

# Code of Ethics



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# Introduction

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## Message from the Board

At **MARCO MKT** we know that, in order to fulfill our mission of generating economic and social value, we must put into practice the values we cultivate. Acting with respect, honesty and integrity, and complying with the laws and regulations of the countries in which we operate, is an essential part of our corporate culture.

**MARCO MKT's Code of Ethics** is the basis of our business conduct and the basis of our policies, procedures and guidelines. It is a document to which I ordered its permanent updating, necessary due to the changes observed in the social environment.

Updating this code allows us to strengthen the trust of our employees, investors, customers, suppliers, business partners, authorities and communities. **MARCO MKT's** Code of Ethics formalizes our ethical principles in a single document, unifies criteria and establishes a common reference that guides us to always act responsibly and comprehensively.

With this document we seek to provide a useful working tool that guides us to make the right decisions in line with our values. I invite everyone who is part of **MARCO MKT** to permanently read and consult our Code of Ethics. Do not forget to consult any questions that may arise when reading it or putting it into practice, we know that this document will be something alive that we want to see active in our daily actions. Last but not least, we are all a fundamental part of the company's value chain, which is why, in case of any irregularity that you feel or perceive, do not hesitate to talk about it through the channels we provide.

We count on your support and commitment to continue building success stories and strengthening the integrity of **MARCO MKT**.

My cordial greetings,

**Lisandro Zapararte**  
CEO MRC Group

## Goals

1. Establish the fundamental principles and standards that guide our ethical behavior in the relationship between employees, with our shareholders, customers, suppliers, business partners, authorities, civil society organizations, the environment, the community and with everyone who interacts with **MARCO MKT**.
2. Define the responsibilities of the company's directors and employees to comply with and enforce this Code of Ethics, which, together with the other **MARCO MKT** Internal Guidelines, is part of our corporate governance system.
3. Publicize the **MARCO MKT** Ethics Line, through which any behavior, infraction or practice that is not in accordance with the provisions of this Code of Ethics and other MARCO MKT Internal Guidelines can be reported.

## Scope

1. Our Code of Ethics applies to members of the Board of Directors, Board of Executive Officers, Headquarters, employees, shareholders, customers, suppliers, business partners, authorities, civil society organizations, the environment, the community and anyone who interacts with or on behalf of any of the companies that make up the **MARCO Group (MRC Group)**.
2. This Code of Ethics is not and is not intended to be exhaustive. Thus, unforeseen situations will be resolved in accordance with criteria of best management practices and corporate governance.
3. Additional topics arising from various situations in our business and the dynamics of the environment in general will be incorporated, as necessary.

# Our Culture

- Our Purpose.
- Our Values.
- Our Essence.



Our Purpose, Values and Essence, which show us the way and establish guidelines for planning strategies and projects that aim to attract and satisfy the general needs of MARCO MKT, with the aim of consistently generating value for the entire ecosystem, as well as beyond greater social development and a healthy environment for all employees, with these actions we continue on the path of continuous improvement.

## Our Purpose

Everyone wants to have a positive impact and achieving it is a constant task that takes a lot of effort. To achieve this, it is necessary to know “why to do it” and “how to do it”, as these are the first steps that allow us to achieve any goal.

It is here that the purpose arises, to give meaning to the actions of a company and the people who collaborate in it; allows aligning the way of thinking, feeling and acting. In any community offers the answer to Why do we do what we do?

So... what is our purpose?

**Co-create solutions that mark the evolution of brands without borders.**

**#M2H [Marco to Human]**

## Our Values

We live the commitment to a sense of belonging and responsibility in our actions through the Values that are an integral part of the organization, and that provide the basis for the development of regulations on which decisions are made and actions are conducted with value.

The key to leaving a positive mark on people is in values, the goal is for authenticity and joy to be recognized in all relationships and interactions. To achieve this, we must have values that consistently guide our behavior.

In this way, the mark we leave will be recognized throughout the world, being consistent with our purpose. The security, strength and enthusiasm that our actions are focused on giving the best is achieved, with a commitment to maintaining integrity with deep connections.

A **MARCO MKT** employee generates great impact, always seeks to transcend, puts the greater good of the organization above their professional goals and stands out for always following these values.

**Our main value is being Marco.** We are committed to the dreams and goals we share. We always seek excellence and, driven by integrity, we seek to make the company a great place to work.

