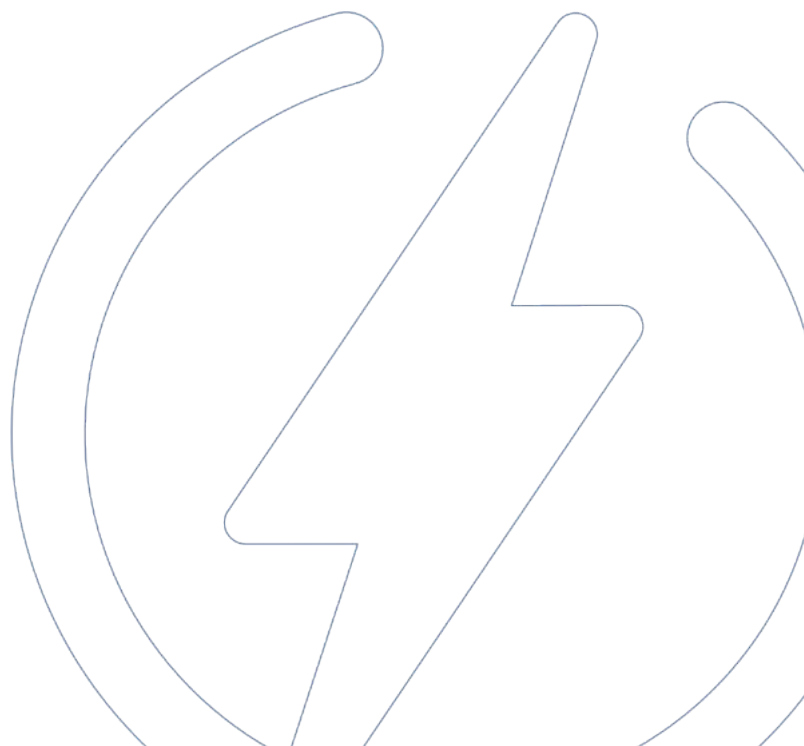




CODE OF CONDUCT





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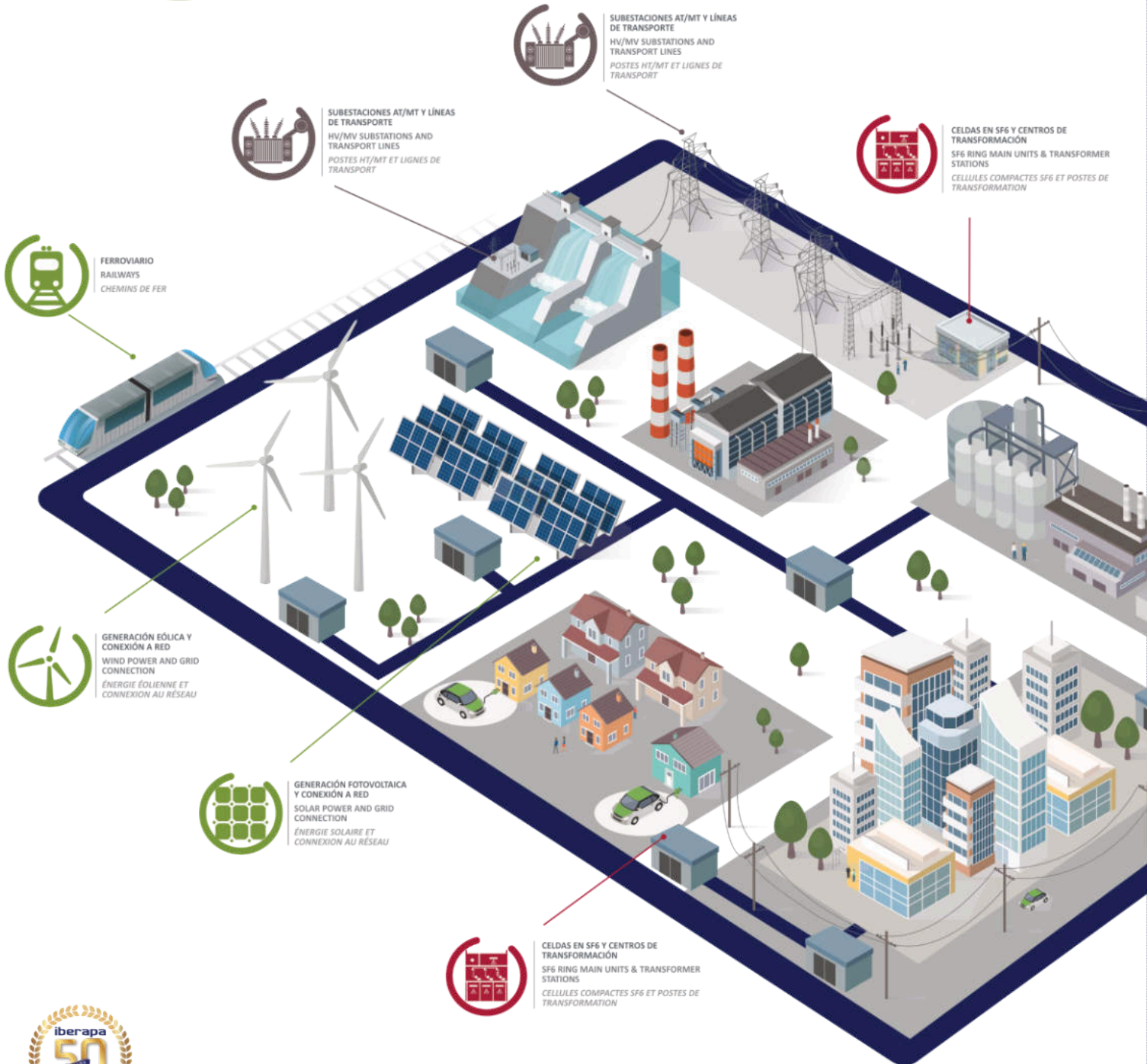


