



CODE OF CONDUCT

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1. INTRODUCTION

The present **CODE OF CONDUCT AND ETHICS** (hereinafter, the **CODE**) of **TECAM SOLUCIONES MEDIOAMBIENTALES S.L.** (Tecam onwards), aims at reflecting and preserving the high standards of conduct that have been and are part of our culture and way of doing business. In Tecam we are committed to fully comply with laws and regulations affecting our organization and way in which we operate. The ethical standards of this **CODE** are closely linked to the vision, strategies and corporate values and aim to provide guidance to all managers, directors, employees and others who act on behalf of Tecam or are linked to our organization.

This **CODE** applies equally to all members of our entity (managers, directors, employees, external agents, subsidiaries...). We also expect our business partners, suppliers, advisors, agents, distributors, salespeople, and third-party representatives to commit themselves to comply with the standards stipulated in this document. When analysing our **CODE**, the following aspects should be taken into account:

- **This CODE reflects our values.** The Governing Body and the Management of Tecam have approved this document. Compliance is really taken into account by the Governing Body and the Management and are firmly committed to guaranteeing the implementation of the **CODE** in all our operations, at all levels. Any renunciation of the provisions of this **CODE** must be in writing and approved by Management.
- **This CODE may suffer modifications.** We are committed to reviewing and regularly updating our policies and procedures. In that case, we will immediately communicate the changes to all members of the organization.
- **Compliance with this CODE is expected.** All members of our organization are required to comply with all applicable laws and corporate policies, regardless of whether they are expressly mentioned in this **CODE**.
- **We encourage the formulation of questions.** Do not hesitate to contact the **Compliance Officer** if you have any question or concern.
- **Actual or potential violations must be informed.** The **Compliance Officer** must be immediately informed or make use of the **Whistleblower Channel** to inform about the belief or suspect that a violation of this **CODE** has occurred or may occur. Failure to report this constitutes, in

itself, a violation of this **CODE** and may result in the application of disciplinary sanctions to the employee.

- **Retaliation is forbidden.** No member of Tecam will suffer retaliation, discrimination, or any other harmful labour measures for reporting actual or potential violations in good faith.

The Governing Body of Tecam has approved and keeps a **COMPLIANCE POLICY** in force, which operates in a complementary way with this **CODE** and that expresses the willingness and commitments of our organization for the development of compliance plans and systems in our activities.

On behalf of the Tecam Board of Directors, we thank you for the time and attention you dedicate to this important matter and your constant support for the commitment that our company has assumed in compliance.

Executive Management/ Governing Body



Bernat Sala (CEO)

Polinyà, October 20th, 2022

2. WHO MUST COMPLY WITH THIS CODE

It is expected that all members of our company (employees, managers, representatives) read and understand this **CODE**, govern by these standards in their daily activities and assume the personal responsibility to comply with this **CODE** and all policies and applicable corporate procedures

It is also expected that our business partners, suppliers, customers, advisors, agents, distributors, vendors, and third parties will commit to comply with the standards stipulated in this document.

3. SANCTIONS IN CASE OF NONCOMPLIANCE

Whoever violates this **CODE** may suffer **immediate disciplinary measures**, including the termination of the employment relationship, without prejudice to the consequences arising from the disclosure to the police/judicial authorities of possible criminal behaviour. The disciplinary regime stipulated by the company is governed by the workers regulation (at the same time by the applicable collective agreement).

They can also be subject to legal actions that are filled by **Tecam** or affected third parties. Violations of this **CODE** that involve transgressions of national criminal laws may also result in criminal charges.

4. REGULATION COMPLIANCE

At **Tecam** we are committed to comply with the laws and regulations that affect our company and the way we operate. We respect the highest standards of ethics and the compliance with international standards. We also expect that those who act in our representation do behave in the same way.

In accordance with the Spanish legal framework of the criminal liability of the legal entity, this **CODE OF CONDUCT AND ETHICS** is applicable within the framework of the reform of the **CRIMINAL CODE** (approved by the Organic Law 1/2015, of March 30; from July 1, 2015) and in accordance with the current legal system in force regarding Criminal Liability of Legal Entities

In this sense, we implement the compliance culture in our organization for the proactive prevention of irregularities and internal control.

This **CODE** is prepared under the framework of the UNE 19601:2017 standard, related to the **Criminal Compliance Management System**, as the maximum expression by **Tecam** of our desire to establish a real and evident compliance culture.

