

# Code of ethics and good practices

## 1. INTRODUCTION

1.1 LITOGRAFÍA A. ROMERO, S.L. (hereinafter, "LITOGRAFÍA ROMERO" or "The Company"), is a company dedicated to printing and graphic arts activities. The activity is currently carried out through a work center located in the Polígono Industrial Valle de Güímar, Tenerife.

1.2 In its desire to carry out its activity within a framework of transparency, ethics, and respect for the law, it elaborates this Code of Ethics, which aims to establish the principles that must govern the behavior of all employees, managers and members of the Board of Directors of LITOGRAFÍA ROMERO (hereinafter, may be jointly referred to as the "Personnel") in their daily performance, and with regard to the relationships and interactions it maintains with all its stakeholders (employees themselves, suppliers and external collaborators, clients, public and private institutions and society in general). The objective is to consolidate a corporate identity that promotes personal and business ethics. Unethical behavior compromises the relationship of trust between LITOGRAFÍA ROMERO and its stakeholders. Good reputation is an essential intangible resource. The good reputation in external relations favors the increase and / or loyalty of the number of clients, the trust of the suppliers and the reliability against creditors. In internal relations, it favors the working environment and fosters a corporate identity presided over by business ethics.

1.3 LITOGRAFÍA ROMERO and its Personnel are committed to rigorously complying with the legislation and regulations, both internal and external, that are applicable to them. In this way, LITOGRAFÍA ROMERO assumes that its staff knows and accepts the current legislation in the area in which they carry out their activities. In difficult or uncertain situations, it is your responsibility to seek advice.

## 2. PURPOSE

The Code of Ethics sets out the guiding principles and desirable guidelines for conduct in LITOGRAFÍA ROMERO and invites you to establish a dialogue when something does not work properly. It is a tool to promote the mission, vision and principles of LITOGRAFÍA ROMERO and an exposition of its binding ethical commitments and responsibilities.

## 3. SCOPE OF APPLICATION AND INTERPRETATION

3.1 The Code of Ethics is addressed to all the staff of LITOGRAFÍA ROMERO. The conduct guidelines contained in this Code are mandatory. LITOGRAFÍA ROMERO will promote and encourage the adoption of principles similar to those of this Code among its partners, suppliers, contractors, and collaborators. 3.2 The Compliance Officer is

available to any member of LITOGRAFÍA ROMERO to answer any questions that may arise, very especially, regarding the interpretation of the commitments or guidelines contained in this Code of Ethics.

#### 4. The LITOGRAFÍA ROMERO Code of Ethics is chaired by the following principles:

- a) Compliance with current legislation, in all its areas, national and international.
- b) Ethical and responsible action in their relationships. LITOGRAFÍA ROMERO will try to spread democratic and social principles throughout the Company, such as solidarity or concern for the common good, as well as other personal principles such as order, discipline or ability to work.
- c) Promotion to promote a climate of dialogue, honesty, trustworthiness, trust, solidarity, tolerance and harmony in the workplace.
- d) Awareness of the importance of the integral development of the person, facilitating the necessary balance between professional and personal life.
- e) The technical preparation of all the Personnel, who must carry out their work in a complete and responsible manner. In this sense, professional responsibility is understood as proactive, efficient and focused on excellence, quality and service will.
- f) The performance of the Personnel in accordance with the principles of order, personal discipline, punctuality, care for people and things, the spirit of work, the formation of their own criteria, the responsible use of freedom, respect towards others, the spirit of service, quality of treatment and external modes of behavior, which contribute to strengthening the personality and improving the environment of coexistence.
- g) The promotion of behavior in accordance with these principles among its suppliers and external collaborators.

#### 5. GUIDELINES OF CONDUCT

The staff of LITOGRAFÍA ROMERO undertakes to comply with the following behaviors:

##### 1 Respect for legality, human rights and ethical values

LITOGRAFÍA ROMERO undertakes to develop its business and professional activities in accordance with current legislation, internal regulations, generally accepted ethical practices and with full respect for human rights and public liberties. Likewise, the staff of LITOGRAFÍA ROMERO must avoid any conduct that, even without violating the law, may harm the reputation of the Company and adversely affect its interests.