TABLE OF CONTENTS

<i>Title</i>	<i>Page</i>
1.- OBJECT	4
2.- SCOPE OF APPLICATION	4
3.- GENERAL ETHICAL PRINCIPLES	4
3.1.- Conflict of interest	4
3.2.- Measures against corruption and bribery	5
3.3.- Relations with customers and suppliers	5
3.4.- Respect	5
3.5.- Resources and means for the performance of professional activities	5
4.- RULES OF PROCEDURE OF THE CODE OF CONDUCT	6
4.1.- Ethics Committee	6
3.6 - Health and safety	6
3.7.- Environmental responsibility	6
3.8.- Transparency of information	6
3.9.- Confidentiality and data protection	6
4.2. - Interpretation of the Code of Conduct	7
4.3.- Compliance with the Code of Conduct	7
4.4.- Approval, validity and revision of the Code of Conduct	7



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1.- OBJECT

This Code of Conduct establishes the general guidelines of ethical behaviour to be observed by the employees of Ibérica de Aparellajes S.L. (hereinafter "Iberapa", "the organisation" or "the company") in the performance of their professional responsibilities. The aim of this Code is to ensure professional, ethical and responsible behaviour by all Iberapa's employees in the development of their activities anywhere in the world, as a basic element of its corporate culture on which the training and personal and professional development of its employees is based. To this end, the principles and values that must govern the company's relations with its stakeholders (employees, customers, owner-partners, suppliers and society) are defined.

In addition to the provisions of this code, Ibérica de Aparellajes employees shall at all times observe the provisions of the applicable legal regulations and shall assume, comply with and respect all the company's policies, procedures and regulations in their area of activity.

2.- SCOPE OF APPLICATION

This Code of Conduct is applicable to all employees of the organisation, who must be familiar with and accept the guidelines specified herein.

3.- GENERAL ETHICAL PRINCIPLES

The following are the general guidelines of ethical conduct that must guide and serve as a basis for all employees in the way they act during the course of their professional activity.

3.1.- Conflict of interest

All employees must ensure that their personal interests do not interfere with those of Ibérica de Aparellajes. Furthermore, personal influence shall not be used to do business with a company or organisation in which you or any person with whom you are associated has an interest unrelated to that of Iberapa.

Other working relationships, academic, social or political activities in other entities may also be maintained, as long as they do not involve a conflict of interest or have repercussions on the work commitment acquired by the employee.

