

Annex to System Manual

REFERENCE

TITLE Code of Ethic and Conduct


PROCESS Compliance

EDITION 00

PAGES 16

NO IMPRIMIR – PÁGINA PARA EL CONTROL DEL REGISTRO
Do not Print Page Only for Report Control

EDITION	DATE	DESCRIPCIÓN	REALIZED	APPROVED
00	25/06/2020	Issuance of the Code of Ethic and Conduct document	A.S. EXTERNAL	DG

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1. INTRODUCTION

The **Montajes ROTELU s.l.** Code of Ethics and Conduct ist firm objective is to establish the guidelines, values and principles by which the behavior of the people in the organization must be governed, in regard to the company's relations with the stakeholders, both in terms of activity **Montajes ROTELU s.l.** with its employees, such as its relationships with customers, suppliers and external collaborators, shareholders, public and private institutions and society in general.

This Code of Ethics and Conduct is based on the definition of the Policy, Mission, Vision, Values and Principles defined by the company, and constitutes an action guide to ensure adequate behavior in the professional performance of its employees.

For this, the Code:


- It facilitates the knowledge and application of the business culture of **Montajes ROTELU s.l.** firmly based on the fulfillment of human and social rights and the effective integration into the company of the entire group of employees, with respect to their diversity.
- Establishes the principle of due diligence for the prevention, detection and eradication of irregular behaviors, whatever their nature, including, among others, risk analysis, definition of responsibilities, employee training and, where appropriate, of third parties directly related to the company, and the formalization of procedures, especially for the notification and immediate elimination of irregular behaviors.
- It takes into account the principle of criminal liability of legal persons, included in our Legal System and prevents and proscribes the existence of behaviors that can determine the company's responsibility among its legal representatives, administrators, employees or by any other person that is submitted to the authority of company personnel.

2. MISIÓN, VALORES AND SCOPE OF ACTION

The **Montajes ROTELU s.l.** mission it is to satisfy the needs of our customers and that of all staff.

li is a company located in the Polígono Industrial de Ribadelouro, in the town of Tui (Pontevedra), which started its activity in 1988 and is primarily dedicated to manufacturing by weldinf of:

- Steel pipes (Penstocks, structural pipes....)

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- Atmospheric tanks (Atmospheric tanks for liquid fuels, vertical tanks, silos...)
- Pressure Vessels (vessels GLP, pressure air vessels...)
- Steel structures (Industrial plants, bridges, cranes, Offshore Structures ...)
- Shipbuilding (hull parts for ships, towing guides, Stern rollers ...)
- Boiler (Spiral cases, Draft Tubes, dismantling Box, Manifolds, Wye Branch ...).

Occupying a plot of 7.500 m² of which 3.528 m² correspond to the industrial building where the production process takes place, and the rest are dedicated to storage and dispatch park.


It develops its activity thanks to its entrepreneurial attitude, looking for competitiveness, flexibility and profitability of its actions, through Quality, and Integrity, attending at the same time to its responsibility towards its workers, clients, suppliers and environment in order to achieve sustainability that makes its continuity possible in the future.

At the same time, look for being able to involve and satisfy all our stakeholders through human relations and quality management, the environment and ethics, with sustainable and profitable development.

Taking into account the changing circumstances that affect an increasingly demanding market, without forgetting respect for the environment, safety and health of workers and compliance with current legislation, it has as a priority objective to satisfy the needs and expectations of the parties interested, using Integrated Systems Management, having an **INTEGRATED MANGEMENT SYSTEM** implanted, with the commitment to fulfill the system requirements and creating an environment of continuous improvement ensuring the necessary resources to fulfill said objective.

Therefore, Management undertakes to:

- Support the strategic direction of the Organization.
- Comply and keep updated a Code of Ethics and conduct, as well as the commitments derived from the risk management system for crime prevention.
- Comply and keep updated all legislation on product, environment and safety, as well as legal and regulatory requirements in crime prevention.
- Achieve the satisfaction of interested parties with quality products, meeting the needs and expectations, working in an ethical framework and continuous improvement.


