords) and company facilities (identification cards).

• We protect the Company's cash and cash equivalents as if it was our own, including:

- Cash
- Checks
- Credit cards
- Invoices
- Vouchers
- Expense payments
- Tradable instruments (bonds, shares, certificates of deposit)

10. COMMUNITY AND SOCIETY

We respect the values of our society and we're committed to conserving the environment and maintaining a mutually beneficial relationship with shareholders, employees, customers and society.

COMMITMENT TO THE ENVIRONMENT AND EXCELLENCE

- We maintain a balance between the environment and business.
- We promote sustainable natural resources. We control the environmental impacts created by our business activities by complying with legal and environmental requirements¹³.

¹² Refer to the company's Employee Manual

¹³ Refer to our ISO-14001 environmental certification and to documents on SIGI



- We ensure that our products and services meet agreed-upon quality standards and exceed our customers' expectations.
- We seek excellence in everything we do, especially when it comes to customer service and constant improvement¹⁴.

SOCIAL RESPONSIBILITY ¹⁵

- We promote the sustainable development of all Company operations. We believe these values benefit our customers, community, suppliers, coworkers and shareholders via ethical conduct and transparency in all our dealings.
- We instill these values in our coworkers by encouraging them to volunteer in projects and initiatives that benefit our community and protect the environment.
- Our company acts in a socially responsible manner with respect to **coworkers, community, consumers and the environment**. *We value transparency, and uphold values and practices against corruption and fraud* ¹⁶.

OUR COWORKERS ¹⁷

- We provide a stimulating, competitive and fair labor environment with many opportunities for personal and professional growth. We respect diversity.
- We care for our coworkers well being by foreseeing potential accidents and avoiding harmful work conditions. We don't tolerate child labor. We cooperate with efforts to eliminate abuses in labor markets linked to our commercial activities.
- We expect a high level of commitment and creativity from all our coworkers in all their work activities.

¹⁴ Refer to the ISO 9001:2000 quality certification, and documents on SiGI

¹⁵ Refer to the Policy of Corporate Social Responsibility on the Intranet.

¹⁶ Refer to the Anti Fraud document on the Intranet

¹⁷ Refer to the INTE 18000 norm



OUR COMMUNITY

- We work to improve every community in which we do business.
- We look to get involved in those projects that strengthen sustainable development and produce specific and measurable results (in the areas of education, culture, environment and vulnerable social groups).

OUR CONSUMERS

- We seek high standards of quality, health and safety for all our products and services.
- We seek constant improvement in all our operations for the benefit of our consumers.

ENVIRONMENT

- We try to make the most efficient use of natural resources.
- We create alliances with organizations committed to using earth-friendly technology and environmental education.

TRANSPARENCY, VALUES AND ANTICORRUPTION

We respect the principles that guide our relationships with suppliers, investors, the government, associations and shareholders.

POLITICS AND GOVERNMENT ACTIVITIES

All political activities and political contributions, including lobbying and consulting with government entities, must be previously authorized by the Board of Directors, General Management and the Legal Department, according to the laws and practices of each country.

EMPLOYEE INVOLVEMENT IN POLITICAL ACTIVITY

It's free and independent, as long as company resources and time are not used for these activities.