

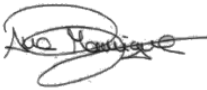


CODE OF ETHICS AND CONDUCT



CODE OF ETHICS AND CONDUCT

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PREPARED BY COMPLIANCE DIRECTOR	REVIEWED BY QUALITY DIRECTOR	REVIEWED BY THE APPOINTMENTS, REMUNERATION AND CSR COMMITTEE	APPROVED BY BOARD OF DIRECTORS
ANA MANRIQUE Signature:  Date: 13/09/2021	BEATRIZ GÓMEZ Signature:  Date: 21/09/2021	Reviewed 06/10/2021	Approved 27/10/2021

LIST OF REVIEWS

Rev.	Date	Modifications
00	26/01/2015	Original edition
01	23/11/2015	Update due to the development of the Compliance Model in accordance with the requirements of Article 31bis of the Criminal Code.
02	23/03/2018	Update of corporate values. Adherence to the Global Compact.
03	06/07/2020	Update of principles regarding business ethics, equality, working conditions and human rights derived from the review of the organisation's risk map
04	27/10/2021	Improved definition of the scope. Inclusion of a specific section clarifying the Ethical Channel — Queries and Whistleblowing Sections. Inclusion of a section on Definitions. Inclusion of correlative numerical coding of the 7 principles and their subsections.

[Changes with respect to the previous review, marked in blue in the document]

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1 EFFECTIVE DATE

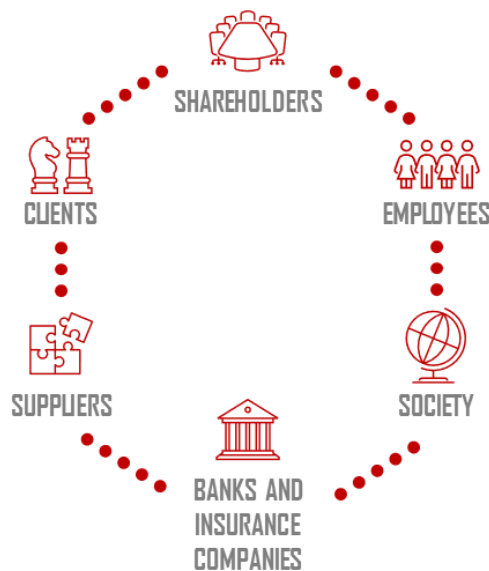
This document, its contents and amendments to the previous version, if any, shall enter into force without any retroactive effects from the date shown in the footnote to the document.

2 SCOPE AND APPLICABILITY

This Code of Ethics and Conduct (hereinafter the **Code of Ethics** or simply **Code**) sets out the guidelines and standards of behaviour to be followed in order to bring conduct into line with the values of Grupo Sesé. It is **applicable to all members (1) of the organisation Grupo Logístico Sesé, S.L. (hereinafter Grupo Sesé (2) or 'the organisation')** regardless of the contractual relationship that binds them to the organisation or the geographical area where they carry out their activity.

It shall include all activities, processes and relationships established by the Company and its members, at all levels, whether formally set out in a contract, policy, procedure or similar or applied by custom or practice.

- (1) See definition of "members of the organisation" in section 7. Definitions.
- (2) Hereinafter, Grupo Sesé refers to Grupo Logístico Sesé, S.L. and all its subsidiaries, and any other company that could, in the future, be a direct or indirect subsidiary and adhere to the Criminal Compliance Management System.



GRUPO SESÉ STAKEHOLDERS

This Code is endorsed by the Board of Directors, and compliance is monitored by the **Chief Compliance Officer**, which is appointed for this purpose.

Its enforceability will be extended, by contract, to the companies, suppliers or subcontracted persons that provide the Group with services.

Grupo Sesé will make this Code of Ethics publicly available and encourage its suppliers, subcontractors and collaborators to take on its principles and contents as their own.

3 SESÉ GROUP VALUES

Everyone in the Group must understand and comply with the expectations of this Code regarding how to act in the work environment and in the business environment.

The values of Grupo Sesé are:

	FOCUSING ON RESULTS		TEAMWORK
	FOCUSING ON CUSTOMERS		ETHICS AND INTEGRITY
	EXCELLENCE		INNOVATION
	A SENSE OF BELONGING		PASSION

Since September 2016, Grupo Sesé has been a **signatory of the United Nations Global Compact** and explicitly supports the 10 principles of this pact relating to human rights, labour rights, the environment, and the fight against corruption.



