



CSR principles

FOR OUR STAKEHOLDERS

CSR principles

FOR OUR STAKEHOLDERS



Content

UN GLOBAL COMPACT

OUR PRINCIPLES

- Communication
- Compliance with the principles
- Legality and social compliance

PURPOSE AND APPLICATION

- Human rights
- Equal opportunities
- Human resources
- Competence
- Child labor
- Work conditions and slavery
- Relationships with suppliers
- Business relationships
- Respect for the environment
- Reputation
- Information control
- Internal processes for confidential information
- Corruption and bribery
- Conflicts of interest



UN global compact

The Principles are communicated between the parties involved, and are released through the delivery of copies thereof, the website and / or any other means, to determine the Directorate of the organization.

We recognize that governments are ultimately responsible, the establishment of a legal framework for the protection of human rights within their markets.

We provide employees the resources necessary to carry out their professional activities, which protect and care for the proper performance of their duties responsibly efficient and appropriate.

We respect the laws and national and international standards on Human Resources in force in each of the markets, which set their Human Resources Policy.

Comply with the legal requirements of the country, fully supporting the guiding principles of

UN Global Compact in matters of work .

COVID-19

Faced the situation generated due to the global pandemic caused by COVID-19, the company is committed to applying all the necessary measures for its control, both in the workplace and in the personal area of its employees, as well as developing safe practices and a culture preventive, where there is no discrimination whatsoever, to those who have suffered it, currently have, or may suffer the disease in the future, or have lived with a family member who suffers from it or has suffered from COVID.

1. Support and respect the protection of international human rights within their sphere of influence.
2. To ensure that their companies are not complicit in human rights violations
3. Businesses must support freedom of association and the recognition of the right to collective bargaining
4. Businesses must support the elimination of all forms of forced and work under coercion
5. Businesses should support the eradication of child labor
6. Businesses should uphold the elimination of discrimination in employment and occupation
7. Businesses should support a precautionary approach to environmental challenges
8. Businesses should undertake initiatives to promote greater environmental responsibility
9. Businesses should encourage the development and diffusion of technologies that respect the environment
10. Businesses should work against corruption in all its forms, including extortion and bribery

CSR principles

FOR OUR STAKEHOLDERS



Our principles

Since more than 50 years ago Daniel Alonso Rodriguez created the first of his companies until reach today, we have worked to build a corporate group based on the best sound human values and labor principles.

Although the Corporate Business Principles are now published as a single document integrated with other management systems, most of the management principles contained in this document had existed for many years individually due to the large interest of the corporate group by management practices based on this principles.

SIGNED BY

*Management Steering Board
Jan-2017*

Therefore, and given the increasing public interest in the area of corporate social responsibility, we share these principles, not only with our employees, but with any person or party interested in understanding the principles underlying the group.

The publication of the Principles has three basic reasons. First, its application as a management tool rather, complementing other systems of the organization. Have been translated and distributed to our members and managers around the world in which we operate to provide useful information on its implementation. Second, develop relevant areas such as communication with each of the stakeholders in our business and corporate standards. Third, the group's Corporate Business Principles we added the tenth principle of the Global Compact of the United Nations dealing with corruption, and we support fully.

The Principles will continue evolving and adapting in to constant changes, but our foundation will remain unchanged reflecting the basic ideas of fairness, honesty and general concern for people. DA group direction have committed to ensuring that our Company is managed in accordance with these principles and commend and our employees around the world.

Each of the companies belonging to Grupo Daniel Alonso through it, declares and certifies that it has received and subscribes to the principles of corporate responsibility (CSR) of the Group, and therefore the principles of the UN Global Compact in which these are based, committing to compliance with the principles contained in such undertaking to transmit, information and training on the content of those principles of corporate responsibility to all employees and stakeholders.

Communication

We believe that our employees are one of the most valuable assets of the company. Participation at all levels, is based on transparent communication both on specific business matters, as on the activities of the Company in general, so are receptive to suggestions and proposals for changes, aimed at improving our performances. The Principles are reviewed and updated periodically by submitting to periodic internal audits. Its findings and recommendations are submitted to the Directors of each company in the group, and are available to all employees who wish to consult grupoda's intranet.

