

CODE OF ETHICS

All companies belonging to the SIWAX Group ("**Companies**") strongly believe that behaving ethically in business is vital for good working practice and the credibility of a company in the eyes of its stakeholders: clients, suppliers, employees, external contractors and, in general, the whole economic context in which it operates. We have, therefore, decided to adopt the following Code of Ethics to formally define the principles of correct behaviour, trustworthiness, integrity and transparency which the company has always aspired to.

1. BASIC PRINCIPLE

A clear commitment from the Companies to abide by all laws and regulations in force in the Country in which they operate.

2. CUSTOMER RELATIONS

The Companies are committed to building a rapport with their customers which is not only based on a high level of professionalism but also characterized by honesty, respect, dignity, courtesy and a continuing effort to respond to customer needs and collaborate effectively.

The Companies strive to be a trustworthy partner and, with this principle in mind, to supply both a high quality service and products. Customer satisfaction is our primary objective.

3. SUPPLIER RELATIONS

All relations with suppliers and business partners must adhere to both national and international laws regarding healthy competition, service offered and fairness of conditions based on an objective evaluation of competitiveness, quality, benefit and, not least, business relations.

The Companies and their suppliers will work together to build a rapport founded on collaboration and mutual trust.

4. HUMAN RESOURCES

Human resources are an indispensable ingredient for the existence, development and success of a company. For this reason, the Companies protect and promote the value of its workforce in order to strengthen and improve the depth and competitiveness of the skills possessed by each and every worker inside the framework of the company.



IBERCERAS

As a result, the Companies are committed to:

- Guaranteeing appropriate and dignified working conditions for its staff;
- Promoting inclusion and equal opportunities;
- Rejecting any form of – direct or indirect - discrimination whether racial, religious, political or sexual as well as on any other ground;
- Refusing doing business with organizations which use under-age workers as well as any child labour;
- Enabling access for all employees to information and training with the aim of enhancing their specific skills and maintaining their professionalism;
- Ensuring fair, equal and adequate remuneration;
- Assessing carefully and objectively all opportunities for promotion or repositioning;
- Maintaining the confidentiality of all personal data in compliance with the applicable legislation and limiting data access to legitimate business purposes.

The Companies expect their workforce to demonstrate:

- A team spirit with a constructive and dynamic attitude, a willingness to learn and the ability to take responsibility for all aspects connected to their role;
- Compliance with all applicable laws and Companies' policy;
- Accuracy and clear representation of any fact and/or transaction, including but not limited to financial reports and accounting reports;
- Respect and correctness towards the company including, among others, avoiding any activity in competition and/or conflict of interest;
- A strong refusal to any form of bribery and corruption when dealing with suppliers and third parties;
- Respect and correctness towards colleagues and workmates also by avoiding, among others, any harassment, bullying, mobbing, discrimination, intimidation etc.;
- A duty to be bound by confidentiality rules regarding company information, strategy as well as any other information which is not in the public domain and regardless whether disclosure benefits a third party or not;
- Safeguarding and properly using Companies' assets and resources (including Internet and email account) for work related purposes only.
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Employees who are aware of any suspected misconduct, harassment and/or wrongdoing shall immediately report such matters to their supervisor, a member of the management or of the Human Resources Department.

5. HEALTH AND SAFETY IN THE WORKPLACE

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The Companies are committed to promoting and consolidating a "safety culture" by increasing risk awareness and encouraging the responsible behaviour of all staff whilst working to preserve their health and safety by, above all, prevention.

The Companies work to safeguard the protection of its workers via:

- the introduction of an integrated system of risk and safety management
- a continual assessment of risk, the level of criticality of procedures and of the resources to protect.
- the use of the most up to date technology and protection devices.
- the monitoring and updating of working methods.
- continuous appropriate training.

All workers and collaborators must fully respect the rules and duties owed by any legislation related to health, safety and the environment, and respect any internal measures or requirements.

6. SAFEGUARDING THE ENVIROMENT

The Companies operate with the maximum respect to the territory in which they are located, with a continuous attention to preserving resources and minimizing the environmental impact of all procedures, systems and materials used.

7. DATA PROTECTION

All information, data and knowledge acquired, used and managed within daily business activities must be kept strictly confidential, appropriately protected and must not be used, communicated or divulged, whether internally or externally, without due respect to company procedure and the EU Regulation no. 679/16 on data protection ("GDPR") as implemented in the Countries where Companies operate.

The Companies manage the personal information they hold in a fair and sensible way, and in a manner that respects and safeguards the rights of individuals. The Companies recognise that a large proportion of its business is based upon the careful use and safeguarding of information which belongs to its employees, clients and candidates. These individuals and organisations must believe that the Companies can handle their information in a responsible and secure manner and in accordance with the GDPR.

The GDPR strikes a fair balance between the rights of individuals (whether they are clients, candidates, consultants or employees) and the ability of organisations to handle personal information for the purposes of their legitimate business activities. The GDPR provides for certain steps that organisations such as the Companies must take, including ensuring that business processes and operations are designed with privacy requirements in mind, and observing restrictions and standards concerning the security, retention, use and disclosure of personal information.

All workers and collaborators must take care of these privacy principles as specified in the various internal policies and instruction given by the Companies in order to discipline workers activities which must be considered as part of this Code of Ethics.

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