

# CODE OF CONDUCT



October 2020

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## 1. INTRODUCTION

Ecopol Tech SL, as its name indicates, Eco (Ecological) pol (Polymers) Tech (Technology) is a chemical company dedicated to the innovation of polymeric compounds minimizing the environmental impact of its activity.

Ecopol Tech SL is committed to promoting integrity, honesty, transparency, sustainability, expertise and cultural diversity in all its activities.

We believe that our pursuit of success must always be based on creating and promoting an environment of trust and respect with our employees, suppliers, clients, authorities and any person or entity with which we interact.

This code sets out the ethical commitments and responsibilities assumed by the entire Ecopol Tech SL organisation.

## 2. PRINCIPLES AND VALUES OF THE COMPANY

The training and development of our workers and respect for the principle of equality are the pillars of our human resources policy.

Respect for the environment and the application of preventive measures that guarantee the safety and health of our workers are the framework for the development of all our activities.

We are aware that the quality of our products, processes and services are key components of the future and that they are aimed at total customer satisfaction.

## 3. GENERAL CONDUCT RULES

### 3.1. Fair competition

Commitment to compete in the markets in a fair way, complying with the antitrust regulations.

### **3.2. Environment**

Development of the activity from the respect to the environment, fulfilling the standards established in the regulations on the matter. Commitment to the environment and sustainable development, which is based on the implementation of a policy that allows the environmental effects generated by each of its activities to be identified with the aim of minimising environmental impact.

### **3.3. Occupational safety and health**

Protection of the integrity and health of our employees through a policy of health and safety at work, based on strict compliance with all regulations, training and preventive management of occupational risks.

Commitment to provide our employees with the necessary resources to carry out their duties safely and in a healthy environment.

Commitment of employees to observe strict compliance with health and safety regulations in the workplace and to make responsible use of the equipment assigned to them, ensuring their own safety and, in general, that of all persons who may be affected by their activities.

## **4. MANAGERS AND OWNERS**

The ethics of owners, directors and managers are essential for the company to be able to properly fulfil its purposes, which are necessary to guarantee and balance the rights and interests of all groups: employees, customers, suppliers, partners and society in general.

To configure the company as an instrument at the service of wealth creation, making its unavoidable purpose of obtaining profits compatible with a sustainable social development that respects the environment,

ensuring that all its activity is carried out in an ethical and responsible manner.

To configure the company as an institution in the medium and long term without the desire for short-term enrichment compromising its continuity.

To seek a fair balance between capital and labour so that workers receive through their salaries the fair compensation for their work.

To define and defend the mission and values of the company in line with its Code of Conduct.

To carry out a professional, ethical and responsible exercise of its activity. Comply with and enforce the company's Code of Conduct and to this end make it known and establish the appropriate mechanisms to ensure its application.

Comply with and enforce compliance with generally accepted accounting standards and principles and establish internal and external risk management and control systems appropriate to the characteristics of the company.

Facilitate the transparency and control of their remuneration in order to guarantee that it is appropriate to their level of responsibility and performance and to the characteristics of the company.

Maintain the confidentiality of the background, data and documents to which they have access by reason of their duties in the company, even after they have left.

The company's managers and directors are responsible for motivating and communicating among the members of their teams, promoting a participatory management style that fosters communication, delegation and encourages initiative, teamwork, results orientation and collaboration with others.

Establish and communicate clear criteria and rules that maintain a balance between the rights of the company and those of the employees in the

recruitment processes and in those of separation from them even in the case of a voluntary change of employer.

## **5. EMPLOYEES**

### **5.1. Policy information**

All employees will be informed and accept the principles and criteria on which the company bases their professional development, the effectiveness of their management and the strengthening of their commitment to the aims and objectives of the company.

### **5.2. Training commitment**

Each employee must attend to their own training, using all the means that the company makes available to them, in a constant commitment to themselves and to the company aimed at updating and increasing their training, in order to achieve their full professional development and the achievement of their personal goals.

### **5.3. Family and professional life reconciliation**

The balance between work obligations and personal and family life is achieved through a human resources policy that generates measures that make it possible to make the commitment to the company compatible with the time needed to develop a personal life project.

### **5.4. Work professionalism**

Ecopol Tech S.L. employees shall act in the exercise of those competences attributed to them by reason of their posts, putting into practice criteria that lead to the greatest efficiency, at the lowest possible cost, always

following the guidelines that, according to their respective technical training, are the relevant ones in each case.

### **5.5. Contract termination**

At the end of the employment relationship between company and employee, whether through dismissal or self-employment, each worker must leave his or her job in the best possible conditions. This implies, on the one hand, organizing and cleaning up everything that must remain in the company for the sake of its development over time and, on the other hand, discarding everything that is not essential to the company's future development.

