


 <b>Hebron</b> PRA 02	<b>MANUAL</b>		Page 1 of 14 Edition: 1 Revision: 1 22/08/17
	<b>CODE OF ETHICS AND GOOD PRACTICES</b>		
<b>PREPARATION:</b>  Date: 22/08/17	<b>REVISION:</b>  Date: 22/8/17	<b>APPROVAL :</b>  Date: 22/08/17	

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## 1. Preamble

Hebron is a company of Catalan origin founded in 1961 in Vall d'Hebron. It began its activity manufacturing additives for plastics and rubbers, among which was the production of Azodicarbonamide. Other products of high added value were also produced, such as pharmaceutical intermediates and fertilizers.

At present, Hebron, S.A. has an industrial area of 21,000 m<sup>2</sup> in the municipality of La Llagosta (Barcelona) and more than 60 people work in the company to fulfil its business projects.

This Code of Ethics and Good Practices constitutes an instrument for developing its principles as an organisation that have been applied for many years in the development of its activity, which could be summarised according to the following scheme:



- **Responsibility.** Improvement of the workplace safety and environmental responsibility for better performance.
- **Self-demand.** Daily improvement of performance by optimising resources and new investments.
- **Teamwork.** Joint efforts into a common project.
- **Compliance.** Integration of good practices into daily activities.
- **Quality.** Offering the best quality for higher expectations.
- **Commitment.** Commitment to shareholders and customers to achieve their goals.

## 2. Code of Ethics and Good Practices of Hebron, S.A.

Hebron, S.A. (hereinafter also referred to as "the Organisation"), as a result of its desire to be at the highest level in the field of ethics, and to comply with current legislation, public authorities' recommendations, social responsibility and good corporate practices, subscribes to this Code of Ethics and Good Practices (hereinafter referred to as "Code" or "Code of Ethics").

This Code is approved in order to establish general guidelines for behaviour, values and ethical principles, which should govern the conduct of members of the Board of Directors, managers, legal representatives, workers and stakeholders, regardless of the type of contractual relationship with Hebron, SA, serving as a guide and reference of the due performance.

At the same time, Hebron, S.A. undertakes that the principles regulated in this Code, and especially fairness, equality and respect for fundamental rights, govern their commercial and professional relations with other market agents such as suppliers, collaborators, contractors or investees. Likewise, when the Organisation is part of Joint Ventures, Temporary Pooling of Companies, and other similar associations, the principles that govern this Code will also apply to those relations and businesses.

This Code of Ethics will apply both to business relations that have their effects in Spain and to those of an international nature, always bearing in mind the cultural, social, economic and legal differences of the different countries where the Organisation operates. Hebron, S.A., with the approval of this text, intends to avoid any type of behaviour that is socially reproachable or contrary to legality. To this end, the Organisation undertakes to carry out the following actions:



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- Identification of the risks likely to be contrary to the principles and ethical values established herein, for further prevention and detection.
- Definition in the Code of Ethics and through the development of policies and procedures, of the expected behaviour of any person related to Hebron S.A. or who work for the Organisation, as well as the establishment of appropriate measures to prevent any inappropriate behaviour or conduct, especially those that may be considered criminal and may lead to criminal liability for the legal entity (Crime Prevention Models).
- Supervision and control of compliance with this Code, as well as the assignment of responsibilities in case of breach of the principles regulated herein.
- Application of a Disciplinary Regime for violations of this Code.

Hebron, S.A., in order to comply with the objective for which this Code has been created, will be committed to adapt it to the social environment and legislative changes that occur, in order to ensure its effectiveness. The present Code should serve as a guide for the interpretation of the internal policies, policies and procedures that Hebron S.A. has, as well as in general for the development of its business activity, establishing general guidelines of conduct and action.

