



CODE OF ETHICS AND GOOD CONDUCT

JEGAN, S.A.L.

The Management and all the workers from Jegan S.A.L. are committed to:

RESPECTING PEOPLE AND THEIR ENVIRONMENT

ACTING WITH IRREPROACHABLE PROFESSIONALISM AND ETHICS

BUILDING RELATIONSHIPS OF TRUST WITH THE TRADING PARTNERS

PREAMBLE

In general terms, and in all circumstances, all employees of JEGAN, S.A.L. must take into account the international, national and local standards, as well as the standards on professional ethics relating to their activities.

This Code of Ethics aims to define the behavioural approach that should be applied every day in our internal and external relations.

The principles contained in this Code of Ethics are not exhaustive.

The Management and all the workers are committed to:

RESPECTING PEOPLE AND THEIR ENVIRONMENT

a) To respect basic human rights

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

All employees are committed not to employ child labour, not to use forced labour and to authorise freedom of expression or representation. They shall ensure that these rights are respected within their area of responsibility and shall request that their partners and suppliers comply with the same commitment.

b) Respect health and safety

The maintenance of each workstation is essential in order to respect the requirements of health, safety and ergonomics.

Each employee must comply with the requirements established regarding Occupational Risk Prevention, paying particular attention to the reporting of any hazardous situation they may become aware of and of any incidents caused by the latter, as well as to participate in the implementation of corrective measures.

To protect the health and safety of everyone, the Company shall adopt the measures that enable it to investigate possible infringements related to the substance abuse policies. If any situation occurs of this nature, it is expected that the employees affected shall work together, enabling a medical evaluation and/or alcohol or drug tests if any inadequate and inappropriate actions are detected, if there is erratic behaviour, or in exceptional circumstances, as a result of an accident.

Respect for all the safety measures by all employees and external personnel is an absolute obligation.

c) Respect equality

The employees of JEGAN must respect the laws and regulations prohibiting discrimination due to age, race, gender, disability, marital status, sexual orientation, political or philosophical opinions, membership of unions or other characteristics protected under the current law.

No form of sexual, physical or psychological harassment will be tolerated. If an employee is witness to or victim of this type of abuse, they must report it to the Department of Human Resources. No measures will be taken against the employee who provides information in good faith.

The selection of new staff and their incorporation into the company is based exclusively on the qualifications, skills and competencies of the candidate person. Pay and working hours shall be determined exclusively in accordance with the professional contribution of JEGAN's employees, in compliance with the current labour regulations.

d) Respect the Environment

Every employee, within their work environment, contributes to the efforts and environmental commitments of JEGAN. Respect the company's rules relating to the conservation of natural resources.

JEGAN demands that its partners and suppliers respect similar demands/requirements.

e) Respect Freedom of Association

The Management of JEGAN is committed to conserving the legal right of its employees on matters concerning free association and collective negotiation.

ACTING WITH IRREPROACHABLE PROFESSIONALISM AND ETHICS

a) Through the protection of personal information

JEGAN and each of its employees, is particularly committed to respecting the laws and regulations relating to confidentiality and the protection of the personal data of the employees and third parties.

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

Access is granted in accordance with the nature and scope of the position and the responsibilities of each employee.

JEGAN does not communicate personal information to third parties, except when necessary and whenever the current laws and regulations allow it.

b) Through the protection of the assets of JEGAN

All employees must do everything possible to protect the assets of the company. These goods and assets shall in no circumstances be used for illicit purposes or in activities unrelated to JEGAN.

The goods and assets of JEGAN may not be appropriate for the personal use of an employee.

In addition, employees must not use JEGAN goods or assets for personal profit, nor allow the use by other persons who are not employed by or are not authorised by the company.

Misappropriation or theft of these assets represents an infringement and may give rise to penalties and, in the case of non-compliance with the current legislation, civil or criminal proceedings.

c) Through the respect of the rules on confidentiality

Any JEGAN employee who handles confidential information or information belonging to the company, must make sure that such information is confidential and is only used for the authorised purposes.

Employees who are not sure whether they should use or disclose information, must consult with their immediate superior or the HR Department.

