

Code of Conduct KCM

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Letter from the director

Dear collaborator:

Kimberly-Clark de Mexico (KCM) is a company that has distinguished itself throughout its history for its strict adherence to laws, ethical business standards and standards for doing business. Our reputation for integrity is an asset of which we must be proud and for which we must ensure each and every one of us who is part of this great company.

For this reason, it is very important that you know our Code of Conduct, as it is the ethical guide to direct our daily actions under the principles of quality, service and rectitude, as well as to always maintain a dignified and cordial work environment.

We must always preserve and promote the principles described in our Code as the ethical foundation that governs all our business activity, from relationships with clients, suppliers, shareholders and consumers, to the coordination and communication that we carry out in our departments and with others areas.

As company employees we have the responsibility to promote and preserve a culture of ethics and institutionality in compliance with the laws, for this reason we must report any inappropriate conduct contrary to our Code of Conduct. An anonymous reporting mechanism has been set up on our internal intranet and on the KCM website, where you can report any situation that you consider incorrect, which will be subject to a careful and discreet investigation to take the necessary measures. If you have any questions about our Code, you can ask your boss, the Human Resources department or the Legal department.

Let's keep together an ethical culture based on the principles that have always distinguished us to continue increasing our leadership.

I count on you.

Pablo González Guajardo

CEO

Why do we have a code of conduct?

At Kimberly-Clark de México (KCM), we are a company that since the beginning of our operations, we have worked for the benefit of our consumers, our employees and the country in general, committed to the communities where we are present, with the environment environment and with sustainable development.

We believe that the way we do our business is as important as the business we do. Doing business with integrity and high ethical standards is our pattern of operation.

This Code of Conduct provides guidance on how to treat our customers, suppliers, other employees, coworkers, competitors, and the general public, with integrity, ethics, and appropriateness. In it, a framework of ethical standards is created under which all employees must perform.

You may note that some of the standards inscribed in the Code of Conduct go beyond what the minimum legal obligations require, a sign of KCM's commitment to operate and conduct business in an appropriate and responsible manner.

The code applies to all of us

Each of us has an obligation to read and understand our Code of Conduct, as it governs all KCM employees, subsidiaries and members of the Board of Directors.

If a local custom, culture or law establishes a different rule than that established in this Code, advice should be sought from the Legal Department.

Each of us is responsible for complying with the Code, reporting any suspected violations of the Code, and cooperating with the Company in investigating possible misconduct.

Share your concerns without fear

If you become aware of a violation of the Code of Conduct, there may be several reasons why you do not want to report it: because you are not sure what happened; Perhaps you are afraid of "causing problems", of someone "retaliating"; Or, think that it is someone else's responsibility to do it ...

But you know very well that the correct thing is to report, either anonymously or with your name. When you report a violation of the Code of Conduct, you play a very important role in promoting a culture of ethical and respectful work, in addition to showing your interest in KCM.

You have a great responsibility to transmit this type of information through the appropriate channels. Thus, KCM will be able to respond quickly and take appropriate action. You can make a big difference if you watch out for any illegal or unethical activity in your workplace and report it immediately to your superiors.

NO retaliation policy

You cannot lose your job, your benefits, or be demoted, suspended, threatened, harassed, or discriminated against for honestly raising a concern regarding the Code of Conduct or for participating in an investigation conducted by the Company.

Honest reporting means that you feel that you are telling the truth and being accurate. If you believe someone is retaliating against you, report it in the same way that you would in violation of the Code. All concerns regarding the Code and reports of retaliation will be fully investigated.

Resources for asking questions or reporting concerns

Reporting any suspected violation of the Code of Conduct is essential for the Company to properly determine if there is a problem that needs to be resolved.

If you have any questions about the Code or suspect a violation, we recommend:

- Go to the top leader of your team

o You can share your questions and concerns with your team leader. If you do not want to inform your team leader, or if you believe that your team leader has not taken appropriate action, you can also go to:

☐ Another team leader.

☐ Any member of the Human Resources / Industrial Relations team in your area.

☐ Any member of the Legal Department.

Violations of accounting practices and internal controls

Failure to comply with the Company's accounting, internal control or auditing policy and procedures practices may have serious consequences for KCM and its shareholders.