### 3. Ethical principles that govern the activities of Hebron, S.A.

Hebron, S.A. is committed to comply with the following principles, on which it develops its determined ethical commitment and serve as guide in the daily development of its business activity:

- **Good corporate governance.**
- **Transparency** in the dissemination of both internal and external information, ensuring the accuracy and precision of the same, especially when it is financial information that may affect the shareholders and/or partners in particular, and the market as a whole.
- **Fair competition** on the part of Hebron, S.A. with the rest of agents operating in the market, promoting free competition and respect for consumers and users.
- **Creating value and sustainable growth, with absolute respect for the environment.**
- Constant commitment to **innovation**.
- Proactive and efficient **Social Responsibility and Commitment**.
- **Loyalty** to the present Code, **professional ethics and good faith** in business relations.
- **Integrity and honesty** in its commitment.
- Maximum **protection of Human Rights and Public Liberties**.
- **Strict respect for the legal systems** of the territory where the Organisation operates and for the internal regulations of the Organisation.

Likewise, the necessary measures will be taken to ensure compliance with the ethical principles set forth in this Code by the Stakeholders.

#### **4. Social commitments of Hebron, S.A. with its Stakeholders**

The social commitment of Hebron, S.A. with each of its Stakeholders is materialised in the sections that are set out below. The Organisation will actively promote adherence, compliance and respect for this Code of Ethics and its guidelines among its Stakeholders.

##### **4.1. Workers**

Workers in Hebron, S.A. will receive a dignified treatment, always respecting their rights and above all, their privacy, equal opportunities within the Organisation and diversity. Differences in treatment or discrimination on grounds of age, sex, ideology, race or religion shall not be tolerated; nor any manifestation with connotations of harassment or abuse of authority or of an intimidating, offensive, degrading or threatening nature against moral integrity.

In all the selection processes of new staff or promotion of existing staff, these will meet criteria of merit, aptitude and capacity, according to the position that is intended to be filled, regardless of subjective or personal elements. Likewise, the selection process will also take into account the candidate's ethical history and professional and commercial honesty. Moreover, Hebron, S.A. is actively engaged in promoting the personal and professional development of its employees, their learning and promotion, as well as the reconciliation of their work and family life.

Hebron, S.A. has a firm commitment to ensure the safety and health of its workers, always complying with the regulations governing the matter and applying them, in particular, in the field of Occupational Hazard Prevention, implementing the corresponding measures. Likewise, the workers of Hebron, S.A. must comply with the measures of Occupational Hazard Prevention that the Organisation puts at all times at their disposal. Similarly, Hebron, S.A. guarantees its workers a healthy working environment that enhances teamwork and a solid corporate identity.

Hebron, S.A. recognises and respects the right of association of its workers and allows them to exercise it freely, as well as freedom of affiliation and the right to collective bargaining.

The Organisation will actively promote among its workers the knowledge of the existence and content of this Code of Ethics, their adherence to it, as well as the importance of respecting and complying with its principles in the conduct of their professional activity, their non-compliance resulting in the application of the current Disciplinary Regime.

##### **4.2. Customers**

Hebron, S.A. always promotes the maximum quality, satisfaction, safety and excellence in the products and/or services provided to its customers, as well as in the attention to them, complying with the current regulations that apply to them. Respect, professional responsibility, transparency and honesty lead all our business relationships.

Hebron, S.A. is committed to offer customers all the information they need with due transparency and without ambiguous or non-rigorous expressions that can lead to confusion or induce error, always complying with the applicable regulations, with the objective to offer publicity and promotion of the product and/or certain and truthful service, without engaging in practices of unfair competition, nor to use false or misleading advertising instruments.

In relation to the customers, the influence of family relations and of friendship or of conflict of interest will be avoided, all of them being governed by the objectivity and independence. In particular, the action will be governed by objectivity and independence in the granting and setting of economic and/or financial conditions and in general contracts.

##### **4.3. Suppliers and contractors**

The relationship with suppliers and contractors must be made on the basis that they are employees of the Organisation, therefore, the treatment must be between equals and within the current legal framework. The Organisation prioritises relationships with suppliers and contractors that, in the course of their activities, incorporate criteria of quality, sustainability and regulatory compliance, as well as sufficient technical,



organisational and risk control capacity, coupled with the lack of Incidents that could affect their professional or business reputation.

It is expressly prohibited to offer, give, request or receive any kind of favour, advantage, collection or payment outside the scope of a contract or transaction, which is a risk of bribery or corruption in business. The hiring of all suppliers and contractors will always be done according to commercial and economic criteria, totally impartial and objective, without, in any case, personal, commercial or favouritism interests, which could give rise to conflicts of interest.