5. WORK PRACTICES

5.1. Health & Safety

At **Tecam** we have assumed the fundamental commitment to **protect health and safety** of our employees and the communities in which we operate. In short, safe operations depend on the proper conduct of all members of **Tecam**. Our company is committed to take all necessary measures to prevent injuries and illnesses related to the workplace.

Tecam's workplaces must comply with the relevant health and safety standards and be exempt from recognized risks that could cause injury, illness or death.

Employees have the responsibility of carrying out their tasks safely and efficiently as well as paying attention to conditions or practices in the workplace that could create undue risks to people or the environment.

To eliminate the possible risks, all members of **Tecam** must immediately inform about the unsafe conditions and correct the dangerous actions that are observed or carried out as soon as possible. Supervisors and employees must immediately report occupational injuries or illnesses, as specified in the policies and practices of our organization and in accordance with national laws.

5.2. Equal employment opportunities

At **Tecam** we are committed to providing equal opportunities to applicants and employees in all areas of employment, including hiring, training, promotion, and compensation.

We will not tolerate unlawful discrimination based on race, religion or belief, age, gender, disability, sexual orientation, nationality, or any other condition protected by applicable law.

All employees have the right to work and participate in employer-sponsored activities in an environment free from sexual, ethnic, religious harassment or other grounds, victimization, hostility, and intimidation. The policies of **Tecam** require compliance with all applicable laws against discrimination.

5.3. Substance abuse

Using, selling, distributing, possessing or promoting illegal drugs as well as improper use of prescription drugs or working under the influence of illegal drugs or alcohol is forbidden in the premises of **Tecam**.

Drugs and alcohol are controlled substances and, in **Tecam**, we are governed by a zero-tolerance policy with respect to members who abuse or are under the effects of these substances while performing their job functions. Those who abuse of drugs or alcohol while performing their tasks can be reported to the police.

5.4. Employees' privacy

In **Tecam** we respect the privacy and dignity of all our members.

We collect and retain the personal information of the members that is necessary for the creation and/or fulfilment of the employment relationship or as required by law. Personal information consists of data related to an individual that can be identified with only that data or in combination with information held by **Tecam**.

Our company uses procedures designed to protect and limit access to personal information of our members in accordance with applicable laws governing their privacy.

No member of **Tecam** can access or use records or information of other members, unless they have authorization to do. In that case, you can only do as required by legitimate business needs, in accordance with applicable laws.

5.5. Threats & violence

The safety of **Tecam** members is of vital importance.

Our members cannot commit acts of violence or other intentional acts tending to harm other people or property in the company's facilities. Similarly, employees cannot intimidate or make threatening comments in the workplace in such a way as to pose a threat to the personal safety or to another person's property.

In accordance with the guidelines of the **CODE**, harassment, violence or threats of violence must be immediately informed.

Whenever legally required, in the facilities, rented/owned properties of **Tecam** it is forbidden the possession, concealment, use or transfer or firearms or other type, including knives, clubs,

explosives or other devices that are primarily used to cause damage.

6. PRACTICES OF PREPARING COMMERCIAL, ACCOUNTING AND FINANCIAL REPORTS

At **Tecam** we strive to maintain accurate and reliable corporate records that comply with applicable accounting standards and established internal controls.

Cash payments, goods transfers, service provision or any other transaction on behalf of **Tecam** won't be approved without proper supporting documentation and are not made when it is understood that part of these payments are used for other purposes from those described in the documentation.

No undisclosed or unregistered funds or assets can be established for any purpose.

Black transactions are strictly prohibited, regardless of their magnitude.

The members of **Tecam** do not try to influence, confuse or interfere with the internal or external auditors contracted to perform audits of accounting books, records, procedures or internal controls of the company's business

All **Tecam's** members must:

- Present in a reasonable manner (accurate, complete, objective, pertinent, timely and understandable) financial and other information that is relevant to the financial statements, in accordance with applicable laws, rules and regulations
- Respect and, when appropriate, supervise and improve **Tecam** processes to maintain effective internal control of financial reports
- Act in good faith, with due care and in a responsible, competent and diligent manner; use well-founded, professional and independent criteria and endeavor to present, at all times, pertinent information reasonably available in a timely manner to the Management and other persons in charge in accordance with the general accounting policies of **Tecam**
- Protect the confidentiality of the information obtained in the course of their work and
- Use the confidential information obtained in the course of their work solely for the commercial objectives of **Tecam** and not to obtain advantages or personal enrichment

7. MONEY LAUNDERING AND FINANCING OF TERRORISM PREVENTION

In **Tecam** we comply with the legal provisions to prevent money laundering and terrorist financing and we audit our activity in the matter, having taken the decision not to establish relationships with persons or entities that do not comply with the aforementioned legislation or that do not provide the information adequate in relation to compliance with it.