### **5.6. Principle of non-discrimination and equal opportunities**

Commitment to creating a work environment where all employees are treated with fairness, respect and dignity, with special attention to promoting equal opportunities and treatment of all employees in a fair and unbiased manner by eliminating discrimination of any kind, whatever its cause or origin. Not to discriminate against employees on the grounds of race, religion, age, nationality, sex or any other personal or social condition unrelated to their conditions of merit and ability.

To try to integrate disabled or handicapped people into the labour market, eliminating all kinds of barriers within the company for their insertion.

### **5.7. Respectful working environment and no harassment**

Reject any manifestation of harassment, abuse of authority, as well as any other conduct that may generate an intimidating, offensive or hostile working environment, favouring a pleasant and safe working environment.

### **5.8. Use and protection of business assets**

Ecopol Tech S.L. provides its employees with the necessary resources to carry out their professional activity. As long as all the people working in the company commit themselves to make good use of the material and immaterial means made available to them.

### **5.9. Information confidentiality**

All employees of the company are obliged to protect the information, confidential or reserved that they are aware of by reason of their position - whether technical, financial, commercial or of any other nature - and not to use it outside the scope of their employment relationship, nor reveal it to third parties without the prior written consent of the company, with the exception of those requests for information that are required by judicial or administrative authority in legal terms.

Those employees who, because of their high responsibilities, have access to particularly sensitive information may be required by the company to sign specific confidentiality commitments as an annex to their main employment contract.

### **5.10. Conduct code function**

Our Code of Conduct is not intended to respond to every one of the many individual situations to which our employees may potentially be exposed in their daily lives. The Code of Conduct serves the purpose of alerting our employees to those situations that they feel may have ethical or legal implications that must always be respected. To this end, our employees have received the necessary training to help them make the right decisions in any situation of this nature.



## **6. CUSTOMERS**

### **6.1. Service quality**

Customer satisfaction with the products served by our company is the priority objective of the business activity we carry out.

All employees must be aware that success in customer relations lies in the correct provision of the services offered. To this end, and in order to reach the committed quality levels, Ecopol Tech S.L. provides its employees with the necessary means to develop their activity.

### **6.2. Customer relations**

All the relationships that Ecopol Tech S.L. has with its clients will be duly documented in the legally appropriate manner and expressed in clear terms that allow the rights and obligations arising from the aforementioned relationships to be precisely determined.

To seek the excellence of the company's goods and services so that its clients and consumers obtain the expected satisfaction.

To guarantee the company's products and services and to deal quickly and efficiently with consumer and user complaints, seeking their satisfaction beyond mere compliance with current regulations.

## **7. SUPPLIERS**

### **7.1. Suppliers relationship**

Employees must comply with and respect the Company's internal regulations when approving suppliers, as well as when awarding work, supplies and services.

Relate to suppliers of goods and services in an ethical and legal manner.

Seek out and select only suppliers whose business practices respect human dignity, do not violate the law and do not jeopardise the company's reputation.

Select suppliers on the basis of the suitability of their products or services, as well as their price, delivery conditions and quality, not accepting or offering gifts or commissions, in cash or in kind, which could alter the rules of free competition in the production and distribution of goods and services.

## **8. COMPETITORS**

Not to abuse a dominant or privileged position in the market.

To compete fairly with other companies by cooperating to achieve a free market based on mutual respect between competitors, refraining from unfair practices.

In particular, not to acquire customers from other competitors by unethical methods.

## **9. CIVIL SOCIETY**

Respect human rights and democratic institutions and promote them where possible.

Maintain the principle of political neutrality, not interfering politically in the communities where it carries out its activities, as well as showing respect for the different opinions and sensibilities of the people linked to the company.

Relate to public authorities and institutions in a lawful and respectful manner, not accepting or offering gifts or commissions, in cash or in kind.

Collaborate with the Public Administrations and with the entities and non-governmental organisations dedicated to improving the levels of social care for the most disadvantaged.

## 10. CORPORATE SOCIAL RESPONSIBILITY

Ecopol Tech S.L. declares its commitment to the principles of corporate social responsibility, promoting and contributing actively and voluntarily to social and economic development.

Both the principles relating to employee training and those relating to the reconciliation of work and family life form part of the set of actions that make up the concept of corporate social responsibility.

The company will guarantee its employees, suppliers, customers and third parties that have a relationship with it, the faithful compliance of the regulations on data protection, adopting the pertinent measures in its organisation so that these regulations are fully effective.

## 11. VALIDITY

The Code of Conduct comes into force on the day of its publication to all employees and will remain in force until its repeal is approved. It will be periodically reviewed and updated and, where appropriate, policies, processes and controls will be reviewed, updated or implemented as necessary.

A handwritten signature in blue ink, appearing to be a stylized name, is written over the Ecopol Tech logo and the company information.

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