If you have concerns regarding these issues, you should go to:

Human Resources Tel. 5282-7221

Legal Department Tel. 5282-7239

Industrial relationships Tel. 5282-7220

Industrial Relations Department of your locality

Internal Audit Management Tel. 5282-7336

Code of Conduct Line

To ensure employees are able to report concerns anonymously, we provide the League of Conduct with the League.

This league will allow you to communicate concerns online:

www.kimberly-clark.com.mx/Empresa/CodigoConducta.asp

Obligations of senior team leaders and others who receive reports of possible Code violations

Team leaders who receive reports of possible Code violations play an important role in complying with it.

They should be prepared and know how to handle any concerns or reports related to the Code of Conduct. They must:

- Make sure you know and understand the Code of Conduct and act according to him.
- Inform the team members that you are at their disposal to resolve any concerns they may have in this regard.
- Support team members who express concerns and treat them with respect.
- Take seriously the questions or concerns of the members of the equipment.
- Ask for advice before responding, if necessary.
- Take steps to correct violations of the Code of Conduct or the law by team members.
- Present all concerns at the appropriate level and role.
- Make sure team members never feel that their concerns are ignored.
- Make sure that no person is retaliated against for report a suspected violation of the Code.

Violations of the Code of Conduct

Violations of the Code of Conduct constitute serious infractions that may cause disciplinary measures, warnings, suspensions, termination of the employment relationship or legal actions by the Company.

Likewise, violations of the Code of Conduct that also violate the law can lead to fines, penalties, criminal proceedings or other legal remedies.

Conduct in front of the team

At KCM we believe that part of success depends on trust and respect between people. Both are key to inter-area teamwork.

Freedom of association

We assume the commitment to respect the right of our coworkers to freedom of association, which means:

- The right to organize in accordance with national laws and practices.

Diversity and NO discrimination

At KCM we are committed to the professional development of inclusive staff through a policy of equal employment opportunities, as well as promoting decent work; in which the human dignity of all our collaborators is fully respected.

We assume the commitment of:

- Recruit, hire, promote, and support the professional development of diverse staff, regardless of race, ethnicity, gender, physical condition, social condition, sexual orientation, age, religion, disability, or state civil.
- Train, promote, and compensate employees based on their abilities, achievements, experience, and conduct, regardless of their race, color, sex, sexual orientation, age, religion, creed, nationality, sexual identity, disability, or marital status.
- Incorporate the diversity of talents, skills and experiences from each of our functional areas.

Human rights

We are committed to recognizing human rights in the company in all its operations and we will not accept doing business with any person or company that carries out the following practices:

- Child exploitation, including child labor.
- Physical punishment.
- Sexual abuse and / or harassment and any other form of human abuse.
- Forced or compulsory labor.
- Discrimination in employment and occupation.

Safety at work

At KCM, we believe that occupational injuries and illnesses can be prevented and eliminated. No production goal, cost savings, time savings, or competitive advantage warrants injury of any kind.

We assume the commitment of:

- Ensure that safety is a core value of the business, embedded in our research and engineering, product development, manufacturing, delivery, and sales activities.
- Provide a workplace that meets or exceeds laws and regulations on occupational safety and health and hygiene.
- Establish our own standards and technical guidelines on occupational safety and hygiene, based on best practices.
- Strive to continually improve our performance in occupational health and safety and hygiene.
- Encourage all KCM staff to contribute to improving security.

Respect in the workplace

We are committed to providing our employees with a dignified and decent work environment in which the integrity of the worker is fully respected, for which conduct of sexual harassment and harassment, intimidation or other inappropriate conduct is prohibited.

Violence in the workplace

We are committed to having a workplace without violence.

Each one of us:

- You must report any act, physical or psychological, that threatens or damages a partner in a violent or potentially violent way.

Human Resources will evaluate any report on any act that may constitute violence in the workplace, even if it is intended to be a joke.

