



# CODE OF CONDUCT

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agriculture products*

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**1. INTRODUCTION**

**1.1. Purpose**

The Code of Ethics, Code of Conduct or Code of Good Practice brings together the values, principles and rules of conduct in a single document that must govern the behaviour and performance of each and every one of the employees and



managers as well as the Board of Directors of the GAVÀ GROUP and COMPANIES OF THE GROUP. This document also applies to other interest groups—clients, suppliers, collaborators and other agents—in as much as it applies to them and the GAVÀ GROUP has the power to enforce it.

The Code is the basic pillar of compliance for the companies that make up the Group and it wholly comprises a clear and faithful reflection of its corporate culture.

The *purpose* of this Code is to establish the rules, principles and values that govern the actions of all employees, with the ultimate goal of attaining ethical and responsible professional behaviour from the employees while carrying out their activities, and uphold the company's commitment to the principles of business ethics and transparency.

This Code of Conduct is binding and contains provisions to ensure its effectiveness. This signifies the establishment of channels for complaints, known as ethical channels that are linked to the attribution of occupational, administrative or criminal liability in the event of non-compliance.

The content of the Code derives from acting in good faith in the workplace. Thus, one of the causes of disciplinary dismissal in Article 54 of the Workers' Statute is precisely the violation of good faith. The binding nature of the Code is assured in this way.

The Code is based on ethical values, which improve the reputation of both the business group as well as each of the companies within it. It provides unity and coherence to the self-regulation system of each of companies; it strengthens the employees' sense of belonging to the company and reflects the corporate culture of the companies and the Group to third parties.

Moreover, and in strict compliance with the law, certain matters covered by this Code will be complemented by internal regulations—documentation on procedures, processes and protocols for action—and rules that will be specified in more detail in the different applicable Sectorial Codes.

This Code takes into account the principle of criminal liability of legal persons and will act as an effective tool to prevent any irregular or improper conduct that could lead to and determine the criminal liability of the companies.

## 1.2. Values

The **values** that guide the work of the GAVÀ GROUP and THE COMPANIES OF THE GROUP are as follows:

- ***Orientation to and respect for persons:*** The company's most important asset comprises the persons who relate to the organisations - employees, clients, suppliers and anyone else linked to the Group. Therefore, we protect and respect universally recognised human rights and the equality of persons as well as non-discrimination within our sphere of influence.
- ***Respect for the environment:*** Promoting greater environmental responsibility, fostering the development and dissemination of environmentally friendly technologies and, particularly, with respect to agriculture, is a commitment for all of us because we are all responsible for the sustainability and development of our environment for present and future generations.
- ***Service and integrity:*** Our goal is to maintain the highest values of honesty and reliability in all our business practices, ensuring a high quality and reliable service for our clients.

This Code is a compendium of rules based on the aforementioned values, while it also contains some specific fundamental principles that guide our actions based on the loyal and ethical conduct of each of the persons it is addressed to.

The Code intends not only to observe the legal regulations that apply to the company's activity, but also to respect the principles of transparency, correctness, exactness and seriousness that are required of any legal person operating in the market. These regulations include: Royal Legislative Decree 1/2010 of 2 July, approving the consolidated text of the Capital Companies Act; Royal Decree of 22 August 1885 that publishes the Commercial Code; Law 10/2010 of 28 April, on the prevention of money laundering and financing of terrorism; Regulation (EU) 2016/679 of the European Parliament and of the

Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data, and which repeals Directive 95/46/EC; Law 58/2003 of 17 December, of General Taxation; Organic Law 10/1995 of 23 November, of the Criminal Code.

### **1.3. Knowledge of the Code of Ethics**

The GAVÀ GROUP and COMPANIES OF THE GROUP will promote knowledge of this Code among all personnel and employees, in order to ensure that their actions are governed by the principles that form the basis of this Code.

The correct application of this Code therefore requires employees and managers to know, participate in, and familiarise themselves with its content and the legal provisions that apply to any activities carried out.