#valuesthatmark



### Integrity

- Recognize dignity.
- Respect freedom and privacy.
- Appreciate differences.
- Be radically honest.
- Seek harmony.



## Excellence

- Give maximum effort.
- Pursue success.
- Develop the business.
- Believing in great ideas.
- Compete to win.



## Commitment

- Living and making culture live.
- Render account.
- We take responsibility for dreams.
- Fulfill what was agreed.
- Enjoy the game seriously.



## Hyperconnection

- Connect with the best in others.
- Identify the potential.
- Actively listen.
- Recognize the extraordinary.
- Enrich the ecosystem.

## Our Essence

In a world of constant change and transformation, staying true to an essence can seem like a difficult task. The rhythm of life changes constantly, the way we relate to each other, the spaces we occupy and even the way we communicate;

But how to find our essence having so many facets of us? It doesn't seem like an easy task. We cannot say what its essence is, but we can tell you how to find it.

### Protagonism

Recognize the power of the activities you do and do your best because it is part of the big story you are writing.

- Activate curiosity.
- Navigate within you.
- Recognize the value.
- Explore the end.
- Get back to start.

### Confidence

Doubting about how to perform an activity and taking responsibility is an open door to learning something new, something that will make you stronger, more capable and more confident than you think.

- Accept limits.
- Have the courage of the humble.
- Make weaknesses insignificant.
- Make the most of your strengths.
- Master the future.

## Innovation

If you've managed to do something great, the next step is to make it phenomenal by envisioning a new solution that generates greater value.

- Focus on value creation.
- Adapt solutions to the customer.
- Completely convince.
- Evolve the ecosystem.
- Surprise again.

## Integration

Each goal accomplished or objective reached is thanks to your effort and that of your colleagues, being part of a great work where every action is important.

- Look beyond.
- Hear the invisible.
- Understand to nothing.
- Co-create tirelessly.
- Being with others in action.

## Focus

Knowing that you are a part of it and that you are doing something relevant will increase your focus, effectiveness and passion to surpass any goal.

- View the objective.
- Plan each step.
- Keep discipline.
- Continuing with ideas.
- Make the imagination come true.

# Our People

- Human Rights.
- Respect for human dignity.
- Diversity, inclusion and equality.
- Fundamental principles and rights at work.
- Safety and health at work.



## Human Rights

At **MARCO MKT** we recognize that Human Rights are a set of prerogatives based on human dignity, whose effective realization is essential for the integral development of the person.

### Respect for Human Dignity

1. We show loyal, respectful, diligent and honest behavior.
2. We respect people's dignity, freedom and privacy.
3. We do not allow verbal, physical or visual conduct that violates dignity and respect.
4. We are committed to promoting and preserving a work environment in which all types of harassment, violence and harassment or any other activity that violates the dignity and respect of our employees is condemned, prohibited and punished.

### Diversity, Inclusion and Equality

For **MARCO MKT**, it is a priority to build the basic definitions to co-create the company's environment and the entire ecosystem, imprinting a culture of interactions and actions that place the person, their uniqueness and their individual potential at the center, which, together with the environment, contributes its unique value and builds a dynamic of growth and evolution. Therefore, through our Diversity, Inclusion and Equality Policy:

1. We promote inclusion so that the diversity of our employees can add value in an environment of equitable rights and duties.
2. We do not discriminate against people by making any distinction, exclusion, restriction or preference that is not objective, rational or proportionate and has the objective or result of preventing, restricting, impeding, impairing or nullifying the recognition, enjoyment or exercise of human rights and freedoms. , for any reason, including origin, race, marital status, age, opinions, sex, creed, tribe, union affiliation or affiliation, ethnicity, social or economic class, pregnancy, gender identity, sexual orientation, health condition, disability or nationality.

## Fundamental Principles and Rights at Work

At **MARCO MKT**, we are committed to growing as a high-performance organization where talent, culture and leadership are the main drivers of the development of our people and the fulfillment of our strategic objectives. Consequently, we seek to promote the professional development of our employees, providing them with the training and resources necessary to promote their safety and success at work.

Our principles are:

1. We value, respect and protect the people who work at MARCO MKT.
2. We do not allow forced labor, support the eradication of child labor and comply with applicable laws regarding the employment of minors.
3. We report cases in which we cannot fulfill our responsibilities objectively, due to pressure from third parties who make use of their position, authority or influence at **MARCO MKT**.