Hebron, S.A. actively promotes among suppliers that provide services, adherence to and compliance with this Code in all that it is applicable, being able to establish a breach by them as a cause of contractual termination. For its part, Hebron, S.A. is committed to treat its suppliers in an egalitarian and transparent manner, as well as to treat in a confidential way those data that could affect the supplier's way of competing in the markets. The selection, hiring and evaluation of suppliers and contractors must comply with the external and internal regulations in force at all times for the Organisation, guaranteeing transparency, equal treatment, and the application of objective and weighted criteria. It is important to avoid dealing with suppliers and contractors with commercial interests, personal interests, external activities or conflicting or potentially conflicting relationships, directly or indirectly with the interests, values and principles of the Organisation, especially those contained in its Code of Ethics and internal regulations regarding its development.

For the purposes of this Code, suppliers will be considered as Staff (defined below in this document) in all matters applicable to them.

#### **4.4. Shareholders / Partners, members of the Board of Directors, Legal Representatives, Executives**

Hebron, S.A. guarantees the veracity of all the information that it makes available to its partners and shareholders and the achievement of common objectives that benefit both parties, by maximising corporate value through efficient management of resources, creating a favourable environment based on communication, mutual trust, transparency and loyalty.

Shareholders and partners, members of the Board of Directors, legal representatives and executives, must know, respect and comply with this Code in the exercise of their functions, as a sign of the Organisation's ethical commitment and culture. Respect, both internally as well as for the market and Stakeholders. The executives and members of the Board of Directors shall ensure that all workers and Stakeholders under their responsibility are informed of the internal values and standards of the Organisation and ensure that they are adequately trained in the position they hold in relation to the values and standards and their implications.

Hence, Hebron, S.A. is committed to strict compliance with current and future laws on corporate governance, as well as other recommendations issued by the public authorities on the matter.

#### **4.5. Agents, representatives, commissioners, distributors and similar business partners**

In Hebron, S.A. business partners are an indispensable part of the Organisation's development and growth, as well as the attainment of other objectives, and therefore, we continually strive to build and maintain a solid and prosperous relationship with them, in order to achieve mutual benefits.

The Organisation supports free market and fair competition and respects the rules related to the Competition Law, as well as all anti-corruption regulations. The Organisation undertakes to guarantee the confidentiality of data that may affect the manner of competing in the market, as well as the business collaborations established with its trading partners.

The Organisation will actively promote, among its business partners, adherence to and compliance with this Code of Ethics, being able to establish their breach hereof as a cause of contractual termination. The selection, contracting and evaluation of business partners must comply with the external and internal regulations in force at all times for the Organisation, which guarantees transparency, equal treatment, and the application of objective and weighted criteria. It is necessary to avoid dealing with collaborators with commercial and personal interests, external activities or conflicting or potentially conflicting relationships, directly or indirectly, with the interests, values and principles of the Organisation, especially those contained in its Code of Ethics and internal regulations designed for its development.



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The Organisation shall require its business partners to observe, in the course of their activities, quality, sustainability and regulatory compliance, as well as sufficient technical, organisational and risk control capacity, together with the lack of relevant incidents that could affect their professional and/or commercial reputation.

For the purposes of this Code, the agents, representatives, commissioners and similar business collaborators will be considered as Staff in all that is applicable to them.

#### **4.6. The sector: competitors**

Hebron, S.A. undertakes to compete with other market agents in compliance with the principles of free competition, avoiding any conduct that entails an abuse of competition or restriction of competition, complying with the antitrust rules and those that may be applicable by regulatory authorities.

Hebron, S.A. undertakes to comply with any regulations applicable to it at local, national or international level in the area of competition law and will collaborate with the authorities that regulate the market. Among others, agreements relating to prices or pricing elements, price increases, or those related to other terms and conditions of the business are not allowed, nor are market assignments allowed with competitors. It will not be allowed attendance to unofficial meetings with competitors. They should always be official meetings, with clear, transparent and specific purposes, always scheduled, and in case of doubt, it should be consulted previously with the hierarchical superiors or with the Compliance Department. The Organisation will display zero tolerance for anticompetitive conduct and, therefore, before initiating or continuing any conduct, in case of doubt, hierarchical superiors or the Compliance Department should be consulted.