8. CONFLICTS OF INTERESTS

Whenever acting as an employee or other representative of **Tecam**, you must make your decisions in the best interest of our company. A conflict of interest exists when your private interests interfere, in some way, with the interests of the organization.

For instance, there can be an interest conflict in the following cases:

- When you take action or have interests that may hinder the objective and effective fulfilment of your duties at **Tecam**
- If you or your relatives receive undue personal benefits, such as cash, loans, loan guarantees or inadequate gifts, due to your position in **Tecam**
- If you work for a competitor, client or supplier of **Tecam** or have a significant financial interest in them. Employees of **Tecam** cannot work for a competitor or serve as advisors or members of the board of directors of a competitor. As a best practice, you should avoid maintaining direct or indirect business relationships with customers, suppliers or competitors of our organization, unless you do so on your behalf. This provision does not include minor or irrelevant shareholding in a publicly traded competitor
- When the directors have financial interests or other jobs or management positions that may conflict with the interests of **Tecam** or prevent them from performing their work effectively. In those cases, directors are expected to disclose the corresponding information to the board of directors and to refrain from making decisions related to that potential conflict.
- Our **CODE** prohibits conflicts of interest.

Questions should be addressed to the **Tecam** Compliance Officer. It must be informed of conflicts or possible conflicts in accordance with the procedure indicated in Section 16 of this **CODE**.

However, we recognize that it is not always easy to determine if there is a conflict of interest.

9. DONATIONS, HOSPITALITY, DONATIONS & FAMILY BENEFITS' POLICY

This **POLICY** constitutes a minimum standard of compliance, applicable to all employees, third parties and business partners of **Tecam**.

In **Tecam** we have a zero tolerance towards bribery and we are committed to act professionally, impartially and with integrity in all our activities wherever we operate.

Accepting gifts, presents, courtesies and other benefits can be a legitimate way of fostering good business relationships, but it is important that they are never used to unduly influence the decision-making processes or make others perceive that illicit influence existed.

Acceptance of gifts, presents, courtesies and other benefits should always be done in accordance with the law and business practices of the place.

It is important that all possible precautions are taken when accepting gifts, presents, courtesies and other benefits, to protect the reputation of third parties and **Tecam** against allegations of unlawful conduct and to ensure that they do not violate anti-bribery regulations.

In general, gifts, presents, courtesies and other benefits should not be solicited from any person with whom **Tecam** does business, including suppliers, customers, business partners and government officials.

9.1. Tecam employees' duties

- Must be sure to read, understand and comply with this **POLICY** and any additional information issued in relation to it.
- The prevention, detection and reporting of bribes is the responsibility of all those who work for **Tecam** or under the control of **Tecam**. Every employee is required to avoid any activity that might suggest or lead to a violation of this **POLICY**.
- Any irregularity/ies detected or suspected must be notified through the **Whistleblower Channel** of **Tecam**, if it is considered that a violation of this **POLICY** has occurred or that may occur in the future. *For example, if a supplier or potential supplier offers you something to obtain a*

competitive advantage from Tecam or a client indicates the need for a gift or payment to insure a business.

9.2. Making gifts, presents, courtesies and other benefits to third parties

From Tecam to employees

The Governing Body determines the delivery of gifts to its employees in good faith in the following cases:

- Holiday / Christmas season (for example a basket, for an amount not exceeding 50 euros)
- Local Custom (a book at Sant Jordi's Day)

From Tecam to third parties (customers, suppliers or government officials)

The gifts and commercial invitations are widely accepted in the day to day business and commercial activity. Giving or receiving gifts, invitations or promotional expenses are considered acceptable if they are:

- In relation to events related to the commercial / marketing activity (fairs, conventions, etc ...)
- Offered and received in good faith in relation to a holiday or recognized event in which they usually exchange presents, in the case of gifts (especially in the Christmas season for an amount not exceeding 100€)
- Allowed under local laws and customs
- Offered and received according to the procedures described by the organization

However, commercial invitations of considerable value can also be used as a cover for bribery.