Any doubts about how the Code should be applied, its content, or how to resolve any situation that is not specifically described in it, must be clarified with the corresponding hierarchical superior or, where appropriate, with the Managing Director or body of the corresponding organisation.

### **1.4. Liability**

Without prejudice to any other applicable liability, failure to comply with the criteria and guidelines for action contained in this Code may result in the corresponding disciplinary sanctions, in accordance with the provisions of applicable labour legislation.

## **2. SCOPE OF APPLICATION AND COMPLIANCE**

### **2.1. Subjective Scope of Application**

This Code of Ethics is intended for several different audiences. It is mandatory and binding for all employees in the companies of the Group, regardless of the position they hold or functions they may perform.

The Group and Companies of the Group will encourage their suppliers and stakeholders to follow the guidelines of behaviour established in this Code of Ethics and, where appropriate, may request that they formally sign a commitment to comply with it.

## **2.2. Acceptance and Compliance**

2.2.1. The GAVÀ GROUP and COMPANIES OF THE GROUP will adopt the necessary measures to enforce compliance with the values, principles and standards of this Code, sharing its content with the intended addressees and resolving any doubts that may arise during its application.

The Code of Ethics will be made known to all members of the Group and Companies of the Group, who will be obliged to attend the training sessions scheduled for this purpose.

Company management staff will participate in these training programmes, sharing workshops with employees or actively participating in them, highlighting the importance of compliance with the regulations in this manner. They will also provide the necessary means and resources to disseminate the values and principles of the Group and its Companies and foster compliance with the guidelines relating to conduct contained within the Code. Their behaviour and level of compliance with the Code will stand out as a reference model at all times.

2.2.2. The Code must be expressly accepted by each of the addressees, who must also expressly commit to complying with it, so that the principles and values in the Code govern the conduct of the people it is intended for. Each addressee will confirm that they have had access to and knowledge of the Code; that they accept it and understand what it involves. To this end, a record of employee compliance will be made and kept, with electronic acknowledgement of receipt of the communication being sufficient. The latter must be sent to the following email address: [canaletico@gavagrup.com](mailto:canaletico@gavagrup.com)

2.2.3. No one in the business organisation, regardless of the position they hold, is authorised to request an employee to violate the provisions of this Code of Ethics. No one may justify any conduct that runs counter to its principles and rules, or any malpractice, on the basis of an order from a superior officer or ignorance of this Code.

2.2.4. Applicable legal provisions cannot be violated when implementing the contents of this Code. Should such a circumstance arise, the contents of the Code must always be adapted to the regulations and legal provisions.

2.2.5. The Code of Ethics does not modify existing labour relations between the Group and Companies of the Group and their employees. But since they are a part of the employer's managerial requirements, their content is integrated within the obligations that employees must comply with. Thus, in addition to the obligations expressly detailed in each employment contract, the employee

must also comply with these rules of action, as they relate to the way in which employees must perform in their jobs.

### **2.3. Responsibility for Compliance with the Code of Conduct**

2.3.1. All managers have the following obligations:

- a) Communicating the Code of Conduct to all employees.
- b) Leading compliance through example
- c) Correcting any breaches of compliance of the Code of Conduct that they detect.
- d) Establishing mechanisms that ensure compliance with the Code in their areas of responsibility.
- e) Reporting on any processes and actions that run counter to this Code.

2.3.2. All employees are subject to and must comply with the following obligations:

- a) Having knowledge of the Code of Conduct and making decisions in accordance with the principles and rules contained therein.
- b) Communicating responsibly whenever there is any indication of processes and actions that contravene the provisions of this Code of Conduct.
- c) Should Managers and Employees fail to comply with the Code and the rules that derive from it, it could result in the opening and initiation of internal corporate investigation procedures established by the Board of Directors, which might even result in disciplinary dismissal.