## Safety and Health at Work

We consider that the physical integrity, safety and health at work of our employees are as important as any other function and objective of **MARCO MKT**.

We take the necessary steps to ensure that the following occupational health and safety objectives are met:

- a. Provide and maintain safe and healthy workplaces.
- b. Provide and maintain a suitable work environment.
- c. Develop a culture of safety among employees.
- d. Provide the necessary tools for each employee to perform their duties.

# Our Planet

- Commitment to our community.
- Environment.

## Our Planet

At **MARCO MKT**, we believe that there is an opportunity to contribute to generating a culture of change in the way the world markets, promotes, disseminates, distributes and consumes products and services.

Our goal is to use our experience to help build a chain of consumption capable of satisfying the needs of the current market, without going beyond the limits of our planet and generating value actions that are favorable to the environment that surrounds us.

## Commitment to our community

We recognize our commitment to contribute to the development of communities through our business management, which is a sample of the principles and values that we have practiced since our origins.

In this area, our goals for the next 5 years are:

1. Establish strategic alliances with civil society organizations and other entities, whose objective is to enhance the social impact of our community actions.
2. Create active volunteer programs, participating in community and public campaigns, that allow us to impact the human, environmental, ecological, educational, technological and economic development of the communities where we operate.

## Environment

Within the scope of our objectives in terms of the Environment, we will seek to know, meet and, within our scope, mitigate the risks associated with the environmental impact of the use of energy, water and waste management throughout the value chain of all our operations.

In view of the above, we share our environmental axes:

1. We recognize the protection and conservation of the environment as part of our social commitment.
2. We encourage the development and diffusion of environmentally friendly technologies throughout our operations.
3. We promote the use of clean sources of energy, the efficient use of energy and we have established teleworking as a working standard, which contributes to reducing the generation of environmental pollutants.
4. We ensure operational growth committed to reducing the impact on the environment, implementing programs to reduce, reuse and recycle waste from our operations, as well as waste related to our products and services.

# Our resources

- Use of MARCO MKT assets.
- Information management.
- Privileged and confidential information.
- Accounting and financial records.
- Intellectual property.
- Personal data.
- Information security.



## Responsible Use of Marco MKT Assets

We are responsible for protecting and safely using **MARCO MKT's** assets, as well as seeking the best use of resources granted or obtained based on the position we hold within the organization.

**MARCO MKT's** assets include, without limitation, e-mail, computers, documents, equipment, facilities, information, Company logo and name, materials and supplies. The use of assets for purposes other than the development of the Company's business is prohibited. In addition, the use of Company assets and resources for personal financial gain is strictly prohibited.

The following are some examples of improper or irrational usage:

- Use of **MARCO MKT** facilities for personal benefit;
- Use of the corporate telephone to generate personal long-distance calls;
- Removal of office supplies and equipment for consumption or personal use;
- Personal use of **MARCO MKT** vehicles without express authorization;
- Unauthorized copying of computer software programs; and
- Use of credit cards issued by the Company for personal purchases.

All data and files contained in the Company's Information Systems or that are transmitted through or through these systems are the exclusive property of **MARCO MKT** and can only be accessed by those who have a business need that justifies it.

Personnel in charge of Information Systems and other authorized personnel may access any computer file, data file, document or e-mail messages (or attachments) at any time for the maintenance, updating and protection of Information Systems, to monitor use, or to ensure full compliance with the Code and other **MARCO MKT** policies and practices.

## Information Management.

We protect and preserve the information we generate, obtain and treat, whether our own or that of third parties, treating them as the company's maximum assets, for which we use them responsibly, ethically and in accordance with the laws applicable to our operation and with systems authorized by our internal areas.

## Privileged and confidential information.

We have established restrictions on the use, handling and processing of the Company's Insider and Confidential Information, including the following:

1. We do not disclose and avoid the leakage of privileged and/or confidential information to unauthorized persons, in compliance with the provisions of the laws that regulate the markets where **MARCO MKT** operates.
2. We do not make quotations or proposals, for our own benefit or that of third parties, whose price may be influenced by the privileged information we have about other Clients.
3. We only use the platforms and storage means of Information previously authorized by **MARCO MKT**, and we always adopt the security measures communicated by the Global IT area.
4. We do not make comments, including on family media or social networks, about activities that we conduct within **MARCO MKT**, which are harmful to it or to those who are part of it.
5. Only persons previously authorized by **MARCO MKT** may provide information about the company to third parties outside the company.