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- Ensure continuous improvement, informing and training workers, with continuous relationships with customers.
- Promote and enhance the participation of staff, to carry out continuous improvement projects.
- Create a flexible environment that allows us to adapt to any change, without suffering any detriment to our management system.
- Establish data controls, either through indicators or statistical techniques that allow us to analyze and manage the system.
- Allocate sufficient resources to develop the planned actions.
- Give participation, to workers in all those aspects required or not by law, that affect their safety and health.
- Develop channels of communication with our stakeholders that allow them to participate directly in our continuous improvement environment.
- Develop channels of communication with our stakeholders for the adoption of behavior patterns consistent with those defined in our Code of Ethics and conduct and, in general, in the management system for crime prevention and the adoption of a disciplinary system for the breach of these requirements and the requirements of **Penal Compliance**.
- Identify risks and opportunities for improvement, proposing prevention measures and allocate resources to minimize them, eliminate them, enhance actions to address them.
- Impose the obligation to report suspicious behavior through established channels, ensuring that reprisals will not be taken against the complainant.
- Grant authority and Independence to the **Penal Compliance** body.
- Audit and Certify **Montajes ROTELU s.l.**, in accordance with the **UNE 19601** Standard.

ROTELU's values are the pillar on which we develop all our activity:

Innovation and continuous improvement

Propose, create and develop ideas, approaches, projects and procedures, as well as put the means to adapt to them in order to optimize the processes and resources available to achieve the expected results, be competitive and anticipate customer demand.

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Orientation to results

Develop assigned functions, taking action and improving the expected results without avoiding the effort or risk according to the general guidelines established and respecting rules from the company.

Customer orientation

Direct the professional activity towards the satisfaction of the needs of internal and external clients, current and potential through a precise knowledge of them and in order to obtain a Benefit for **ROTELU**.

Teamwork

Collaborate and integrate into the company, participating and establishing a climate of cooperation and communication that facilitates the achievement of organizational objectives.

Integrity and honesty

Develop assigned functions and collaborate in the organization and having as reference the culture of **ROTELU** and social values.

Leadership, people development

Get people to achieve their individual and common goals by promoting an environment of commitment, motivation and development in which performance is optimized and business culture is transmitted.


The content of this Code of Ethics and Conduct and its procedures are mandatory for all **ROTELU** people. Likewise, it must serve as a guide for the behavior of customers, suppliers, external collaborators, as well as a guide for the company itself with respect to these and for shareholders, public and private institutions and society in general.

3. GUIDELINES OF CONDUCT

The Code of Ethics and Conduct determines specific guidelines for action in the following content areas:

3.1. Fundamental rights

All persons belonging to **ROTELU**, undertake to respect in all their activities the fundamental rights of persons and public freedoms recognized by national and international agreements, establishing the obligation to perform all their activities with full respect for human dignity.

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ROTELU, complies with current legislation on contracting. In addition, it respects the freedom of association and effective recognition of the right to collective bargaining, as well as the elimination of all forms of forced or compulsory work.

All **ROTELU** employees must avoid any conduct that, even without violating the law, may damage the reputation of the organization before the community, the government of the country or other organizations, and negatively affect their interests.

All employees must know the laws that affect their work, requesting, where appropriate, the precise information through their superior or the corresponding instances.

No employee will consciously collaborate with third parties in the violation of any law, nor participate in any action that compromises respect for the principle of legality or that may damage the reputation of the company.

In the event of any doubt or observation of cases of disrespect for legality, human rights or ethical values, employees must inform the organization through their hierarchical superior or the **Compliance officer** and follow up on the **Code of Ethics and Conduct**.


Likewise, it will require suppliers and external companies with which it maintains business relationships, that respect these principles, and will establish this requirement as another criterion for its selection and for the maintenance of business relationships.