### **3. ETHICAL AND RESPONSIBLE BEHAVIOUR (RULES OF CONDUCT)**

The guiding principles and ethical values of the organisation form the basis of the company's activity. These principles and values are:

- Respect for the law, human rights and ethical values.
- Respect for all persons, avoiding any kind of harassment, intimidation, abuse or disrespect. No physical or verbal abuse will be tolerated. The company will take the opportune and appropriate measures in the event of any of the aforementioned situations, including disciplinary measures. Any notification of harassment or discrimination will be the subject of a prompt and thorough investigation, in conditions of the utmost confidentiality.

- Retaliation against persons who report this kind of situation or who collaborate in these investigations is inadmissible. If such a circumstance arises, opportune disciplinary action will be taken.
- Responsibility and prudence in all actions of the persons this Code is addressing, which translates into scrupulously monitoring established internal procedures, especially in the prevention of occupational and environmental risks, when complying with legal or internal regulations related to the activity being carried out as well as in training and education to ensure the activity is carried out in the best way possible.
- Transparency and impartiality when making any type of decision.
- Equal opportunities and professional development as well as non-discrimination, both in terms of access to work and promotions. Discrimination on the basis of sex, race, religion, marital status, sexual orientation or any other differentiating factor will not be permitted.
- Enhancing innovation and efficiency in processes in order to offer a better service to our clients and drive our growth.
- Corporate image and reputation. Our corporate image and reputation is one of our most valuable assets for preserving the trust of shareholders, clients, employees, suppliers, the authorities and society at large.

### **3.1. Respect for the Law**

While carrying out their professional work, no person addressed by this Code will consciously tolerate the violation of any law, national or international, nor will they cooperate in actions or omissions that compromise the principle of legality. The addressees undertake to comply with all the laws in force, the internal procedures of the Group and Companies of the Group and the values and principles contained in this Code of Conduct. At the same time, they undertake to report any non-compliance they detect in their surroundings.

Employees must avoid any conduct that could damage the reputation of the Group or Companies of the Group or adversely affect their interests.

All employees must know the laws that affect their work, requesting their superiors to provide them with precise information when appropriate.

The Group and Companies of the Group will provide the necessary resources so that everyone involved in its organisation knows the relevant external and internal regulations so that they can correctly fulfil their functions.

### **3.2. Honesty and Trust**

Addressees must be honest and trustworthy in any negotiation in which the interests of the entity are at stake and will comply with all the commitments made.

Likewise, they will protect the confidentiality of Company information that has been entrusted to them, as well as information relating to clients, shareholders, employees and suppliers.

### **3.3. Integrity and the Fight Against Corruption**

3.3.1. Under no circumstances will the addressees offer or accept gifts, invitations, hospitality services or any other incentives with the goal of rewarding or unduly influencing a business decision, or contributing to obtaining an unfair advantage.

3.3.2. Addressees cannot promise, offer or grant managers, administrators, employees or collaborators of a company, association, foundation or organisation any unjustified benefits or advantages of any kind that favour them or a third party, that compromise objectivity and transparency in decision-making, or that fail to comply with their obligations in the acquisition or sale of goods or in the hiring of professional services. The Compliance Body should be consulted whenever in doubt.

The company will have an autonomous body in charge of control, surveillance, supervision and monitoring of possible risks for the company, which will be called the, “Supervisory Board of the Preventive Model for Offences” (hereinafter CSMPDD, its acronym in Spanish). It will have complete independence and autonomy to carry out its functions.

3.3.3. Addressees will avoid and, where appropriate, report to the corresponding management body, any potential conflict of interest that may put personal priorities and interests before those of the Group or Companies of the Group. They will behave with rectitude, without in any case seeking any kind of benefits or advantages of an unjustified nature that favours either them or a third party, thus constituting a breach of their obligations in relation to the acquisition or sale of goods or hiring of professional services. If there is any doubt as to whether

the activity to be carried out may involve a conflict of interests, the body responsible for compliance with this Code must be consulted.

3.3.4. The Group and Companies of the Group will act with absolute political neutrality with respect to institutions, and will refrain from taking any direct or indirect position, whether it is in favour of or against legitimate political processes and actors.