## Accounting and Financial Records.

We record the accounting and financial information in a complete, correct and timely manner in accordance with current regulations, as established by the legislation applicable to our operation and by Organs regulatory bodies in the matter, ensuring the accuracy of the indicators under our responsibility.

## Intellectual Property

We do not disclose any type of confidential information, including that related to industrial and intellectual secrets, processes, methods, strategies, plans, projects, technical, market data or any other type of data. We maintain the confidentiality of such information even after the end of our employment relationship with **MARCO MKT**, as well as with the confidential information of the companies in which we already work.

## Personal Data

We obtain and process personal data responsibly, ethically and in accordance with the laws applicable to our operation.

## Information Security

We are aware of the responsibility shared by everyone in protecting and preserving the security of the information we manage, which is why we responsibly use and protect the access accounts and passwords assigned to technological resources.

All the above precepts are linked to the following documents and prevention mechanisms:

- a. Information security policy;
- b. Anti-corruption clause inserted in all contracts entered into with customers and suppliers;
- c. Confidentiality agreements entered into with customers, suppliers, business partners and employees;
- d. Privacy and personal data protection policy;
- e. Policy on the use of mobile devices and teleworking;
- f. Password management policy; and
- g. Responsive subscription for delivery of work tools to employees.

# Our relationship with third parties

- Customers.
- Suppliers.
- Competition.
- Government and authorities.
- Marketing.



## Customers

At **MARCO MKT** we seek to improve the value proposition and experience of our Customers, so we take the following points as a guide:

1. We serve customers by offering fair and honest treatment in each operation, adhering to **MARCO MKT** principles and values, providing services with the highest quality and punctuality.
2. We do not make false quotations or commercial proposals about our services and we always foster an environment of fair competition.
3. We understand our customers' needs and are committed to innovating our processes and services to satisfy them.
4. We disclose, through our official communication channels, our Code of Ethics throughout our value chain.

## Suppliers and Business Partners.

We contribute to the improvement of the commercial, social, environmental and ethical performance of our suppliers and we seek them to operate based on responsible business policies, principles and practices, complying with the following:

1. We only include in our portfolio of suppliers and business partners those who share our ethics and values in accordance with this Code of Ethics.
2. Who negotiates the acquisition of goods and services that **MARCO MKT** requires, offers and demands professional treatment from suppliers in each transaction, always seeking the best interest of the company.
3. We ensure the equitable participation of suppliers based on quality, profitability and service criteria, considering the ethical, environmental and information security standards established by **MARCO MKT**.
4. We consider it illegal conduct to solicit or receive incentives of any kind from suppliers for their selection or promotion, other than for the benefit of the company.

## Competition

We do business fairly and fairly, based on our ethical principles and in compliance with the competition laws applicable to our business.

1. We do not enter into any agreement with customers, suppliers, business partners or competitors that seeks to limit free commercial competition in the markets in which we operate.
2. Anyone who has contact with representatives of competitors demonstrates a professional attitude, attached to the Company's principles and values, as we are clear that we are responsible for upholding the good name of **MARCO MKT**.
3. When interacting with competitors, whether individually or in forums and business or professional associations, we do not comment on issues that may generate risks or possible contingencies for MARCO MKT with regard to compliance with competition laws.

## Government and Authorities

At MARCO MKT, our Values are the basis for relations with the government and authorities of the countries where we operate, providing a treatment of openness and respect. All employees who have in their functions the interaction with any Authority or person who holds a government position, contemplate the following points in their actions:

1. We comply with applicable laws, regulations and other regulations set by the governments of the countries in which we operate.
2. We collaborate at all times with the government and competent authorities for the full exercise of their powers, and we act in accordance with the law in the defense of the legitimate interests of **MARCO MKT**.
3. We respect the government and the authorities, to whom we offer friendly treatment, and we seek an environment of openness and trust that facilitates the discussion of issues and the establishment of agreements.
4. We comply with the requirements and observations of governments and authorities in the exercise of their powers conferred by applicable laws or regulations, seeking to collaborate effectively and courteously in the fulfillment of their mission.
5. The relationships that, on behalf of **MARCO MKT**, we maintain with government bodies or authorities, we conduct in accordance with the laws applicable to our operation and this Code of Ethics.
6. Before contacting the government and/or authorities on behalf of **MARCO MKT**, we verify, together with the Institutional Relations areas of our Business Unit, that the interaction is within our attributions.