3.2. Respect to the people

ROTELU rejects any manifestation of physical harassment, psychological, sexual, moral, or abuse of authority, as well as any other conduct that may generate an intimidating or offensive environment with the people rights. Company employees must be treated with respect, fostering cordial relationships and a pleasant, healthy and safe work environment.

All employees have an obligation to treat their colleagues, superiors and subordinates in a fair and respectful manner.

In the same way, the relationships between employees and those of companies or external collaborating entities will be based on professional respect and mutual collaboration. **ROTELU** considers the integral development of the person important, so it will facilitate the necessary balance between professional life and personal life.

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3.3. Equal opportunity and non-discrimination

It is a basic principle for **ROTELU** that the principle of equal treatment and opportunities at work is fulfilled for all purposes and in all areas. We are engaged in the fight against discrimination in any of its forms, directly or indirectly, not admitting discrimination based on sex, marital status, age within the limits set by the legal system, race, social status, religious ideas or policies, affiliation or not to an union, etc.

The company is committed to the profesional and personal development of its employees, guaranteeing equal opportunities, through its action policies.

The selection and promotion of employees is based on performance of profesional functions and the criterio of merit and capacity defined by the company for each of the jobs.

These principles off air contracting will apply to all aspects of the employment relationship, including remuneration, promotions and transfers, as well as in the evento that the relationship develops after the momento in which the respective employee has joined the company.

Employees who consider themselves to be harassed must immediately inform their hierarchical superiors.


ROTELU will promote that all employees actively participate in the training plans designed for each profesional level, in order to promote the profesional progress of its employees. People who hold management or command positions must also facilitate the profesional development of their employees, in a way that fosters their profesional and technical growth in the company.

3.4. Security and health

ROTELU expresses its interest in the prevention of workplace incidents and occupational diseases, as well as in the improvement of Occupational Health and Safety conditions.

All workers who develop their work activity for the company are obliged to comply with the Occupational Risk Prevention regulations established in each job and must actively collaborate in the integration of Prevention in all activities carried out in the organization in accordance with the roles and responsibilities assigned in the Occupational Risk Prevention Plan.

Equally, all staff must promote the increase of Preventive Culture in the organization, promoting compliance with good health and safety practices and communicating any irregularity or situation that may pose a risk, both for workers and for facilities.

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Likewise, they must make responsible use of the equipment that they have assigned when developing risk activities and will divulge knowledge among their coworkers and subordinates, promoting compliance with risk protection practices.

3.5. Protection and care of the brand, image and corporate reputation

ROTELU considers its corporate image and reputation as one of its most valuable assets to preserve the trust of its customers, employees, suppliers, authorities and society in general.

All employees must take the utmost care to preserve the image and reputation of the company in all their professional activities.

3.6. Respect for the environment

ROTELU assumes the commitment to ensure the greatest respect for the Environment in the development of its activities, as well as to minimize the negative effects that, eventually, they could cause. Consequently the company is certified in “ISO 14001 – Environmental management systems” on these areas with procedures that must be respected and complied for their conservation.

All employees must actively and responsibly commit to the conservation of the Environment, for which they will comply with the legal requirements and procedures stipulated for each job; they will commit to the environmental programs implemented in the company and will act with the utmost diligence in the correction of any error that damages the Environment.


Likewise, employees must strive to minimize the environmental impact derived from their activities and from the use of facilities, equipment and means of work.

In their relations with contractors or external collaborating companies, employees will transmit these principles and demand compliance with the environmental procedures and requirements that were applicable in each case.

3.7. Alcohol and drug use

ROTELU expressly prohibits the possession, consumption or trade of drugs and alcoholic beverages, as well as work under its influence.

All this in order to avoid endangering oneself, their coworkers, as well as other people, or the company’s assets and equipment.

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3.8. Order and cleaning at work

When working in shared environments, respect for colleagues is essential, so it is requested to keep the jobs in order and clean, using the services and common areas in a hygienic and adequate manner.