On an annual basis, Grupo Sesé publishes its **Corporate Social Responsibility Report**, prepared in accordance with the essential standards of the Global Reporting Initiative according to the GRI Standards document published in 2016. This Report is also the tool used for presenting information on the status of the non-financial position of Grupo Sesé and, therefore, forms part of the organisation's Management Report, thus responding to the requirements of Spanish Law 11/18 on non-financial information and diversity.



Through the use of an external audit carried out by an independent body, this Report is verified annually against GRI requirements and the requirements of Law 11/18.

4 ACCEPTANCE AND COMPLIANCE

The conduct set forth in this Code is **mandatory** for all personnel within the “Scope and Applicability” of Section 2 of this document, in the performance of their professional activity in the Group or in the development of their collaboration with the Group.

Failure to comply with this Code may be sanctioned in accordance with the procedure established in the disciplinary regime, in accordance with the regulations in force, without impairing any other responsibilities the offender may have. The application of the content of this Code may not, under any circumstances, result in the violation of applicable legal provisions, nor should it be understood as a limitation of workers' rights.

As a member of (or contributor to) Grupo Sesé your obligation is:

	To be aware of the behaviour guidelines established in this document.
	To apply and comply with the above-mentioned practices.
	To never tolerate any behaviour that violates this Code of Ethics and/or the Compliance policies that develop it.
	To report any breaches of the Code of Ethics and/or the Compliance policies that develop it through the mechanisms established for this purpose (see section 5).
	To consult the Compliance Department in case of doubt.

Before making decisions, you need to ask yourself the following key questions:

	Is the action within the framework of the reference legislation?
	Is the action in line with Grupo Sesé's values and/or policies?
	Would you act the same way in similar cases?
	If it were someone else who was behaving like this, would you support them? Would I find this behaviour appropriate and/or professional?
	If this behaviour were made public, would it be considered appropriate and/or professional? Would you still support the decision?
If any of the answers are negative, you should not proceed. 	
If you have any doubts or do not know what to answer, please solicit advice through the mechanisms established for this purpose (see section 5). 	
If all the answers are yes, the behaviour is in line with Grupo Sesé's principles and values. 	

5

MECHANISMS FOR CONSULTATION AND FOR REPORTING
IRREGULARITIES

The conduct contained in this Code is **mandatory**. All members of Grupo Sesé must understand and comply with the expectations of this Policy in terms of the way they act in the work environment and in the business environment. This conduct must also be enforced, and part of this commitment is to report any non-compliance by other individuals, if applicable.

Any member of the organisation (or any third party linked to Grupo Sesé) who becomes aware of conduct that may constitute an infringement or breach of this Policy may report it confidentially by one of these means:

- ▶ [Ethical Channel — Whistleblowing Section](#) (form accessible through the Compliance website, Sesé Linking Portal and Grupo Sesé's corporate website).
- ▶ Email address canal-etico@gruposesese.com

Regarding the use of this Channel:

- ▶ Communications made through the means enabled for reporting are sent exclusively to the Corporate Compliance Department of Grupo Sesé.
- ▶ All complaints received will be treated confidentially and the identity of the complainant will be protected.
- ▶ Retaliation of any kind against any person who reports an illegal practice, infringement, or breach of regulations from the point of view of good faith and good practice will not be tolerated.
- ▶ False allegations or allegations made in bad faith will also not be tolerated.
- ▶ For more information, consult the [Internal Regulations of the Ethical Channel](#) available on the Compliance website.

In addition, to resolve any further queries, the organisation makes the [Ethical Channel — Queries Section](#) available to members of the organisation (the form is accessible through the Compliance website, the Sesé Linking Portal and the Grupo Sesé corporate website).

This channel has been set up to allow you to express any doubts about the provisions of the company's corporate Compliance policies, thereby making it possible to query any doubts about the validity of certain behaviours and/or report bad practices in the prevention of conflicts of interest.