Alcohol and drugs

We are all committed to maintaining a healthy, alcohol and drug free workplace. Usually:

- Consuming or being under the influence of alcohol, over-the-counter medications, narcotics, or any other “controlled substance” as defined by law during business hours is strictly prohibited, except when serving alcoholic beverages in connection with an authorized event.
- All employees are subject to evaluations especially if the employee appears to be under the influence of drugs or alcohol at work, or when the Company has reason to believe that an employee has violated this policy.

Conduct in front of others

Our company

Business honesty has been a core value of Kimberly-Clark since the Company's founding. We believe that honesty and trustworthiness build lasting relationships. There are many ways in which we remain true to this value in today's environment.

Clients and suppliers

We are committed to conducting ourselves honestly in our business with customers and suppliers.

- Maintain a clear and transparent relationship, of truthfulness and avoiding confusion or deceit with suppliers.
- If you know of a mistake, whether in favor of KCM or not, correct it.
- Buy from suppliers and sell to customers based on appropriate business reasons, such as quality, price, service, and reliability.
- When purchasing products or services on behalf of the Company, treat all potential suppliers impartially and honestly.
- Never indicate to the provider that our relationship with him may benefit from personal favors, donations to charities or other charitable actions.
- Do not offer gifts, entertainment, or favors to obtain or maintain a business.

Consumers

Quality is one of the fundamental standards on which KCM was founded.

We are committed to providing safe and satisfying products to our customers.

The quality and safety of the products is not the obligation of a single team or department, each of us has the responsibility to comply with the Company's safety and quality policies.

Never do anything that damages the trust that consumers have placed in us.

- If you notice anything that could adversely affect the safety or quality of our products, report it immediately.
- Try to maintain rigorous standards for the safety and quality of our products.

Confidentiality of consumer and employee information

We assume the commitment to comply with the privacy and personal data protection laws in all the places where we operate, in all the processes that apply.

Competition

We are committed to complying with competition laws (also called antitrust laws), which apply to some of our activities, such as:

- Relations with competitors.
- Prices and conditions of sale to distributors and other consumers.
- Marketing and business practices.

These laws are very complex. Penalties for violation of its provisions can include significant fines and even imprisonment.

Usually:

- Do not talk to competitors about confidential business issues, such as pricing, sales conditions, business or marketing plans, margins, costs, production capacity, inventory levels, trade programs, or discounts.
- If a competitor mentions any of these topics, regardless of whether they do so informally, stop the conversation immediately and explain that it is against our policy to discuss these matters.
- Contact a member of the Legal Department for specific advice and to report any inappropriate conversations with competitors and customers.

Competition information

During the course of normal business activities, information is obtained about other companies, including customers, suppliers and competitors.

Obtaining this type of information is a regular part of the commercial competition system. However, there are legal and ethical limits to obtain information of this type:

- We must not obtain information by inappropriate means, such as bribes or spying on our competitors.
- We should not hire an employee of a competitor to obtain confidential information or encourage the employees of competitors to disclose confidential information about their employer.
- If they offer you information about a competitor that you think may be confidential, you should question whether it is confidential and how it was obtained.
- If the material offered is written material and contains a legend such as "secret", "confidential", "exclusive property" or "for exclusive use", or if you determine otherwise that it is confidential, you should contact a member of our Legal Department.

Environment

Carrying out our business activities with sincere and proper care for the environment is a basic principle of KCM. As a result, the Company has developed important environmental policies in matters such as: energy and water conservation, reduction of waste in the manufacturing process, proper disposal of waste that cannot be eliminated, use of sustainable practices and raw materials , compliance with environmental laws, and monitoring and reporting of environmental compliance.

KCM is subject to many environmental laws and government requirements. These establish the minimum standard of conduct; KCM's policies go further, setting higher standards. Each one of us:

- You must know and respect the applicable laws and regulations.
- You must know and respect all KCM environmental policies.
- If in doubt, you should consult the Sustainability Department or the Legal Department for more information about applicable Kimberly-Clark environmental laws and policies.
- Must support the sustainable use of natural resources, including water conservation, waste reduction and reuse, and energy conservation.

We regularly audit performance in these areas and develop action plans to improve the use of natural resources.

We expect all employees to act as responsible citizens; respecting the rules and regulations of the workplace regarding the environment.