All gifts, presents, courtesies and other benefits offered to third parties (government officials, customers or suppliers) must:

- Be reasonable and habitual for the circumstances
- Not motivated by the desire to improperly influence the government clerk, client or supplier
- Be tasteful and in accordance with the rules of professional courtesy generally accepted in the country where it is offered and in the country where Tecam has its headquarter.
- Offered in an open and transparent way
- Offered in good faith and without expectation of reciprocity

- Offered in relation to a legitimate business purpose and in good faith, in the case of travel and courtesies.
- Not offered to any government Clerk, client or supplier with a regularity or frequency that generates an inadequate perception or that distorts the purposes of this **POLICY**
- Comply with local laws and regulations that are applicable to the government clerk, client or supplier.

9.3. Gifts, presents, courtesies and other benefits' acceptance by Tecam from third parties (customers and suppliers)

In Tecam we **DO NOT** allow the use of gifts or gifts of any kind that:

- Could influence business relationships, either with customers or with suppliers, so that any advantage, difference in treatment, business expectation, ability to influence or obligation (direct or indirect) of hiring with them are created.
- Could affect the professional activity of Tecam employee's activity in any way so as not to carry out their work independently and objectively, in the most favorable way for the interest of Tecam.
- Are against any legislation, regulation and/or regulation, whether external and general or internal and specific to Tecam.

Other complementary guidelines, also mandatory for the acceptance of gifts by employees and executives of Tecam are the following:

- It is forbidden to accept any kind of personal financial assistance by a third party, unless it comes from a financial institution acting in its ordinary activity and with no exceptional or singular criteria.
- Under no circumstances should cash be accepted
- It is not allowed to accept leisure trips or attentions of any kind for the employee and/or any family members, who are paid by third parties with direct or indirect economic relations with Tecam

Any attempted bribe must be communicated and reported through the **Whistleblower Channel**.

The delivery, offer and/ or acceptance of the elements mentioned below received by Tecam personnel are considered admissible by third parties:

- Brand utensils / stationery: pens, notebooks, calendars, cups, t-shirts, etc ... that sponsor a third party as long as the value does not exceed 20 euros
- Gift baskets on the occasion of festivities indicated as long as their amount does not exceed 50 euros (Christmas time)

Personnel that receive it must notify the Compliance Officer/ Compliance Body and assess their acceptance based on internally established criteria.

Only in the case of gift baskets received by third parties, will they be accepted and drawn between Tecam's internal staff.

10. CONFIDENTIALITY, ASSETS' USE, COMPANY'S INFORMATION & TECHNOLOGY

10.1. Confidentiality

The protection of confidential information is fundamental to the success of **Tecam**, including confidential information about the members, customers and suppliers of our organization.

Several aspects of our business that allow us to compete effectively are based on information: our products our plans and our strategies to serve customers and meet their needs.

Our information assets may include, for instance:

- The clients' names and their product needs
- Patents, trademarks, licenses and other types of intellectual property.
- Knowledge (know-how) and trade secrets, including, for example, registered equipment, suppliers (of equipment and raw materials) and product formulations.
- Future business ideas and concepts
- The non-launched product features, programs and launch strategies.
- Passwords for accessing the network and systems
- Database extraction rights
- Financial data not publicly available
- Information about pending acquisitions and joint Ventures
- Production, marketing and sales' forecasts
- Pricing and sales strategies
- Sellers, suppliers and the terms of **Tecam** agreements with them
- Prices of goods, materials and services purchased
- Employee records

- Organization charts and organizational changes
- Operational strategies
- Security procedures, and
- Any other valuable information, which provides competitive advantages and, in general, is not publicly available.

We entrust confidential business information to our members and partners, so they can carry out their work successfully. This confidential information is the property of **Tecam** and is only used for corporate purposes. Maintaining the confidentiality of registered business information and business secrets is essential to achieve success and growth, as well as to maintain our reputation and relationship with customers, vendors, suppliers and business partners.

We are committed to protecting confidential information in any format. Confidential information can be presented or stored in various formats, including, for example, printed documents, cloud storage services, emails, voice mails or recordings, Skype messages, faxes, information on hard drives and other storage devices. electronic, pictures and graphic presentations and audio and video tapes.

The obligation to preserve confidential information continues even after the employment relationship with Tecam ends. If you decide to stop working for our company, you can not disclose confidential information to third parties.

