



Senefelder

IMPRIMIENDO DESDE 1921

POLICY AND PRINCIPLES OF THE CODE OF ETHICS

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1. The Code And Our Standard Of Conduct

The code of ethics and conduct corresponds to a series of ethical and control standards and principles that oblige the executives and collaborators of Artes Gráficas Senefelder to know and comply with them, in order to allow them to act with absolute austerity and transparency. in the development of their daily tasks.

2, Code Policies

Our code policies define the ethical behaviors we all need to demonstrate when working at Graphic Arts Senefelder CA

The policies of the code are mandatory.

If there are specific situations that are not expressly contemplated, the Code or the Code Policies must be maintained through the exercise of common sense and good judgment, always in compliance with applicable laws.

2. Frame of Reference

The Code of Ethics and the policies that support it (Code Policies) establish the standards of behavior required of all employees.

This Code Policy explains how to ensure that the Code and all Code Policies are understood and applied by all of our employees and others who work for Senefelder Graphic Arts. It confirms everyone's responsibility to report violations, potential or actual, and sets out how such situations should be handled. Any failure to comply with the Code and any of its Policies is taken seriously by the company, and may result in disciplinary action, including termination and legal action.

References in the Code and Code Policies to “employees” include the following:

- Employees, whether full time, part time, temporary, casual.
- Contractors and interns.
- Employees of new acquisitions.

All Senefelder Graphic Arts employees must:

- Ensuring that they know and understand the requirements of the Code and the Code Policies;
- Perform the relevant training, requested by your immediate boss and the Human Talent department.
- Follow the Code and Code Policies: If you are unsure how to interpret these or have concerns about whether specific behaviors meet required standards, you should seek support from your line manager or Human Resources department.
- Immediately report actual or potential violations of the Code and Code Policies, whether related to them, their colleagues and people acting on behalf of the company and whether accidental or deliberate. This includes instances where the behavior of suppliers or contractors may not meet the same standards.

Your immediate boss is usually the right person to report to. Potential or actual breaches. If this is not appropriate, they should go to one of the following people:

- Human resources analyst
- Human resources manager;
- Managing Director;
- CEO;

-If your immediate manager or another employee requests not to report a breach, it must be reported immediately to the Human Resources Department, General Manager or Executive President.

-Management-level executives and above must model appropriate conduct in a manner that promotes a culture of ethics and compliance, displaying their familiarity with the Code and Code Policies, and taking actions to embed a culture of integrity throughout all operations. the operations;

-Team leader, C-level executives and above must ensure that all members of their team, including new hires:

- Have read the Code and Code Policies.
- Have completed any related mandatory training.
- Understand how to raise concerns and/or report actual or potential non-compliance;

-The ethics committee must ensure that anyone who raises concerns, or highlights potential or actual violations, is supported and respected and is not retaliated against;

-The ethics committee should ensure that concerns raised are taken seriously and promptly addressed, treating related information with discretion, and discussing it with the board of directors. company as soon as possible, to determine the appropriate course of action including who else to report;

All employees, in the event of a conduct report, can share their comments personally with the HR Department, in the suggestion boxes located in the company's facilities.

4. Ethical Principles:

4.1 Interest conflict

All employees and others working for Senefelder Graphic Arts are expected to avoid personal activities and financial interests that could conflict with their responsibilities to the company.

Company employees must not seek to obtain a benefit for themselves or others through the improper use of their positions. This Code Policy sets out what employees must do to avoid or manage actual or perceived conflicts of interest.

- All employees must immediately notify their direct manager if they believe that any of their personal, financial or political activities create a real, perceived or potential conflict of interest with their role in the company. Employees must notify their direct manager or the Ethics Committee, to agree how best to handle the situation.
- All employees must immediately notify their direct boss if they have a family member or close personal contact who is a public official;
- Family members, or close personal contact working for or providing services to actual or potential competitors, customers and suppliers. Employees must notify their direct manager and member of the ethics committee, to agree on how best to handle the situation.