Public organisms

The Company encourages the participation of employees in civic activities in their free time. However, if you are part of any body or Civic Association that is considering any measure that involves KCM, you should carefully evaluate whether you can act independently. Under such circumstances, you should consult a senior leader or a member of the Legal Department.

- When you express opinions on public or political matters in civic meetings, you must clarify that the declarations are made in person, unless express authorization is given to declare on behalf of KCM.
- If a public official communicates with you in relation to your work, or if you are asked for information in connection with an investigation or investigation by a public body, you should channel them, without responding, to the Legal Department.

Conduct in front of our Company

Our company information and resources

Each of us has an obligation to protect the Company's resources and avoid conflicts of interest.

Conflicts of interest

In carrying out the Company's business activities, each of us must act in accordance with the Company's interests and must avoid any possible or actual conflict of interest. A conflict of interest arises when business relationships or personal, social, financial or political activities interfere with our objectivity and loyalty to KCM.

Some conflicts of interest are obvious, such as accepting a bribe in exchange for granting a business with KCM to a supplier. Other conflicts of interest may be less obvious, such as doing business with a company that belongs to a close relative, even if that company seems to offer the best price. Potential conflicts of interest should be discussed with the team leader to ensure that the interests of the Company are protected.

Each one of us:

- We must avoid actions that generate - or even seem to generate - conflicts of interest with the Company.
- We must never use our position at KCM for personal gain.
- If you believe that you or a family member has a conflict of interest, inform your team leader or a member of the Legal Department and, if applicable, you must obtain approval for the relationship.

Employment outside the Company

- You or a close relative is an employee of a competitor, supplier or customer, provides services to you, or receives payments from him.
- You or a close relative own a company that has a business relationship with KCM.
- When you have a job or business interests outside the Company that interfere with the performance of your work at KCM.
- If you carry out external commercial activities (not for the Company) with any seller, supplier, customer, contractor, etc. from KCM.

Financial interests

- You or a close family member has an investment or other financial interest in a private KCM provider, competitor, or customer.
- You or a family member own more than 1% of the shares of a competitor, supplier or customer of KCM.

Public service

- If you are a volunteer for a charity or other organization that has a relationship with KCM.
- If you raise money for charities during business hours (except when sponsored by KCM).
- If you ask customers or suppliers to make charitable donations during business hours.
- Customers or suppliers ask you to make charitable donations (except when sponsored by KCM).

Speeches and presentations

- When you are offered a fee for giving speeches or giving presentations regarding your work for KCM.

Personal relationships

- If you supervise a close relative or your partner, or vice versa.
- If you are thinking of hiring a close relative or your partner as an employee or contractor.

Commissions

- If you are considering accepting a commission appointment, but are concerned that the engagement may interfere with your work.
- If you are part of a commission that is analyzing a decision that may affect KCM.

Political relations

- If you work in a political campaign during business hours.
- When you express political opinions in an environment where the audience may interpret that you are speaking on behalf of KCM.
- When you make contributions or payments to political parties or candidates on behalf of KCM.

Confidential information

We are committed to protecting confidential information. In doing our work, many of us have access to confidential information, which includes:

- Commercial plans.
- Pricing strategies.
- Financial information.
- Patent applications.
- Product development information.
- Information on employees and wages.
- Research and development activities.
- Manufacturing methods.

Disclosing confidential information outside KCM could harm the competitive position of the Company and its shareholders. Collaborate in the protection of confidential information:

- Be cautious when discussing the Company's business in public, such as in elevators, airplanes, and restaurants, and when using cell phones.
- Do not use your laptop on an airplane to work with Company affairs when someone can see the screen.
- Do not let anyone access the Company's facilities without proper written authorization.
- Direct any questions from investors, analysts or the media to Corporate Communication or Investor Relations.
- Address external questions that appear to request confidential information to the Legal, Human Resources / Industrial Relations Department.

- Do not use non-public information about KCM to trade stocks or securities.
- Consult your team leader or a member of the Legal Department if you have any questions about whether it is appropriate to buy or sell Company shares.

Media tools such as blogs, wikis, social networking sites, etc. they are subject to the same rules as any other communication. Do not write about acquisitions, product recalls, organizational changes, customer or supplier relationships, financial information, or personal information of employees (address, phone numbers, employee identification numbers, etc.). Consider that once published, the information may be available to anyone in the world, including our competitors ...