Compliance with the principles

We recognize that our stakeholders have a sincere and legitimate interest in the conduct, beliefs and actions, beyond the name of the company in which place their confidence, and that would not exist without such parties. Therefore we are committed to respect the principles of management in all countries in which we operate, taking into account local legislation, as well as cultural traditions and religious practices and where no conflict with local laws.

The people involved in grupoda are required to comply with the corporate principles, with respect for the values they contain and establish. Internally, the Principles are intended, members of different stakeholders such as the Directorate of the organization, or employees, regardless of the type of contract to determine their relationship, hierarchical position or location in to execute their business.

Legality and social compliance

We conduct our activities in different countries and cultures around the world, it does constitute a large diversity and invaluable source for our progress. Therefore we are convinced that, in general, the laws represent the best guarantee of responsible behavior. However, we understand that in certain areas, additional guidance to employees in the form of voluntary business principles, ensures compliance with the highest standards throughout the organization.

A single document can not pick up all legal obligations required in each of these countries, even opposing legal requirements may exist. Our companies remain committed to follow and respect all national laws in each of its markets. If any content of this document be interpreted contrary to the laws of any country, this interpretation does not apply in that country.

CSR principles

FOR OUR STAKEHOLDERS



Purpose and application

Corporate Business Principles Daniel Alonso Group (grupoda) constitute our reference framework for carry out the Better Government and Social Responsibility.

The principles are the expression of corporate values that will govern the conduct of each of our businesses and all the individual members thereof, in the performance of their roles and industrial relations commercial and professional.

The aim of the activities, and therefore its management, and employees at all levels, is to manufacture and commercialize our products in such a way to provide durable and sustainable value for all interested and affected parties (customers, employees, managers, so on.) and to national economies in which the organization exercises each of their activities.

We do not favor benefits by sacrificing the prosperity of the long-term business development, however, we recognize the need to generate profits every year to enable it to secure the support of financial markets and finance our investments.

We promote the sense of integrity among employees of all countries, and apply common standards, although they should be adapted to the local customs and culture, establishing working relationships based on trust, integrity, honesty and respect for the values, attitudes and basic human behaviors.

Human rights

Hopefully, in each market, to respect and follow the laws and regulations of the country relating to human rights and to fully support the two guiding principles of the UN Global Compact, in this matter.

We want to be an example of good practice in the field of human rights in all business activities and who has an interest in promoting the improvement of social conditions, as essential for sustainable development.

Equal opportunities: Foster an environment in which equal opportunities, ensure non-discrimination based on race, sex, ideology, nationality, disability, creed or any other personal, physical or social. We also reject, any form of harassment, or any other conduct that creates an intimidating or offensive to the personal rights of the same. Develop training policies personnel and professional, who select and / or promote our employees, on the basis of principles such as merit, experience or other, and in response to the requirements of competence necessary in every situation and in particular, equality treatment for men and women.

Human resources: We are aware that the success of a company is a reflection of the professionalism, behavior, and responsible attitude of the people who compose it. Therefore, the recruitment of right people and continuous training and good career development are essential factors. We encourage continuous progress through training, professional competences, and empower all levels of the organization, providing professional developments, taking into account the merits of each one, regardless of color, age, nationality, religion, sex, disability, veteran or any other class as defined by national legislation.

Competence: The professional competence, experience and the ability and willingness to implement the Basic Management and Leadership, are the main criteria for promotions. We support the market economy and therefore compete in the market on fair, reasonable and recognize that other companies have the same right to work the same way. We support the development of competition laws to protect these principles. Especially grupoda companies establish their commercial policy independently, and do not set prices according or in collusion with its competitors, behaving fairly with its customers and suppliers, according to competition law.

Child labor

We offer our cooperation to the competent agencies of the United Nations, governments and the business community in finding solutions to the problem of child labor, promoting universal primary education and all aspects of global economic development. We reject all forms of child exploitation, understanding that the development of any policy in this area should take into account the social and legal situation of each country. In this regard:

- 1) not employ minors, as defined by the competent authorities. In those countries where the use of a DNI is not habitual, we will make sure that the staff comply with legal age by means that we deem necessary;
- 2) expect from our suppliers and business partners to implement rules that are based on the same criteria as our Principles;
- 3) respect the laws of all countries in which we operate and comply with the Convention of the International Labour Organization (ILO) 138 concerning the minimum age for admission to labor and the ILO Convention 182 on Worst Forms of Child Labour. The ILO recommendations are based on the United Nations Convention on the Rights of the Child (Article 32).

