

## GCP – CET COPISA GROUP CODE OF ETHICS

Version	Application Date	Modification
0.0	07-11-2011	Creation of the Code of Ethics
1.0	08-11-2017	Format update

## **COPISA GROUP CODE OF ETHICS**

### **1. PURPOSE**

### **2. SCOPE OF APPLICATION**

### **3. BASIC PRINCIPLES OF ACTION**

#### **3.1. Integrity**

- Compliance with the Law
- Ethical integrity
- Honesty in management
- Conflict of interest
- Confidentiality

#### **3.2. Professionalism**

- Quality
- Use and protection of corporate assets
- Openness
- Relationships with suppliers and contractors

#### **3.3. Respect for human rights**

- Respectful treatment and non-discrimination
- Eradication of child labour
- Equal Opportunities
- Occupational Health and Safety in the Workplace
- Privacy of personal data

### **4. COMMITMENTS TO THE COMMUNITY**

#### **4.1. Environment**

#### **4.2. Social Responsibility**

### **5. INTERPRETATION AND COMPLIANCE**

## **1- PURPOSE**

The Ethical Code of the Copisa Trading Group (hereinafter referred to as "the Group") aims to inform of the values, principles and conduct guidelines that must steer the behaviour of all Group members in the carrying out of their professional activity.

The process of diversification and internationalisation undertaken has led to a new dimension within the Group, whereby the diversity of people and scenarios form an intrinsic value and one of its current signs of identity.

## **2- SCOPE OF APPLICATION**

This Code is addressed to all dependent firms and bodies (in which it holds a minimum stake of 50%) that are part of the Group and all the members of them, regardless of the contractual format that determines their employment relationship, the position they occupy or the place in which they perform their work:

- Members of the Executive Committee
- Executive Staff
- All employees

## **3- BASIC PRINCIPLES OF ACTION**

### **3.1 Integrity**

The companies, employees and executives of the Group must act with integrity, professionalism and respect.

- Compliance with the Law

All the employees and executives of the Group must comply with the laws in force in the countries where they carry out their activity, observing an ethical behaviour in all their actions.

- Ethical integrity

The business and professional activities of the Group and its employees shall be based on the value of integrity, and be developed according to the principles of honesty, avoidance of all forms of corruption and respect for the circumstances and needs of all parties involved therein.

- Honesty in management

The Group outlaws bribery to public authorities and officials and prohibits its employees from giving third parties or receiving from third parties undue payments of any kind, along with gifts, handouts or favours that are outside the market uses or that, owing to their value, their

characteristics or circumstances, may reasonably affect the development of entrepreneurial, administrative or professional relationships in which their undertakings are involved.

- Conflict of interest

During the carrying out of their professional responsibilities, employees and executives must act with loyalty and bear in mind the defence of the Group's interests. Likewise, they must avoid situations that may lead to conflict between personal and corporate interests.

- Confidentiality

Every employee or executive will maintain the strict duty of permanent confidentiality with respect to information whose disclosure or publicity may affect the interests of the Group.

### 3.2 Professionalism

The professionals and executives of the Group must be signified by their high professionalism based on an efficient performance, being duly focused on excellence and quality of service. In this sense, their behaviour must be based on the following principles:

- Quality

The Group commits itself to the quality of its products and services by making available to its employees the necessary resources for the development and continuous improvement of the most adequate management systems at all times in order to reach the highest quality in view of profitability criteria.

The Group strives to exceed its clients' expectations and to anticipate an understanding of their needs.

- Use and protection of corporate assets

The Group makes available to its employees the necessary resources for the performance of their professional activity and undertakes to provide the means for the protection and safeguarding of the same. All employees must use company resources in a responsible, efficient and appropriate way with regard to the environment of their professional activity, and must protect and preserve them from any loss, damage, theft or illegal or dishonest use.

- Openness

All employees must provide truthful, necessary, complete and timely information about the progress of activities related to their performance or area of competence.