## Marketing

Communication through the services we provide related to the promotion, promotion, advertising and marketing of **MARCO MKT** is:

1. Legal, honest, truthful and in accordance with the principles of fair competition and good business practices.
2. Prepared with a sense of social responsibility and based on principles of transparency and good faith.
3. Verifiable and free of elements that could lead to a misinterpretation of the characteristics of the products and services offered.
4. Respecting the values of **MARCO MKT**, our Customers and Business Partners, avoiding unethical circumstances that violate human integrity and dignity or use culturally offensive symbols.

# Legality Culture

- Regulatory Compliance.
- Anti-Corruption and Anti-Bribery.
- Anti-Money Laundering.
- Political Contributions.
- Conflict of interest.
- Financial Interests.
- Family, friendship and/or affinity.
- Gifts, hospitality and entertainment.
- Donations.
- Other activities.



## Regulatory Compliance

At **MARCO MKT**, legality is part of our culture and we work for our employees to practice it, we firmly believe that our world requires organizations and individuals committed to society.

We comply with the laws, regulations and ordinances applicable to our operation, as well as the Internal Guidelines.

## Anti-Corruption and Anti-Bribery

We conduct business practices in accordance with the law, honestly and ethically, with zero tolerance for bribery, rejecting, denouncing and fighting any act of corruption and extortion.

In our activities inside and outside **MARCO MKT** or on its behalf, directly or through third parties, we do not participate in acts of corruption, therefore:

1. We do not order, authorize or promise to conduct corrupt practices;
2. We do not induce anyone to practice corrupt practices;
3. We do not conspire to conduct corrupt practices;
4. We comply with anti-corruption laws applicable to our operation; and
5. We reject any type of bribery of government officials.

## Against money laundering

We comply with applicable laws to prevent money laundering and promote knowledge and compliance with our employees. We have developed processes and mechanisms to comply with applicable laws in the prevention of money laundering, which contribute to the generation of security and confidence in the sectors of the economy in the countries in which we operate.

## Political Contributions

Those who participate in political activities in any jurisdiction are prohibited from involving **MARCO MKT**, it being clearly established that they act in a personal capacity and not on behalf of the company.

We comply with the requirements established by local laws regarding political contributions in the countries in which we operate, as well as the Internal Guidelines established by **MARCO MKT**.

## Conflict of Interest

At **MARCO MKT** we conduct all our activities with integrity and professional ethics, always putting **MARCO MKT's** interests above any personal interest, avoiding undue personal benefits and reporting any conflict of interest of which we are aware.

## Financial interests

Those who have or intend to have commercial, business or investment relationships in companies or other businesses that have or intend to have commercial or business relationships with **MARCO MKT**, may conduct the aforementioned commercial, business or investment relationships, provided they have been previously analyzed and approved in accordance with **MARCO MKT's** Internal Guidelines.

We do not have interests or investments that allow us to influence, nor do we participate in the commercial activities of competing businesses.

## Family, friendship and/or affinity

1. We do not participate or directly or indirectly influence the requirements, negotiations, contracting and decision-making processes, relating to any customer, supplier and/or business partner, whether with any of them, or in any of them:
  - a. We have a family relationship;
  - b. We have a family member who is a partner, investor or representative;
  - c. We have a relationship (including friendship) that may generate a conflict with MARCO MKT's interests or any personal benefit, (even if this relationship is with a partner, investor, representative or employee of said customer, supplier or business partner).
2. We prevent our relatives from working for us, except as authorized in accordance with the provisions of our **MARCO MKT** Internal Guidelines.
3. Those who conduct surveillance, supervision, auditing or control over the activities conducted by a family member must inform their immediate superior to be replaced of this responsibility, and in the case of the **CEO of MARCO MKT**, they must inform the Board of Directors.
4. We do not intercede or comply with the demands of superiors, subordinates, co-workers, family members or friends, if this harms **MARCO MKT**.