In particular, commercial companies shall not make donations in cash or in kind, of any type, to political parties, organisations, movements, or to public or private entities whose activity is clearly linked to political activity.

### **3.4. Commitment to Employees**

The addressees of this Code are our largest and most important asset, and they are essential partners in meeting our business objectives and developing quality employment. Therefore, the Group and Companies of the Group will promote the personal and professional development of their members and will encourage a positive work climate, equal opportunities, conditions and rights, as well as the express rejection of any form of harassment in the workplace.

#### **3.4.1. Human Rights**

The relations between all employees of the companies that make up the Group will be governed by respect. The managers responsible for each business structure must remain vigilant against any form of violence, abuse or discrimination in any form. Relationships between the addressees will be presided over by mutual respect, transparency and trust. Under no circumstances will child labour or forced labour be tolerated.

The principle of equal treatment and opportunities for employees, irrespective of their race, colour, nationality, ethnic origin, religion, gender, political or sexual orientation, marital status, age, disability or family responsibilities, is a principle that inspires our human resources policy and will apply to the recruitment of employees as well as to training, career opportunities, salary levels and other aspects of labour relations.

Under no circumstances will the exercise of the rights of association, syndication and collective bargaining be limited within the framework of the rules governing each of these fundamental rights.

Employees will be offered fair and adequate compensation in accordance with current salaries offered on the labour market. Attention will be paid to helping employees reconcile work with their personal and family life.

#### 3.4.2. Commitment to Safety and Health

The Companies of the Group will ensure a safe and healthy work environment for their employees, taking all the reasonable measures needed to maximise the prevention of occupational risks. In addition, they will provide the necessary means for due compliance with any measures deemed opportune for the effective prevention of occupational risks.

All employees assume responsibility for observing health and safety rules and practices in the workplace.

#### 3.4.3. Commitment Related to Workplace Harassment

Any type of workplace harassment is rejected as it is considered unacceptable and intolerable in any form. There will be no tolerance of any behaviour or organisational factors that lead to harassment in the workplace.

#### 3.4.4. Alcohol and Drug Use

The consumption of alcoholic beverages during working hours is strictly forbidden to the extent that its consumption goes against safety and productivity in the workplace and influences the professionalism and responsibility of employees.

Drug use is totally forbidden in the facilities or offices of the GAVÀ GROUP and COMPANIES of the GROUP.

### **3.5. Commitment to Clients and Users**

#### 3.5.1. Customer Orientation

Customer satisfaction is the foremost objective for those addressed by this Code. Therefore, efficiency of the processes to be carried out and transparency in actions, as well as customer care that will guarantee the maximum quality of



service, will be the goals for all employees of the GAVÀ GROUP and COMPANIES of the GROUP.

To this end, clear, true and timely information will be provided, transparency will be ensured in operations and personalised advice will be offered when required by the customer, always within the framework of professional customer service. Incidents will be resolved in an agile and transparent manner.

The necessary resources will be provided to guarantee that the services offered do not pose any health risks. Where appropriate, opportune actions will be undertaken to resolve them

### 3.5.2. Aligned Codes of Conduct

Clients must comply with the Code of Ethics of the GAVÀ GROUP and COMPANIES OF THE GROUP. If they have their own Code of Ethics, it must be in line with that of the GAVÀ Group.

### 3.5.3. Communications

The company undertakes to be honest with clients, always providing them with true, clear, useful and accurate information when marketing its products and offering its services. Additionally, it will check that its products and services meet required specifications at all times.

In the event of any dissatisfaction with the product or service offered, clients will have the necessary channels at their disposal to make their complaints, which will be resolved in the shortest time possible.

## **3.6. Commitment to Suppliers**

### 3.6.1. Purchasing Policy

Ethics and respect will govern all relations with suppliers, who should always be chosen following criteria of objectivity and transparency. Quality, cost and meeting deadlines are essential. However, priority will be given to suppliers whose business practices respect human dignity, comply with the Law and do not put the company's reputation at risk.