BEWARE!

Use of Company resources

We are committed to protecting the resources that are under our direct control. The Company's resources include, by way of example:

- Equipment, machinery, tools and spare parts.
- Inventory and supplies.
- Telephones, copiers and fax machines.
- Computers, printers and other technological resources.
- Systems and tools for accessing email and the Internet.
- Confidential information and records.
- Inventions and ideas.
- Trademarks, copyrights and patents.
- Secrets and business plans.
- Accounts receivable.
- Business relationships.
- Reputation.

Each one of us:

- We must use Company resources responsibly to ensure that they are not misused or wasted.
- We must properly manage budgets, expenses, and other funds.
- We must follow KCM's travel rules and policies, which are designed to maximize efficiency and minimize costs.
- We must be attentive to security procedures and be alert to situations that may cause loss, theft or misuse of resources.

Gifts, entertainment and other favors

Accepting or offering gifts, entertainment and other favors may also create a potential or actual conflict of interest.

By "gifts, entertainment and other favors" we mean anything of value. For example: meals, lodging, discounts, prizes, trips, tickets, money or actions.

Acceptance of gifts, entertainment or favors

During your work activities at KCM, you may receive offers of gifts, entertainment or other favors from customers, suppliers, vendors or other business contacts. Accepting these offers often makes us feel that we must do something in return. This could affect our ability to make objective business decisions based on KCM's interests.

In general, the only types of gifts and entertainment you can accept from anyone who has or may have a business relationship with KCM are:

- Infrequent low-value gifts, such as pens, calendars, or small business-related promotional items.
- Occasionally priced meals with a business contact.
- Occasionally attend local sports, theater, or other cultural events with a business contact.

No KCM employee should:

- Accept something that can make us feel we should do, or promise to do something in return.
- Accept something in exchange for giving someone a business with KCM.
- Accept something that does not have a commercial purpose.

If you receive something that meets these guidelines, you must return it and explain that our policy does not allow it to be kept. If returning it would violate social custom, ask your team leader about donating it to a charity or other solution. If you are not sure if the gift, entertainment or favor offered violates this policy, consult your team leader or a member of the Legal Department.

Offering gifts, entertainment or favors

We are committed to winning business based on the superior features and benefits of our products and services. Offering gifts, entertainment, or favors to win or maintain a business is unethical and may be illegal. However, there are cases where a modest gift or entertainment may be offered to a business contact to create a business relationship. Usually:

- Do not offer gifts, entertainment or favors to the same person or company, unless you do it occasionally.
- Limit gifts, entertainment and favors to what is reasonable and appropriate under the circumstances.
- Do not offer gifts, entertainment or favors if you are doing so that the other person feels obligated to give KCM a business.
- Do not offer gifts or entertainment that appear to violate our commitment to respect each other.
- Make sure you are not violating the other company's gift and entertainment policy.
- Never provide cash, checks, money orders, gift certificates, loans, or other types of money.
- We must make minimal personal use of KCM resources. Occasional personal use of computers, copiers, fax machines, and telephones is permitted, provided such use does not distract you from your job responsibilities and is in accordance with KCM policies and procedures.
- We must not allow other people, including friends and family, to use KCM's resources.

- We must always use our own user ID and password on KCM computers and you should never give your password to anyone.
- Never use unauthorized encryption software on a KCM computer.
- Treat the Company's assets with care and avoid any use that may cause loss or damage.

Gifts, entertainment or favors to public officials

Almost all countries have laws to prevent bribery and corruption. The anti-corruption laws of any country, carry severe penalties for those who violate them and violating any of them, could significantly harm our reputation.

It is generally illegal, and constitutes a violation of this Code, to offer, promise or provide, directly or indirectly, anything of value, regardless of the amount, to induce or influence the decision of a public official or to guarantee an inappropriate advantage. Some examples of payments that may be prohibited are cash payments, gifts, meals, entertainment, business opportunities, Company products, job offers and contributions to charitable organizations, among others.

These activities could be considered bribery or corruption.

