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Promociones Serigráficas, s.a.	Rev.:1
ETHICAL CODE	
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### 1.- OBJECT

The purpose of this Code of Business Ethics is to establish the basic principles that must guide the behavior of PROMOCIONES SERIGRAFICAS and all its employees and management.

## 2.- SCOPE

This Code is binding on the following individuals and entities.

- Management board of PROMOCIONES SERIGRÁFICAS.
- All employees who work in PROMOCIONES SERIGRÁFICAS

## 3. - BASIC PRINCIPLES OF CONDUCT

The business and professional behavior must adhere to the following basic principles

## 3.1.-Respect for the law

The business and professional activities will be developed in PROMOCIONES SERIGRAFICAS in strict compliance with current legislation in each of the locations.

## 3.2. - Ethical Integrity

Business and professional activities of PROMOCIONES SERIGRAFICAS and its employees shall be based on the value of integrity and will be developed according to the principles of honesty, avoidance of all forms of corruption and respect to the circumstances and needs of all involved in them.

PROMOCIONES SERIGRAFICAS will promote among its employees the recognition and appreciation of the behaviors that are consistent with the principles set out in this Code.

# 3.3. - Respect for human rights

Every action of PROMOCIONES SERIGRAFICAS and its employees shall scrupulously respect the Human Rights and Civil Liberties enshrined in the Universal Declaration of Human Rights. These basic principles will lead to the fulfillment of the commitments set out below.

## 4. - RELATIONSHIP WITH AND AMONG EMPLOYEES

PROMOCIONES SERIGRAFICAS'S relationship with its employees and among them will be based on compliance with the following commitments:

# 4.1. Respectful treatment and interdiction of discrimination

PROMOCIONES SERIGRAFICAS is responsible for maintaining a work environment free from discrimination and any conduct involving personal harassment. All workers must be treated fairly and with respect by their superiors, subordinates and peers. Any hostile or verbal or physical offensse or abuse will not be tolerated.

## 4.2. Abolition of child labor

PROMOCIONES SERIGRAFICAS will not support child labor. PROMOCIONES SERIGRAFICAS will not resort to child labor and ensure compliance with the provisions of the International Labour Organization (ILO) in relation to the work of minors. PROMOCIONES SERIGRAFICAS requires all its employees and suppliers strict adherence to this principle.

#### 4.3. Equal opportunities

All employees enjoy equal opportunities to develop their careers. PROMOCIONES SERIGRAFICAS is committed to establishing an effective policy of equal opportunities for employees to develop their professional activity on the basis of the merit principle. Promotion decisions are always based on

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circumstances and assessments aim. Also, PROMOCIONES SERIGRAFICAS is committed to maintaining a policy for learning and personal and professional development of its employees. PROMOCIONES SERIGRAFICAS's employees respect the equal opportunities policy in their professional and support staff learning and professional peers.

## 4.4. Safety and health at work

PROMOCIONES SERIGRÁFICAS will supply its employees with a safe environment and will respect the applicable law to this matter in all places where its enterprise activity was developed.

All employees are responsible of following strictly the health and safety rules. Furthermore, they should make a responsible use of assigned equipment when developing risk activities and should disseminate knowledge among their peers and subordinates, promoting the compliance of risk protection rules

# 4.5. Respect for privacy and confidentiality of employee information

PROMOCIONES SERIGRÁFICAS undertakes to request and use only the employee data that are necessary for the effective management of their work and was recorded as required by applicable law. Also, PROMOCIONES SERIGRÁFICAS will take all necessary measures to protect the confidentiality of personal data that is available and to ensure confidentiality in the transmission thereof, when necessary for business reasons, fit to current legislation.

Employees who, by reason of the performance of their work, have access to information from other employees shall respect and promote the confidentiality of this information and make a professional and responsible use of it.

# 4.6. Promoting personal and professional balance

PROMOCIONES SERIGRÁFICAS will promote a balance between personal and professional lives of its employees. PROMOCIONES SERIGRÁFICAS will appreciate the benefits for the employee and for the company, implies the existence of a balance between professional and personal responsibilities to their employees, so they promote measures to reconcile these two areas

## 4.7. Freedom of Association and the Right to Collective Bargaining

The right of every person to form, organize and join unions of their choice and to bargain collectively on their behalf with the company will be respected.