All suppliers should be operating and complying strictly with the regulations in force. Likewise, in the event that any service is subcontracted, the subcontracted companies will be required to work in keeping with the rules promoted in this document, and within the corresponding legal framework.

Internal procurement procedures must be scrupulously respected, and all documentation related to operations will be kept for the sake of possible internal and external checks.

### 3.6.2. Purchasing Policy

Suppliers must respect compliance with internationally recognised Human Rights. They will ensure that they do not commit fraud or abuse of these rights in their business operations. Every supplier shall treat their employees with dignity and respect, without permitting physical punishment under any circumstance, harassment of any kind or abuse of power.

All suppliers shall promote and respect the following principles: a) Eliminate all forms of child labour, b) Eradicate any type of forced or coercive labour, c) Avoid discrimination of any kind in the workplace, d) Respect established maximum working hours and minimum wages, e) Ensure that employees carry out their work following the required standards of safety and hygiene at all times, f) Respect the rights of employees to associate, organise or collectively bargain without suffering any kind of harassment or punishment, g) Obtain and maintain environmental permits for business operations, where required. If business operations generate waste or scrap, they must be treated and controlled in accordance with the provisions of applicable legislation.

Suppliers must uphold a preventive approach aimed at environmental protection, adopting methods that benefit sustainability, development and the spread of environment-friendly technology.

Suppliers will avoid engaging in any form of corruption, extortion or bribery that could affect the principles of fair trade or lead to public scandals that could implicate the Group. Suppliers accept that their participation in any of the

aforementioned activities is a cause for the immediate termination of their contract with GAVÀ GROUP and COMPANIES OF THE GROUP. If such activities are verified, suppliers will not be allowed to claim any compensation resulting from the termination of the contract.

Suppliers who express their commitment to the principles detailed in this Code of Conduct through their acceptance and compliance will be considered positively. To this end, each company shall endeavour to extend the content of this Code of Conduct to its suppliers by incorporating, whenever possible, their commitment to comply with it in all signed contracts.

The GAVÀ GROUP and COMPANIES OF THE GROUP reserve the right to terminate the contractual relationships that they hold with suppliers who repeatedly and seriously breach this Code, as well as to claim for damages, including, where appropriate, moral damages.

### **3.7. COMMITMENT TO ASSETS, KNOWLEDGE AND RESOURCES OF THE ORGANISATION**

#### **3.7.1. Personal Data Protection**

Each company will ensure protection of the personal data in its possession during the exercise of its business activity, insofar as such protection is a priority for achieving excellence in its business purpose.

For this reason, all employees will take special care of data processing, guaranteeing privacy and compliance with current and applicable legislation.

In order to effectively comply with the above, training policies will be put in place to always distribute teaching materials that enable employees to understand the protection mechanisms in place and avoid possible violations of the regulations.

#### **3.7.2. Prevention of Money Laundering and Financing of Terrorism**

The GAVÀ GROUP and COMPANIES OF THE GROUP will comply with national and international provisions to prevent money laundering.

In this sense, commercial and business relationships will not be established with persons or organisations that do not comply with these regulations or do not provide sufficient and adequate information in relation to compliance.

Thus, special attention will be given to cash payments that are unusual for the nature of the operation, transactions made by bearer cheques or those made in currencies other than the one previously agreed on. Any payments that seem irregular will be communicated through the channels and procedures established in this Code of Conduct.

Payments in which the payer or beneficiary is a third party that is not mentioned in the corresponding contracts, or payments made to accounts that are not the usual ones when relating to a certain organisation, company or person, will also be notified.

### 3.7.3. Compliance with Accounting and Financial Regulations

The economic and financial information of the GAVÀ GROUP and COMPANIES OF THE GROUP will faithfully reflect its economic, financial and patrimonial reality, always in accordance with generally accepted accounting principles and applicable international financial reporting standards. No employee or manager will distort the information in accounting records and reports. Such information will be fully, accurately and truthfully reflected.