- All employees must immediately notify their direct superior of any interest in a supplier if the latter, or any of their team, are involved in the selection or evaluation of suppliers or negotiations with them;
- Personal, financial or political activities that affect or are perceived to affect the way they do their job at the company are not allowed.
- You are not allowed to work for, or provide any services to, competitors, clients or suppliers, unless they have been previously approved in writing by the company's board of directors.
- You are not allowed to work as a public official unless there is written approval by the company's board of directors.

4.2 Anti-bribery

Artes Gráficas Senefelder does not give or receive, directly or indirectly, bribes or other improper advantages for commercial or financial gain. No employee may offer, give or receive any gift or payment that constitutes or could be construed as a bribe. Any request or offer of a bribe must be rejected immediately and reported to your immediate boss or ethics committee.

No unrecorded or hidden account, fund or asset shall be established or maintained.

This Code Policy covers what employees should and should not do to comply with company requirements.

- Employees must always clarify, internally and when dealing with third parties, that Senefelder Graphic Arts has a zero-tolerance approach to bribery and corruption and will not offer (directly or indirectly), pay, seek or accept payments, gifts or favors. for

improperly influence the outcome of a business;

- Immediately notify the ethics committee if they discover any transaction that has the potential to generate non-compliance with this Code Policy;

Company employees must not directly or indirectly (through suppliers, agents, distributors, consultants, attorneys, brokers, or anyone else)

- Offer or give bribes or improper advantages (including facilitation payments) to any public official or other third party individual, which are, or appear to be intended to influence decisions by any person about the company;
- Solicit or receive bribes or improper advantages from any third party, which could give the impression that they may be directed to influencing decisions by the company on that third party.

When an employee believes that a bribe, improper advantage or facilitation payment has been given or received, they must not cover it up or take actions that seek to delay reporting to the ethics committee.

4.3 Relationship with clients

Our firm commitment as a company and employees is to maintain the highest quality standards in the sale and services we provide, we will assume the common commitment to maintain the loyalty and confidentiality of our clients.

We promise to keep our word and meet the expectations that we generate for our clients in accordance with the company's policies.

4.4 Relationship with suppliers

Artes Gráficas Senefelder expects its suppliers and/or contractors to adhere to values and principles consistent with ours. Our requirements to suppliers (companies that supply services to both the production and non-production areas of our businesses.

They must comply on the basis of:

1. Freely agreed and documented terms of employment.
- two. The business is conducted legally and with integrity.
3. All workers are treated with equality, respect and dignity.
- Four. The work is carried out on a voluntary basis.
5. All workers are of the age approved by Ecuadorian law.
6. All workers receive a fair wage.
7. The working hours of all workers are reasonable.
8. All workers are free to exercise their rights to form and/or join collective associations or refrain from doing so and to enter into collective agreements.
9. The health and safety of workers is protected at work.
10. Workers have access to fair procedures and remedies.
- eleven. The business is conducted in such a way that searching reduces the environmental impact.

This Code Policy establishes the responsibilities of the service providers that comply with the requirements.

4.5 Protection and safeguarding of company information and assets Employees are responsible for ensuring that Senefelder Graphic Arts assets are protected. This Code Policy addresses the protection of physical assets/property, financial assets, and intellectual property.

PHYSICAL ASSETS/PROPERTY

Employees must take care to ensure that all company property/physical assets with which they come in contact while on the job are not damaged, misused or wasted. Physical assets/property include equipment,

Company machinery, spare parts, raw materials, customer products, buildings, computers, and motor vehicles.

FINANCIAL ASSETS

Employees must:

- Protect the company's financial assets such as cash, bank accounts and credit cards, protecting them from misuse, loss, fraud or theft;
- Authorize only expenses, loans or other financial transactions in line with your role and position.
- Employees handling contracts or transactions must comply with relevant company standards.

INTELLECTUAL PROPERTY

Employees must:

- Protect information related to our customers, product design, services, logos, advertising and promotional materials. Employees must not remove physical assets/property from the company site without permission or use them for improper purposes.

4.6 Fair treatment and respect for individuality

People must be treated with dignity, honesty and fairness. We provide the right environment for them to find in the company the right space for their professional and individual development and we respect the diversity of ideas and opinions.

We offer work in fair and safe environments, where rights are respected and we promote equal opportunities for all our employees without distinction of age, race, gender, religion, special abilities or sexual preference, political ideology, based on their training, skills and competencies.

