

# CODE OF ETHICS AND CONDUCT

RHM-001, Rev 1, nov 12, 2024

# Message from our General Manager

#### **Dear Collaborators**

All of us who are part of Desarrollos Químicos Mundiales S.A de C.V (PINTURAS DEQUIMSA) are committed to being governed by principles of ethical behavior and the obligation to comply with the legal regulations of each country and/or territory where we operate.

The standards of business conduct contained in this document apply to all of us who work in the Company, both as an organization and as individuals. These are a guide to our legal responsibilities and ethical commitment, and also constitute key principles of conduct that represent the company's policies.

In addition, they guide us to make the right decisions in each of our jobs and act accordingly. The Standards are framed within the corporate principles of integrity, honesty, diversity and sustainability and are a reflection of the values that we adopt at Desarrollos Químicos Mundiales. Compliance with these standards helps us not only to grow the business and the Company responsibly, but also as professionals, while fulfilling our Mission.

This is a shared commitment that requires us to continue and maintain the good reputation of Desarrollos Químicos Mundiales, in front of our Clients, Suppliers, Collaborators and the Communities where we operate. In this way, they will reinforce our objective of being the first choice of Company to work for.

We all represent Desarrollos Químicos Mundiales, through our daily actions. I hope that these Standards will proactively guide your actions, in addition to guiding your decisions and that they will contribute to detecting behaviors that are far from these guidelines.

Acting in conjunction with the Ethics Committee, we will be responsible for supervising the implementation and compliance of these.

The success we have on this path will be a daily challenge and will lead us to always be the Company that we can all be proud of. Sincerely

A cordial greeting,

Ing. Salvador Recio Haces General Manager

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#### I. Introduction

This document has been prepared by employees of Desarrollos Químicos Mundiales S.A de C.V. hereinafter Pinturas Dequimsa and applies to all persons related to the company.

The Code of Ethics and Conduct ("Code") is the expression of the company's commitment to maintain the highest ethical levels of performance, and thus maintain leadership in the provision of services in the industry.

This Code defines the values and principles with which we govern our actions, determines Pinturas Dequimsa's commitment to the different interest groups (Employees, Clients, Suppliers, Shareholders, Communities, Associations and Institutions, Authorities and Competition) to express its intention to generate added value for each of them.

At Pinturas Dequimsa, every person has the rights and freedoms proclaimed in the Universal Declaration of Human Rights (UDHR), without distinction of any kind, such as race, color, sex, language, religion, political or other opinion, social origin, nationality, economic position, birth or any other condition. At Pinturas Dequimsa, the right to freedom of thought and expression is sought.

Compliance with this Code is an individual responsibility that transcends the limits of Pinturas Dequimsa, maintaining great respect for the community and the environment. The commitment of those of us who work at Pinturas Dequimsa is to give life to this document, through its application in all our actions. The guidelines declared here are the foundation that defines the entity of Pinturas Dequimsa.

Although this Code of Ethics and Conduct covers a wide range of business situations and procedures, it does not intend to cover every situation in which it is necessary to make an ethical decision, but rather it sets out the key principles that serve as a guide for the staff of Pinturas Dequimsa.

Our Code of Ethics and Conduct does not exhaust all situations or ethical and behavioral guidelines, nor does it replace any of the policies and procedures of the same, but rather establishes a set of ethical standards that the company and its members undertake to respect.

Every person who works at Pinturas Dequimsa must conduct their actions in accordance with the language and essence of this Code, in addition to avoiding behaviors that give the appearance of being incorrect.

Our Code of Ethics and Conduct is a guide for all of us who make up Pinturas Dequimsa, therefore, it is everyone's responsibility to observe each of these ethical precepts, in order to act in an ethical and comprehensive manner.

#### II. Values

At Pinturas Dequimsa we seek excellence through the daily experience of what we value:

- Integrity: We act ethically with consistency, honesty and transparency, based on our Institutional values, always within the legal and regulatory framework that governs us.
- Professionalism: We seek excellence in our services, processes and ways of working with a full focus on achieving results.
- Teamwork: We work as a team, generating camaraderie, synergy and enhancing the talent of our people. We learn and improve with a positive attitude, respect and simplicity.
- Commitment: We seek a sustainable balance between the use of our resources, the environment and the community, we compete honestly, we respect the laws and established regulations, with the safety of all being our priority.