In this sense, employees will refrain from:

- ✓ Keeping a record of operations outside accounting ledgers, outside the official books.
- ✓ Recording non-existent expenses, income, assets or liabilities.
- ✓ Making entries in the accounting books with an incorrect identification of their object.
- ✓ Using false documents.
- ✓ Deliberately destroying documents before the time limit provided for by law.

### 3.7.4. Compliance with Tax and Fiscal Regulations

The GAVÀ GROUP and COMPANIES OF THE GROUP will comply with all applicable tax and fiscal regulations and foster the execution of all necessary actions to reduce important tax risks and prevent any conduct likely to generate them.



### 3.7.5. Proper use of IT tools

Employees will use IT tools responsibly (email, intranet, internet, telephone or any other similar device) in conditions consistent with their position and the functions they perform. The said tools will not be used for personal use, for their own benefit, or in actions that could affect the reputation or image of the entity.

Employees may only access computer systems when they have the appropriate permissions and licenses. Employees may not download, install, use or distribute any software that could affect the security of their own or another's systems. Copies are not permitted without prior authorisation. Any action that may lead to the entry of computer viruses is definitely prohibited.

Under no circumstances must communications sent via computer tools contain offensive or defamatory statements.

All information relating to user names, passwords and authentication devices on computer systems must be controlled and kept secret. It is essential to report any potential risk or security incident of this nature.

The company's computer equipment and tools are its property and are subject to review by the company, while respecting the regulations in force on the matter.

The user of any computer or communication media owned by the company cannot disclose or publish content that is illegal, sexist, abusive, defamatory, obscene, racist, offensive, pornographic, or any other information not authorised by laws, whether through photographs, texts, advertising banners or links to external pages. Nor can users publish, transmit, reproduce, distribute or exploit other possible components that could be harmful to the integrity of computer systems or likely to infringe intellectual property rights. Similarly, they cannot publish or provide materials or access to resources on hacking, cracking or any other information that could compromise, although only potentially, the security or integrity of the computer systems.

### 3.7.6. Protection of Confidential Information

Employees must maintain the strictest professional secrecy and keep all the information they have for their job confidential.



Employees cannot access, use or disclose confidential information at any time, unless they have been appropriately authorised by their immediate superior to do so, expressly and irrefutably. In case of doubt, and unless otherwise indicated, employees must consider as confidential all the information they have access to, rightly and for the performance of their professional activities.

The rules indicated below must be followed at all times with regard to handling Confidential Information:

- ✓ All information will be protected and kept strictly confidential.
- ✓ Confidential information will only be disclosed and used by the employee for the assigned purposes, as a result of the employment contract or relationship that links him/her to the company. If, in some cases, the assistance of a third party is required and it were necessary to disclose confidential information, the employee will take the necessary measures to protect it properly, signing a confidentiality agreement for this purpose, with all the guarantees offered by Law.
- ✓ The information will not be used, in whole or in part, for purposes other than those assigned to the employee.
- ✓ The information cannot be copied, reproduced or duplicated, in whole or in part, without written permission from the company.
- ✓ The employee will notify, as soon as possible, any incorrect use of confidential information, so that measures can be taken to protect it adequately.
- ✓ No employee will keep confidential information of the entity in private computers or any other medium that has not been provided by the company itself.
- ✓ In case an employee needs to have information available outside the facilities or their usual workplace, always for performing a specific task, he/she must return it after the task has been completed.

#### 3.7.7. Theft or Misappropriation of Assets

The company will provide its employees with the necessary resources to perform their professional activity.

Misappropriation and misuse of these assets will bring criminal charges against them.

### **3.8. OBLIGATIONS WITH REGARD TO FRAUDULENT OR UNETHICAL PRACTICES**

#### **3.8.1. Manipulation of Information**

The falsification or manipulation of information, or the deliberate use of false information, constitutes fraud. The company adheres to the principle of informative transparency, understood as the commitment to send reliable information to the markets, both financial and of any other nature.