Hebron, S.A. bases its business decisions on the principles of independence, self-development and sustainability, always seeking organic decisions that respect and put into practice the values set forth in this Code.

The Organisation guarantees the respect for the intellectual and industrial property of third parties, undertaking not to use it without authorisation or licence of its owners, nor to make unauthorised use of any information unlawfully supplied, or in respect of which the Organisation has to maintain confidentiality.

Hebron, S.A. assumes the obligation not to publicize misleading or illegal advertising that could harm the rest of competitors, consumers and users. The Organisation will observe a reliable promotion, disclosure and marketing, which will always be linked to the applicable legislation, always respecting the same.

#### **4.7. Relationship with governments and authorities**

Hebron, S.A. respects all current and future regulations of the countries in which it operates, guaranteeing in all cases its political neutrality and the good reputation of the Organisation.

Hebron, S.A. will not be part of any project that compromises respect for the principles contained in this Code. Likewise, given that the chemical sector is controlled by different administrations, authorities and competent public bodies, especially in the area of Environment, part of the Staff of Hebron, S.A. must maintain a direct relationship with these authorities and public officials, with whom a professional, objective and transparent treatment is maintained, in order to exchange the information required for the development by those of the administrative control activity. Any relationship between Hebron, S.A. and agencies, authorities and public administrations will be developed on the principles of cooperation and transparency, conserving and recording the necessary evidence based on the legislation applicable at any time.

Relations with national and international public institutions and bodies will be based exclusively on forms of communication that guarantee maximum transparency. Contacts with institutional partners will be carried out through representatives who have been expressly appointed by the Organisation.

Hebron, S.A. recognises the right of employees to exercise their freedom of speech and, in general, to participate in public and political life, as long as it does not interfere with their professional performance nor violate the principles of this Code, and is developed at non-working hours.



#### **4.8. Environment**

One of the main commitments and objectives of Hebron, S.A. is the protection of the environment, which is why ecological values are applied in the different environmental practices that are carried out, ensuring maximum respect for the environment and contributing to sustainable development, minimising or radically eliminating any negative impact of their activity and thus contribute to mitigating the effects of climate change.

Furthermore, Hebron, S.A. is committed to comply with all applicable environmental regulations, as well as to promote the R&D activities required to promote the protection of the environment, to train its employees in the matter, thus strengthening and promoting sustainable development.

In particular, the Organisation's Staff is committed to respecting and assuming the environmental commitments that the Organisation has made as their own.

#### **5. Obligations of the members of the Board of Directors, Legal Representatives, Executives and workers of Hebron, S.A.**

The members of the Board of Directors, legal representatives, executives and workers of Hebron, S.A. (the "Staff"), regardless of the contractual relationship that binds them to the Organisation, commit themselves to the absolute respect of the precepts, principles and rules of conduct contained in the different sections of this Code of Ethics, assuming each of the commitments, as well as the following stipulations:

##### **5.1. Subscription and compliance with the Code of Ethics and Good Practices**

The Staff of Hebron, S.A. undertake to respect and comply with this Code of Ethics, a mandatory norm for the Organisation, in order to generate an ethical and professional environment to develop their activities. Likewise, the Staff are responsible for knowing, complying with and executing the regulations, policies, procedures and internal controls in force at all times and that are applicable according to their function, responsibility and workplace, as well as to respect the legality, customs and common uses of the countries where they operate.

The Staff will adjust their professional performance to the principles of loyalty and good faith with respect to the Organisation, their hierarchical superiors, peers, collaborators, Stakeholders, as well as regarding third parties with which they are related in the exercise of their professional activity. The Staff should make any queries to their superiors or to the Compliance Department, prior to making a decision.

The Staff will provide accurate and necessary, complete and timely information, to their superiors, especially on all those aspects that affect the progress of activities within their area of competence, as well as to Stakeholders and Staff, in all that is necessary for the adequate development of their functions for the Organisation, providing the necessary collaboration.