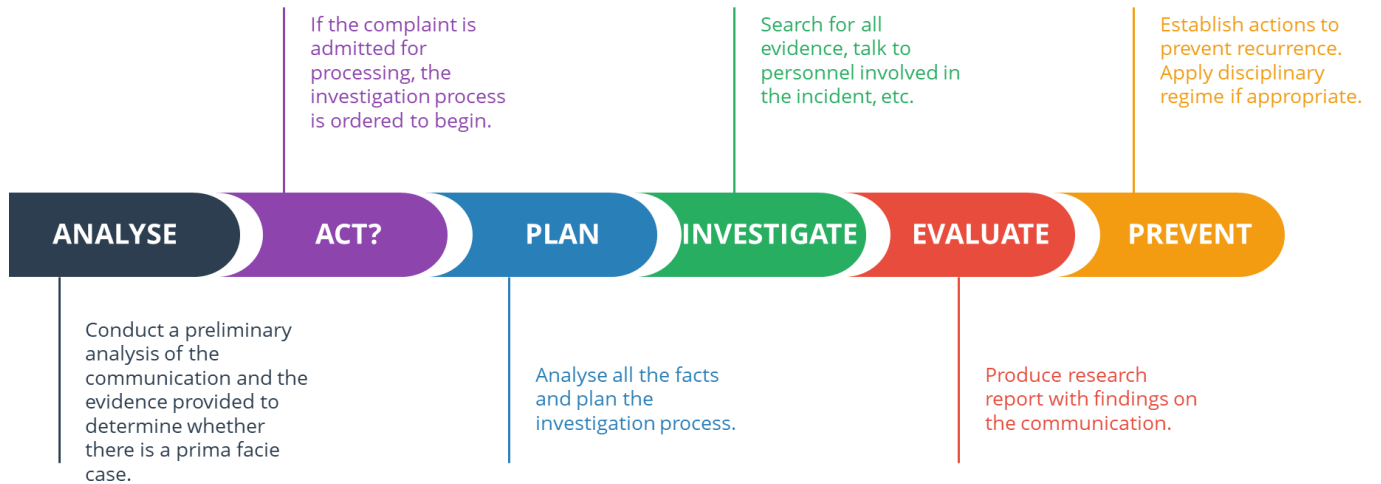
proteccion.datos@gruposesese.com

This email address is also available to resolve specific queries about data protection [or to exercise your data access, rectification, erasure, objection, and restriction \(ARSOL\) rights.](#)



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This is the **working outline** a complaint should follow when raised through the Ethical Channel:



6 BASIC PRINCIPLES OF THE CODE OF ETHICS AND CONDUCT

In all its strategies, Grupo Sesé is committed to going beyond the gaining of respect, i.e., it is not enough not to cause negative impacts on stakeholders and society as a whole, but rather it advocates acting as an agent of development, launching initiatives aimed at causing positive impacts that change the way business is done and provide a real return for society as a whole.

Grupo Sesé considers it essential to uphold the principles of honesty, justice and integrity and is committed in all its activities to respecting human rights and, where necessary, establishing mechanisms to evaluate, verify and guarantee compliance with them.

The **basic principles** that guide Grupo Sesé's activity are as follows:

	1	To pursue strict compliance with the law and internal regulations .
	2	To guarantee equality, fairness, respect, and dignity in the treatment of all employees, collaborators, partners, suppliers, competitors and other related third parties.
	3	To work for the protection of the most vulnerable groups .
	4	To safeguard a responsible commitment to health and safety . The prevention of accidents and the assurance of safety in the development of activity will run in parallel to the Group's activity.
	5	To develop activities while showing respect for natural resources and natural heritage, adopting a preventive approach that favours the environment , thus seeking to achieve sustainable business development through the use of environmentally friendly technologies and pursuing economic prosperity without losing sight of social justice and environmental protection.
	6	To ensure transparency, objectivity, and professionalism in the development of all activities and relations with all stakeholders.
	7	To respect the right to privacy of the Group's employees and collaborators, adopting the necessary measures to preserve the confidentiality of personal data and protect the intellectual and industrial property of third parties.

These **7 principles** must be known and respected by all members of the organisation, who must take them on board and reflect them in all their actions.

CODE OF ETHICS AND CONDUCT

1 STRICT COMPLIANCE WITH THE LAW AND INTERNAL REGULATIONS

- 1.1. The law and the internal regulations imposed by the Group must be observed and respected. It is everyone's obligation:
- 1.1.1. To be aware of the laws affecting the scope of the work undertaken, and if necessary to request precise information through the line manager concerned or to make use of the appropriate instruments and bodies.
 - 1.1.2. To **scrupulously comply with all internal regulations and the legislation in force** in all the territories where Grupo Sesé operates.
 - 1.1.3. To strictly comply with all laws, rules and procedures ensuring neutrality, objectivity and non-discrimination when interacting with suppliers (for example, during contracting processes and execution of contracts).
 - 1.1.4. **Not to knowingly collaborate with third parties in violating any law**, nor participate in any action that compromises respect for the principle of legality, even if the order was given by a superior.
 - 1.1.5. To inform the competent Sesé Group bodies of any action that is contrary to current legislation.
- 1.2. To comply with the procedures and policies in place, and, if needs are identified that require changes or improvements, to propose them to the appropriate manager.
- 1.3. Illegal practices and non-compliance with regulations will not be tolerated within the Group, meaning that appropriate **information** must be provided when these situations are detected.