Addressees must transmit information in a truthful, complete and comprehensible manner. Under no circumstances will they knowingly provide incorrect, inexact or imprecise information.

#### **3.8.2. Bribery, Corruption, Illegal Commissions and Influence Peddling**

International regulations for the prevention of corruption and bribery will govern the relations of all company employees with the authorities, institutions and public officials. Any practice of corruption, bribery or payment of commissions, in any form, whether by action or omission, or by the creation or maintenance of favourable or irregular situations, with the aim of obtaining a benefit for the company, is **STRICTLY PROHIBITED**.

It is expressly forbidden to accept, request, or offer any type of payment—in cash or in kind—or, in general, any type of benefit or advantage of any kind that is not justified, that favours the employee or a third party against others, in breach of their obligations in the acquisition or sale of goods, or when contracting suppliers or services. Receiving or offering gifts of a “low value” or publicity objects are excluded from this prohibition. If there are any doubts about what is included in this concept, the body in charge of compliance with this Code can be consulted. In any case, cash gifts are prohibited.

Likewise, employees will refrain from making payments that consist of delivering money or goods in kind, whatever their amount, in exchange for guaranteeing or

speeding up the course of a procedure or action before any judicial body, public administration or official body of any kind.

It is also forbidden for any employee to exercise any kind of influence on an official or authority because of the personal relationship they may have.

The fulfilment of obligations arising from the grant of any subsidy or aid will be monitored thoroughly and very vigilantly.

#### **4. ETHICAL CHANNEL PROCEDURE**

All employees of the GAVÀ GROUP and COMPANIES OF THE GROUP are obliged to comply as well as contribute to compliance with this Code.

In this sense, each company of the group has established a procedure that allows employees to notify any breach of the principles contained therein, confidentially and without fear of reprisals.

The procedure for notifying and handling any possible breaches of the Code of Ethics will be managed by the CSMD (Ethics Committee, Compliance Officer or "Complaints Manager"). They act independently, reporting their activity to the Administrative Board.

Any person or entity can report alleged breaches they may detect of the Code of Conduct.

#### **ALTERNATIVES:**

All notifications must include the following:

- List of the facts, in chronological order.
- Arguments that support their initiative, including, where appropriate, submission of evidence (documents, emails, etc.).
- Identification of the complainant. Initially, an anonymous communication is acceptable.

The complaint handling procedure will ensure anonymity and confidentiality at every stage. It will also guarantee that there are no reprisals.



All employees have the opportunity to raise issues related to compliance with the Code of Conduct and associated policies, through the help channel, that is confidential and available on the intranet.

Suppliers, clients, and members of the public can also communicate alleged breaches of the Code of Conduct, in the manner specified in the corporate website.

Anyone seeking advice or wishing to report an incident will be treated with respect and dignity in accordance with the following principles:

- a) Confidentiality: Any information provided or statements made will be assessed under strict confidentiality.
- b) Thoroughness: the information received on potential breaches of the Code of Conduct will be researched in detail and in their entirety, in order to determine the truth of the facts presented.
- c) Respect for the persons involved: the rights of those involved in potential breaches will be considered and respected at all times. Before drawing any conclusions on the situations presented, the persons and/or employees involved will have the right to provide any reasoning or explanations they deem opportune.
- d) Grounds: any decision must be made in a reasoned, proportionate and appropriate manner, while considering the circumstances and situation surrounding the facts.
- e) Protection for reporting persons: anyone who reports (in good faith or on the basis of a reasonable belief) unethical acts or violations of the Code of Conduct is assured that they will not be subject to reprisals or discriminatory or disciplinary measures, either for reporting violations of the criminal prevention policy, or for refusing to participate in criminal activities. This guarantee does not extend to cases in which the complainant has participated in the breach.

We are convinced that our employees and managers will act in a professional manner and in accordance with the highest standards of integrity.

## 5. VALIDITY



This Code of Conduct will come into force on 28 May 2017, the date of its approval by the Administrative Body.