The Personnel must act with honesty and integrity in all their contacts or transactions with the authorities and officials of the different governments and administrations, making sure that all the information they present, as well as the statements they make, are truthful.

The staff of LITOGRAFÍA ROMERO is obliged to know the laws that affect their work, requesting, where appropriate, the precise information through their superior or the corresponding instances. For its part, LITOGRAFÍA ROMERO will put in place the necessary means for the Personnel to know, at all times, the external and internal regulations relevant to the functions they perform, and will establish the necessary internal control models that ensure compliance with legality and principles guiding.

No member of the Staff will consciously collaborate with third parties in violation of any law, or participate in any action that compromises respect for the principle of legality. In any situation of lack of respect for legality, human rights or guiding principles, the Personnel must inform the Company through the Compliance Officer.

## 2 Respect for people

LITOGRAFÍA ROMERO rejects any manifestation of physical, psychological, moral or abuse of authority, as well as any other conduct that may create an intimidating or offensive environment with the rights of people and promotes working conditions that prevent harassment in all its forms .

The staff of LITOGRAFÍA ROMERO must be treated with respect, promoting cordial relationships and a pleasant, healthy and safe work environment.

Personnel have the obligation to treat their colleagues, their superiors and subordinates fairly and respectfully. In the same way, the relations between the LITOGRAFÍA ROMERO staff and that of the supplier and collaborating entities will be based on professional respect and mutual collaboration.

LITOGRAFÍA ROMERO promotes and respects the right to freedom of association and collective bargaining in the workplace.

LITOGRAFÍA ROMERO considers the integral development of the person to be important, which is why it facilitates the necessary balance between professional and personal life.

## 3 Effective equality

LITOGRAFÍA ROMERO promotes gender diversity, as well as the professional and personal development of all its employees, ensuring equal opportunities through its action policies. It does not accept any type of discrimination in the professional field based on age, race, color, sex, religion, political opinion, national descent, sexual orientation, social origin or disability.

The selection and promotion of employees and managers is based on the competencies and performance of their functions, as well as the criteria of merit and ability defined in the requirements of the job. LITOGRAFÍA ROMERO encourages internal promotion and mobility as ways to retain talent in the organization. It seeks the stability of employees, their development and their motivation. People who hold management or command positions must act as facilitators of the professional development of their employees or collaborators.

## 4 Cooperation and dedication

LITOGRAFÍA ROMERO fosters a cooperative environment for a better use of all capacities and resources. The staff of LITOGRAFÍA ROMERO must act in a spirit of

collaboration, making available to others the knowledge or resources that may facilitate the achievement of the objectives.

Likewise, you must work efficiently during the workday, making the most of the time and resources that the Company makes available to you.

## 5 Occupational safety and health

LITOGRAFÍA ROMERO is committed to achieving the highest levels of health and safety in the workplace and adopts the preventive measures established in current legislation.

Likewise, LITOGRAFÍA ROMERO promotes the application of its rules and policies on health and safety at work by the suppliers with which it operates.

All the Personnel are obliged to know and comply with the rules of protection and safety at work and ensure the safety of themselves, other employees, suppliers and customers and, in general, of all people who may be affected by the development of their activities.

## 6 Use and protection of assets

The staff of LITOGRAFÍA ROMERO will efficiently use the goods and services of the Company and will not use them for their own benefit.

In this regard, and in relation to the Company's computer equipment, the Staff may in no case install or download programs, applications or content whose use is illegal, that contravenes the internal rules of application or that may harm the reputation of LITOGRAFÍA ROMERO . Likewise, the use of Company funds or cards to support actions that are not proper to their professional activity is prohibited.

The Staff knows that the documents and data contained in the information technology systems and equipment of LITOGRAFÍA ROMERO may be subject to review by the competent bodies or departments thereof, or by third parties designated for this purpose, when so considered necessary and allowed by current regulations.