- 👍 Since 1999, Grupo Sesé has been **certified with ISO 9001** "Quality Management System".
- 👍 Since 2016, Grupo Sesé has been **certified under IATF 16949** (formerly ISO TS 16949).
- 👍 Since 2017, Sesé Group is a **Tier 1 "A" supplier qualified according to Formel Q**.
- 👍 Since 2018, Grupo Sesé has held the AEO (Authorised Economic Operator) certificate and IATA accreditation.
- 👍 Since 2020, Trans Sesé has held **ADT and Secure Freight Forwarder** accreditation.
- 👍 Since 2021, PAM has been accredited by **ADT**.



OTHER RELATED DOCUMENTATION:

- [Criminal Compliance Policy](#)
- [Integrated Management Policy](#)

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2 EQUALITY, EQUITY, RESPECT AND DIGNITY AT WORK

- 2.1. In all labour, commercial and social relations, the utmost respect, fairness, and dignity in terms of treatment shall prevail, in as far as relations with employees, collaborators, partners, suppliers and competitors are concerned, as well as regarding other third parties linked to the company.
- 2.2. Activities will be carried out against a backdrop of absolute and constant **respect for the Human Rights and Public Freedoms** included in the Universal Declaration of Human Rights.
- 2.3. All staff have the right to have their dignity respected and are obligated to treat those with whom they interact for work purposes with respect. Grupo Sesé defends these principles of equality through its Equality Plans and policies for the prevention of sexual and/or labour harassment.
- 2.3.1. **Sexual harassment is prohibited, as are bullying and/or discrimination** on the basis of sex, race, religion, gender identity, marital or maternal status, age, political affiliation, nationality, disability, sexual orientation, ethnicity or any other aspect of identity.
- Such behaviour will not be permitted or tolerated under any circumstances. It must not be overlooked. It will be robustly sanctioned. The company is committed to establishing mechanisms for the detection of new inequalities, as well as to implementing the necessary procedures that contribute to continuous improvement within the area of equality.
- 2.4. Offensive, intimidating, discriminatory, malicious, humiliating or demeaning behaviour, harassment, etc. towards employees or third parties linked to the Group is not permitted and will be reported if appropriate. All individuals and entities will be treated in a non-discriminatory fashion and objectively.
- 2.5. Abuse of a position of superiority for the possible purpose of imposing forced labour shall not be permitted, nor will exploitation for criminal activities [or any other kind of physical, mental or moral abuse](#).
- 2.6. All the Group's employees and collaborators are committed to **creating a dignified, safe and professional working environment** that supports and respects people, their rights, their dignity, their personal conditions, and that promotes mutual respect and collaboration. Any behaviour that creates an intimidating, hostile, humiliating or offensive working environment must be avoided.
- 2.7. Grupo Sesé believes that the comprehensive development of its employees is positive both for them and for the company, which is why it encourages measures aimed at achieving a **balance between the family/personal and professional responsibilities of its employees**.
- 2.8. The processes of hiring and promotion, both internal and external, will be based only on the professional qualifications and abilities of the candidates and **guided by objective criteria regarding competence**.
- 2.8.1. All employees shall be given equal opportunities in their professional career, based at all times on the **principle of merit**.
- 2.8.2. In these processes, **inclusion and diversity** will be promoted, without allowing the influence of other factors which could affect the objectivity of any decision.

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2.8.3. Direct family members of a person subject to this Code may not be candidates for positions that are hierarchically or functionally dependent on their family member. Family status does not make up for the absence of skills requirements. In the event that selection team family members are taking part in any vacancy filling process, either through external or internal selection, this fact will be communicated to Corporate HR Management.

2.9. Grupo Sesé is committed to developing **training plans** to ensure all employees are properly trained, plans which specify the tasks and objectives for each one of them.

2.10. Likewise, Grupo Sesé is committed to **promoting the talent** of its employees through training and on-the-job coaching. It also undertakes to apply the greatest objectivity and rigour in performance evaluation processes.

2.11. In all countries where activity is carried out, **both labour and wage legislation will be respected**. This commitment is extended to temporary employment, outsourcing and the recruitment companies we collaborate with.

