

## **CODE OF ETHICS**

### **OBJECTIVE. -**

Establish standards of behavior based on the company's values that generate an environment of trust, satisfaction and long-term peace in our conscience, as well as the commitment of all of us who work in the company to conduct ourselves with integrity.

#### **Acting with Integrity**

This code of conduct helps guide us and defines how we should behave as members of this company. Through the code, we seek to collaborate in the integral development of the individual and leave a positive mark as responsible citizens in our work, in our community and in our families.

In addition to this code, use your good judgment. If you are ever in doubt about your conduct, ask yourself:

- Is it ethical?
- Is it legal?
- Does it reflect well on me and the company?
- Would I want to read about it in the newspaper?

If your answer is “NO” to any of these questions, don't do it. If you are still in doubt, ask your immediate supervisor or Human Resources for advice.

### **SPECIFIC ETHICAL STANDARDS. -**

#### **1. RESPONSIBILITY TO OURSELVES:**

1.1. We consider integrity and honesty as the highest value that distinguishes us. We seek to be a positive image of the company.

1.2. Comply with the provisions of the Code of Ethics of the company, always with honesty and respect both personally and professionally.

1.3. Report any inappropriate conduct that we observe, with the assurance and confidence that the anonymity of the reporter will be maintained.

1.4. Work with efficiency, quality, sense of urgency and intensity, avoiding personal activities.

#### **2. MUTUAL RESPONSIBILITY AMONG US:**

2.1. Treat all employees and colleagues fairly and respectfully.

2.2. Value and recognize the contributions of each person.

2.3. We take care of the physical integrity of Our Personnel.

2.4. We encourage both the professional development and the integral development of the individual.

2.5. We do not discriminate against any person for reasons of race, age, marital status, pregnancy, gender, religion, political preference, social class, family situation, sexual orientation, disability or illness.

2.6. We do not tolerate any kind of harassment or conditioning of personnel, or that the success of an individual depends on favoritism, bribes or practices contrary to our Code of Ethics.

**3. RESPONSIBILITY TO CUSTOMERS AND SUPPLIERS:**

3.1. Our customers and consumers are the essence for which we exist. Their satisfaction is essential to our success. Therefore, we are committed to do our work with responsibility, punctuality and quality.

3.2. We seek to serve all customers and suppliers with respect and honesty under a win-win scheme.

3.3. We want our suppliers to help us offer excellent services, so we ensure that their selection is impartial, based on quality, profitability and service.

3.4. We consider that one of our main commitments to our suppliers is the timely payment for their services and products.

3.5. In dealing with customers and suppliers, we do not accept or encourage any type of corruption, bribery or favoritism. We do not receive favors or money to grant benefits to anyone.

3.6. We always keep in mind the safety of customers, suppliers and the social environment in which we carry out our operations to protect the physical integrity of all.

**4. RESPONSIBILITY TO AUTHORITIES, COMMUNITY AND ENVIRONMENT:**

4.1. We seek to comply with the laws in each State where we operate and encourage honest and transparent relations between the Company and the authorities. Bribes or acts of corruption, whether to speed up a procedure, avoid a fine or suspension, are prohibited and represent a very serious offense that may be grounds for dismissal from the company.

4.2. We try to understand and respect the customs and cultural practices of each state if they do not contradict the law, or the values established in this Code.

4.3. We do not espouse any ideological or partisan affiliation but encourage civic cooperation and the responsible exercise of political rights.

4.4. We are committed to the economic and social growth of the communities where we operate through the creation and maintenance of decent and productive sources of employment.

4.5. We are committed to seek the means to care for the environment and natural resources. Likewise, we favorably recognize the responsible practices of our personnel in environmental matters.

**5. ASSET PROTECTION AND INFORMATION MANAGEMENT:**

5.1. We are committed to protect and use in an efficient, prudent and profitable manner the company's resources, using them for the performance of our job functions and not for personal purposes. By company assets we mean machinery, buildings, vehicles, furniture, plans, designs, systems, technology, processes, business strategies, intellectual property and trade secrets of the company.

5.2. The use of computers, telephones and cell phones for personal, illegal or unethical uses, such as social networks, games, pornography, etc., is prohibited.

5.3. All personnel are expected to respect the agreed working hours, as well as for food.

5.4. All non-public company information shall be kept for the exclusive use of the company. Employees are obliged to always protect non-public information, in addition to being responsible for its correct storage, avoiding unauthorized leaks.

5.5. We obtain, treat and protect personal data in a responsible and ethical manner, and in accordance with the laws and regulations issued by the authority.

5.6. For any statement on behalf of or involving the company, whether written or oral, including communications in newspapers, magazines, publications or other media, the explicit permission of the General Management is required.

#### 6. CONFLICT OF INTEREST:

6.1. A conflict of interest arises when your personal activities and relationships interfere with your ability to act in the best interest of the company. All employees of the company have the responsibility to declare to their immediate supervisor and Human Resources any interest that may conflict with the company.

6.2. A conflict of interest shall be considered when an employee or family member is a partner, advisor or employee of a company that competes with VYNMSA or is a supplier or customer of VYNMSA.

6.3. If there is a possibility that any relationship could generate any type of conflict of interest, this must be analyzed and potentially resolved exclusively by the General Management.

6.4. If for reasons of social or cultural rules a gift in kind is received (except for pens, notebooks and diaries, of common use), such gifts must be delivered to Human Resources who will channel them through a raffle to employees or as donations to social causes.

#### 7. PRODUCTIVITY, AUSTERITY AND TRANSPARENCY:

7.1. We seek to be highly productive in everything we do so we avoid distractions or non-urgent personal matters.

7.2. We are convinced that the business and daily operations of our companies must be carried out with simplicity, so we are committed to carry out our processes under the principle of austerity.

7.3. We make efficient use of available resources by avoiding waste and keeping them in perfect working order.

7.4. To facilitate transparency schemes, in addition to being able to inform your immediate boss or Human Resources in person or by telephone, we have established a system for anonymous suggestions or complaints, through the Human Resources Portal <https://vynmsa.inteam.app/>

7.5. The company takes any report of possible misconduct seriously. We will investigate the matter confidentially and determine whether the Code has been violated and take appropriate corrective action. If you are involved in an investigation, cooperate fully and

answer all questions with integrity and honesty. We encourage the reporting of unethical acts, but we also avoid unfounded or bad-faith reporting of an innocent person.

**VIOLATIONS OF THE CODE OF ETHICS:**

- The observance of this code applies to all members of the company.
- Directors, Managers and Middle Management will be an example of its compliance, as well as to disseminate it and to take the corresponding disciplinary measures when any of their collaborators fail to comply with it.
- Any employee who engages in practices that do not comply with the terms of the Code of Ethics of our companies will be subject to disciplinary measures that may lead to termination of employment and/or legal or criminal action.
- When situations arise that are not foreseen in the code, we will be guided by adherence to the law, VYNMSA's values and principles, and good will. Such cases will be resolved by the company's Ethics Committee.

**EXERCISE AND DISSEMINATION OF THE CODE OF ETHICS:**

- The company will ensure that the principles set forth in this code are duly communicated, understood and observed by all employees.
- This code is renewed and comes into force on July 1, 2018.
- All of us who work at VYNMSA share its values and are committed to promoting and applying them in the Letter of Knowledge that we sign upon receiving the Code of Ethics.