# III. CSR Principles

- 1. We respect the norms (rules) and seek to go beyond the letter of the law towards a spirit of transparency, trust and accountability.
- 2. We respect human dignity with justice and equity in all our actions.
- 3. We provide favorable working conditions for quality of life that are equitable and that contribute to professional and human development.
- 4. We respect the environment in each and every one of the operating and marketing processes, in addition to contributing to its preservation.
- 5. We combat corrupt practices internally and externally; including extortion and bribery with a Zero Tolerance Policy.
- 6. 6. We contribute to social development as part of our strategy to increase social capital and contribute significantly to the common good.
- 7. We seek competitiveness without causing harm, we support multilateral trade, fair competition, and we are responsible and ethical in advertising, product and/or service quality, distribution and promotion.
- 8. We establish in writing the commitment of the organization with its stakeholders, we follow up, engage in dialogue and seek competitive initiatives and/or strategies of mutual benefit and verify their compliance.
- 9. We implement processes that contribute to the adoption of the principles applied in the areas and interest groups.
- 10. We act based on institutional values, we promote and monitor their compliance permanently; we have included them in this Code of Ethics and Conduct and we make them public.

# **IV.Objective**

The objective of this Code of Ethics and Conduct is to share the guidelines that represent the interests of employees, to ensure the best development of our company and a healthy work environment that also allows for professional and human development, which will be the foundation for achieving our goals.

#### V. Scope

The scope of this Code involves all company personnel, representatives, suppliers, distributors, contractors and other business partners in each of the sites in which we operate, who are required to know, understand and put into practice the principles contained herein to make known that Desarrollos Químicos Mundiales S. A de C.V. (hereinafter, "PINTURAS DEQUIMSA") and all persons who work in the Company, as well as its interest groups.

# VI. Relationship with our Stakeholders

#### VI.1 Relationship with our people

At Pinturas Dequimsa we recognize that our employees are our most valuable resource. That is why we promote a work environment of respect, dignity and justice. Together we build the company's reputation through our actions every day.

Pinturas Dequimsa's commitments to our people:

- 1. Provide jobs that improve living conditions with fair and equitable compensation based on individual and collective productivity in accordance with their skills, market and performance in the position.
- 2. Provide a work environment that promotes well-being, comprehensive health and dignity of each employee.
- 3. Generate two-way communication channels with our employees by sharing useful and timely information that contributes to improving staff development.
- 4. Empower our employees in their area of responsibility in such a way that action is promoted in an environment of trust and creativity.
- 5. Engage in good faith negotiations when a conflict arises and generate feedback practices periodically.
- 6. Avoid discriminatory practices by guaranteeing equality and fair treatment, and promote diversity in terms of age, gender, sex, race and religion.
- 7. Promote diversity by considering the employment of personnel with different abilities and be inclusive in the job offer in jobs that generate value for both parties.
- 8. Provide our employees with the necessary facilities and equipment for the protection and safety corresponding to each job role and promote a culture of incident prevention, health care and constant training to avoid accidents and unsafe conditions.
- 9. Encourage and help employees to develop useful and transferable knowledge and skills, through ongoing training and development of programs, projects and experiences that are useful in their professional and personal growth.
- 10. Be sensitive to strikes resulting from business decisions, collaborate with governments, employee groups, other organizations and/or companies to solve such problems.

- 11. Promote work/family balance and respect the privacy and individuality of employees.
- 12. Respect the employee's right to vote in the election of a candidate to occupy a political position, which is free, personal and non-transferable.

# VI.2 Relationship with customers

Our customers are the reason why we exist, their complete satisfaction is essential for our success, they are our strategic allies and therefore we strive to ensure that our business proposal fosters their growth and development. In our dealings with customers there is no room for any type of corruption, bribery, favoritism or any activity that is contrary to good customs and laws.

Commitments of Pinturas Dequimsa with our customers:

- 1. Provide products and/or services of the highest quality according to their specifications, seeking their complete satisfaction.
- 2. Treat our customers with honesty in all aspects of our business transactions, offering them a high level of service, and a prompt solution to their complaints.
- 3. Do everything possible for the well-being and safety of our customers; ensuring that the environment is preserved or improved, through our quality products and services.

#### VI.3 Relationship with suppliers

We are committed to conducting honest and fair negotiations, without discrimination and/or impositions. All suppliers will always be treated with respect, fairness, trust and cordiality.

Pinturas Dequimsa's commitments to our suppliers:

- 1. Seek justice and truthfulness in all our activities; including prices, licenses and sales rights.
- 2. Ensure that our commercial activities are free of all unnecessary coercion and litigation.
- 3. Forge permanent stability in our company/supplier relationship, in exchange for quality, competence and seriousness.
- 4. Seek the development of our suppliers by providing them with support and information to improve the characteristics of their materials and services and integrate them into planning processes that lead us to a long-term relationship of trust.
- 5. Establish agreements on fair payment conditions and define stable, simple and transparent processes.
- 6. Seek, encourage and select suppliers whose business practices respect human dignity, the environment, compliance with their tax obligations and the legality of their operations.