The company will not interfere in any way in the establishment, operation or management of such organizations of workers or collective bargaining.

# 5 -. COMMITMENTS TO THIRD PARTIES AND THE MARKET.

PROMOCIONES SERIGRÁFICAS and its employees will base their relationships with customers, suppliers, competitors on the principles of integrity, professionalism and transparency.

#### 5.1. Fair competition

PROMOCIONES SERIGRÁFICAS prohibits any action that involves the exercise of unfair competitive practices and is committed to ensuring compliance with the laws applicable antitrust in the countries where it operates.

#### 5.2. Integrity in management

PROMOCIONES SERIGRÁFICAS forbids its employees to give or receive undue payments of any kind, nor gifts, gratuities or favors that are out of the market or uses for its value, characteristics or circumstances may reasonably alter the development of trade relations, administrative or professional involved.

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5.3. Quality

PROMOCIONES SERIGRÁFICAS is committed to quality products and services PROMOCIONES SERIGRÁFICAS's guideline establishes corporate conduct the search for quality products and services and will provide its employees with the resources necessary for the development of management systems more suitable quality at all times.

PROMOCIONES SERIGRÁFICAS seeks the best satisfaction of customer expectations and develop an effort to advance the understanding of their needs.

5.4. Confidentiality of the information of third party

PROMOCIONES SERIGRÁFICAS guarantees respect for the confidentiality and privacy of data held by third parties. PROMOCIONES SERIGRÁFICAS undertakes to preserve the confidentiality of the data that has always referred to third parties unless the obligations of legal, administrative or judicial obligations involving entities or persons to deliver or make them public. Also, PROMOCIONES SERIGRÁFICAS guarantees the right of third parties affected to consult and promote modification or correction of the data when needed. PROMOCIONES SERIGRÁFICAS employees in the exercise of their profession, keep confidential data on the terms outlined above and shall refrain from any misuse of this information.

5.5. Protection of business assets

PROMOCIONES SERIGRÁFICAS and its employees always look for the best protection of those assets and rights constitute the assets of the organization maintaining the confidentiality of the information about it that can only be used in relation to the activities of the company. Employees are responsible for protecting the assets of PROMOCIONES SERIGRÁFICAS entrusted to them and preserve them from any loss, damage, theft or illegal or dishonest.

All employees must PROMOCIONES SERIGRÁFICAS avoid situations that might involve a conflict between their personal interests and PROMOCIONES SERIGRÁFICAS and refrain from representing the company or intervene or influence decision-making in which, directly or indirectly, wholes themselves or a third party bound to it by any economic relationship, family or significant professional has a personal interest.

Employees who are in conflict are obliged to communicate it to his superior.

#### 6. - COMMITMENTS TO SOCIETY.

### 6.1. Environment.

PROMOCIONES SERIGRÁFICAS is committed to ensure the highest respect for the environment in the development of their activities and to minimize the negative effects that eventually they could cause. To that end, PROMOCIONES SERIGRÁFICAS will supply with the most suitable ways to its employees. To this end PROMOCIONES SERIGRÁFICAS sets environmental practices among employees and promote knowledge and use of the same. PROMOCIONES SERIGRÁFICAS agrees to strict compliance with the environmental legislation that applies.

#### 6.2. social commitment

PROMOCIONES SERIGRÁFICAS undertakes socially responsible actions with law enforcement, in particular, assumes the responsibility to respect cultural diversity.

# 7. - INTERPRETATION AND PERFORMANCE.

This Code sets out principles and business ethics commitments PROMOCIONES SERIGRÁFICAS and employees must respect and comply with the exercise of their activities.

Any employee who has knowledge or suspicion of a breach of this Code may notify your supervisor or report it through the mechanisms established by the company to make suggestions and complaints.

PROMOCIONES SERIGRÁFICAS takes the necessary measures to avoid adverse consequences as a result of the communications that employees perform in good faith as herein provided. The breach or violation of this Code constituting a labor shortage is punishable under the law in force, without prejudice to any other liability that the offender could attend.