3.2.- Measures against corruption and bribery

Employees may not offer or accept unjustified benefits in the course of their professional activities. Such benefits are understood as any kind of gifts, hospitality, services or any other kind of favour that could affect objectivity or unlawfully influence the business or professional relationship.

Gifts and services that meet the following requirements are permitted:

- They do not violate the laws and/or ethical principles of the country where they take place.
- Correspond to accepted business practice or courtesy.
- They have an irrelevant or symbolic economic value.

3.3.- Relations with customers and suppliers

Relations with customers and suppliers shall be based on respect, transparency and confidentiality, fostering the trust of the parties and contributing to the creation of long-term relationships. All of them will be treated with equal diligence and treatment, with no preferential treatment of one over the other.

The selection of suppliers and contractors shall be carried out on the basis of impartiality and objectivity, applying criteria of necessity, quality, efficiency and cost in these processes, and applying the principles and guidelines of this Code in the event of conflicts of interest.

3.4.- Respect

The employees of Ibérica de Aparellajes shall promote respect for people through their behaviour, regardless of their position within or outside the company, training, education, profession, age, sex, disability, sexual orientation, religious beliefs or values, language, origin or geographical origin, etc.

Employees of the company are obliged to treat other colleagues and co-workers fairly and respectfully. No form of harassment, abuse or intimidation in the performance of duties is permitted. The company supports the elimination of forced or compulsory labour and child labour.

3.5.- Resources and means for the performance of professional activities

Appropriate use shall be made of all resources provided by the company for the performance of the tasks and purposes for which they are intended. The use of any type of property, asset or expense shall be in accordance with the principles of necessity and austerity.

3.6 - Health and safety

The company promotes a preventive culture among its employees, as well as among the rest of its collaborators (subcontractors, suppliers, etc...). Ibérica de Aparellajes aims to ensure safe working conditions and reduce occupational risks as far as possible, by implementing work processes and instructions that must be respected by the entire organisation.

3.7.- Environmental responsibility

Ibérica de Aparellajes assumes its responsibility for environmental protection and sustainability. Employees must respect the environmental laws and guidelines that the company has stipulated, in order to avoid or reduce the negative impact on the environment.

3.8.- Transparency of information

All records and reports produced on behalf of the company, whether for internal use or external communication, must be accurate, complete and reliable.

3.9.- Confidentiality and data protection

Any information in the employee's possession that is of a strategic, economic or commercial nature is considered highly confidential and may not be passed on to anyone outside Ibérica de Aparellajes or to any other employee who does not need it to carry out their duties. This obligation persists even when the contractual relationship with the company has ceased.

4.- RULES OF PROCEDURE OF THE CODE OF CONDUCT

4.1.- Ethics Committee

In order to ensure compliance with and promotion of this Code of Conduct, Ibérica de Aparellajes has appointed an Ethics Committee whose main tasks are:

- To ensure that all company employees are aware of the contents of this Code of Conduct.
- To provide guidance on any doubts or questions that may arise regarding its interpretation.
- To provide a direct and confidential channel of communication to all employees, so that they can report possible breaches of this Code.

Such communications shall be sent to the attention of the Ethics Committee at the following postal address: *Ibérica de Aparellajes S.L., Camino del mar s/n, 46130 Massamagrell, Valencia, Spain.*

4.2. - Interpretation of the Code of Conduct

In the event of any doubt of interpretation that may arise regarding the content of this Code, the Ethics Committee is at the disposal of the company's personnel to answer the same.

4.3.- Compliance with the Code of Conduct

Employees are responsible for reporting any breaches of the practices set out in this Code. In this case, employees have the communication channel established in section 4.1. The communications received will be analysed by the Ethics Committee in order to determine their veracity and scope.

Once an employee's non-compliance has been confirmed, the company will take the appropriate disciplinary action to correct such behaviour.

4.4.- Approval, validity and revision of the Code of Conduct

This Code of Ethics comes into force with the approval of the General Manager of Ibérica de Aparellajes, and shall remain in force until its repeal is approved.

The Ethics Committee shall carry out an annual review of the same, proposing the appropriate modifications, taking into consideration the contributions and proposals of the stakeholders. If a new revision of the Code of Conduct is approved, it will be approved and disseminated once again.

Approved by: M. Rivas
General Manager

24/07/19

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