#### VI.4 Relationship with shareholders

Shareholders are a driving force in the creation of jobs in the communities where Pinturas Dequimsa has operations and that is why we are committed to them for the sustained growth of the company.

Pinturas Dequimsa's commitments to our shareholders:

- 1. Offer diligent and professional management, in order to ensure a fair and competitive return for our investors.
- 2. Provide all relevant information within the limits of the law and fulfill our responsibilities in compliance with the Corporate Governance guidelines.
- 3. Conserve, protect and increase the company's assets; in such a way that they are used exclusively to carry out tasks related to commercial activities and the performance of the company's functions.
- 4. Respond to their requests, suggestions, complaints and formal resolutions.
- 5. Incorporate good Corporate Governance practices that allow regulation, decision-making in an objective and strategic manner and the institutionalization of the organization.

# VI.5 Relationship with the community

At Pinturas Dequimsa we are committed to promoting and contributing to the development of the communities in which we operate. We believe that the community is the home of our people, so we make sure that our presence is always positive.

Pinturas Dequimsa's commitments to our community:

- 1. Contribute to the economic growth and social development of the communities where we have activities through the creation and maintenance of local sources of employment.
- 2. Respect and promote human rights, as well as democratic institutions.
- 3. Collaborate as much as possible with those groups in the community dedicated to improving the development of the community. (Example: in the areas of education, health, safety and sanitation, human development and economic well-being).
- 4. Promote and stimulate continuous development through the preservation and improvement of the environment, respecting the environment and minimizing the environmental impact of our operations.
- 5. Respect the laws and regulations of the localities in which we operate, as well as customs and traditions.
- 6. Be a good citizen through social investment, cultural and educational contributions, actively participating in community and public affairs with social impact, as well as encouraging employee participation in civic and community affairs.

# VI.6 Relationship with the authorities

At Pinturas Dequimsa we stay informed of the laws and make the necessary adaptations to avoid any violation. We collaborate at all times with the competent authorities for the full exercise of their powers and act in accordance with the law in defense of the legitimate interests of the company.

Commitments of Pinturas Dequimsa with our authority:

- 1. Respect and comply with the obligations of the law.
- 2. Seek specialized certifications related to the daily operations of the company, even in areas that are not normally subject to them.
- 3. Provide sufficient, timely and clear information to the competent authorities for the fulfillment of their functions, safeguarding our legitimate interests.
- 4. Collaborate with government and social development programs that are the responsibility and obligation of the company.
- 5. Propose the launching of campaigns at points of interest in our organization.
- 6. Contribute to the fight against bribery and corruption.

# VI.7 Relationship with the competition

We are committed to competing in the market based on price, quality and service, within a framework of integrity and respecting our competitors in every way, which is why we comply with competition legislation.

Commitments of Pinturas Dequimsa with our competition:

- 1. Promote competitive behavior that is socially and environmentally beneficial and that demonstrates mutual respect among competitors. As well as refrain from negative comments about the competition.
- 2. Respect property rights, both tangible and intangible.
- 3. Refrain from promoting or participating in dubious payments or favors with the idea of obtaining competitive advantages. In addition to reporting them if they occur.
- 4. Reject obtaining commercial information through dishonest or unethical means, as well as industrial espionage.

# VI.8 Relationship with associations

Associations are essential for the development of communities, which is why Pinturas Dequimsa adheres to, participates in, and supports them.

Pinturas Dequimsa's commitments to associations:

- 1. Seek to link up with chambers and/or associations where we can contribute and participate in improving the development of the industry and the community.
- 2. Link up with educational institutions to encourage and motivate educational development, new technologies, and local knowledge, as well as structure strategies so that future generations can carry out their university internships.
- 3. Support institutions in the region with technology or resources that allow these organizations to contribute to the community more efficiently.

# **VII. Standards of conduct**

#### VII.1 Safety and health

A safe workplace is a benefit and a guarantee that Pinturas Dequimsa provides to its employees. We are committed to safety and health, for us it is not negotiable, so we provide everything necessary to employees for the good performance of their duties in a safe manner; protecting them against possible work accidents and occupational diseases.

Pinturas Dequimsa promotes a culture of safety and health by providing ongoing training in this area. For this reason, rules, practices and the existence of a permanent safety, occupational health and environmental protection program are established, active with solid support from its entire team.

The behaviors not permitted are:

- Possession of weapons and other dangerous devices by employees and visitors within the company's facilities, buildings, yards and boats.
- Non-compliance with established safety procedures and civil protection measures.
- Non-compliance with the Client's safety, health and environmental protection regulations.