## Gifts, hospitality and entertainment

1. We do not receive, give, pay, offer, promise or authorize directly or indirectly, on behalf of **MARCO MKT**, money, gifts, advantageous conditions, wages, travel, commissions or anything else of value to obtain any advantage or benefit. inappropriate of any kind.
2. We do not give or offer gifts to government officials.
3. We only accept, give or offer gifts of a promotional, occasional and symbolic nature.
4. We only provide care in accordance with the provisions of our Corporate Policy and applicable legal provisions.
5. When a customer, supplier or business partner invites us, involving an out-of-town trip or to attend a sporting event or any other type of entertainment, we must comply with the provisions of this Code of Ethics and the **MARCO MKT** Internal Guidelines, and obtain the corresponding approvals in advance to assess the commercial justification of your assistance.

## Donations

All contributions or donations made by **MARCO MKT** must follow the strictest legal and ethical standards, and must necessarily comply with the requirements and limits established by the legislation of each country, as well as the written authorization of the Administration. No employee may make donations to political parties, political campaigns or candidates for public office on behalf of any company that is part of **MARCO MKT**.

In cases where our suppliers, customers and/or business partners invite us to be part of a donation campaign, they must send the invitation by any written means to their contact within **MARCO MKT**, who must forward the request to the Board, that will authorize or deny our participation in said campaign.

## Other activities

We do not conduct any external activity that could affect our capacity and availability with the obligations we have with **MARCO MKT**.

# Our responsibilities

- CEO.
- Offices, Studies and Specialized Companies.
- Ethics Committee.
- General Managers of the Business Divisions.
- Employees.
- Human Resources.
- Internal Audit.



All of us who belong to the **MARCO MKT** family play an especially important role within the organization and make it possible for everything to work as part of a big gear. In terms of Ethics, the main responsibilities of each of us are described in this Chapter.

## CEO

1. Approve the content and adjustments of the Code of Ethics, as well as its issuance; and
2. To ensure, together with the Ethics Committee, the dissemination of this **MARCO MKT** Code of Ethics.

## Offices, Studies and Specialized Companies

1. Know the **MARCO MKT** Code of Ethics and the Representative must annually sign the Letter of Commitment to comply with its provisions.
2. Transmit this Code to your subordinates who have a direct relationship with **MARCO MKT's** business.
3. Report any possible violation of the **MARCO MKT** Code of Ethics.
4. Be governed at all times by the provisions of this Code of Ethics, especially when dealing with authorities and/or any other third party on which the performance of their functions depends.

## Ethics Committee

1. Supervise compliance with the **MARCO MKT** Code of Ethics.
2. Submit to the Board of Directors the proposals for modifying and updating the Code of Ethics for its approval.
3. Ensure that the members of the Board of Directors annually sign the Letter of Commitment to comply with the Code of Ethics.
4. Clear doubts about the interpretation and content of the Code of Ethics and other **MARCO MKT** Corporate Guidelines.
5. Ensure the disclosure, understanding and use of the Code and Ethics Line.
6. Provide guidance in dealing with complaints received on the Ethics Line, as well as with questions and concerns related to possible violations of this Code of Ethics and other Internal Guidelines.
7. Promote and ensure that the investigation process of complaints received through the Ethics Line is conducted in an objective, impartial and confidential manner.
8. Deliberate and decide on corrective measures that, according to the Sanctions Guidelines, are applicable for acts or omissions that violate the Code of Ethics and other Internal Guidelines, and suggest their application to the Human Resources Department and the corresponding Unit.

## General Managers of the Business Divisions

1. Disclose the Code of Ethics and other **MARCO MKT** Internal Guidelines among employees.
2. Ensure, in its business divisions, compliance with the provisions of the MARCO MKT Code of Ethics and other **MARCO MKT** Internal Guidelines.
3. Ensuring, in its Business Units, compliance with the Code of Ethics to promote the Culture of **MARCO MKT**.

## Employees

1. Know and comply with the Code of Ethics and other **MARCO MKT** Internal Guidelines.
2. Report any violation and/or risk of violation of the Code of Ethics and other MARCO MKT Internal Guidelines.
3. Know and use, if necessary, the Ethics Line.
4. Sign the Letter of Commitment to comply with the Code of Ethics and other Internal Guidelines according to the frequency that **MARCO MKT** indicates.
5. Immediately report any Conflicts of Interest, whether actual, potential or apparent.