##### **5.2. Environment and Public Health**

The Staff are actively and responsibly committed to the preservation of the Environment and Public Health, and must comply with the contractual and legal obligations required and associated with their position in said area, arising from the Organisation's commitments to the Environment and Public Health, as well as with the regulations, policies, procedures and internal controls that are in force at all times in the Organisation. The Staff will act with the utmost diligence in the resolution of any risk or contingency that could harm the Environment and/or Public Health.

The Staff shall observe the maximum respect for the Environment and Public Health, contributing to the sustainable development thereof, minimising or eliminating any negative impact that their activity may cause.

##### **5.3. Conflicts of interest**

The Staff undertake to avoid any situation that may lead to a conflict of interest with Hebron, S.A., derived from any direct or indirect relationship with the Organisation, or with any of its members or persons related



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thereto, refraining from being a party in such a project or decision, and communicating it immediately to their superior or to the Compliance Department.

The nature of the personal interests of the Staff, which may bring about a direct or indirect conflict with the interests of Hebron, S.A. can vary greatly, with emphasis to property, business or kinship relations of the Staff with suppliers, partners/shareholders, competitors, customers, public authorities or persons related to them.

Conflicts of interest can be corrected if the Organisation expressly and justifiably authorises it, with the necessary measures in this regard, and must always inform immediately their superiors or the Compliance Department in any case.

Any business decision will be adopted under the criteria of transparency, objectivity and impartiality, such as price, quality, service and always in the best interest of the Organisation.

The Staff shall not in any case be able to make use of their position or any information that has been accessed during the exercise of their position, in order to obtain an advantage, both for themselves and for any person related to them.

The Staff of the Organisation may not perform any type of position, perform functions or representation in competing organisations or as suppliers. Nor in organisations that maintain a situation of dominance or control competitor organisations.

Their superiors or the Compliance department must be consulted before Staff members accept any position, function, representation, designation or any appointment that arises outside the Organisation, which may affect their independence and professional dedication to the Organisation or which may imply breach of this Code.

#### **5.4. Information confidentiality and privacy. Intellectual and Industrial Property**

Hebron, S.A. considers that information is one of its main assets, crucial for the management of business activities. Thus, the Staff shall observe the utmost confidentiality and diligence in the custody of all the information that has been obtained as a result of their professional performance, which is not public, relative to the Organisation, its Stakeholders or third parties. Information that is considered confidential, secret or privileged, belonging to the Organisation, to the Stakeholders or to third parties, which the Staff have access to, shall not be used, disseminated, assigned and/or disclosed in any case, to third parties, without prior and express authorisation of their owner, as well as of their hierarchical superiors or the Compliance Department, regardless of their contractual relationship with the Organisation.

In this sense, the Staff undertake to comply strictly with the Organic Law on Data Protection and other applicable legislation regarding privacy, as well as the current legislation on Intellectual Property and Industrial Property, always acting under the legal requirements that are applicable at all times, ensuring the preservation of documentation and data, their integrity and availability.

Third-party Intellectual and Industrial Property cannot be used by the Staff, nor for the benefit of the Organisation, nor for their own benefit or of third parties, whether it is owned by the Organisation, its Stakeholders or third parties, without prior and express authorisation of its owner, of hierarchical superiors or of the Compliance Department.

In general, staff who, in the exercise of their professional functions, access any information relevant to the listing of any class of securities or instruments traded in an organised, official or recognised market, shall refrain from carrying out, directly or indirectly, any act, contract or transaction in such regard.

Staff members who are aware of or have reasonable evidence of misuse or leak of confidential information, shall immediately inform the Compliance Department or their superiors.

**5.5. Prevention of corruption, bribery and influence peddling**

The Staff shall avoid any type of conduct aimed at influencing, for their benefit or the Organisation or a third party, the decision-making by authorities, agents and public officials.

The Staff may not offer, deliver, request, receive and/or accept, nor in their benefit nor for the Organisation or third party, promises, gifts or money, undue advantages or compensations, for the purpose of bribing authorities, agents or public officials, or that improperly favours another in the acquisition or sale of goods, contracting services or commercial relations, whether individuals or public or private legal persons. All this except what can be understood as reasonable or in accordance with the uses and customs of the territory where it is operating.