#### VII.2 Environment

Pinturas Dequimsa is strongly committed to the protection and preservation of the environment. We seek to ensure that our operations are in harmony with nature and we encourage

the development and implementation of systems for prevention, control and reduction of environmental impacts in all our operations without exception.

It is the responsibility of all of us who work at Pinturas Dequimsa to comply with and enforce compliance with the rules, laws, policies and established procedures.

Employees must take the necessary actions to ensure that in their operating units:

- Significant changes in facilities and processes are evaluated in advance to prevent adverse changes in the environment.
- Effective procedures are implemented to respond to possible emergencies, to minimize the impact of unpredictable incidents.
- Unacceptable environmental impact is avoided due to emissions into the air, discharges into the drain and the management and confinement of solid waste.
- Energy sources are used efficiently.
- Environmental accidents are prevented by using international best practices in environmental care.

The following are prohibited behaviors:

- Violating environmental laws in any territory where Pinturas Dequimsa has operations.
- Contributing consciously or through negligence to environmental pollution in any of its forms.

#### VII.3 Equal employment

At Pinturas Dequimsa, the way in which its collaborators relate to each other is always based on respect and dignity. Each person has a unique role, so it is essential that there is a motivating, rewarding and fair work environment. Each of us must have the opportunity to achieve our full potential and contribute to the success of Pinturas Dequimsa, striving to provide an open and creative environment that inspires the best efforts and results.

The following behaviors are not allowed:

- Making differences in the treatment and behavior of employees
- Promoting discriminatory language in any type of corporate communication, internal or external and with distinction.
- Maintaining favoritism among employees that puts their activities and the benefits granted in unequal conditions.
- Not contributing to the professional development of employees or limiting it.

These principles extend to all decisions related to employment, including:

- Recruitment, hiring and promotion.
- Salaries, benefits and perks.
- Promotions, reductions and transfers of personnel.
- Training and career plans.

Any of these decisions will be the result of individual evaluations of the applicant or employee related to job performance, based on merits, qualifications and results, without taking into account characteristics that are not related to the job, for example: color, race, nationality, sex, age, religion, disability, among others.

Pinturas Dequimsa complies with the Federal Labor Law and those laws applicable to labor matters, ensuring that its entire Value Chain also observes them. "At Pinturas Dequimsa, diversity enriches us and, at the same time, we respect individuality."

#### VII.4 Workplace without harassment

The application of values requires a work environment in which people's rights are respected. A professional work

environment must be maintained in the company's facilities, where employees treat their colleagues and those with whom they carry out professional and commercial activities (clients, suppliers and other interest groups) with respect.

The behaviors that are not permitted are:

- Inappropriate conduct, whether physical, verbal or visual.
- Abusive language and/or physical aggression.
- Intentionally causing injuries to a fellow human being.
- Intimidation and harassment of other people (sexual harassment).
- Extramarital relationships between employees.

In order to create a work environment where each person's rights are respected, it is essential that when establishing personal and professional relationships, the civil status of each individual is respected.

# VII.5 Workplace without toxic substances

The use of any type of toxic or narcotic substances, such as alcohol, drugs, narcotics, among others, constitutes a great threat to the safety, health and productivity of our company and of all of us who work there, without taking into account the legal implications that this entails.

The behaviors that are not permitted are:

- The use or possession of alcohol, narcotics or other controlled drugs in the workplace is not permitted under any circumstances. Only the possession of medications prescribed by a doctor is permitted, which must be reported to the immediate supervisor and to the Human Resources area of Pinturas Dequimsa, who will evaluate that the employee can perform his/her duties.
- Working under the influence of alcohol, narcotics, toxic substances and drugs.

In accordance with the provisions of article 17, section II of the Federal Law on the Protection of Personal Data in Possession of Private Parties, Pinturas Dequimsa is responsible for the use and protection of your personal data, and we therefore undertake to respect the company's exclusive private data in the following manner:

- Maintaining strict confidentiality of the information provided. All information handled is considered classified, intellectual property and private, this
- applies to own information and that provided by interest groups.
- Avoiding sharing information with anyone, even a coworker who does not need to know it.
- Making good use of information is a competitive advantage, because it is handled responsibly, safely, objectively and in accordance with the law. Confidential information is understood to be all information that is the property of the company, such as personal data of the group's companies and their employees (sensitive data), methods, processes, strategies, plans, projects, technical data, among others, whether published or not.

The following behaviors are prohibited:

- Violations of laws that protect private and confidential information.
- Transgressions of contractual obligations acquired by Pinturas Dequimsa regarding the confidentiality of information about clients, suppliers and interest groups.
- Undue removal of private and confidential information from Pinturas Dequimsa or third parties by any means.
- Undue communication of private and confidential information from Pinturas Dequimsa or third parties by any means.