Likewise, facilities and factories must meet the same cleaning criteria, collaborating each employee in the recycling of materials according to the procedures.

3.9. Money laundering and payment irregularities

All people subject to the Code must exercise full compliance with the general duty of identification and knowledge of customers, demanding their identification documents.

Special attention should be paid to the fulfillment of the obligations imposed by the Law on the Prevention of Money Laundering and terrorist financing:

- Identify how many natural or legal persons intend to establish business relationships or intervene in any operations with **ROTELU**.
- Refrain from performing any operation in which the intervening persons have not been properly identified.
- Notify the representative of **ROTELU** before the Commission for the Prevention of Money Laundering and Monetary Offenses (SEPBLAC) any fact or operation in which there are indications of being related to money laundering or terrorist financing.
- Do not disclose to the client or third parties the control and investigation actions that are being carried.
- Collaborate fully with Public Authorities.
- The company carries out specific controls on all transactions of an economic nature, both collections and payments and, especially on those that by their nature or amount can be considered unusual, avoiding or controlling especially those made in cash, with bearer checks or with destination to bank accounts located in tax havens.
- Employees will pay special attention to those cases in which there may be indications of lack of integrity of the persons or companies with which the organization maintains relations, and must immediately inform the company of any payment that is raised in doubt. Likewise, special attention

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will be paid to extraordinary payments, not provided for in the corresponding agreements or contracts.

- Under no circumstances will collaboration be provided to carry out activities that could cover terrorist or criminal activities.
- Those other legal obligations in the matter.

3.10. Bribery, Gifts and Attentions

No practices of offering or accepting bribes, or situations that cause, as a result of the performance of the labor functions, a personal benefit or enrichment, monetary or not, of any person of the company, or of favor for said benefit will be allowed or enrichment occurs in other people, whether family members or not. It is prohibited to offer or accept gifts that are disproportionate or far from the customs and habits, both in our company and in the environment. Understanding as disproportionate those who exceed the amount of 100 euros per person, without it being repeated on more than one occasion per year.


In case of receiving any gift, you should inform your hierarchical superior, who will decide on the acceptance or not of the gift and will communicate, in any case, to the company representative.

3.11. Use of ROTELU assets

ROTELU employees and executives are responsible for the proper use of the assets and resources of the company, including those related to intellectual property, technologies, computer equipment and media, software, real estate, equipment, machinery and tools, components, raw materials.

To this end, **ROTELU** employees and executives must in particular:

- Use the Assets in accordance with the rules and procedures in force in **ROTELU**.
- Take the necessary measures to avoid the use of the Assets by a third party (including family members) without proper authorization.
- Use the Assets in the places authorized exclusively for this purpose and if it is at home, only for professional tasks.
- Keep all passwords and codes in a safe place to prevent Access to the company's computer data without authorization.

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- Do not copy software developed in **ROTELU**, procedures, codes, manuals, presentations, training or another programs, without the authorization of the representative.
- More generally, use the new **ROTELU** information and communication technologies for exclusively professional use, related to the provision of professional services in the company.
- When leaving **ROTELU**, whatever the reason (retirement, end of contract or any other cause), return to the competent Human Resources services all documents containing confidential information without keeping copies, and all the assets they have in their possession.

3.12. Conflict of interests

Conflicts of interest are considered all those circumstances where the personal interests of the employees, directly or indirectly, interfere in the responsible and ethical fulfillment of their professional duties and responsibilities or involve them in a personal capacity in any transaction or economic operation of the company, your customers or suppliers.

ROTELU's relationship with its employees must be based on loyalty and trust, reason why any situation in which the personal interests of the employees, directly or indirectly, through family or friends, may conflict with those of the company.


ROTELU, understands and respects the participation of its employees in other financial and business activities provided they are legal and do not enter into unfair competition and do not imply collision or interference with responsibilities, obligations and due dedication to their work performance.