10.2. TECAM's opportunities and assets

Tecam members have a duty to promote the legitimate interests of our organization when the opportunity arises. Consequently, they can not:

- Take advantage of the opportunities that arise in the course of their work for **Tecam** or through the use of goods or information from **Tecam**.
- Use goods, information or charges of **Tecam** to obtain undue personal benefits
- Borrow or use the name, assets, business reputation, funds, data or other assets of **Tecam** for your personal Benefit or gain or for the Benefit of third parties and,
- Use assets of **Tecam** for illicit or improper purposes

Given theft, negligence and waste have a direct impact on our company's profitability and may violate local laws, **Tecam** members are expected to

ensure that corporate assets are used for legitimate business purposes only. At the end of the employment relationship, all records and equipment of **Tecam** must be returned in accordance with the contractual terms and applicable laws.

The Compliance Officer should be immediately informed of suspected fraud or theft.

10.2.1. *Non-divulgence of the records*

In **Tecam** we are committed to avoiding the improper use of the information contained in the corporate records.

Because information about the operations of our organization can be disseminated quickly and easily (for example, by e-mail), **Tecam** members should take precautions to avoid the unauthorized or unnecessary diffusion of crucial and recorded information

The access must be made only for commercial purposes and the need to know. The information about customers and employees that appears in the corporate archives is not disclosed outside of **Tecam** without the permission of our company and the client, except in the case of judicial summons, other legal processes or requests of governmental investigators or regulatory entities, under the approval of the Compliance Officer.

10.3. New ideas & products' ownership

Employees who develop ideas, products or services while working for **Tecam**, with the help of corporate resources (such as materials, information, equipment, technology or installations of **Tecam** or with time), do so with the understanding that these elements are the exclusive property of **Tecam** within the framework established by law.

11. POLICY OF THE CORRECT USE OF ELECTRONIC MAIL OR E-MAIL

11.1. Introduction

The electronic mail has become the main channel of internal and external communication of companies. Therefore, in this section we define how we should make use of the **Tecam** email and how we should communicate with our customers, suppliers, colleagues and other collaborators.

11.2. Rules

This regulation affects both the email accounts with domain **@tecamgroup.com**, as well as those messages from particular email addresses (@

gmail.com, @ hotmail.com, @ yahoo.com, etc.) addressed to **Tecam** or related to **Tecam**. As an employee of **Tecam** you must take into account:

- Each email account **@tecamgroup.com** is for strictly professional use and is associated with a person responsible for it. Therefore, you must not make use of your **Tecam** email account to send, forward or receive personal e-mails.
- You must not send or forward messages that attempt against the security and integrity of clients, suppliers, partners and other collaborators of **Tecam**. It is forbidden to send or forward derogatory, deceptive or false messages that attack or abuse clients, suppliers, colleagues or other collaborators of **Tecam**.
- You must not disseminate confidential information or disclose information that discredits or may harm **Tecam**.
- You should not send, forward or receive emails whose size exceeds 20 MB (including all attachments in the message). In the case of including heavy attachments in the email, you must have previously compressed them in a known format (such as .zip).
- You must inform the **IT Manager** of the receipt of spam mail (junk mail), unsolicited mail, mail of dubious origin (of unknown or malicious users) or email with viruses.
- You must be responsible for keeping your email purged to avoid saturation of your mailbox, as well as save the information of your mail that you consider important
- You must not send, receive, download, copy or execute videos, music, graphics, or other files not related to the activity of **Tecam**.
- You must not use electronic mail in a way that interferes with the normal development of your work at **Tecam**.
- Those who do not correctly use their email account can be sanctioned according to this **CODE OF CONDUCT** of the organization.

11.3. E-mail's account

E-mail account is understood as the assignment by **Tecam** of:

- An electronic address with the form **USER@tecamgroup.com**
- A mailbox (disk space) to store the messages
- A password or password to access the account privately
- The possibility of sending and receiving messages within **Tecam** and to the Internet

using the assigned electronic address.

The email account is personal and non-transferable, so you must have secure keys and you cannot share the account. The dependencies or work groups (projects) that have been assigned an account must authorize a user to manage it. Each person, or the authorized user, is responsible for the security of your account and password. The first time the user receives their email account, they must change their password. For security, the key must be changed at least every three months.