# VII.7 Conflict of interest

At Pinturas Dequimsa it is important that in every decision made inside and outside the company, conflicts between personal interests and those established in the company are avoided. We, the collaborators, commit ourselves to managing professional relationships taking into account responsibility with the company and always trying to avoid any situation that could represent a problem within the company.

A conflict of interest occurs when a person who works in the company seeks personal benefits or if a member of his or her family receives undue benefits from the company.

Purchase-sale operations with companies that are owned by relatives in the first and second degree of blood or political relationship (spouse, parents, children, siblings, first cousins, nephews, etc.) and by Pinturas Dequimsa's own collaborators will not be permitted unless such companies:

- Demonstrate that they are competitive in terms of price, quality and service.
- Are outside the area of responsibility of the collaborator with whom they have a family relationship.
- This fact is brought to the attention of the Ethics Committee so that it can validate compliance with these requirements.

The behaviors that are not permitted are:

- Not communicating to the Ethics Committee personal conflicts of interest, of first and second degree relatives in relation to Pinturas Dequimsa and those that are known of any employee of the company.
- Those mentioned in the Conflict of Interest Prevention Policy and in the applicable laws.

# VII.8 Corruption (gifts, bribes, illicit conduct)

At Pinturas Dequimsa we are against actions such as bribing, accepting or receiving gifts, bribes, money that affect objectivity in decision-making.

The following behaviors are not permitted:

- Receiving gifts, meals, discounts or special attention for himself or his family members from clients, suppliers or other people related to the company, as well as accepting that clients and suppliers cover his expenses in business meetings.
- Accepting any gratuity, reward, bonus or other form of compensation in his relationship with clients, suppliers and interest groups.
- Making any type of offer or payment, whether in money or in kind to interest groups (directly or through third parties), in order to influence their relationship with the company.
- Offering, promising, giving, accepting, forgiving or demanding bribes, in order to obtain commercial contracts or other services.
- No person should benefit from them as explained in the company's anti-corruption policy.
- Giving any valuable object to government officials and employees, if this can be interpreted as an attempt to seek favors for the company and can be interpreted as bribery of Public Servants.

"Except for minor promotional and office items, legal and authorized in accordance with the guidelines established in the Anti-Corruption and Transparency Policy" and in applicable laws.

# VI.9 Fraud

The act or intention to cheat, deceive or steal, to simulate or lie, constitutes a dishonest act and a crime, so at Pinturas Dequimsa all acts of fraud will be subject to reporting to the corresponding authorities, as well as grounds for termination of the employment relationship, in accordance with the provisions of the labor and criminal provisions established by applicable laws. It is important to understand the implications of committing inappropriate conduct that results in an illicit action.

The behaviors that are not permitted are:

- Submitting false expense reports.
- Forging or altering checks or documents.
- Embezzling and/or stealing cash or assets or misusing company property.
- Handling and reporting unauthorized transactions.
- Making inaccurate reports.
- Simulating the contracting of services.
- Those mentioned in the Anti-Fraud Policy and those cases established by applicable laws.

# VII.10 Compliance with the law, norms and standards

At Pinturas Dequimsa we are committed to complying with the laws, as well as with compliance with the regulations of the different matters that the company has established, which includes policies, practices, systems and procedures. Inaccurate, incomplete or non-timely accounting and reporting may violate the Law and result in legal liability for the

#### company and/or its employees.

We maintain accurate books and records that reflect our business transactions and company activities, and we fulfill our responsibilities in compliance with the established internal controls.

The behaviors that are not permitted are:

- Violations of the laws, norms and standards of the regulatory framework that Pinturas Dequimsa must comply with.
- Ignoring, failing to comply or requesting non-compliance in any of the forms of Internal Control established by Pinturas Dequimsa, which Pinturas Dequimsa entails: activities, procedures, processes, etc.
- Non-compliance with any of the rules and guidelines established by Pinturas Dequimsa, which include manuals, guidelines, codes, corporate policies, operational policies, instructions, among others.

# VII.11 Company assets

At Pinturas Dequimsa we use the company's assets efficiently and we take care to protect them against loss, damage, misuse and theft. All assets allow us to carry out the tasks and functions corresponding to our position, so we are committed to:

- Safeguard the assets under our control and use them to perform our duties and for the benefit of the company.
- Prevent them from being used for different purposes without written authorization from the immediate superior.
- We understand the company's assets to be not only land, buildings, trucks, machinery or furniture; but also plans, designs, processes, systems, technology, drawings, business strategies, product launch plans, money, materials, tools, among others. Those tangible and intangible assets of the company.