The situations in which one of our employees becomes, by their direct or indirect participation, a customer or supplier of **ROTELU**, must be communicated to the company representative.

3.13. Relationships with customers

The company promotes the commitment of quality in the relationship with its customers, so that it will establish the necessary measures to ensure that the quality policy is practiced by all employees serving customers.

All employees must act integrally with the company's customers, aiming at achieving the highest levels of quality and excellence in the development of relationships based on trust and mutual respect.

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In this sense, all customers will be treated in a respectful, fair, honest and in accordance with the fundamental principles and values of the company.

The relationship with customers must be based on efficiency, professionalism, service mentality and collaboration, looking for to meet their needs, providing solutions.

3.14. Relations with suppliers

ROTELU will promote the establishment of stable relationships with its suppliers and collaborating companies based on trust, the demand for maximum quality, transparency, the search for continuous improvement and mutual benefit, promoting innovation and development activities.

For this, relations with suppliers must conform to a framework of mutual collaboration that facilitates the achievement of objectives by both parties, so that the treatment must be equal to equal and always withing the legal framework.

ROTELU will ensure that companies supplying products/services develop their activity within the framework of a proven Corporate Social Responsibility and Business Ethics.


The selection of suppliers must be carried out in accordance with the Purchase Process of the company in force at all times, guaranteeing transparency, equal treatment and the use of objective criteria.

All employees who participate in the contracting of services or purchase of goods have the obligation to act with total Independence, impartiality and objectivity, applying quality and cost criteria and avoiding the collision of their personal interests with those of the company.

Purchase practices will not be allowed that are not included in the Purchase Process, or situations that cause a profit or enrichment of any person of the company, the supplier itself or third parties. Likewise, it is prohibited to offer, give, request or receive any type of collection or payment outside the contract or order.

3.15. Relations with authorities and officials

ROTELU employees will interact with public authorities and institutions, in those countries where they carry out their activities, in a lawful, ethical, respectful and aligned manner with international provisions for the prevention of corruption and bribery. Those employees who are related to representatives of public administrations must be specifically authorized by the company.

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As a general rule, no **ROTELU** employee may offer, grant, request or accept, directly or indirectly, gifts, favors or compensation, whatever their nature, or of any authorities or officials.

Only gifts and attentions of little value that are proportionate and reasonable according to local practice, transparent, delivered on the grounds of legitimate, socially acceptable, and sporadic interests, are excluded from the previous rule, to avoid that their content or regularity could lead to independent third party to doubt the good faith of the employee or the company. Cash gifts are expressly prohibited.

It is the responsibility of each employee to know and properly value local practices, taking into account the interest and good reputation of the company.

ROTELU employees will refrain from making facilitation payments or expediting procedures, consisting of the delivery of money or other things of value, whatever their amount, in exchange for ensuring or expediting the course of a procedure or action whatever its nature, in front of any judicial body, public administration or official body.


Employees will avoid obtaining undue tax advantages for **ROTELU** and will ensure that the information declared in this matter to the authorities is truthful and faithfully reflects the reality of the company. They will also ensure that the aid requested or received from public administrations receives proper use and that their request is transparent, avoiding distorting the conditions for obtaining it or giving them a different use to that for which they were granted.

In those countries where there are requirements and restrictions regarding international trade, employees will scrupulously comply with the regulations in force and submit the required information on their activities to the authorities that so request.

3.16. Confidentiality of información and protection of personal data

ROTELU staff has the obligation to protect the information and knowledge generated within the organization, its property or its custody. **ROTELU** has implemented a data protection system according to Organic Law 3/2018, of December 5, Protection of Personal Data and guarantee of digital rights.

Employees will refrain from using any data, information or document obtained during the exercise of their professional activity for their own benefit. Nor will they communicate information to third parties, except in compliance with applicable regulations, company rules or when they are expressly

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authorized to do so. Also, they will not use data, information or documents or a confidential nature from a third company without their written authorization.