These prohibitions extend to all persons closely related to, such as family members, or those who have a personal relationship with public officials, agents or authorities or influential individuals, where the aim is to obtain something in return.

In any case, when employees have doubts about the reasonableness or acceptability of a gift, compensation, offer or invitation, they should consult with their hierarchical superiors or the Compliance Department in writing.

Conversely, Hebron, S.A., in its high degree of commitment to society, carries out sponsorship projects in which it mainly contributes with economic resources. These contributions must always be made in accordance with the principles of integrity and transparency and by persons expressly authorised by the Organisation. Hebron, S.A. undertakes to collaborate exclusively with those institutions that have sufficient means to effectively manage the contribution made and to properly account for it in accordance with the General Accounting Plan. Finally, Hebron, S.A. guarantees the monitoring of the contribution and effective control thereof.

Staff members who are aware of any irregular situation in relation to the above, shall immediately inform the facts to their hierarchical superiors or the Compliance Department so that the necessary measures are taken.

**5.6. Economic relations with political parties, worker's unions and associations**

The Organisation does not make any direct or indirect donations to political parties. Any donation must be made in compliance with applicable regulations, it must be ensured that it does not damage the image of the Organisation, that it is transparent, and that the recipients are easily determinable. The Organisation shall refrain from any prohibited activity in connection with the financing of political parties.

The Organisation does not provide support to organisations or associations with which there may be a conflict of interest, but it may cooperate on specific projects if their mission is aligned with the values of the Organisation, provided they have a clear purpose, documenting the resources and through the corresponding authorisation issued by the responsible person within the Organisation. Staff members who are aware of any irregular situation in such regard must immediately notify their superiors or the Compliance Department.

**5.7. Aid and sponsorships**

The Organisation may sponsor and support social, sporting, cultural and artistic initiatives, involving citizens, institutions and associations, but in no way contrary to the principles and values that govern this Code. In any case, in choosing sponsorships and aid, the Organisation will take special care with any possible personal or business conflict of interest, always gathering evidence of sponsorships and aid, as well as the destination and traceability of the use of the funds of the beneficiaries.



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#### **5.8. Prevention of money laundering and terrorist financing**

The Staff are actively engaged in the prevention of any conduct that may be characterised or related to money laundering and terrorist financing. The following may be considered as conduct likely to incur the risk of money laundering and terrorist financing:

- Collections or payments in which it is not possible to determine who is the recipient or it is not possible to know the origin of the transferred economic funds.
- Unusual collections or cash payments based on the nature of the transaction.
- Collections or payments to/from individuals or legal persons residing in tax havens or with current accounts in such locations.
- Collections or payments made through bearer checks (not "to the order of").
- Collections or payments made in currencies other than those established in contracts or invoices.
- Collections or payments made to/by third parties not mentioned in the contract.

In case of any doubt, the Staff must first inform their hierarchical superior or the Compliance Department in order to solve it. In addition, one must proceed with such a conduct when one becomes aware of these irregular situations.

#### **5.9. Public finance and Social Security**


The Staff of Hebron, S.A. shall not have any fraudulent conduct regarding any legally enforceable fiscal, tax and social security obligations, or in the obtaining of benefits, aid, incentives, public benefits and/or subsidies in fiscal, tax and social security matters, derived or committed in connection with the business activity of the Organisation and in any territory where it could operate.

#### **5.10. Economic information**

The Staff shall ensure that those operations of economic importance related to Hebron, S.A. are recorded with the greatest accuracy in the accounting books, records and financial statements of the Organisation, always representing the true and accurate image of its financial and accounting situation. To this end, the accounting regulations and principles, as well as the regulations and recommendations in force on the matter, shall be faithfully adhered to.