The behaviors that are not permitted are:

- The improper removal of company assets (theft).
- The misuse of assets or their use for personal benefit.

# VII.12 Diversity and inclusion

At Pinturas Dequimsa we define "diversity" as the unique characteristics that make up each of our employees, such as: personality, lifestyles, ways of thinking, work experiences, ethnic origin, race, color, religion, gender, gender identity, sexual orientation, marital status, age, nationality, disability, veteran status, among others.

We strive to attract, develop and retain a workforce as diverse as the markets in which we operate, and we seek to ensure an inclusive work environment that embraces strength through these differences.

The role of all of us who work at Pinturas Dequimsa is important in creating a solid, inclusive work environment that

embraces the strengths of our differences and where everyone feels valued and included in the development of the company. We promote diversity and inclusion through respect for each other and for others.

The following behaviors are prohibited:

- Discrimination based on age, skin color, disability, marital status, race, religion, sex, sexual orientation or any other condition protected by law.
- Failure to respect the diversity of talents, abilities and work experiences of others.
- Failure to value the contributions of others.
- Preventing the creation of an atmosphere of trust, openness and sincerity.

#### VII.13 Human Rights

Pinturas Dequimsa recognizes the importance of maintaining and promoting fundamental Human Rights in all our operations and throughout our value chain. Our Institutional Values, our Code of Ethics and Conduct, our Sustainability Business Strategies and our Talent Attraction Policies, among others, are integrated to support the principles that emanate from the United Nations Universal Declaration of Human Rights (UDHR).

For this reason, Pinturas Dequimsa expresses its commitment to promote these principles within its sphere of influence, both to collaborators and to all external parties who have a relationship with the company. We constantly try to evaluate our actions to ensure that we do not violate or contradict any of the basic principles of Human Rights.

The behaviors that are not permitted are:

- Not providing humanitarian and safe working conditions.
- The hiring of forced labor and/or the exploitation of minors.
- Promote a workplace with discrimination and any type of harassment and/or intimidation.
- Provide salaries, benefits or other employment conditions that are unfair or inequitable.
- Prevent the right of freedom of association of employees

Our commitment extends to promoting these principles to all our Interest Groups, as mentioned in our Child Labor Policy and Forced Labor Policy.

# VII.14 Communication Channels and Corporate Image

At Pinturas Dequimsa we take care of the image and the way of communication both internally and externally. We know that the entity of our company corresponds to our way of relating and communicating. What we say, project and express defines our entity, strengthening or weakening it.

That is why attention to national and foreign media in all its forms corresponds solely and exclusively to the

Management, who will be in charge of approving the media and the formal language through the spokespersons designated for this purpose in the Sales and Administration area.

Likewise, the Management has authorized a Corporate image which we must take care of and respect by not misusing it. (Our image is our most powerful weapon before all our Interest Groups.) It is everyone's responsibility to protect it and make correct use of it.

The behaviors that are not permitted are:

- Communicating on behalf of the entity without previously informing the authorized spokespersons, or declaring that said communication is on behalf of oneself and not of the company.
- Disclosing confidential and restricted information, without the due precautionary measures and with prior authorization.
- Using the logos of Pinturas Dequimsa, (whatever they may be) incorrectly, or without prior authorization.
- Using the brand of any of the products that make up Pinturas Dequimsa, for personal use and personal benefit.
- Discrediting the image of the company.

Our commitment extends to promoting these principles to all our Interest Groups, diligently seeking the correct uses and forms of communication, as well as respect for our corporate image in any form, protecting at all times the reputation of Pinturas Dequimsa.

# VII.15 Transparent and integrated record of information

A company like Pinturas Dequimsa carries out many activities and operations on a daily basis, interrelating all the areas that comprise it, so the information generated from this daily activity must be obtained with diligence and care.

All records that the collaborators of Pinturas Dequimsa work with on a daily basis must be kept, preserved and destroyed in accordance with internal rules and regulations.

It is everyone's responsibility to keep our records in a transparent and integrated manner. All accounting books and records of our daily

operations must be kept clearly and precisely, in a timely manner to prevent any risk from materializing due to the lack of such information or because this information is incorrect or inaccurate, which may lead to error.

The behaviors that are not permitted are:

- Not recording all operations in a clear, precise and timely manner, leaving gaps in said information or seeking the lack of it.
- All generated information is not fed into the authorized computer systems intended for it.
- All economic transactions are not reflected with integrity.

- The information recorded and produced is not clear and reflects other types of information other than the real one.
- Failure to comply with the internal control systems established for the registration of information.