2.11.1. Remuneration policies must be based on the principles of equity, competition, and equality.

2.11.2. Freedom of association and negotiation must be guaranteed.

2.11.3. Abusive labour practices will not be tolerated. **Forced labour practices are prohibited**.



OTHER RELATED DOCUMENTATION:

- [Personnel Selection and Recruitment Policy.](#)
- [Corporate Social Responsibility Policy.](#)
- [Equality Plans.](#)

3 PROTECTION OF THE MOST VULNERABLE GROUPS

- 3.1. Grupo Sesé works actively via the Sesé Foundation and its Special Employment Centres to promote and facilitate **social and labour integration of disabled people and/or people at risk of exclusion** through the development of sustainable employment projects.
- 3.2. Grupo Sesé **will not tolerate any form of forced labour** or labour obtained through threat, punishment or coercion, with a particular focus on the most vulnerable groups.
- 3.3. Grupo Sesé **recognises and protects the basic rights of children** in accordance with the precepts set out in the Convention on the Rights of the Child and the United Nations International Bill of Human Rights.
- 3.4. Thus, Grupo Sesé is **committed to protecting children's rights** by prohibiting any activity that involves economic exploitation, as well as the performance of any work that is potentially dangerous or that prevents access to their education, or that is harmful to their health or physical, mental, spiritual, moral or social development.
- 3.5. It is mandatory to **comply with the minimum age provisions set out in the legislation** of the country in which projects are carried out, and to comply with international provisions on the matter.
- 3.6. **Appropriate and reliable mechanisms will be used to verify the age of recruitment**, as well as the specific mechanisms defined in terms of occupational safety for the development of their functions within the company.
- 3.7. At all times, work will be done to ensure **full universal accessibility in the working environment for people with disabilities**.



The Sesé Foundation has been awarded the **Exceptional Solidarity Certificate** for promoting the inclusion of people with disabilities into the workplace.



OTHER RELATED DOCUMENTATION:

- [Corporate Social Responsibility Policy](#)

4 COMMITMENT TO HEALTH AND SAFETY

- 4.1. Grupo Sesé promotes initiatives supporting **safety, protection and prevention of occupational risks** and establishes the necessary lines of action through its **Occupational Risk Prevention Plan**, in order to adequately manage and mitigate the risks associated with the Group's activity. These plans are periodically reviewed, and the necessary resources are provided for their maintenance and improvement.
- 4.2. *Occupational health and safety legislation will be scrupulously respected.*
- 4.3. The concept of a preventive culture will be promoted in order to create **safe and healthy working environments**.
- 4.4. Personal safety will be prioritised with the clear objective of **zero accidents**, opting for safe and healthy working conditions that help to prevent injuries and/or accidents.
- 4.5. **Healthy habits** will be promoted that aim to improve the physical health, **emotional well-being** and quality of life of the organisation's staff both inside and outside the workplace.
- 4.6. The Occupational Risk Prevention Plan will be based on the use of **technologies, elements and systems** that help to improve health and safety in the workplace.
- 4.7. **The prevention of accidents and ensuring safety** in the course of the Group's activity will always go hand in hand with such activity and operations.
- 4.8. Employees and collaborators will be **trained so that they can adequately carry out their tasks**, prioritising safety in all areas. They are also provided with all the resources necessary to ensure such safety.
- 4.9. *Employees and collaborators will scrupulously comply with the work protocols and procedures established by the organisation to guarantee health and safety measures.*
- 4.10. **Working under the influence of alcohol or drugs will not be tolerated.** Such behaviour is strictly forbidden and will lead to the imposition of the maximum penalties envisaged under existing legislation.
- 4.11. Under no circumstances will the possession, sale, consumption or distribution of illegal substances or drugs be allowed in the workplace. *Company vehicles (lorries, vans, cars, etc.) are also considered an extension of the workplace.*



Since 2012, Grupo Sesé has been accredited with SQAS (Safety & Quality Assessment for Sustainability) and promotes safety-based behaviour.



Since 2018, Grupo Sesé has been a signatory of the Luxembourg Declaration on health promotion at work in the European Union.



Grupo Sesé has had an ISO 45001 certification for "Occupational Health and Safety Management Systems" since 2019.



OTHER RELATED DOCUMENTATION:

- [Integrated Management Policy.](#)

