

# **SECIL GROUP**

## **Code of Conduct**

### **Object and scope**

#### **Object**

Compliance with high business ethics and personal integrity standards by members of the Secil Group's corporate bodies and by its employees (hereinafter jointly referred to as the Secil Group's collaborators), and by the Group itself, in the course of their activities, is one of the Group's key pillars, and a critical element of its strategy.

#### **Scope of application**

The principles and rules established in this document are applicable to all Secil Group's collaborators.

### **Acting principles**

#### **Diligence**

Secil Group's collaborators have the duty to be diligent, always acting with professionalism and responsibility and doing their best efforts in performing the functions entrusted to them, in order to actively participate in the harmonious and sustained development of the Group.

Secil Group's collaborators have the duty to protect the Group's assets, conserving them, using them with care and managing them in a sound and prudent manner.

## **Loyalty and collaboration**

Secil Group's collaborators are bound by the duty of loyalty to the Group and other collaborators, and should always act with honesty, integrity and respect for the interests and objectives of the Group.

Secil Group's collaborators should foster a team spirit, the sharing of common objectives and mutual assistance between all.

## **Conflict of interests**

Secil Group's collaborators should not intervene or act when there is a situation of potential conflict of interests (situations in which their own interest or that of third parties can be benefitted as opposed to the interests of the Group). Secil Group's collaborators should notify their hierarchy of any situation that could create a conflict of interests. In case of doubt about their impartiality, Secil Group's collaborators should proceed with such notification.

Secil Group's collaborators should stay away from and not intervene in processes or decisions that could generate conflicts between their personal interests and the duty of loyalty to the Group, such as family or similar relations in hierarchical or direct functional dependence and/or occupying legal, patrimonial or family positions that could interfere with the company's interests or with its activities, in particular in suppliers or entities that provide services to the Group.

Secil Group's collaborators undertake not to exercise external activities, with or without remuneration, that could directly prejudice their professional performance or the activities or interests of the Group.

## **Gifts**

Secil Group's collaborators should not accept gifts from entities or people with whom the Group may have relations, except if these are merely symbolic.

## **Urbanity and integrity**

In their relations among each other and with third parties, Secil Group's collaborators should be considerate and correct, respecting others, and should act with urbanity and base their relations on the values of truth and transparency.

## **Harassment**

The Secil Group and its collaborators reject any form of moral or sexual harassment, threats and physical or psychological aggression, and they should refrain from adopting any behaviour that could be construed as moral or sexual harassment, threats and physical or psychological aggression.

## **Non-discrimination**

The Secil Group and its collaborators reject discrimination of any kind, in particular on account of origin, gender, race, language, religion, sexual orientation, territory of origin, political or ideological convictions, education, economic situation or social condition, and should refrain from adopting any behaviour that could be construed as discrimination.

## **Confidentiality**

Secil Group's collaborators should maintain secrecy about facts relating to the Group that they have taken or will take cognizance due to the exercise of their activities or because of them, and should also refrain from using these facts for their own advantage or that of third parties.

## **Legality**

The Secil Group and its collaborators should act in accordance with the laws and standards that rule their activity, locally and internationally, adopting the most demanding standards among different standards that may apply.

The Secil Group does not tolerate any form of corruption, fraud, money laundering, bribery or extortion, and its collaborators should refrain from participating in, directly or indirectly, or from adopting any behaviour that could be construed as corruption, fraud, money laundering, bribery or extortion.

The Secil Group does not tolerate any form of slavery, forced labour or child labour, and its collaborators should refrain from participating in, directly or indirectly, or from adopting any behaviour that could be construed as slavery, forced labour or child labour.

The Secil Group and its collaborators should protect, not use and not provide unauthorised third parties' data.

## **Commitments with stakeholders**

### **Sustainability**

The Secil Group and its collaborators recognise the sustainability of their activities as a key pillar of their decisions and behaviour.

### **Labour rights and equality**

The Secil Group respects the labour rights of its collaborators and fosters equal opportunities and equal treatment in terms of employment and professional functions.

### **Health and safety**

The Secil Group adopts firm policies that promote the health and safety of its collaborators, identifying, controlling and preventing risks and taking the necessary preventive measures, and providing means of protection and education in risks prevention, health and safety.

Secil Group's collaborators should always respect safety standards and observe the best practices in the matter, refraining from adopting behaviours that may cause risks for or jeopardise their safety or that of third parties.

## **Environment**

The Secil Group and its collaborators encourage environmental responsibility and the use of innovative and clean technologies and strive to adapt to the challenges of climate change.

The Secil Group recognises its responsibility to the communities where it is present and with which it interacts, contributing towards their progress and well-being.