The Legal Department can advise you on whether a specific offer or payment would be prohibited by law or by this Code.

Exact Records

We undertake to create Company records that accurately and honestly present our activities and transactions, and then maintain such records for the time required by law or as indicated in our record retention schedules.

Some examples of Company records are:

- Contracts.
- Invoices.
- Check orders.
- Expense reports.
- Laboratory notebooks.
- Attendance records.
- Production reports.
- Research and development tests.
- Financial schedules.
- Reports of sales activities.

As required by applicable law, the Company has policies on the proper administration, maintenance, and retention of records, and each of us is responsible for complying with such policies.

This means that records must be truthful and correct, must be maintained and made available to those who need them for their jobs, and must be disposed of properly when it is no longer necessary to keep them under the law or as required by our record retention.

The presentation of financial information requires the highest standard of truthfulness and honesty. Damage to the reputation of the Company and its investors from fraudulent or misleading reporting can be severe. Dishonest financial reports can lead to civil or criminal penalties for the individuals involved and the Company. The presentation of false or misleading information in internal or external financial reports is strictly prohibited.

Fraud Prevention

All fraudulent activities are strictly prohibited. All KCM employees must act with honesty and integrity in working with the Company's materials, funds and financial reporting systems. In addition, all KCM employees must take a proactive approach, helping to prevent and detect fraud.

Fraudulent activity is a serious issue for all companies, due to the significant effect it can have on the Company's reputation and financial stability. Some examples of fraud are as follows:

- Steal cash, inventory items, or other assets.
- Receive money or gifts from suppliers in exchange for granting them a business with KCM.
- Submit false or misleading refund requests.
- Receive worker's compensation when you are no longer injured or affected by an incident.
- Cancel recoverable assets or debts.
- Use the Company's assets for personal gain.
- Record sales before sale is delivered / win.
- Falsifying time log cards or time reports.
- Make invalid entries in the accounting system.
- Authorize or receive payments for items not received or services not provided.
- Authorize or receive payments for hours not worked or expenses not incurred and documented.
- Forgery of any kind.

Kimberly-Clark's policy is to do the right thing

The purpose of this Code of Conduct is not only that we read it, but that we all act in an ethical, lawful manner and at all times respecting what its precepts establish. Kimberly-Clark's policy is to do it right. Each of us is responsible for complying with the Code of Conduct, reporting any suspected violations of its precepts, and cooperating with the Company in investigating possible violations. No one will lose their job or benefits, or be demoted, suspended, threatened, harassed, or discriminated against for honestly raising a Code of Conduct concern.

This Code is intended to provide guidance on what is correct in dealing with customers, suppliers, other employees, competitors, and the general public.

A new reality

A person is discriminated against when access to rights and opportunities is denied or conditioned, as well as when he or she is socially or occupationally relegated for any condition or reason, including having suffered an impact on their health. There are many misconceptions, fears, and rumors about COVID-19 that can limit the rights of certain people, as well as separate or segregate them from social and labor inclusion.

What do we do at Kimberly-Clark de México?

In the face of any situation that affects health individually or collectively such as a pandemic, epidemic, outbreak of disease, individual or massive contagion, among others ("Health Situation"), and that arrives or may affect any of our collaborators or any of his relatives, and once the period of quarantine or healing, provided by the health or medical authorities for his recovery and that he returns to his work, is not discriminated, isolated, treated differently, nor will he be identified or identified as in any way that affects their employment and social inclusion in any KCM production facility. At all times, at KCM and its facilities, non-discrimination will be promoted and disseminated among all employees in any of its manifestations due to a Health Situation such as those indicated here.

What is not discrimination?

It is also important to recognize that the measures applied for prevention and mitigation, in accordance with the guidelines designed for it and in accordance with what the health authorities have to deal with any contagious situation in a Health Situation, are not considered discriminatory. It is not discriminatory to take a healthy distance (as defined and promoted by the respective authority), nor to create individual work spaces, as long as these spaces are worthy; use protection measures for health, as well as motivate hygiene and personal care practices among employees, both outside and inside the facilities, as well as when moving to them. These are preventive measures to take care of the health of the collaborators in the Facilities, at home and in general with the population.