ROTELU staff undertakes to maintain confidentiality and to make use in accordance with the internal regulations in the matter, of any data, information or document obtained during the exercise of their responsibilities in the company. In general, and unless otherwise indicated, the information to which they have access must be considered confidential and may only be used for the purpose for which it was obtained.

Likewise, they must not make duplicates, reproduce it or make more use of the information than is necessary for the development of their tasks and will not store it in information systems that are not owned by the company.


The obligation of confidentiality will remain once the activity in **ROTELU** is concluded and will include the obligation to return any material related to the company that the employee has in his possession at the time of the termination of his relationship with the company.

The staff must respect the personal and family privacy of all those people, whether employees or others, to whose data they have access.

Data usage authorizations must respond to specific and justified request. Employees must strictly comply with the internal and external regulations established to ensure the proper treatment of information and data provided to the company by third parties.

In the collection of personal data of customers, employees, contractors or any person or entity with whom a contractual or other relationship is kept, all **ROTELU** staff obtain the consents, when it is mandatory, and commits to the use of the data in accordance with the purpose authorized by the grantor of said consent. Likewise, **ROTELU** staff must know and respect all internal procedures implemented regarding the storage, custody and access to data and that are intended to guarantee the different levels of security required according to their nature.

Employees will notify the corresponding department or área of any incident they detect related to the confidentiality of the information or the protection of personal data.

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3.17. Protection of intellectual and industrial property

ROTELU, fosters creativity among the people of the organization, and considers it essential to open up new ways of doing things, since the knowledge and experience acquired in relation to innovate systems, products and production processes have been and will be a competitive advantage of the company in its sector.


Consequently, the company considers it necessary to protect the rights that may fall on patentable inventions susceptible of industrial application, from distinctive signs, such as trademarks, trade names or processes.

ROTELU, is committed to the protection of its own and other people's intellectual and industrial property. This includes, among others, copyrights, patents, trademarks, domain names, reproduction rights, design rights, database extraction rights and rights in specialized technical knowledge.

ROTELU, responds to the originality of its own designs and will ensure that its suppliers guarantee the originality of the designs made available to the company. The staff is expressly prohibited from using works, creations or distinctive signs of intellectual or industrial property of third parties without proof that the company has the corresponding rights and/or licenses.

ROTELU, staff will take the necessary measures to protect intellectual and industrial property, ensuring that processes and decisions in this area are traceable, in the sense of being documented and justifiable and verifiable, especially through the titles of the Works themselves, creations or distinctive signs and the application of contractual clauses that guarantee the originality and peaceful use of those of third parties.

The intellectual and industrial property resulting from the work of the employees during their stay in the company, and which is related to the present and future business of **ROTELU**, will be owned by the company. Only those brands, images and texts duly authorized by the organization will be used in marketing and advertising.

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4. DISCLOSURE AND UPDATE OF THE CODE

The content of this **Code of Ethics and Conduct** will be communicated to all employees through a delivery document along with the link to the website on which the Criminal Prevention Plan, the Code of Ethics and its modifications will be published. It will also be available in the company's Bulletin Board.

5. OBLIGATION OF COMPLIANCE

Failure to comply with the principles established in this Code will be analyzed in accordance with internal procedures, legal regulations and current agreements. Any questions that may arise in the interpretation and/or application of this Code should be brought to the Compliance Officer by sending an email to the email address: compliance@rotelu.es, which is established as a reporting channel.

The violation or breach of this Code that constitutes a lack of labor nature, will be sanctioned in accordance with current regulations, without prejudice to other responsibilities in which the offender could have concurred.

6. VALIDITY

This Code has been approved by **Montajes ROTELU s.l.** Management Body.

The **Code of Ethics and Conduct** enters into force on the day of its publication on the web and internal divulgation to all its employees and will be in force as long as its modification or repeal is not communicated.

This Code will be reviewed and updated annually.