



CODE OF ETHICS AND GOOD CONDUCT

JEGAN S.A.L



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Preface

In general, and under any circumstances, all JEGAN, S.A.L. personnel must take into account international, national and local standards, as well as professional ethics standards relating to their activities.

The purpose of this Code of Ethics is to define the behavioral approach to be applied daily in our internal and external relations.

The principles set forth in this Code of Ethics are inaccurate.

Management and all personnel undertake:

Respect for people and their environment

a) Respect for all human rights:

JEGAN's policy is to fully comply with the United Nations Universal Declaration of Human Rights and the Basic Conventions of the International Labour Organization.

All employees undertake not to use children, not to use forced labour and to allow freedom of expression or representation. They ensure respect for these rights in their area of responsibility and urge partners and suppliers to fulfil the same commitment.

b) Respect for the environment:

Each worker in his or her area of work contributes to the environmental efforts and commitments of JEGAN. It respects the company's rules on the protection of natural resources.

JEGAN demands that partners and suppliers respect similar requirements.

c) Respect for freedom of association:

The JEGAN Directorate undertakes to safeguard the legal right of workers to free association and collective bargaining.

d) Respect for health and safety:

It is essential to maintain each job in order to respect the conditions of health, safety and ergonomics.

Each worker must comply with the requirements laid down in the Prevention of Occupational Risks, paying particular attention to any dangerous situations and incidents that may arise, as well as to participate in the implementation of corrective actions.

In order to protect the health and safety of all, the Company shall take measures to investigate possible violations of substance abuse policies. In the event of such a situation, the workers concerned are expected to cooperate by allowing medical evaluation and/or testing of alcohol and drugs in the event of inadequate or defective activities, misconduct or special circumstances resulting from an accident.

It is an absolute duty for all workers and external personnel to respect security measures.

e) Respect for equality:

JEGAN personnel must respect the laws and regulations prohibiting discrimination on the grounds of age, race, sex, ethnic origin, nationality, religion, health, disability, marital status, sexual orientation, political or philosophical opinion, membership of trade unions or other characteristics protected by the current law.

No sexual, physical or psychological harassment shall be permitted. If a worker is a witness or victim of such abuse, he or she must report it to the Human Resources Department. No action shall be taken against a worker who provides information in good faith.

The selection and incorporation of new staff is based solely on the qualifications, skills and abilities of the applicant. Remuneration and working hours are determined solely on the basis of the professional contribution of JEGAN personnel, in accordance with the labour regulations in force.

f) With regard to family reconciliation:

JEGAN is committed to promoting the improvement of the quality of life of workers and their families. It therefore promotes a series of measures aimed at reconciling work requirements with the personal and family life needs of managers and workers.

PROFESSIONALISM AND ETHICS:

a) Protecting personal information:

JEGAN and each of its employees, in particular, undertake to respect the laws and regulations relating to the confidentiality and protection of personal data of workers and third parties.

Only those attitudes and responsibilities which explicitly require the processing of such information have access to the personal data of employees and third parties.

Access is provided according to the position of each worker and the nature and scope of the responsibilities.

JEGAN does not provide personal information to third parties except where necessary and permitted by existing laws and regulations.

b) Protecting JEGAN assets:

Every worker must do everything possible to protect the assets of the company. Under no circumstances may such assets and assets be used for illicit purposes or not related to the activities of the JEGAN.

JEGAN's property or property cannot be suitable for the personal use of a worker.

In addition, workers shall refrain from using the property or assets of JEGAN for their personal benefit or from allowing the use of persons other than employees or authorized by the enterprise.

The misappropriation or theft of such property constitutes an offence which may give rise to sanctions and, in the event of non-compliance with existing legislation, may be conducted in accordance with civil or criminal proceedings.

c) Respecting the rules of confidentiality:

Any JEGAN employee in charge of confidential information or information owned by the company shall ensure that such information is confidential and used only for authorized purposes.

Staff who are not sure whether the information should be used or disseminated should consult their immediate manager or the Department of Human Resources.

JEGAN employees maintain these obligations after leaving office.

PROFESSIONALISM AND ETHICS:

d) Respecting intellectual property:

JEGAN's intellectual property rights include technical knowledge, trade secrets, trademarks, domain names, industrial concepts and copyright.