# VII.16 Compliance with the Code

Pinturas Dequimsa will establish a preventive monitoring program to monitor compliance with this Code. Each deviation from the ethical precepts, or each complaint received, will be investigated by the Ethics and Transparency Committee of Pinturas Dequimsa. Prior approval by the general director or, where appropriate, whoever he designates.

Investigations will be carried out confidentially and with strict respect for the laws of employee rights and will be coordinated with the other areas involved in the management of personnel designated by the Ethics and Transparency Committee. It is the responsibility of all employees to promptly respond to the recommendations made in order to correct any deviations detected against Corporate Ethics; with respect to Internal Control, Policies and Procedures, Control Mechanisms, among others; whether in the Operational or Administrative area, and to be obliged to implement the necessary corrective measures.

The behaviors that are not permitted are:

- Not cooperating with internal or external investigations, not providing information and/or evidence.
- Not maintaining the confidentiality of the information that is presented, when participating in a requested investigation.
- Destroying or altering documents and/or information with the intention of obstructing an investigation or review.
- Reprimanding or intimidating other employees to not report incorrect situations that violate the ethical principles established in this Code.
- Not honestly communicating requested information or preventing by any means correct and concrete communication in the investigations.
- Not carrying out the agreed corrective actions.

We are committed to protecting the rights of employees who report or express their concerns always in good faith.

# VIII. Administration and implementation of the Code of Ethics and Conduct

# VIII.1 General responsibilities

Without exception, all of our shareholders, directors, deputy directors, managers, chiefs, coordinators, administrative and operational personnel, and/or any employee of Pinturas Dequimsa agree to:

- 1. Know and adopt this Code of Ethics and Conduct in accordance with each of its established guidelines.
- 2. Comply with fundamental human rights and with the legal prohibitions regarding forced labor, slavery and child

labor.

- 3. Contribute to the achievement of the Mission and Vision, through ethical behavior that consistently reflects our principles and values.
- 4. Respect nationality, age, race, ethnicity, religion, different ability, marital status, sexual orientation, or others.
- 5. Conduct our operations in a transparent and upright manner, which is why it is necessary that our transactions comply with the Anti-Corruption and Anti-Bribery laws, including maintaining complete and accurate accounting books and records.
- 6. Provide a safe, healthy, productive and dignified work environment where fundamental rights are respected.
- 7. Promote an environment of mutual respect and comply with the laws, regulations, policies and regulations in which we operate.
- 8. Act with integrity and ethics, always seeking to protect the interests of Pinturas Dequimsa.
- 9. Treat personal data responsibly, ethically and in accordance with the privacy laws applicable in the country where we operate.
- 10. Avoid situations that mean or could mean a conflict between personal interests and those of the company.
- 11. Improve our processes, policies and procedures to minimize the negative impact on the environment and the communities in which we operate.
- 12. Report any violation of the Code of Ethics and Conduct through the reporting channels.
- 13. Refrain from taking actions to influence, coerce, manipulate or deceive any internal or external auditor or official who is carrying out reviews or investigations.

# VII.2 Particular responsibilities

The particular responsibilities include the following:

# **General Management:**

- Approve and authorize this Code of Ethics and Conduct of Pinturas Dequimsa.
- Promote and set an example of the values and conduct established in this Code of Ethics and Conduct of Pinturas Dequimsa
- Authorize the application of sanctions for serious violations of this Code of Ethics and Conduct.
- Provide shareholders with benefits that are proportional to the level of risk they operate.
- Ensure responsible and efficient management of Pinturas Dequimsa's resources.
- Provide information to shareholders in a timely manner.
- Ethics and Transparency Committee
- Maintain the Code of Ethics and Conduct of Pinturas Dequimsa in force, ensuring that its content responds to the requirements of employees and their relationship with their stakeholders. Ensure the process of receiving, addressing, evaluating, investigating and sanctioning complaints, claims and suggestions regarding the elements of this Code.
- Establish the sanctions and action plans corresponding to violations of this Code.
- Recognize with merits and awards for good practices.
- Protect the confidentiality of the complainants and/or collaborators involved in the investigation, provided

that this does not contravene the law.

- Review, update and supervise compliance with the Code of Ethics and Conduct.
- Evaluate cases where there is or could be a conflict of interest, and determine the corresponding actions.
- Disseminate the Code of Ethics and Conduct, with the support of Human Resources.
- Establish, in conjunction with the Human Resources area, annual learning plans on the Comprehensive Ethics System for staff.

#### Human Resources:

- Comply with the guidelines and policies regarding safety in the company and promote awareness of prevention and safety among employees.
- Include in the induction programs the topics contained in the Code of Ethics and Conduct after approval by the Ethics and Transparency Committee.
- Keep the letters of adherence to compliance with the Code of Ethics and Conduct of all Pinturas Dequimsa employees.