## Human Resources

1. Disclose the **MARCO MKT** Code of Ethics, other **MARCO MKT** Internal Guidelines, including the reporting procedure through the MARCO MKT Ethics Line, as well as updates to these documents, among employees.
2. Include in the induction and training programs the topics contained in the **MARCO MKT** Code of Ethics and other **MARCO MKT** Internal Guidelines.
3. Integrate into the organization employees who share our ethics and Values in accordance with this **MARCO MKT** Code of Ethics.
4. Ensure that all directors and managers annually sign the Letter of Commitment to comply with the **MARCO MKT** Code of Ethics and other **MARCO MKT** Internal Guidelines.
5. Ensure the disclosure, understanding and use of the Code and Ethics Line.

## Internal Audit

1. Assess compliance with the provisions contained in the **MARCO MKT** Code of Ethics.
2. Inform the Audit and Corporate Practices Committees of the Board of Directors of any breach of **MARCO MKT's** Code of Ethics.
3. Monitor the measures adopted by management in violations reported through the **MARCO MKT** Ethics Line.

# Ethical compliance system

- Reports.
- MARCO MKT Ethics Line.
- Answering queries and concerns.
- Corrective measures.
- Letter of commitment to comply with Marco MKT's Code of Ethics.



## Reports

At **MARCO MKT**, our values are an essential and essential part of life and culture, therefore, we take seriously any complaint about illegal practices or inappropriate conduct detected in our company.

The guidelines on which the Ethics Committee is governed are the following:

1. We keep the complaints received, whether they come from our employees and/or third parties, or those compiled through the **MARCO MKT** Ethics Line or by any other means, except when partial or total disclosure of information is mandatory. of the complaint and/or its corresponding investigation, in accordance with applicable law.
2. We do not tolerate complaints that, whether unfounded and/or in bad faith, are made to an innocent person.
3. To determine that a person has committed an act or omission that violates the Code of Ethics and other **MARCO MKT** Internal Guidelines, we conduct an objective and reasoned investigation, which supports the imputation of responsibility to the investigated.
4. We do not take any type of retaliation against people who report and/or collaborate in good faith, in investigations in which there is a presumption of non-compliance with any provision established in the Code of Ethics or in other **MARCO MKT** Internal Guidelines.
5. The fact of not denouncing any violation of this Code of Ethics and/or other **MARCO MKT** Internal Guidelines of which it is aware, implies being co-responsible for it, being deserving of a corrective measure.

We manage and document all complaints received on the MARCO MKT Ethics Line.

## MARCO MKT Ethics Line

We promote and facilitate the detection of illegal practices and inappropriate conduct, through open communication and formal mechanisms implemented in accordance with the provisions of the **MARCO MKT Code of Ethics**, and we promptly report violations.

The Ethics Line is a formal mechanism created so that employees, as well as third parties with whom **MARCO MKT** has a relationship, can report any violation of the Code of Ethics and other Internal Guidelines of the Company.

**The Ethics Line is available 24 hours a day, every day of the year** and is managed confidentially by a specialized company outside MARCO MKT, and is monitored by the Company's Ethics Committee, composed of internal employees, who have a certain degree of specialization in various subjects.

Any breach of the Code of Ethics and other **MARCO MKT** Internal Guidelines, in addition to being able to report it to the Ethics Line, can also be reported to the immediate superior, the Ethics Committee or the Human Resources area.

To facilitate the reception of complaints, we have the following means:

**E-mail:** [marcomkt@kpmg.com.ar](mailto:marcomkt@kpmg.com.ar)

**Web site:** <https://marcomkt.lineaseticas.com/>

**Phone lines:**

<b>Country</b>	<b>Telephone</b>
Argentina	0800-122-0396
Brazil	0800-892-3806
Chile	8000-0-0158
Colombia	0180-0752-2260
United States	1866-807-4210
Mexico	0180-0123-3284
Panama	0080-0052-1445
Peru	0800-0-0795

## Attention to questions and concerns

We promote a culture of prevention, which is why we receive questions and concerns regarding compliance with our Code of Ethics and other **MARCO MKT** Internal Guidelines through the Ethics Line.

## Corrective Measures

1. Violations of this Code of Ethics and other **MARCO MKT** Internal Guidelines will be subject to corrective measures.
2. The severity of the corrective measures will be applied depending on the seriousness of the faults committed.
3. Corrective measures range from a written reprimand, dismissal, to communication to the competent authorities and the exercise of any other corresponding legal action, in accordance with the provisions of the applicable legislation in each country.
4. We consider it a violation of this Code not to take corrective action for violations of this Code.

# The best of one for all.

MARCO MKT Code of Ethics