Staff members are strictly forbidden to make any unlawful payment with the economic resources of Hebron, S.A. In addition, it shall be required that in any economic transaction that uses resources of Hebron, S.A., the following conditions are met:

- a) That the transaction is related to the activities of Hebron, S.A.
- b) That the amount paid is in accordance with economic and market criteria.
- c) That the transaction is duly authorised by the persons appointed by the Organisation in such regard.
- d) That the withdrawal of money occurs by bank transfer or through a nominative title, unless expressly and because it is a small amount is determined otherwise.
- e) That it is duly documented and accounted for.
- f) That the lawful destination of such payments is guaranteed.

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The Staff of Hebron, S.A. will refrain from having the following behaviours in their professional performance:

- a) Keeping accounting practices parallel to the official practices.
- b) Not registering any transaction or vice versa, register something non-existent.
- c) Manipulation of accounting records or use of forged documents.

Deliberate destruction of accounting and tax documentation before the minimum term established by law.

#### 5.11. Use of assets

The assets owned by Hebron, S.A. shall be made available to the Staff solely for use for their professional purposes. However, they must use them in accordance with the general rules of use set forth in the following lines and in the policies and internal regulations that the Organisation develops for such purpose:

- The Staff shall guard with due diligence the assets and tools made available to them by Hebron, S.A. and to use them for activities directly related to the interests of the Organisation.
- The assets of Hebron, S.A. shall not be used for private or extra-professional purposes, unless expressly authorised, and always in compliance with the strictly reasonable according to the principles of contractual good faith.
  - In the case of devices of the Organisation such as computers, tablets, USB cables, telephones, etc. they shall always be used for professional purposes, unless the contract or internal regulations of the Organisation allow for some extraordinary use. The use of files or software of external origin may pose serious risks to the security of Hebron, S.A. and may constitute an infringement of intellectual or industrial property if it is not operated with the proper licence or authorisation. For this reason, the use of unauthorised software, dangerous downloads or any other behaviour that brings risks to the IT security of Hebron, S.A. is forbidden and may lead to an infringement of intellectual or industrial property rights.
  - Likewise, Staff members are forbidden, among other conducts, to send emails for purposes other than the activity carried out within the Organisation, including threatening or injurious emails, to use an inappropriate language, to make inappropriate comments that could imply an offence to a person or damage to the image of Hebron, S.A. or browse web pages with indecent content or that could endanger the image of the Organisation.
- The image, brand and reputation of Hebron, S.A. will be preserved, cared for and protected by the Staff in the development of their professional activities, avoiding any behaviour that could damage or put it at risk.
- The intellectual and industrial property of Hebron, S.A. will be used by the Staff internally and always for the benefit of the Organisation, being owned by Hebron, S.A. all the know how that is generated internally by the Staff. Third-party intellectual and industrial property will always be respected and in any case, the necessary authorisations and licences will be obtained.
- The Staff shall ensure that none of the property of Hebron, S.A. be subtracted by third parties of whatever value.

Both tangible and intangible assets of Hebron, S.A. may only be used for the benefit of the Organisation and never for interests outside the Organisation.



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Likewise, the acquisition of assets and services will always be carried out under conditions that guarantee transparency and objectivity and that prevent conflicts of interest.

#### **5.12. Bound operations**

The Staff of Hebron, S.A. may not acquire in any way assets or rights of which the Organisation is the legitimate holder, nor carry out any legal business with them.

However, Hebron, S.A. may authorise such businesses or acquisitions provided that the lawfulness in force regarding the matter, transparency and ordinary market conditions are respected and there is no privilege whatsoever.

#### **5.13. Training**

The Staff undertake to participate actively in the training programs made available to Hebron, S.A. in order to acquire new knowledge and improve business activity.

#### **5.14. Human Rights and Public Liberties**

The Staff undertake to protect the Human Rights and Public Liberties recognised in the Universal Declaration of Human Rights and in the main international agreements in this respect. Everything related to the protection of the rights of children and minority groups or groups at risk of social exclusion or discrimination is of special protection for Hebron, S.A.

Likewise, the Staff members assure that in no case will they carry out projects with institutions or organisations that do not respect Human Rights and Public Liberties.