5 COMMITMENT TO THE ENVIRONMENT

- 5.1. Grupo Sesé is committed to a philosophy of **sustainability** that helps the organisation to be an integral and active part of **climate change mitigation**.
- 5.2. Grupo Sesé will carry out its activities showing **respect for natural resources and natural heritage**, promoting the conservation of the environment, biodiversity and areas of special ecological, scientific or cultural interest.
- 5.3. Environmental legislation will be scrupulously respected and the most appropriate processes and techniques will be applied to identify the risks of any activity, to control and **minimise the associated environmental aspects** and to assume any environmental responsibility that may be generated by the provision of any service.
- 5.4. A **preventive approach favouring the environment** will be adopted, one that achieves sustainable business development via environmentally friendly technologies, pursuing economic prosperity without losing sight of social justice and environmental protection.
- 5.5. A plan to **assess, report, reduce and compensate for our carbon footprint** will be adopted, as a strategy for the progressive reduction of greenhouse gas emissions and the improvement of air quality.
- 5.6. Opting for the application of technologies and practices that lead to a **responsible use of natural resources** will be encouraged, favouring **reduction in consumption of energy, water, raw materials and other natural resources**.
- 5.7. Initiatives aimed at **reducing the generation of waste and dumping** will be encouraged.
- 5.8. Procedures will be implemented for restricting the use of **chemicals and products which pose a danger** to health and the environment.
- 5.9. **Employees and collaborators will scrupulously comply with the work protocols and procedures established by the organisation to protect the environment and minimize the environmental impact of the organisation's activity.**

- 👍 Since 2015, Grupo Sesé has held **ISO 14001** Quality Management System certification.
- 👍 Since 2019, Grupo Sesé has been actively assessing and controlling its **carbon footprint**.
- 👍 Since 2019, Grupo Sesé has had a **Chair at the University of Zaragoza**, which aims to develop innovative solutions for supply chains with a view to reducing their **carbon footprint**.
- 👍 As of 2021, Grupo Sesé is leading the transition towards zero carbon by setting emission reduction targets through the **Science-Based Targets Initiative (SBTi)**.



OTHER RELATED DOCUMENTATION:

- [Integrated Management Policy.](#)
- [Corporate Social Responsibility Policy](#)
- [Good Environmental Management Practices.](#)

6 TRANSPARENCY, OBJECTIVITY AND PROFESSIONALISM

Corruption is understood to mean: "the soliciting, offering, giving or accepting, directly or indirectly, of a bribe or any other undue advantage, or the promise of an undue advantage which affects the normal exercise of a function, or the required behaviour of the recipient of such bribe, undue advantage or promise of an undue advantage."



This is dishonest behaviour that in practice has at least two protagonists:

- the party who fraudulently uses their powers or influence to favour third parties in return for a benefit;
- and whoever proposes or provides this benefit.

Furthermore, a person who favours an act of corruption will be considered an accomplice, and a person who takes advantage of this act by receiving an undue advantage in return will be considered a recipient. Both people will incur responsibility.

- 6.1. Grupo Sesé as an entity, along with its employees, collaborators, and managers, will base its internal relations and relations with its stakeholders on **ethics, honesty, professionalism** and transparency.
- 6.2. The **fight against corruption and fraud** is fundamental to the development of Grupo Sesé's activity. It is not only a question of each Sesé Group employee behaving impeccably, but also one of each employee taking part in the corruption prevention system while carrying out their daily work.
- 6.3. Grupo Sesé does not permit **falsification, concealment or simulation of data, entries or accounting operations** or keeping double-entry books for the purpose of evading payment or obtaining any illicit profit to the detriment of the tax or social security authorities.
- 6.4. The **accounting of contracted operations** shall be carried out **with accuracy** and rigour and the required files and records shall be maintained with equal criteria. The personnel responsible for accounting are obligated to prepare any accounting information in accordance with the true and fair view of the Group's assets and financial situation.
- 6.5. Grupo Sesé shall establish those internal controls and management systems it considers most appropriate at any given time to ensure the **reliability of financial information** and the accuracy of the organisation's records.
- 6.6. **Legitimate and honest competition** will be facilitated, avoiding any harm to competing individuals or entities. **Any practices involving unfair competition are prohibited** and compliance with applicable laws on competition in countries where it operates will be actively ensured.
- 6.7. **Relationships with suppliers** or any type of provider, contractor or collaborator will be guided by **impartiality** and **objectivity**, with the application of rigorous criteria regarding suitability, quality, efficiency and cost. This applies both to personnel in the Purchasing areas and to any person in the organisation who deals with or has a relationship with suppliers. Suppliers shall be selected through objective and transparent processes in accordance with the relevant procedures and requirements defined in the General Terms and Conditions of Purchase.