- Relations with suppliers and contractors

All employees involved in selection processes for contractors, suppliers and outsourced collaborators have the obligation to act with impartiality and objectivity, applying the criteria of quality and cost, and avoiding the collision of their personal interests with those of the company.

### 3.3 Respect for human rights

All actions of the Group and its employees shall respect scrupulous Human Rights and Public Liberties included in the Universal Declaration of Human Rights, so that the Group's relationship with its employees and the employees' relationship with each other shall be based on the fulfilment of the following commitments:

- Respectful treatment and non-discrimination

The Group must maintain a working environment free from all discrimination and from any conduct conducive to personal harassment. All workers must be treated fairly and with respect by their superiors, subordinates and peers.

- Eradication of child labour

The Group subscribes and promotes the fulfilment of Human Rights and avoids collaborating with those organisations that breach them. For this reason, it undertakes to respect all provisions issued by the International Labour Organisation (ILO) and the United Nations Global Compact in this respect.

- Equal opportunities

The Group promotes the professional and personal development of all its employees, ensuring the equality of opportunities through its action policies. The selection and promotion of employees is based on the objective criteria of merit and ability.

- Occupational Health and Safety in the Workplace

The Group will provide its employees with a safe and stable environment and undertakes to permanently update its occupational risk prevention measures, as well as scrupulously respecting the regulations applicable in this matter in all the places where it carries out its business activities.

All employees are responsible for observing strict compliance with health and safety standards. Likewise, they must make responsible use of

equipment assigned to them when performing high-risk activities, duly informing their peers and subordinates of risk protection practices and promoting compliance with said practices.

- Privacy of personal data

The Group promises to request and to use exclusively employees' data that are deemed necessary for the effective carrying out of its business policies or data which are demanded by applicable legislation in force. Likewise, the Group will take the necessary measures to preserve the confidentiality of the personal data available and to ensure that confidentiality in the transmission of such data, when necessary for business reasons, is in accordance with current legislation.

Employees who have access to this information will ensure their confidentiality and will refrain from disclosing or misusing it.

#### **4- COMMITMENTS TO THE COMMUNITY**

##### **4.1 Environment**

The Group is committed to ensuring the greatest respect for the environment when performing its activities and also to minimising the negative effects that could potentially be caused from the same. To this end, it will make available to its employees the most appropriate means for doing so.

The Group will also contribute to the conservation of natural resources and those areas of ecological, scenic, scientific or cultural interest. With this in mind, best practices will be established and amongst its employees the knowledge and use of them will be actively fostered.

The Group is similarly committed to strict compliance with the applicable environmental legislation

##### **4.2 Social Responsibility**

The Group endorses socially responsible actions, assuming the responsibility to respect the diversity of cultures and the customs and principles in force amongst the people and communities affected by its activities.

#### **5- INTERPRETATION AND COMPLIANCE**

This Code establishes the principles and commitments of business ethics that the Group and its employees must respect and meet in the exercising of their duties.

Any employee who has knowledge or reasonable suspicion of a breach of this Code may inform it by e-mail for this purpose: [compliance@grupocopisa.net](mailto:compliance@grupocopisa.net)

The Group will guarantee the confidentiality and anonymity of all those who use the communication channel for complaints. In the same way, complaints will be dealt with through a thorough analysis of possible breaches of the Code and respect for persons allegedly involved in them.

Complaints that do not include the identity of the complainant will also be evaluated and processed if the evidence provided and subsequent investigations show genuine non-compliance.

The Group shall take the necessary measures to avoid adverse consequences as a result of communications that employees perform in good faith according to the content of this Code.

## **6- VALIDITY**

This Code will remain in force as long as its modification or cancellation is not approved.

***I declare i have read and understood the contents of this document***

Name and Surname:

DNI:

Date:

***This document is subject to changes, both for the possible updating of internal regulation, and for the application of the current legislation.***