

## What is the Code of Conduct and Business Ethics?

Our Code of Conduct and Business Ethics defines the basic principles of behaviour and corporate values that we must follow in our day-to-day life in our professional relationships, forming the basic pillars of our way of working. With this code, we try to establish a common framework of behaviour applicable to the entire Segura Group staff.

This Code of Conduct and Business Ethics includes the guidelines that define our way of being and acting, the essence of what we are, how we do things and a reflection of our daily activities.

The objective? For all of us to know and share our activity framework within the company and to be conscious of the responsibility we all have as an integral part of the Segura Group.

Every employee and manager at the Segura Group must respect the Code of Conduct and Business Ethics and foster its dissemination and respect by its collaborators.

## What is the Code of Conduct and Business Ethics?

### Compliance with and Respect for the Law

At Segura Group, all of our employees comply with applicable legal regulations at all times. These regulatory requirements must be respected by the employees of the Segura Group, and they will safeguard their compliance. At the same time, the employees of Segura Group must adhere to internal regulations agreed upon by the Company's Management and the workers' union. Segura Group tries to create an atmosphere of trust at all levels of the company, inviting its employees to express themselves freely. Likewise Segura Group recognizes the freedom to unionize and to not practice any kind of discrimination in relation to its activities.

### Respect for People

Respect for people is a fundamental principle of the day-to-day life of our company. The recipients of this code shall make sure that there is fair, equal and respectful treatment of every person that is in our surroundings.

### Equal Treatment. No Discrimination. Abuse

At Segura Group, we guarantee that all our employees will have equal treatment, with respect, and will not be discriminated due to race, age, sex, religion, nationality or any other type of circumstance protected by law. All of our collaborators must comply with this principle and see to its compliance. At Segura Group we punish and denounce abuse in the workplace and we encourage any of our employees to denounce any kind of situation susceptible of falling into that category.

### Respect for Human Rights

All employees of the Segura Group must respect the laws and regulations that are implemented in each country where Segura Group carries out its activity. The Segura Group complies with both national and international laws related to child labour. Under no circumstances do we work with children younger than 16 years of age and we always make sure that our providers and clients comply with this premise, following the guidelines laid out by the ILO and regulations regarding child labour in every country where we carry out our activity.

At Segura Group we are fully convinced that work is a right, not an obligation. That's why we condemn any type of forced labour or service that is carried out against their will and under the threat of punishment.

### Safety and the Environment

We make an effort everyday to provide a healthy and safe environment at our organisation. We understand that fostering this situation creates a positive environment and benefits everyone.

It is the obligation of every employee at our company to look after and respect the regulations regarding safety and hygiene in work and to use the equipment and facilities they have access to correctly.

## Use of Our Resources and Equipment

As employees of the Segura Group we have the obligation of using the resources that the company offers to us in the most suitable, responsible and efficient way, respecting the purposes they are given for and exclusively to the benefit of the company. Any kind of activity not destined to the benefit of the Segura Group, using its resources, is totally prohibited.

All employees at the Segura Group who use IT, telephone and internet equipment must remember that this equipment was made available to them in order to improve their performance, which is why they must be used responsibly, and exclusively for professional use.

Employees who, due to the activity they carry out at our company, have the responsibility of handling its funds are responsible for having them be used appropriately and efficiently, and always under authorisation and following the guidelines laid out for that purpose.

## Protection of Information

Under no circumstances may any employee of the Segura Group reveal confidential information regarding our company to other natural or legal persons outside of the Segura Group. At the same time, this type of information must not be divulged internally, unless it is necessary to use it in the habitual carrying out the duties of each job position.

If it is necessary to share confidential information with providers and/or clients, do it with full responsibility and always informing your immediate superior on the situation.

## Application of the Code

Our Code of Conduct and Business Ethics expresses the Segura Group's stance on aspects that we consider to be highly important, and is intended to be a guide in the decisions that its employees make every day in their job position. Every employee at the Segura Group who has knowledge of a breach of any of the norms defined under this Code of Conduct and Business Ethics must communicate it to their direct manager and/or to the HR department of our company.

None of our employees may be punished, fired or receive any type of disciplinary or discriminatory measure for having reported the actions that violate this code of conduct, nevertheless false accusations presented deliberately will not be tolerated.

If getting into contact to denounce any type of situation contrary to this Code of Conduct and Business Ethics, we at Segura Group Management encourage our employees to identify themselves to facilitate communication and respond to their concerns. Segura Group Management ensures confidentiality in this information, provided that doing so is compatible with the investigation being carried out to clarify the denounced acts.

All employees of the Segura Group are encouraged to report and denounce any type of breach of this Code of Conduct and Business Ethics that they are aware of.

## Conflicts of Interest and Transparency

All decisions made by the employees of the Segura Group must be founded in the full interest of our company and never in personal interests. When we select our collaborators and providers we always do it following unique and exclusively professional criteria and never guided by personal interests.

If in carrying out their duties, any of the employees of the Segura Group finds themselves in a situation of being able to hire services from a collaborator and/or provider with which they have a family and/or friendly relationship, in such a way that doubts could arise on the objectivity of this decision, this situation must automatically be notified to their immediate superior and it will be decided always following the values of our company.

Accepting or offering gifts, lunches, dinners, services or any other type of consideration by the employees of the Segura Group to our collaborators or from them is not allowed under any circumstances, save those due to habitual commercial practices or courtesy and the value of which is symbolic.

## Company Image

The corporate image of our company is very important to us, which is why we encourage our employees to follow and promote the values of integrity, honesty, sincerity, equality and respect, and proactiveness that the Segura Group Management tries to enact every day in order to make the Segura Group a dynamic, modern company, which fosters creativity, the achievement of its goals and the sense of responsibility.

## Corporate Social Responsibility

At Segura Group we opt to be a socially committed company, promoting initiatives that make our commitment to CSR known. This is shown by our close collaboration with non-profit organisations, the creation of a food bank for underprivileged groups, solidarity races and the existence of special employment centres to include people with mental impairments in the working world at our manufacturing plants.