#### **5.15. Equality and protection against discrimination**

The Staff of Hebron, S.A. must observe a dignified treatment in the exercise of their labour relations, always respecting the rights legally recognised in the labour regulations applicable to the Organisation, especially in the fields of privacy, equality and diversity. It is strictly forbidden that the Staff carry out differences of treatment or discrimination by reason of age, sex, ideology, race or religion; nor any manifestation with connotations of harassment or abuse of authority, of intimidating, offensive, degrading or threatening nature against the moral integrity and respect for persons.

Likewise, Staff members are prohibited to have any conduct or act that threatens the sexual freedom of the people.

The Staff, in case of being aware of any of these behaviours or in case of suffering personally, must inform their superiors or the Compliance Department. For its part, Hebron, S.A. guarantees a treatment of the situation in a strictly confidential manner, guaranteeing without prejudging it, the protection of the victim and the immediate cessation of these actions, informing the authorities if necessary.

#### **5.16. Occupational health and safety**

Hebron, S.A. counts with and encourages the adoption of all preventive measures to promote and maintain a safe working environment. Hence, it has different internal policies and regulations that complement and support all those established in the legislation in force in the field of Occupational Hazard Prevention.

The Staff shall be aware of the regulations applicable to Occupational Hazard Prevention associated with their position, as well as comply with the prevention and safety measures that the Organisation may at all times make available to them.

### **6. Supervision and evaluation of compliance with the Code of Ethics and Good Practices**

The Staff of Hebron, S.A. will carry out an exemplary behaviour, performing in their professional activity all the ethical principles that inspire this Code of Ethics, as well as complying with all the norms, policies, procedures

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and internal controls of Hebron, S.A. and guaranteeing honesty and transparency in their professional practice and in their commercial relations.

Failure to comply with this Code by the Staff will entail subsequent disciplinary and/or contractual measures. Such breaches may be detected through different means that Hebron, S.A. discloses to the Staff and its Stakeholders, who must actively collaborate with the Organisation, reporting any possible risk of non-compliance of which they are knowledgeable, as well as those non-compliances, irregular or illicit or criminal conduct. The different means that Hebron, S.A. makes available to such effects are:

- Ethical or Reporting Channel. The Ethical Channel is a very effective means through which the Staff and other Stakeholders will communicate in a strictly confidential manner and without fear of retaliation, any possible real risk of non-compliance with this Code, as well as those non-compliances, irregular or illegal or criminal conduct of which they have knowledge. Internally, a rule will be designed that will regulate in detail the procedure for the processing of complaints, specifying the competent bodies for the management of the Ethical Channel, processing and resolution of received complaints. See PRA 03 Canal Ético y Canal Consultas
- The Ethical Channel is structured through the following alternative means of communication:
  - Email: [canal.etico@hebronsa.es](mailto:canal.etico@hebronsa.es)
  - Internal mail: 2 mailboxes located in main entrance and in the office of plant 1. Queries or complaints in a sealed envelope to the attention of "Ethical Channel". See DRA 09 Canales de comunicación.

Finally, the role of the Organisation's Compliance Department is fundamental, which, among its functions, is responsible for ensuring compliance and effectiveness of this Code of Ethics. To this end, an email is sent to the Staff, as well as to Stakeholders, to address doubts or queries that may arise in the interpretation and execution of the same (See PRA 03 Canal Ético y Canal Consultas and DRA 09 Canales de comunicación):

- Email: [consultas.compliance@hebronsa.es](mailto:consultas.compliance@hebronsa.es)

## 7. Disciplinary Regime of the Code of Ethics and Good Practices

The Staff of Hebron, S.A. are committed to the respect and absolute compliance of this Code of Ethics, regardless of the activity they develop, the position they occupy and the contractual relationship they have with the Organisation.

The Staff, in any case, may request other members of the Staff or Stakeholders to contravene the stipulations and principles established in this Code, nor shall it be deemed justified those conduct contrary to it on the basis of performance by an employee of an order from a superior.

Any breaches that may arise from this Code of Ethics, as well as any wrongdoing, shall be considered a very serious infraction, a breach of contractual good faith, and shall be processed and sanctioned in accordance with the disciplinary sanction established for that purpose by the collective bargaining agreement applicable to the Organisation, and other legislation that results from the application. Notwithstanding any other legal or contractual liability that may arise from the facts.