The causes of child labor are complex and often involve several factors such as poverty, different levels of economic development, social values and cultural particularities, so that any action aimed at eradicating child labor must, above all, be based on the interests of the child, as thoughtless policies and practices may aggravate the situation.

CSR principles

FOR OUR STAKEHOLDERS



Work conditions and slavery

Freedom of association and the effective recognition of the right of workers to collective bargaining, respecting the right to form representative organizations, and to affiliate or not affiliate a union, provided that this right is freely exercised. Maintain a constructive dialogue with these organizations, refraining from any action restricting the right of an employee to be, or not to be, affiliate, the elimination of all forms of forced and compulsory labor.

Our business practices are intended:

- 1) offer competitive salaries and benefits. The rules on working hours, overtime pay and comply with the respective national laws and are competitive with those offered by similar companies to ours;
- 2) limit the number of overtime at a reasonable level;
- 3) treat all employees with respect and dignity, and not tolerate any form of bullying, harassment or abuse.

Our organization has a policy, ensure that neither slavery nor human trafficking, takes place within your organization. To avoid slavery or human trafficking, we have established our CSR principles and we apply labor agreements and laws in each country where we operate. Also in the code of conduct of our organization.

We provide to our employees a section in the corporate website to communicate any aspect complained of.
www.grupo-danielalonso.es

Within these principles and policies, we also include our global supply chain extending to our suppliers and subcontractors, the CSR principles as part of our assessment process, in faith so they are applied. Our organization has not been convicted for the violation of any law slavery in countries in which we operate and that will be our continuing objective.

Relationships with suppliers

Raw materials, principally steel and steel products, are key quality factors, and the cost of manufactured goods and, consequently, affect the Group's results. The economic and technical environment in constant evolution, affects procurement strategies and methods of production.

The technological development of the industry, changes in the political or commercial law, new technologies for the processing of raw materials, as well as the evolution in customer preferences mean that the group must adapt their sourcing strategies. Key suppliers with which we maintain contractual relationships are approved and audited if deemed necessary to ensure compliance with Corporate Business Principles or group who are striving to achieve.

In this context, we will support production systems that are sustainable, that is, those methods and systems that meet the requirements of economic, environmental and social long term as well as technical assistance to producers in order to transfer know, ensure long-term supply on competitive terms and obtain raw materials that meet quality and safety requirements and a production system that is economically viable, socially acceptable and environmentally friendly.

The organization companies have a policy of dealing only with reputable suppliers who are prepared to apply quality standards, making commercial agreements being compared and evaluated periodically, with the aim of searching continuous improvement in the areas of quality, service, so on.

The decision to establish or maintain this supply system depends on a number of factors, including company requirements relating to: quality, safety, quantity and cost; characteristics of each raw material supply guarantee and sustainable local production conditions.

CSR principles

FOR OUR STAKEHOLDERS



Respect for the environment

Persons involved in the scope of its functions, know and assume that policy and act at all times in accordance with the criteria that inspire respect and sustainability, adopting habits and behaviors related to good environmental practices and contribute positively and effectively to the achievement of the objectives, striving to minimize the environmental impact of their activities and use of facilities, equipment and working means at their disposal, ensuring efficient use of them.

Organization companies:

- integrate policies, programs and practices that respect the environment in all areas of management for each of its activities;
- develop, design and operate their facilities, and carry out their activities, taking into account an efficient and sustainable use of renewable resources, reducing the adverse environmental impact and waste generation and safe disposal of the materials responsible waste;
- respect and comply with legislation and standards in national markets with respect to environmental issues;
- apply their own rules, depending on the situation in those areas where specific legislation on environmental issues not yet exist or is insufficient;
- facilitate information, communication and proper training to ensure understanding of their commitment and their performance in environmental matters, both inside and outside of the Company;
- support professional associations like the International Chamber of Commerce in its work on environmental protection and assists in its efforts to develop guidelines for environmentally friendly management;
- marked targets environmental protection, control their progress, check the results and define future actions.