JEGAN employees shall remain subject to these obligations even after their duties have ceased.

d) Through respect for intellectual property

Intellectual property rights of JEGAN include technical expertise, trade secrets, trademarks, domain names, industrial concepts, and copyright.

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

JEGAN is committed to respecting the intellectual property of others and ensuring that the employees do not infringe their rights.

e) Through respect of the company's media

The communications media provided by the company (email, voice mail, Internet, telephone (including mobile phones) and other communications media) are the property of JEGAN and may only be used for professional purposes.

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

It is strictly forbidden for employees to use email, the company Internet or any other communication media for unacceptable purposes, especially to send or receive messages or images that could be considered insulting, offensive or disrespectful.

BUILDING RELATIONSHIPS OF TRUST WITH THE TRADING PARTNERS

a) Based on mutual respect

=> **Customers**

JEGAN must treat all its customers equally, regardless of the size of the company. The company is committed to providing all its customers with quality products and services that satisfy their demands.

Employees responsible for the negotiation of contracts must ensure that all declarations, communications and presentations to customers are precise and reliable.

Confidential information of the customers must not, under any circumstances, be transmitted by a JEGAN employee, except when required or authorised in the project or contract.

=> Suppliers and subcontractors

The actions of the suppliers and contractors have a significant effect on the value of JEGAN's 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 contractor, as well as the overall attractiveness of their offer with regard to the short-term and long-term considerations.

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

b) Rejecting agreements with competitors

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

Open and fair competition is in the interests of the customers. JEGAN employees have prohibited all agreements with competitors, with the objective or outcome of fixing prices which misrepresent a litigation process, sharing of the market, limiting production, or boycotting a customer or supplier.

c) Rejecting any corruption

JEGAN's policy is contrary to illicit payments and practices. The company respects the existing laws in the country in which it operates.

JEGAN employees are obligated to respect the legislation of the country in which they are working. They must not offer or provide, directly or indirectly, any advantage, whether financial or of another kind, to a government representative, political party, employee or agent of a public or private customer, credit organisation or bank, violating the legal obligations of the company and of the ethical principles, with the sole aim of obtaining or maintaining a commercial transaction, or receiving a service or favour that involves the violation of a rule or law.

d) Rejecting money laundering

Money laundering is a crime that consists of concealing funds generated by an illegal activity. Each employee must exercise vigilance with regard to payments made in order to detect any irregularity, in particular with partners whose business practices give rise to suspicion.

e) Rejecting any conflict of interest

JEGAN employees must avoid any situation that could create a conflict between their personal interests (or those of their family) and those of the company.

In order to protect the employees and the company from a conflict of interest, the latter must not have assets or investments with a supplier, customer, a competitor company or consultancy, nor any associated company, if these interests or investments can influence the commercial decisions adopted in the name of JEGAN. If such a case arises, the employee must inform their immediate superior or the HR Department of the situation in a transparent manner, and obtain a specific exemption in writing of the latter.

f) Having a responsible Policy regarding donations and gifts

No employee of JEGAN may offer, accept or authorise a member of their family to accept gifts, money, loans, invitations or any special treatment from any person, in relation to the company's business, if the true intention is to influence a commercial decision. However, an employee could accept an invitation to dinner or a non-financial gift in of little value the name of JEGAN, if they are able, subsequently, to reciprocate with a similar gesture.

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

CONSEQUENCES DUE TO NOT RESPECTING THE COMPANY'S CODE OF ETHICS

Every employee is responsible for complying with all points included in the Code of Ethics and Good Conduct, and the applicable instructions.

Certain infractions may have serious and harsh consequences on the image, commercial relations and financial situation of JEGAN, therefore JEGAN could initiate legal, civil or criminal actions, and adopt the most appropriate internal measures.

Any employee or group of employees of JEGAN, with knowledge of the violation of one or several regulations defined in the present Code, will be able to report it to their hierarchical superior, to the Human Resources Department or through the Suggestion/Complaints Box.

| Review | Date | Historical Changes |
|---------------|---------------|---------------------------|
| 00 | February-2014 | Initial editing. |

| Review | Date | Historical Changes |
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| 01 | December-2016 | Added to chapter " Respect persons and their environment " section b a paragraph relating to the substance abuse policies. |
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