To report problems, make suggestions or make any request related to email accounts or the email service in general, a call must be made or a communication sent to the IT Customer Service Section.

It is IT manager's responsibility to have backup copies of the messages of the mail folders and of their address book of each user according to the frequency established by the company.

11.4. E-mail's use

- It is an institutional mail before personal. Therefore, it should be used for institutional, not personal, matters; alien to the institution and the functions and responsibilities granted by it.
- Use appropriate language in your messages
- The mail (e-mail) is not guaranteed to be private. Remember that there are people who are dedicated to trying to "capture" information that surfs through the Internet, therefore, never write in an email message information that would not put in an envelope.
- All information shared and communicated in this medium, must respond to the values of responsibility, honesty, respect, loyalty and tolerance.
- The mass sending of e-mails is managed by the Human Resources and Communication Manager. The maximum amount of mails per day and user is limited to an amount valued by the IT department and considered adequate for the daily operation of each user.
- As a personal identification, it will be only used for the company's own issues. Not being authorized to subscribe thought it to any mean, page, blog, social networks or / and similar, unless in case of official authorization for the formal representation of the institution.
- The improper use of these rules will generate sanctions. Each user is responsible before the

institution for its use and, therefore, assumes and accepts the sanctions that the institution applies in relation to this matter

- Every user is in solidarity with the institution, so he must notify of any infraction of this regulation or the malfunction of the e-mail to the IT Manager in order to contribute to its proper use, as well as to disclaim responsibilities.
- Users must not read someone else's mail or generate or send emails in the name of another person without authorization or supplanting it.
- Violations of the rights of any person or institution protected by copyright, patents or any other form of intellectual property are prohibited. Among other activities, the distribution or installation of software without the Tecam license is included.
- Do not reveal your account's code or password nor allow its use to third parties for activities outside of Tecam. The prohibition includes individuals.
- The use of electronic mail is forbidden in order to carry out any type of harassment, defamation, slander, with the intention of intimidating, insulting or any other form of hostile activity, regardless of the language, frequency or size of the message.
- It is forbidden to carry out activities that contravene the security of the systems or that generate networks or services' interruptions of. Among the actions that contravene the security of the network are (although not limited by them) access to data whose recipient is not you, enter an account of a server or an application for which it is not authorized. For the purposes of these policies, the word "interruption" includes, but is not limited to, capturing network traffic, flooding the network, spoofing packets, denial of service (DoS) attacks, or falsifying routing information and configuration of the equipment in order to take advantage of any vulnerability of the systems.
- It is the obligation of the users to report to the IT Manager any type of irregularity or abuse of these services, to prevent this from happening again or from happening to other civil servants.

12. POLICY OF THE CORRECT USE OF INTERNET

12.1. Introduction

The purpose of this Policy is to establish standards that ensure the proper functioning of the Internet.

Employees are expected to use the Internet responsibly and productively. Access to the Internet is limited to activities related only to work and personal use is not allowed.

12.2. General rule

Tecam offers its employees and collaborators different computer tools that must be used for professional purposes.

12.3. About Internet's misuse

Unacceptable use of the Internet by members of the organization includes, but is not limited to:

- Access to pages with illegal content or that threaten human dignity: those that advocate terrorism, pages with xenophobic, racist or anti-Semitic content, etc.
- Use computers to perpetrate any form of fraud, and / or piracy of software, movies or music
- The use of the so-called "CHAT" will not be allowed at any time unless authorized by your direct supervisor.
- Steal, use or discover the password of a third party without authorization
- Share confidential material, trade secrets or proprietary information outside the organization
- Send or post defamatory information for the company, its products / services, employees and / or clients
- Introduce malicious software in the company's network and / or endanger the security of the organization's electronic communication systems
- Send or publish chain letters, requests or announcements not related to the purposes or activities of the organization
- Divulge personal opinions as representation of those of the organization
- The user should not install any program to play MP3, RA, WAV or radio stations via Internet.
- Any type of unauthorized transmission via Internet is prohibited (listen to music and watch video)
- Employees must always communicate with education and respect, being professionals. Post comments or send derogatory, deceptive or false messages.
- Post comments or send anonymous messages or with pennames. Employees must always use their real name and identify themselves as workers / collaborators of **Tecam**.
- Create a group, page, blog, etc. mentioning

Tecam, without prior approval.

- Use social media in a way that interferes with the normal development of their work at **Tecam**

If an employee is not sure what constitutes an acceptable use of the Internet, they should contact with the IT

Manager.