It is guaranteed that there is no verbal abuse, forced labor, physical punishment, physical or mental coercion, or any type of abuse or mistreatment towards employees or officials.

Employees of Senefelder Graphic Arts must:

- Respect the dignity and human rights of colleagues and all those with whom they come into contact as part of their jobs; Y
- Treat everyone fairly and equally, without discrimination based on race, age, role, gender, gender identity, color, religion, country of origin, sexual orientation, marital status, dependents, disability, social class or position politics. This includes consideration for hiring, firing, promotion, awards and benefits, training or retirement, which must be based on merit.

The company must:

-Ensuring that the work of all its employees is conducted on the basis of documented and freely agreed terms of employment, clearly understood by and available to relevant employees and others who work for Senefelder Graphic Arts;

-Ensuring that all employees are paid fair wages, including a comprehensive compensation package that meets or exceeds legal minimum standards or appropriate prevailing industry standards. Apart from deductions other than those legally established, all other deductions from wages require the

express and written consent of the employee;

Ensure that there is no verbal abuse, forced labor, physical punishment, physical or mental coercion, or any type of abuse or mistreatment towards employees and officials.

- Provide transparent, fair, and confidential procedures for employees to raise appropriate concerns. These must allow employees to discuss any situation where they believe they have been discriminated against or treated unfairly or without respect or against their dignity, with their immediate boss or ethics committee without fear of reprisal.

Employees of Senefelder Graphic Arts must not:

- Engage in any direct behavior that is offensive, intimidating, malicious, or insulting. This includes any form of harassment, sexual harassment, and intimidation, whether individual or collective, motivated by race, age, role, gender, gender identity, color, religion, country of origin, sexual orientation, marital status, dependents, disability, social class or political position;
- Take part in any indirect behavior that may constitute a type of harassment, such as making offensive or sexually explicit jokes or insults, generating, sending by mail, text message, or other form of distribution, offensive material or material of an explicit sexual nature, misuse personal information, create a hostile or intimidating environment, isolate or fail to cooperate with a colleague, or spread malicious and insulting rumors;
- Work more than the normal or overtime hours allowed by the law of the country in which they are employed. All overtime work will be on a volunteer basis.

The company must not:

- Using or allowing the use of forced, compulsory or labor trafficking.

We have zero-tolerance for forced labor;

- Allow child labor, ie individuals under 18 years of age.
- When minor workers are employed (short-term work experience schemes and work that forms part of an educational program are allowed), requiring or allowing them to do work that is mentally, physically, socially or morally dangerous, or that interferes with their study , depriving them of the opportunity to attend college.

4.7 Political activities

Senefelder Graphic Arts are prohibited from endorsing or contributing to political parties or candidates. Employees may only offer support and contributions to political groups in person. This Code Policy sets out how company employees should handle their business relationships with political groups.

Employees must ensure that:

- Any contributions to, and support for, political parties are clearly personal and do not give the impression of being linked to the company;
- Any personal political support or contribution does not affect performance or objectivity on the job.

4.8 External communication

Communication with the investment community - including shareholders, brokers and analysts - and the media must be handled carefully. Such communications have important legal requirements, and demand specialized skills and experience. Only individuals with specific authorization, and training/instructions may communicate about Senefelder Graphic Arts with investment communities or the media, or respond to their requests and questions.

What to do if there are doubts about the ethics of your behavior

or decisions to make.

If you have doubts about the applicability of the code, consult the head of Human Talent or the company's ethics committee.

5. Glossary

Client:*Natural or legal person who buys products offered by any Senefelder Graphic Arts production line.*

Ethics Committee:*Head of SGI and Certifications, Human Resources Manager, General Director and Executive President.*

Contractor:*Legal entity that performs a work or provides a service by contract.*

Employee:*A person employed by Senefelder Graphic Arts under any variety of contracts. The term includes all employees, whether full or part time.*

Business:*Senefelder Graphic Arts*

Supplier:*It is the natural or legal person that supplies some good or service to another company or community, the term comes from the verb to provide, which refers to supplying what is necessary for an end.*