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- 6.8. Grupo Sesé as an entity, and all its employees and managers, shall **collaborate with the authorities, the justice system, public regulatory bodies, and other public entities**, diligently and properly, without placing obstacles in their way or generating errors or omissions, as well as facilitate their work in all the Group's relations with them, and providing them with all the information requested and that is appropriate and/or obligatory.
- 6.9. All company employees, collaborators and managers will carry out their work to high standards of quality, with diligence, professionalism, transparency, honesty, looking to provide value, to improve efficiency, making others aware of any risks, deficiencies and/or improvements, innovating, making **rational and appropriate use of all resources, and safeguarding the Company's assets**. Resources made available by Grupo Sesé must be used appropriately and effectively. They cannot be used for private purposes or for purposes other than those established in the organisation.
- 6.10. Grupo Sesé stands against any unethical practices aimed at inappropriately influencing people's actions to obtain advantages. Conduct that could constitute **extortion, bribery or attempted bribery**, or the **facilitation of payments**, even if not intended to obtain an undue advantage, is prohibited.
- 6.10.1. No employee, collaborator or manager shall accept gifts, invitations, handouts, services or favours that may affect their professionalism, objectivity and/or their own impartiality in their **professional relationships**, which may give rise to the generation of a commitment or return of a favour, within the scope of the Group and its environment, and/or that may imply fraud, illegality, unethical practices or cause harm to third parties.
- 6.10.2. Likewise, no employee, collaborator or manager shall offer gifts, invitations, handouts, services or favours to individuals or institutions that may affect the objectivity and/or impartiality of the **latter** in their commercial or professional relations, which may generate a commitment or return of a favour, within the Group and its environment, and/or which may involve fraud, illegality, unethical practices, or cause harm to third parties.
- 6.11. In order to **avoid conflicts of interest**, the company's employees, collaborators and managers shall not have any economic or other type of interest, nor shall they carry out activities with companies or institutions related to the Group.
- 6.11.1. If such a circumstance should arise, it must be reported to the Compliance Department to be evaluated with the assistance of the legal advisor, and, if deemed appropriate, the necessary measures should be taken.
- 6.12. It is not permitted to carry out **professional activities outside Grupo Sesé** that could lead to a decrease in the performance of work, limit availability or compete with Grupo Sesé's activities.
- 6.13. It is prohibited, on account of an individual's position in the Group, to use their resources, powers, influence, or other facilities for their own benefit or that of their immediate environment. It is also strictly forbidden for an individual or entity to act in the name of or on behalf of the Group without prior consent, as well as to use such name, means, relations with third parties, position, or influence for their own benefit or that of their immediate environment.
- 6.14. Scrupulous compliance with **import/export formalities** must be guaranteed to ensure the prevention of any type of activity contrary to that defined by the customs authorities and to prevent possible smuggling activities.

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- 👍 Since 2017, Grupo Sesé has held the **RSA Seal** (Social Responsibility of Aragón) from the Government of Aragón.
- 👍 Since 2018, Grupo Sesé has held the **RSA+ Seal** for its initiatives in the areas of equality, reconciliation, corporate volunteering and the dissemination of culture.
- 👍 As of 2018, several Sesé Group companies have been accredited with the **"Ecovadis" Gold Medal** for their work on CSR.

OTHER RELATED DOCUMENTATION (*):



- Criminal Compliance Policy
- Corporate Social Responsibility Policy.
- Conflict of Interests Prevention Policy.
- Anti-Corruption Policy.
- Gift and Entertainment Policy.
- Donations and Subsidies Policy.
- Employee Expense Payment Policy.
- Company Vehicle Policy.

(*) Non-exhaustive list, for more information consult the Quality website.

7 PRIVACY, PROTECTION OF DATA, CONFIDENTIAL INFORMATION, INTELLECTUAL PROPERTY

- 7.1. Grupo Sesé will respect the right to **privacy of its employees and collaborators**. The request and processing of personal data will be limited to that information which is essential for the normal activity of the Group and for the timely compliance with applicable regulations.
- 7.2. Grupo Sesé will take the necessary measures to preserve the **confidentiality** of the personal data it holds and to ensure that it is processed, and that rights of access, rectification, cancellation and objection are exercised in accordance with the legislation in force on this matter. Grupo Sesé is committed to **protecting the intellectual and industrial property of both Grupo Sesé and third parties**.
- 7.3. Grupo Sesé's activity may generate knowledge and commercial information whose value lies largely in keeping it reserved. **Sesé Group employees shall make discreet and professional use of the information to which they have access and shall keep** the content of their work **confidential**. In any case, they shall refrain from using information, data or documents obtained in the course of their activity for their own benefit.
- 7.4. The information of customers, employees, suppliers or any third party that is accessed for the development of normal professional activity is confidential, must be kept reserved, and the necessary measures must be adopted to collect, store, and access this data in accordance with current data protection regulations and comply with the stipulations of the **Information Security Policy** and procedure **PG-12-06 Personal data management**.
- 7.5. The **logo, brand, image, corporate identity, and name of Grupo Sesé** may only be used within the framework of professional activity and always in compliance with the provisions of the Corporate Identity Manual.
- 7.6. It is obligatory to respect Grupo Sesé's intellectual and industrial property: software, documents, processes, technology, know-how, etc. as well as information about clients, products, strategies, and operations, which must only be used for Grupo Sesé's own professional purposes.
- 7.7. **Technical resources** such as email and IT tools are work instruments that should be used only for the performance of work duties.