12.4. Penalties for Internet's misuse

The equipment that has Internet can be submitted to audit in order to verify its proper use. The improper use of these rules will bring about sanctions to be applied. Each user is responsible before the institution for its use and, therefore, assumes and accepts the sanctions that the institution applies in relation to this matter.

13. COMPETITION & FAIR TRADE

In general, antitrust and competition defence laws prohibit agreements or deals between real or potential competitors to set or control prices, manipulate bids, boycott specific suppliers or customers, limit production and sales of product lines or assign markets and / or customers. Other laws prohibit controlling the resale price of distributors and dealers, discrediting a competitor, making false statements about the company's products, stealing trade secrets or offering or paying bribes. These laws are firmly enforced and failure to comply with them could result in significant fines for **Tecam** and its members, as well as incarceration.

In accordance with our policy, we will compete energetically, but fairly, and comply with all applicable antitrust and competition defence laws and regulations.

As a general rule, **Tecam** members cannot discuss non-public information with competitors and suppliers, including members of trade associations, such as the following topics:

- Pricing policies, discounts, profits, credit terms
- Other conditions of the sale and / or purchase of goods or services
- Geographical areas of operation or sales
- Production or sales quotas
- Assignments of clients and bids for jobs or contracts

Questions about the relevance of proposed or actual contacts with competitors that include these issues should be addressed to the **Compliance Officer**.

This **CODE** prohibits stealing registered information, obtaining trade secrets without the owner's consent or inducing the disclosure of recorded information by previous or current employees of other companies. Moreover, in general, these actions are illegal.

We must all respect the rights of customers, suppliers and competitors of **Tecam** and fairly interact with them. No one, in the course of being a **Tecam** employee, may unfairly benefit from other people through manipulation, concealment, abuse of confidential information, false declaration of pertinent facts or other intentional unfair practices.

14. ENVIRONMENTAL ISSUES

Our products and operations respect environmental laws and regulations and permit requirements related to air emissions, land and water discharges and the management, treatment and disposal of chemical substances, including hazardous wastage.

From **Tecam** we are committed to fully comply with all applicable environmental laws and regulations. Employee labour practices must respect these laws and regulations and the policies and procedures of our organization adopted to achieve this objective.

In addition, it is part of **Tecam** policy to minimize or eliminate the adverse environmental impact of our products and operations and implement programs to ensure that our activities meet or exceed the legal requirements.

Questions or doubts about the applicability of environmental laws or regulations to labour practices or proposed actions should be addressed to the Quality Manager in accordance with the procedure indicated in Section 16 of this **CODE**.

15. LIABILITIES & DUTIES

15.1. Government body

The Administrative Body of **Tecam** has a clear and unwavering commitment to the culture of compliance and ethics in the way of doing business.

Therefore, it has arranged the following actions and measures:

- Has approved a **COMPLIANCE POLICY**, which complements this **CODE OF CONDUCT**, which expressly prohibits any type of criminal behaviour.
- Has approved this **CODE OF CONDUCT** as an extension of what is expressed in the

COMPLIANCE POLICY, which aims to serve as a reference guide and mandatory guidance for all members of our organization.

- Has provided the necessary resources for the effective functioning of the **Compliance Management and Crime Prevention System** of our organization.
- Periodically reviews the evolution of the System and its effectiveness, as well as the necessary improvements to undertake.
- Receives periodic information on the operation and incidents of the System.

15.2. Executive Management & Management

In compliance with the **COMPLIANCE POLICY** of **TECAM GROUP**, with respect to legality and in accordance with the current legal system in force regarding Criminal Liability of Legal Entities, the **EXECUTIVE MANAGEMENT AND MANAGEMENT**:

- Establishes, defends and promotes as one of the fundamental values of **Tecam** that the actions of our members are always in accordance with the legal system, in general, and with criminal law, in particular, promoting an adequate culture of compliance, complying and making compliance the willingness expressed by the organization
- Ensures the establishment of mechanisms to comply with the willingness of **Tecam** expressed in the **COMPLIANCE POLICY** and in this **CODE OF CONDUCT** through the correct adoption, implementation, maintenance and continuous improvement of our **Criminal Compliance Management System** and through procedures, clear and defined policies and processes designed to prevent and detect crimes or to significantly reduce the risk of their commission, in accordance with the **UNE 19601: 2017** standard, within the specific framework of the risks derived from our activities
- Provide the **Criminal Compliance Management System** with adequate and sufficient financial, material and human resources for its effective functioning
- Periodically examine, at least once a year, the effectiveness of the **Criminal Compliance Management System**, modifying it, if necessary, when serious breaches are detected or changes occur in **Tecam**, in its control structure or in the activity carried out.
- It is ensured that the necessary resources planned

for the correct operation of the System are available and are used effectively.

