CORPORATE INFORMATION

FOR EMPLOYEES AND STAKEHOLDERS

DACERO | WINDAR | IDESA | TADARSA | DANIMA | TADARSA LOGISTICS

CONDUCT

Grupo Daniel Alonso

GD000124-R.05

Ethical conduct

Introduction

The Corporate HR Management and the Management of each of the companies and factories that make up Grupo Daniel Alonso, is aware of the importance of both its conduct, its image and reputation, which is why it has committed and established principles of management based on guidelines for ethical and moral conduct within the different areas and processes of the company.

These guidelines will regulate the criteria to be met by all our employees and those who act on our behalf throughout the world, in addition to the established and defined sanctions that will be imposed in case of detecting infractions to them.

For the company, compliance with internal procedures, instructions and protocols, as well as externally international, national and local regulations and regulations in all areas of action, is a fundamental objective that we must convey to our clients and other interested parties in the company.

Scope

These corporate guidelines for action will be applicable to all people who belong to any of the Grupo Daniel Alonso companies or represent them in any way and will be developed together with our CSR Principles (Corporate Social Responsibility: GD000113).

In the case of our international production plants, in order to comply with the regulations of each country, it will be necessary for them to develop their own internal regulations in accordance with said legislation, which will complement these corporate guidelines as Annexes.

When internal regulations, legal requirements or business practices are not clear, good judgment and the advice of the management of each company and workplace will be used.

Communication

The communication of these guidelines of ethical conduct to all our stakeholders will be governed by the basic principles of transparency and truthfulness, therefore, they will be available to all Grupo Daniel Alonso personnel through the HR department. They will also be available in the CEDOC management tool for all indirect personnel.

Externally, the conduct guidelines will be communicated to clients, suppliers and subcontractors and other interested parties, through the website: http://www.grupo-danielalonso.es.

Any reasonable indication of a deviation, infringement or legal breach of the guidelines detailed below, will be immediately communicated to the Management of each company or factory so that the appropriate measures can be taken to correct it.

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Legal compliance

The Management of each company and workshp, Factory managers, Head of department and area managers, will defend strict compliance with the internal rules of conduct and current regulations. Each of them will ensure that they are maintained at all times,

a) The ethical and moral criteria in the attitudes and behaviors of the workers,

b) Professional, correct and impartial conduct, always avoiding participation in activities contrary to what is established, illegal or immoral.

Respect and dignity

The workers who are part of our company will be treated with dignity and respect.

A labor framework will be promoted where equal opportunities reach the worker, ensuring non-discrimination for any condition of race, sex, ideology, religion, or any other discriminatory factor.

Any kind of harassment or behavior and conduct that promotes an intimidating or offensive environment, with the personal rights of its professionals, will be totally rejected.

Professionalism

It will ensure that our workers act professionally. It will ensure that the necessary resources for the performance of the professional activity made available to our workers are adequately protected and cared for, being used only for the proper performance of their duties.

Likewise, each worker will undertake to know the products they handle and the possible effects that they can produce on their colleagues and facilities if they are used incorrectly, as well as the processes they handle in their professional work, especially those aspects related to the safety and the environment.

The workers will participate in collaborating in the maintenance of all the facilities where they work and more specifically their job and the equipment used.

Daily tasks, such as maintaining order and cleanliness of the workplace and its surroundings, are difficult to describe for each specific worker, therefore, each person knows with good judgment how to do it and its possible implications for improvement.

Confidential information

Workers may at any time use external or customer information or documents, which are subject to certain levels of confidentiality.

For this reason, they will be responsible for ensuring that the information handled under their control is treated in a faithful, precise and real manner, not disseminating it or making an inappropriate use of it. In this sense, the company has a "Confidential Information Policy (GD000597)", which must be applied at all times.

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Health and wellness

For the Corporate Management, it is a commitment objective to prevent, improve and maintain the health and well-being of its workers, guaranteeing the conditions that allow them to perform their duties properly.

Specifically, we are aware that tobacco, alcohol and the consumption of illicit drugs generate harmful and damaging effects for the safety and health of our workers.

These substances can interfere with the productivity and efficiency of workers, compromising their personal professional performance, as well as that of the company. For this reason, we adopt the following guidelines, directed as an action policy:

TOBACCO

- In application of current legislation and as an internal policy, smoking is prohibited inside our facilities, in any company, our own work centers and those of our clients.

ALCOHOL

- The consumption, possession, distribution and sale of alcoholic beverages, within our facilities or the facilities of our clients, and/or suppliers, during the working day, is strictly prohibited. Failure to comply will lead to the adoption of disciplinary measures, in accordance with its internal regulations.

- In the case of external personnel (clients, suppliers, subcontractors, ...), they will be dismissed from the workplace immediately, and communicated to their company, and will not be able to provide services again to the companies of the Grupo Daniel Alonso.

- It is forbidden to appear at the company under the influence of alcohol.

DRUGS

- The consumption, possession, distribution and sale of drugs, within our facilities, or in the facilities of our clients, and/or suppliers, during the working day, is strictly prohibited.