#### VIII.3 Reporting channels

All Pinturas Dequimsa employees have the freedom to seriously report any illegal practice or inappropriate conduct that they observe within the organization and that violates the guidelines of this Code. To this end, Pinturas Dequimsa has established its official reporting system to report all detected practices:

Paintings Dequimsa Reporting Line Means:

- a) Telephone: 818-381-0421, 818-381-0428 and 818-381-0273
- b) Email address: <u>denuncias@dequimsa.com</u>
- c) Suggestion box

If you detect any breach of ethics and its principles, you can notify us by:

- Speaking directly to your immediate supervisor, area manager or any other colleague (same or different area); or, if applicable, communicating directly with the Ethics and Transparency Committee.
- Reporting the breach directly through the designated means for the Reporting Line.
- Monitoring and follow-up is the responsibility of the Ethics and Transparency Committee.

When reporting a possible breach, it is important to take the following into account:

- All communication must be consistent, objective and based on real facts.
- All communication will be considered confidential, and the company will make every effort to protect the identity of the person who reports it.
- When a person decides to make a communication anonymously, it is likely that it will be difficult to carry out the investigation.

- For this reason, it is advisable to provide some contact option, for example: a generic email, telephone, etc.
- All communications will be investigated, including those submitted anonymously.
- Retaliation for reports made in good faith will not be tolerated. Making a "good faith report" means providing all available and truthful information.
- Exceptionally, during the investigation, the participation of the person reporting may be requested, and therefore the person has the responsibility to support the investigation.

#### VIII.4 Zero Tolerance for Retaliation

Pinturas Dequimsa does not allow retaliation; we consider it to be improper conduct. Retaliation can take different forms, such as: derogatory comments, jokes, exclusion, intimidating offensive treatment, or constant harassment of an employee.

If you believe that you have been the object of retaliation or know someone who is being retaliated against, report it through Pinturas Dequimsa's official reporting channel (Reporting Line).

#### VIII.5 System of consequences

Violations of the Code of Ethics and Conduct will be subject to sanctions, so this document must be complied with and respected. Disciplinary measures (sanctions) will be determined based on the provisions of the Federal Labor Law.

The sanctions in order of severity for noncompliance with this Code of Ethics and Conduct are:

- a. Verbal warning.
- b. Written warning.
- c. Temporary suspension.
- d. Permanent suspension of work.
- e. Civil and/or criminal lawsuit.

The Ethics and Transparency Committee will establish the sanctions applicable to each of the violations against ethical principles, based on the Document "Bases for sanctioning breaches of the Ethics of Pinturas Dequimsa"; and Human Resources will follow the corresponding corrective actions, reserving as an optional power of the company the imposition of the sanction, within the applicable legal frameworks.

# VIII.6 Comprehensive Ethics System

The Comprehensive Ethics System is composed of:

• The Code of Ethics and Conduct, which is a document that establishes the standards, principles and expected conduct.

- The Ethics and Transparency Committee is the body that monitors ethical conduct and establishes an appropriate climate of conduct at Pinturas Dequimsa, thus supporting Management.
- The Communication Channel is the means by which employees report possible ethical and/or conduct violations: Reporting Line.

The objectives of the Comprehensive Ethics System are:

- 1. To guide the conduct of employees in the same direction as that of the Code of Ethics and Conduct.
- 2. To motivate all employees of Pinturas Dequimsa towards the Ethical behaviors with their benefits.
- 3. Build a good reputation inside and outside Pinturas Dequimsa.
- 4. Reduce exposure to the risk that arises in the operation due to inappropriate conduct.
- 5. Prevent, identify and resolve improper acts that generate a negative impact in the most exposed areas within Pinturas Dequimsa.

# VIII.7 Suggestion, complaint or report format

The Comprehensive Ethics System establishes an official format in which each of the collaborators can present their Complaint, report and/or Suggestion, in the event of any breach of the ethical conduct standards established by this Code. The collaborator can attach this format directly to any of the communication media of the Reporting Line mentioned in VIII.3

# VIII.8 Letter of adherence to the Code of Ethics and Conduct

The Code of Ethics and Conduct establishes the commitment to each of its collaborators. This commitment is reflected in the document called "Letter of Adherence to the Code of Ethics and Conduct", which must be signed by the employee at the time of receiving this document, during his/her hiring and/or incorporation into a new position. Likewise, an authorized copy must be kept by Human Resources in the employment file.

# VIII.9 Validity

The Code of Ethics and Conduct comes into force from the date of its publication in any of the internal means of communication of Pinturas Dequimsa, as well as on the date of delivery of the same to the employees at the time of their hiring and/or review.