Reputation

Organization's reputation and image, are one of its most valuable assets, to preserve the confidence of all its stakeholders, including employees, customers, suppliers, authorities, and society in general, so your employees will take care to preserve the image and reputation of the company, in all their professional activities, and especially in any public intervention, and / or to the media, participation in professional conferences or seminars and other events that may have public issue, adjusting to the principles of loyalty and good faith.

In the professional and personal activities will be maintained at all times, the highest ethical and moral standards in their attitudes and behaviors, a strong commitment, to act according to their responsibilities, always maintaining an optimal quality level all aspects of their professional activities, to contribute to the profitability of the business of the company, and maximize value for its stakeholders.

Business relationships

- **Authorities and Local Communities:** Encourage the dialogue between all the sectors in which we operate, and governmental authorities and regulatory authorities, both nationally and internationally, promoting and implementing applicable law, regulations and / or agreements that protect the rights of all interested parties and ensure the healthy competitive environment. In addition to direct investment and employment creation, contribute to the welfare of local communities in many countries in other ways.
- **Academic and Professional Relations:** We favor, communication and cooperation in both directions, with academic and professional associations, with the aim of promoting a constant updating of knowledge, mutual benefit, leading to improved products, policies and services of the Group.
- **Finances:** Our communication is open, direct, accurate, and uses the appropriate communication tools to ensure that the information is available at the same time, to the financial community and the general public. No person or institution receives preferential treatment. The financial information, especially the annual accounts faithfully reflect its economic, financial and equity, in accordance with generally accepted accounting principles, and international financial reporting standards that apply.
- **Nongovernmental organizations:** Maintain a dialogue with non-governmental organizations that have a history of constructive engagement and a code of principles. We encourage a debate who can contribute a greater understanding and cooperation in improving economic, social and environmental development of the community

Since its origins the organization companies, have made efforts to implement business practices that respect the environment and contribute to sustainable development and responding to current needs without compromising the interests of future generations.

This activity ensures continuous improvement of environmental measures along the supply chain, from the procurement and purchase of raw materials, to production, packaging, distribution and ultimately, the consumer.

CSR principles

FOR OUR STAKEHOLDERS



Information control

The accuracy of the information is basic principle in all our actions, so as truthfully be transmitted all the information they have to communicate, both internally and externally, and in any case provide knowingly incorrect or inaccurate information that may lead to error or confusion.

Guarantee the right to privacy and privacy of individuals and stakeholders in the terms provided in the laws, protecting personal data and committing them not to disclose unless consent of the parties or except in cases of legal or compliance with resolutions judicial or administrative.

We consider the information and knowledge as one of its main assets and essential for business management, so they must be given special protection. Proprietary information and / or entrusted to us will, in general, the consideration of private and confidential information.

We have a Privacy Policy which is available online on the website of the Group.

Internal processes for confidential information

The internal circulation of private information, owned by Grupo Daniel Alonso, and external information, which has the obligation to protect, will generally, and independence of the media type, where they contain, consideration of private and confidential information.

Such information shall be subject to professional confidentiality, without the content can be provided to third parties, unless previous and express, internal authorization, except for situations in which mediates a legal, judicial or administrative authority requirement.

It is the responsibility of Grupo Daniel Alonso, and all companies that are part of its corporate group, as well as all professional members of their workforce, put all the security means necessary, and apply established procedures to protect the transmitted and treated including either own or third party information.

Corruption and bribery

We insist on honesty, integrity and fairness in all aspects of its activities, and hope to find the same principles in the companies with which we interact, and their suppliers of materials, goods and services.

We support the efforts of the OCDE, for countries not members of the organization, comply with the recommendations to combat corruption. We believe that support for these measures, show practical support to the principle of the Global Compact of the United Nations, added in June 2004, and that combats corruption.

Conflicts of interest

Each market, defines what constitutes a conflict of interest, in line with these principles, and the laws and practices of the country themselves. Sanctions apply when a reprehensible conduct, or detect abuse the application of the principles and rules established.

The organization will comply with the current legislation on data protection committed by its customers, suppliers, candidates in selection processes or others, agreeing not to disclose unless consent of the parties and except in cases of legal or compliance with resolutions judicial or administrative.

We declare contrary, to influence the will of people external the company to obtain a benefit by using unethical practices.

Nor let that other person or entity to use these practices with the People involved.