## 7 Confidentiality

LITOGRAFÍA ROMERO and its Personnel guarantee the confidentiality of the information they have, forcing themselves to act in accordance with the regulations that are applicable at all times.

## 8 Loyalty to the Company and conflicts of interest.

The conflict of interest appears in those circumstances where the personal interests of any member of the Staff, directly or indirectly, are contrary to or collide with the interests of LITOGRAFÍA ROMERO, interfere in the straight performance of their duties and responsibilities or involve them In a personal capacity in any transaction or economic operation of LITOGRAFÍA ROMERO.

The relationship of LITOGRAFÍA ROMERO with the Staff must be based on the loyalty that arises from common interests, avoiding situations of conflict of interest on the part of these.

Personnel must refrain from representing the Company and intervene and influence decision-making in any situation in which they directly or indirectly have a personal interest.

#### 9 Measures against bribery, fraud and corruption

LITOGRAFÍA ROMERO undertakes to carry out its activity and business with integrity and in accordance with current legislation.

For this reason, LITOGRAFÍA ROMERO declares itself against influencing the will of people outside the Company to obtain any benefit through the use of unethical practices. Nor will it allow other people or entities to use these practices with their Personnel.

The staff of LITOGRAFÍA ROMERO must act in accordance with the applicable laws and, in no case, may resort to or tolerate bribes from third parties towards the Company, its employees, managers or vice versa. In addition, the staff of LITOGRAFÍA ROMERO may not offer or accept gifts and hospitality to or from public officials or other third parties that may affect the impartiality of any of the parties, influence a business decision, or lead to a poor performance of professional duty. .

The staff of LITOGRAFÍA ROMERO may not make contributions on behalf of the Company for political purposes contrary to the law, obtain favorable treatment using sponsorships or donations as a means to achieve it, use the Company's commercial relationships and contacts for their own benefit or a third party, or establish business relationships with third parties without fulfilling the minimum due diligence duties in the knowledge of third parties. LITOGRAFÍA ROMERO does not use misleading or false information in order to obtain any type of help or advantage.

The staff of LITOGRAFÍA ROMERO must ensure that public aid and subsidies, if any, or other funds of which the Company may be a beneficiary, are used exclusively and diligently for the purpose for which they were granted.

Additionally, only LITOGRAFÍA ROMERO staff authorized to do so may negotiate contracts. The Company will periodically review its accounting and internal control elements to ensure that undue payments or contrary to the provisions of this Code cannot be hidden.

#### 10 Customer Relations

LITOGRAFÍA ROMERO assumes, leads and drives the commitment to the quality of its products and services. All the Staff must take care of the relations with the clients, acting in an integral way and having as objective the achievement of the highest levels of quality and excellence in the provision of services, seeking the development of long-term relationships based on trust and mutual respect.

## 11 Relationship with suppliers, partners and collaborators

LITOGRAFÍA ROMERO considers its suppliers an indispensable part to achieve its growth objectives and improve the quality of service, seeking to establish relationships with them based on trust, mutual benefit, and respect for free competition.

LITOGRAFÍA ROMERO undertakes to promote practices among its suppliers or collaborators in accordance with the guiding principles included in this Code of Ethics. All the staff of LITOGRAFÍA ROMERO that participates in the selection processes of suppliers or collaborators have the obligation to act impartially and objectively, applying transparent criteria and complying, strictly and without exceptions, with current legislation and internal regulations on the matter, avoiding in any case, the collision of your personal interests with those of the Company.

## 12 Respect for the environment

Preservation and respect for the environment is one of the basic pillars of action of LITOGRAFÍA ROMERO, which manifests itself in compliance with the best environmental practices in the development of its activity, through the prevention and minimization of adverse environmental impacts and the conservation of natural resources.

The environmental strategy of LITOGRAFÍA ROMERO is structured around the promotion of energy saving, the rationalization of the use and management of water, the responsible use of resources, the use of products that control or avoid contamination, the effective management of waste, the prevention of pollution and the protection of the natural environment and biodiversity.