- 👍 As of 2019, Grupo Sesé has had an **ISO 27001 certification** for "Information security management systems".
- 👍 As of 2021, several companies of Grupo Sesé have held **TISAX (Trusted Information Security Assessment Exchange) certification**, an information security standard promoted by the VDA.



OTHER RELATED DOCUMENTATION:

- [Integrated Management Policy.](#)
- [Information Security Policy.](#)
- [Privacy and Confidentiality Policy.](#)

7

DEFINITIONS

For the purposes of this document, and for a better understanding of it, a series of concepts are established which, given their relevance, it is necessary and convenient to contemplate and define. This is without prejudice to the legal definitions established for each of these concepts by the laws applicable to the Organisation in each area of its activity, or the definitions that are found in other internal rules of Grupo Sesé for identical concepts.

Top Management. A person or group of people who direct and control an organisation at the highest level.

Direct or indirect benefit. Requirement of Article 31 bis of the Spanish Criminal Code in the commission of the offence in order to be able to impute criminal liability to the legal person.

- Benefit is understood to be that advantage, economic or otherwise, that the company obtains as a consequence of the commission of the offence.
- Profit is also understood as the mere expectation or improvement of position in relation to other competitors or the advantage for the profit of the legal entity.
- Profit is considered as such with both an income and a cost saving.

Conflict of Interest (COI). A situation in which outside business, financial, family, political, or personal interests may interfere with the judgement of members of the organisation as they carry out their duties in the organisation.

Culture. Values, ethics and beliefs that exist in an organisation and that interact with the organisation's structures and control systems to produce norms of behaviour.

Crime. Criminal offence. This is typified in the penal code as punishable conduct.

Fraudulent offence. A criminal offence that can only be committed with malice on the part of the perpetrator, i.e. with knowledge of the unlawfulness of his or her conduct and the will to commit it.

Reckless crime. Criminal but unintentional offence committed through the fault or negligence of the perpetrator.

ARSOL Rights. (Spanish acronym: access, rectification, erasure, objection, and restriction) These are those rights that can be exercised by any natural person in relation to the processing of their personal data — Access, Rectification, Deletion, Limitation of Processing, Portability and Objection. The exercise of these rights is regulated by the General Data Protection Regulation (GDPR) and the Organic Law on Data Protection and Guarantee of Digital Rights (LOPDGDD).

Due diligence. Operational process that aims to obtain and evaluate information to contribute to criminal risk assessment.

Organisation members. The members of the Board of Directors, managers, employees, workers or temporary employees or persons under a collaboration agreement, volunteers of an organisation, or any other person under hierarchical subordination of the above.

CODE OF ETHICS AND CONDUCT

Compliance Committee. A collegiate or single-person body, responsible for the Compliance function and endowed with autonomous initiative and monitoring powers, that is entrusted (by the Board of Directors) with the responsibility of supervising the operation and observance of the CCMS. The single-person body is known as **Chief Compliance Officer (CCO)**.

Governing Body (Board of Directors at Grupo Sesé). A group or body that has primary responsibility and authority for the activities, governance, and policies of an organisation and to which senior management reports and is accountable.

Exposed personnel / Exposed positions. Members of the organisation who are especially exposed to the risks of Criminal Compliance due to the functions they perform. From the COI's perspective, these are people who have a special capacity to influence the making and/or execution of key decisions for the company due to their function, position and/or responsibility.

Criminal risk. Risk related to the development of conduct that could constitute a crime, according to the criminal liability regime for legal entities established in the Spanish Criminal Code.

Criminal Compliance Management System (CCMS). A set of interrelated or interacting elements of an organisation that establish and measure the level of achievement of criminal compliance objectives, as well as the policies, processes, and procedures to achieve these objectives.

Business partner. Any party, other than members of the organisation, with whom the organisation has, or expects to establish, any type of business relationship. Business partners include, but are not limited to, customers, joint ventures, joint venture partners, consortium partners, contractors, commission agents, consultants, subcontractors, suppliers, vendors, advisors, consultants, agents, distributors, representatives, intermediaries, and investors.

Third parties Includes business partners and any other persons and bodies independent of the organisation.