They are one of our main assets and are protected by law whenever possible. The preservation of this property is the duty of all employees.

JEGAN undertakes to respect the intellectual property of others and to ensure that workers do not violate their rights.

e) Respecting the media in the enterprise:

The media provided by the company (e-mail, voice mail, Internet, telephone (including cellular phones) and other media) are owned by JEGAN and can only be used for professional purposes.

However, any personal use must be within reasonable and necessary limits, when circumstances so require.

It is strictly prohibited for workers to use e-mail, Internet company or any other means of communication for unacceptable purposes, in particular to send or receive messages or images that may be considered offensive, offensive or disrespectful.

BUILDING RELATIONSHIPS OF TRUST WITH BUSINESS PARTNERS:

a) On the basis of mutual respect:

- Customers:

JEGAN must treat all customers equally, regardless of the size of the company. The company undertakes to provide its customers with quality products and services to meet their demands.

Contract negotiation staff shall ensure that all statements, communications and presentations made to customers are accurate and reliable.

The confidential information of customers shall in no case be transmitted by a JEGAN employee, unless requested or authorized in the project or contract.

Suppliers and subcontractors:

The actions of suppliers and subcontractors significantly affect the value of JEGAN products and services and play an important role in customer satisfaction.

Purchasing decisions are based on an objective assessment of the reliability and integrity of the supplier or subcontractor, as well as on the overall attractiveness of the offer, based on short- and long-term objectives and considerations.

JEGAN requires that suppliers and subcontractors strictly comply with the legal provisions relating to their activities and professional environment.

b) Excluding agreements with competitors:

JEGAN strictly complies with the competition laws and regulations applicable in the European Union and in all the countries in which the company operates.

Open and fair competition is in the interests of customers. JEGAN employees are prohibited from distorting a tendering process, sharing a market, limiting production, or boycotting a customer or supplier for the purpose or purpose of setting prices.

c) Rejecting all corruption:

JEGAN's policy is against illegal payments and practices. The company respects the laws in force in the country in which it operates.

JEGAN personnel are obliged to respect the law of the country in which they work. They shall not, directly or indirectly, offer or grant any advantage to an agent of a government, political party, employee or public or private client, credit institution or bank, in breach of the company's legal obligations and ethical principles, for the sole purpose of obtaining or maintaining a commercial transaction, or of receiving a service or favour in breach of a rule or law.

d) Refusing to launder money:

Money laundering is covering up funds generated by illegal activity.

Each worker must exercise vigilance in respect of the payments made, in order to detect any irregularity, especially with the partners suspected of business.

e) Excluding any conflict of interest:

JEGAN workers must avoid any situation that may conflict between their personal (or family) interests and those of the company.

In order to protect workers and the enterprise from a conflict of interest, workers shall refrain from holding shares or investments in a supplier, client, competition or advisory company, or in an associated company, where such interests or investments may affect commercial decisions taken on behalf of JEGAN.

If such a case arises, the worker shall report the situation to his or her immediate manager or to the Department of Human Resources in a transparent manner and obtain a specific exception to it in writing

f) Responsible policy towards gifts:

No JEGAN employee may offer, accept, or authorize any member of his family to accept gifts, money, loans, invitations, or special treatment of any person in a business relationship with the company, if the real intention is to influence a commercial decision.

However, a worker, on behalf of JEGAN, may accept an invitation to eat or a symbolic non-financial gift of little value, provided that he can then make a similar gesture in return.

JEGAN applies its policies and standards in all countries where the company has a commercial presence.

CONSEQUENCES OF NOT RESPECTING THE COMPANY'S CODE OF ETHICS:

All employees must comply with all the points contained in the Code of Ethics and Good Conduct and the applicable instructions.

Certain offences may have serious and lasting consequences for the image, commercial relations and financial situation of the TSJCV, and may therefore initiate legal, civil or criminal proceedings and take the most appropriate internal measures.

Any JEGAN worker or group of workers, knowing that one or more of the rules defined in this Code have been violated, may file a complaint with the hierarchical superior, the Department of Human Resources or the complaint channel available on the website.

REVIEW	HYSTORICAL	CHANGES
00	February 2024	Initial edition
01	December 2016	"Respect for people and their environment" is added, section b of a paragraph relating to substance abuse policies.
02	October 2024	"Family reconciliation" is added in the section on respect for people and their environment.