In accordance with this strategy, LITOGRAFÍA ROMERO and all its people should strive to minimize the environmental impact derived from their activities and the use of the facilities, equipment and work facilities made available to them.

## 6. ACCEPTANCE AND COMPLIANCE WITH THE CODE OF ETHICS

6.1 LITOGRAFÍA ROMERO will communicate and disseminate among all its Personnel, who must make a written commitment to comply, and among those third parties for whom the content of this Code of Ethics is relevant. Likewise, all the personnel that join LITOGRAFÍA ROMERO must accept the Guiding Principles and the guidelines of conduct established therein, finding the obligation of their fulfillment expressly stated in the work contracts. A copy of the Code of Ethics will be given to each new staff member on the occasion of their incorporation into LITOGRAFÍA ROMERO.

6.2 This Code of Ethics is mandatory for all LITOGRAFÍA ROMERO staff, so a high level of compliance is expected of it.

6.3 LITOGRAFÍA ROMERO will include and take into account the principles and guidelines included in the performance evaluation processes, in the evaluation of potential suppliers or collaborators, and in the hiring of new employees.

6.4 All LITOGRAFÍA ROMERO staff have the obligation to inform the Compliance Officer or Committee of any breach or malpractice that they may observe in the performance of their professional activities, through the reporting channel, in any of the ways allowed by the Company.

6.5 Failure to comply with any of the principles and guidelines contained in this Code of Ethics will be analyzed in accordance with internal procedures and current regulations. When a breach is identified, its investigation will be carried out and the application of disciplinary measures will be determined, as the case may be, according to the sanctions regime set forth in the Crime Organization and Management Model.

6.6 No member of LITOGRAFÍA ROMERO, partner or administrator may take advantage of their position or status to request an employee to contravene the provisions of this Code, just as no employee may justify improper conduct based on a higher order or ignorance of the Ethical Code.

## 7. OTHER DOCUMENTATION

This Code of Ethics is complemented by the policies and procedures contained in the Crime Organization and Management Model, which is also mandatory for Personnel. The terms of the Code of Ethics that appear in capital letters and have not been expressly defined, will have the meaning given in the Crime Organization and Management Model.

## 8. VALIDITY

This Code of Ethics comes into force on the day of its publication and will be in force as long as its cancellation is not approved. The Code of Ethics will be reviewed and updated periodically, taking into account the suggestions and proposals made by the Staff and its own operation.

This Code of Ethics has been approved by the Board of Directors on February 8, 2018 and will be in force as long as its cancellation is not approved.

## SAFETY AND HEALTH POLICY

Litografía Romero has a great interest in Occupational Safety and Health, with the firm purpose of avoiding accidents and protecting the health and well-being of its workers, preserving the integrity of its facilities and achieving relevant production efficiency. Work accidents and occupational diseases are the key points in any Safety Regulation. Currently, our focus is on preventive actions, on preventing accidents at work and occupational diseases.

From the systematic investigations of accidents, it can be deduced that we have to make a greater effort to educate our staff, inculcating that Safety is everyone's responsibility and, therefore, we are all responsible for complying with and enforcing current regulations.

The practice and promotion of Health and Safety constitutes one of the fundamental principles of our company. Litografía Romero is convinced of the importance of Safety and develops its Safety and Health policy with the following objectives:

- The safety of personnel and the adequacy of the workplace will be permanently in the foreground. Our motto summarizes it very significantly "SAFETY IN ROMERO IS FIRST".
- The company supports 100% of the Safety and Health at Work programs, and these will form an integral part in each task carried out.
- All the personnel will be permanently trained, to act with full responsibility for their personal Health and Safety and that of the whole, so that the collective effort constitutes permanent and reciprocal protection.
- Safety and Health should never be jeopardized by carrying out work of any kind, and will always be present in their programming.
- The firm will have to prevail in the organization to maintain an equitable discipline with the intention of eliminating risks and injuries.
- Injuries will never be considered products of chance. Systematic investigation of each accident will help us locate, eliminate or minimize future risks.
- The buildings, machinery, tools, facilities, equipment, etc., must provide absolute Security and Adequacy. Authorized work methods will not contain risky or dangerous tasks.
- Occupational Safety and Health has its own organization in the company. This organization forces everyone to participate. The pillars of this organization are: Management Committee, General Committee for Safety and the Environment, Safety and Hygiene Committee and the Work Groups (internal and external transport, regulations in the workplace, training, environment, media accident prevention and investigation).