- Establishes internal processes to encourage the participation and denunciation of any act or conduct that may be suspicious or criminal, articulating mechanisms to protect any member of Tecam that collaborates / or is affected in this task of any type of retaliation, discrimination or sanction for this reason
- Aware of the complexity of the objective and the permanent change of context, Tecam's **EXECUTIVE MANAGEMENT AND MANAGEMENT** is committed to the continuous improvement of our Compliance System, encouraging all the members of the organization to participate with their proposals and suggestions. can improve the ethical performance of our company

15.3. Compliance Officer (Collective Body)

The **Compliance Officer/Collective Body** assumes the functions and responsibilities of the **Criminal Compliance Collective Body**, which is entrusted with the supervision of the operation and execution of the **Criminal Compliance Management System**. For Tecam is defined as a Collective Body integrated with the responsible of departments such financial, human resources and quality and with a member as a representative of the body in necessary case. The Criminal Compliance Collective Body is responsible for:

- Promote and continuously supervise the implementation and effectiveness of the **Criminal Enforcement Management System**
- Ensure that ongoing training support is provided to members of our organization, to ensure that all relevant members are regularly trained
- Promote the inclusion of criminal compliance responsibilities in job descriptions and performance management processes of Tecam members
- Implement a system of information and documentation of criminal compliance
- Adopt and implement processes to manage information, such as complaints and / or comments received through the **Whistleblower Channel**
- Establish performance indicators of criminal compliance and measure the performance of criminal compliance

- Analyse performance to identify the need for corrective actions
- Identify and manage criminal risks, including those related to business partners
- Ensure that the **Criminal Compliance Management System** is reviewed at planned intervals
- Ensure that employees are provided access to compliance resources

The Criminal Compliance Collective Body is supported by a specialized external consultant, in order to improve their capabilities and thereby demonstrate:

- Integrity and commitment to criminal compliance
- Effective communication skills and ability to influence
- Capacity and prestige so that their advice and guidelines have acceptance.
- Competence and knowledge needed

The **Criminal Compliance Collective Body** personifies the position of maximum guarantor of the supervision, surveillance and control of the obligations of criminal compliance in Tecam, both inside and outside of it, for which it has sufficient resources and has the competencies, adequate status, authority and independence.

15.4. Common duties and liabilities

In order to prevent or, where appropriate, detect any irregular conduct that may take place at any of the hierarchical levels, the duty of all members of Tecam to inform and denounce, through the procedures developed by our organization is imposed, the possible risks or breaches of the law, of the **CODE OF CONDUCT**, of any other internal regulation or protocol of action implemented and/or of any action that could be considered unlawful or criminal.

All Department / Area Managers must ensure that the members assigned to their Dept./Area are knowledgeable and apply the provisions of this **CODE**, as well as the processes, procedures and / or policies related to compliance that may affect them.

16. INQUIRIES & DOUBTS

Do not hesitate to contact to the Criminal Compliance Collective Body if you have any doubts or questions about the application of this CODE to your tasks and about the knowledge of possible

violations of the code or company policies.

17. WHISTLE-BLOWER CHANNELS AND COMPLAINTS' PROPOSAL

We have established procedures to:

- The confidential presentation of complaints and denouncements in good faith by the members, interest groups and business partners of **Tecam** and third parties, regarding violations of this **CODE** and the **POLICY** through a whistle-blower channel explicitly for this assignment
- The reception, retention and treatment of complaints that we receive at **Tecam** regarding violations of this **CODE**.

Keep in mind that actual or potential violations must be informed. Failure to report them may result in the application of disciplinary sanctions. The company will establish them according to the Statute of the Employees (which refers to the Collective Agreement to apply).

18. CONTACT INFORMATION

EMAIL

compliance@tecamgroup.com

WHISTLE-BLOWER CHANNEL (web page)

https://tecamsolucionesmedioambientalesl.intedyacloud.com/canal_denuncias/?idIdioma=8

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