- It is forbidden to appear at the company under the influence of drugs.

Corporate Management is committed to ensuring that its companies and workplaces around the world are managed in accordance with the above guidelines.

Likewise, it recommends all its workers to watch over and commit themselves to complying with them as a positive and healthy attitude both in the personal and work environment.

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Health and safety

Corporate Management has defined and acquired the following commitments in this matter, which it promotes as a Policy in all its companies and work centers around the world:

1. Workers will go to their job in perfect condition and will remain alert at all times, detecting and reporting any incident that may affect personal safety, such as equipment and facilities.

2. Workers will ensure their personal safety and that of colleagues and third parties who are in the facility.

3. Workers will respect the rules for handling suspended loads at all times, never staying under them, or in the areas of influence thereof.

4. Workers will make sure that all auxiliary elements for lifting loads that they use are in good condition and are appropriate for the work to be carried out.

5. Workers will avoid making inadequate efforts, for which they will use the mechanical means available and when this is not possible, they will request the help of their colleagues.

6. The workers will not deactivate or modify the safety devices of the machines, equipment and tools made available to them by the company, also ensuring that no one does so.

7. Workers undertake to always use individual eye and face protection equipment, regardless of the duration of the tasks to be performed.

8. Workers will use the means of prevention and protection against falls in all jobs where it is necessary and its use has been established.

9. Workers will use hearing protection equipment as a preventive measure when exposed to noise.

10. The workers will contribute to the correct order and cleanliness of the facilities and work station, appropriately segregating the waste they generate in their corresponding containers, thus complying with the obligations assigned to the work station and the environmental management where it is carried out.

11. Workers will respect the safety standards and signs existing in the facilities, and will correctly use the specific PPE (Personal Protective Equipment) for each job.

In case of any doubt about the points that have just been described, the workers will be able to make an information query to their direct managers, as well as to the Health and Safety technicians of their workplace or to the representatives of the workers. .

Ethical conduct

Road safety

We are a company committed to road traffic safety in such a way that the accident rates associated with this cause are aimed at a total reduction. To do this, we have established a series of principles whose compliance will be the responsibility of all the company's workers, contractors and subcontractors.

All of them will participate in the activities that are programmed and developed by the company, with the aim of reducing the probability of accidents that may affect the physical, mental and social integrity not only of personnel, contractors, subcontractors, but also of the community and/or environment.

- We will spread the culture of road safety among all road users: workers, contractors and subcontractors, promoting safe mobility initiatives and the understanding of road safety within the workplace as an aspect of improvement.
- We will promote the awareness of our staff and contractors and subcontractors, through strategies that guide them on the road to preventing traffic accidents, such as respecting traffic signs, or adopting pro-active behaviors against the defensive handling of the vehicle, as well as providing road users with the necessary information to guarantee safe mobility when traveling.
- We will promote compliance with legal requirements regarding occupational road safety. We will especially ensure compliance with the requirements established in the National Code of Road Traffic (Law 769/2002), which directs the principles in terms of safety, quality, preservation of a healthy environment and the protection of public space.
- We will allocate the financial, human and technical resources that are necessary in compliance with the commitments of this policy.
- We will include road safety within the prevention of occupational risks, so that any employee, contractors and subcontractors assume the obligation to comply with the requirements and standards established by the company.
- We will monitor the responsibility of our personnel and contractors in the performance of preventive and corrective maintenance of the vehicles, provided for the exercise of their work, in order to maintain an optimal performance of these.
- We will consider as a basic element in the management of work processes, the continuous improvement of Road Safety, for which those associated with this Policy will be integrated into the objectives and indicators of the organization.
- We will maintain and promote direct and fluid contact with interested parties, guaranteeing communication on the matter, collaborating with national and international organizations and companies, in order to favor the exchange of knowledge and good practices.

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Violations

Any company person who detects a breach of the rules of conduct, or an infringement, of the legal requirements in force will be under the obligation to immediately inform their direct managers, who in turn will transmit it to the Directorate of the company and workplace.

An investigation team will be created consisting of the Factory Manager, the direct manager of the worker, as well as those responsible for HR and the affected area, who will study the facts and in case of verifying the detected non-compliance, will identify the type of offense, as specified in Annex I of this document.

NOTES:

1) In no case will the sanction consist of a reduction in the duration of the vacation or another minimization of the worker's rest rights or a fine if any.

2) In the case of sanction of "serious" and "very serious" offenses, written communication will be required to the worker, stating the date and the facts that motivated it, being the person in charge of HR who will inform the legal representatives of the workers of all kinds of sanctions that are imposed.

3) Once the sanction is imposed, compliance with it may be delayed until six months after the date of imposition.

The Management of each company and factory in the world may sanction the workers in accordance with the graduation of the offenses and sanctions that are established in the legal provisions or collective agreements of the sector.

In general, faults are classified according to their importance, significance and intention:

a. LOW faults,

b. SERIOUS fouls and

c. VERY SERIOUS fouls.

Next, ANNEX I is included where the classification of offenses and the sanctions to be adopted in each case is included. Each country must develop said Annex in accordance with the above.