## QUALITY POLICY

The Directorate of Litografía A. Romero, SL, is aware that Quality oriented towards satisfying customer expectations is a fundamental element that ensures the success and competitiveness of the company, especially in a current market situation in which the demands are getting bigger and more complex.

Therefore, as a company in the Graphic Arts sector specialized in the Printing, finishing and handling of magazines, postcards, books, commercial brochures on a press, commercial paper, tobacco packaging, food boxes and labeling, etc., it has established as the maximum objective, the commitment to the continuous improvement of Quality that is achieved through its permanent leadership, allocating all the necessary resources to carry out effective management, favoring the good organizational climate and appropriate communications, and bearing in mind in addition, the analysis of the results of the processes as an essential measure to control continuous improvement.

This responsibility assumed by the company in the different areas is achieved by maintaining a firm commitment to the following guidelines:

- Litografía A. Romero, S.L., must be considered by its customers, employees and shareholders as a company worthy of full trust.
  - Our clients will be provided with products that comply with the agreed requirements and with the legal and regulatory provisions in due time and form.
  - The Quality Policy will form part of the basis for the decisions made in the company. This implies that it must be known and supported by all employees in each of its areas.
  - Within the company, both the organization and the responsibilities must be clearly defined and documented.
  - Our work to achieve maximum Quality will be based on clearly defined objectives based on continuous improvement. In order to establish them and achieve adequate performance, we must have measurable indicators based on our clients' expectations.
  - The Department Management and Managers will actively work to ensure that all the personnel under their responsibility are fully qualified for their tasks and that they fully assume their commitment and duty regarding Quality.
  - It will be the responsibility of the Management and the Department Managers to ensure that the actions to improve the Quality are adapted to the established objectives and that the plans are drawn up for that purpose. The efficiency and results of actions to improve quality will be continuously monitored.
  - Each employee must be a representative of the company and as such, will always keep in mind the code of good practice in dealing with customers and suppliers.
- Periodically, the Quality Management System will be verified and risk assessment and prevention plans will be established to:
- Ensuring the safety of employees
  - Protect and maintain our assets.
  - To ensure the supply to our customers of products and services with the required quality in a timely manner.
  - Develop actions aimed at protecting the environment.
- This declaration of principles, which will be mandatory for all Litografía A. Romero, SL staff, must be a source of inspiration for establishing improvement objectives that will lead to constant progress in the Quality Management System, therefore it will be subject to constant supervision and review by the Management

March 2017

CEO

Manuel Hermoso Varela

## ENVIRONMENTAL POLICY

Litografía Romero is committed to protecting the environment in all its areas of operation. To ensure that such an attitude of commitment to the environment is reflected as an integral part of our operations, we specifically commit to:

- Comply with applicable environmental legislation and regulations, as well as other requirements to which our company subscribes.
- Continuously intensify our environmental management to obtain improvements in the global environmental performance of the company through the policy of always opting for the best solution within the economically viable.

Use processes, practices or materials that prevent, reduce or control pollution under the focus of its prevention.

Establish and regularly review environmental goals and targets.

Ensure that our employees and contractors are aware of the Environmental Policy.

Maintain a system for identifying training needs and planning it, aimed at ensuring compliance of our staff with this Environmental Policy.

Our Environmental Policy is also market-oriented. We cooperate closely with customers and suppliers to develop products that contribute to improving the environment.

Inform the community about the achievements we have made in environmental protection.

In particular, we are very sensitive when choosing our suppliers, so we only purchase paper certified by the FSC (Forest Stewardship Council) and odorless inks, especially for food packaging.

March 2017

CEO

Manuel Hermoso Varela