



### REVISION HISTORY

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### DOCUMENT APPROVAL

ELABORATED	REVISED AND APPROVED
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## 1.- PRESENTATION OF THE CODE, MISSION AND OBJECTIVES

At present, society demands and demands greater quotas of responsibility, integrity and sustainability from organizations, and for this reason ENGINEERED LAND SYSTEMS, SL (hereinafter ELS) bases its strategy as a responsible and sustainable organization respecting and ensuring respect for the values and principles of this Code of Ethics and Conduct.

The objectives of this Code of Ethics and Conduct are:

- Make ELS stakeholders aware of the values and principles that serve as a guide to govern the different work and professional activities developed by the organization.
- Develop models and guidelines for professional, ethical and socially responsible behavior that should serve as a guide for all the organization's staff in the performance of their activities.
- Prevent the appearance of criminal and / or illegal behavior, as well as minimize its eventual impacts.

This Code of Ethics and Conduct is mandatory for all personnel of the organization regardless of the contractual modality that determines their employment relationship, position they occupy or geographical area in which they carry out their work.

## 2.- VALUES OF THE ORGANIZATION

ELS assumes the commitment to develop its activities with the highest level of honesty and respect for our values, which are:

### - ***Responsibility and Integrity:***

- Compliance with regulations, including anti-corruption, criminal regulation, money laundering and data protection, analyzing and resolving possible conflicts of interest that may arise in our activity.
- Act with transparency and integrity, showing respect for the rules that affect us.
- ELS is responsible for the results to its clients, associates, and other interested parties.

### - ***Quality and Commitment***

- ELS works daily with the passion of being able to bring high quality products to its customers. That work. That respond. All its efforts are focused on the complete satisfaction of the client and end user.

- ***Flexibility***

The ELS motto is: "Now you're in charge. Choose HOW, WHEN and WHERE you want the product. We adapt to you. "

- ***Innovation***

At ELS we are positive, creative, enthusiastic. We have eliminated "Can't" from our vocabulary. We CAN do it. Express everything you carry in your head, tell us what you need and, if it does not exist, we will invent it.

- ***International***

Think Global, Act Local. We have never been so close from one end of the world to the other. NO DISTANCES - NO LIMITS. We are International. We were born, grown, and learned with it. We are closer to you than you can imagine.

***Efficiency and competitiveness***

- We do research to detect business opportunities and be well informed regarding advances that can improve our competitiveness.
- We incorporate news in knowledge and its dissemination, as an asset that serves to improve our work and the satisfaction of our clients.

***Safety, health, workers' rights and the environment***

- ELS is set as essential objective respect for the right to the equality, the rights of the foreign workers, freedom of association, right to strike, preventing workplace harassment and protection of the child. In line with the foregoing, ELS will not sign working conditions that illegally restrict the rights of workers, will not hire workers without insuring or registering them with Social Security, will not launch job offers with deceptive working conditions, will not participate in any way in the trafficking illegal in hand of work.
- We protect the health, fulfilling strictly the prevention of occupational hazards. Training in the field of prevention of risks labor is compulsory for all levels of the company.
- We respect the environment, applying prevention policies, avoiding activities that involve environmental risk and trying to mitigate the environmental impact of our activity with specific measures such as promoting the recycling of the materials used or encouraging the use of less polluting resources.
- We comply with the corresponding sector regulations applicable to the environment wherever we operate.

***Professionalism***

- We care about the personal development and professional development of our workers. It is our human team that brings originality and added value to our products and services. Their good work constitutes one of the essential features of our company.

### **3.- CODE OF CONDUCT**

This document includes the organization's Code of Ethics based on ELS corporate principles and values, which serves as a guide to our culture of integrity and is mandatory in our company.

Regulatory compliance and ethical conduct are new perspectives of business activity whose objective is to avoid conduct that entails any type of non-compliance with national, regional or local regulations, transnational regulations or declarations or agreements agreed by international organizations.

Therefore, it is about monitoring not only compliance with all current legislation, but also with commonly accepted international agreements or protocols that affect the integrity of businesses.

The objective of ELS is to establish stable and long-lasting commercial relations of cooperation, based on honesty, transparency and trust, which allow minimizing the risk of violation of human and social rights, ensuring regulatory compliance, particularly in matters related to ethics and integrity in conduct.

With this Code, ELS is committed to making a positive contribution to society through its actions and expects that all groups with which it maintains business relationships are bound by these principles in their own activity, acting in accordance with best practices, complying with internationally accepted standards regarding transparency, business ethics, health, occupational risks, quality, preservation of the environment and Human Rights.

With this we want to record our recognition of what these values represent and our commitment to their application.

#### **3.1.- Integrity and responsibility**

All ELS professionals must act responsibly in their actions and in their relations with third parties. We must build trust and for this we must always act in good faith, guaranteeing the integrity of our behavior. This entails, among other attitudes, complying with the law, acting with transparency, taking care of formalities and maintaining ethical conduct.

#### **3.2.- Compliance with regulations**

- ✓ Know, respect and comply with the laws of the territories or countries in those who carry out our activity, as well as the procedures and regulations internal that in his case are of application.
- ✓ The compliance both with the law and with the planning law is a primary mandate for ELS at all times and anywhere where it does business enterprise.
  - ✓ All the partners must comply with the laws and regulations of the legal system within

which they operate.

- ✓ Failure to comply with the law should be avoided under all circumstances.
- ✓ An illegal or inappropriate behaviour on the part of a single of our collaborators can cause damage to the company.

### **3.3.- Against corruption, money laundering and financing of terrorism**

- ✓ Integrity and avoid the corruption, as essential requirement for any action.
- ✓ Comply with all the laws and regulations applicable related to public procurement, including laws prohibiting any operations to influence how inadequate staff in public. Neither directly, nor indirectly, it should offer, promise, grant or authorize actions to influence any administrative or official procedure.
- ✓ Do not engage in improper negotiations with authorities and / or officials public or offer or grant to these nor to officers, employees or partners outside entities benefit or advantage of any kind that is out of the licit uses of the market or that could be construed as aimed at improperly influencing the normal development of commercial, administrative or professional relationships.
- ✓ At ELS we comply with the regulations regarding money laundering and / or terrorist financing, not allowing, as a general rule, payments and collections in cash. Any exception must be properly documented and authorized, be of a small amount and respect compliance with current local legislation on the matter.

### **3.4.- Ethical conduct. Free competition and good market practices**

- ✓ Comply with all special rules governing the export and subject to the controls of customs applicable in those countries where we do business. Respect the applicable economic blocks in accordance with international standards, and the guidelines or procedures that affect the country of origin or destination or the type of business, object or material in question.
- ✓ The company bases its performance in the market on the principles of free competition and equal opportunities, discarding any action aimed at obtaining an unfair or illegitimate benefit, use or advantage over supplier clients, competitors and other players in the market. Unethical practices or conduct should not be carried out, violating the law, can damage the reputation of ELS.
- ✓ Competing with the quality and price of our products and services, not by offering improper benefits to third parties. At no time will false indications or promises be made to a client or to the market about the qualities or characteristics of an own product or that of the competition.
- ✓ Each employee must be aware of maintaining and promoting the good reputation of ELS in the corresponding country.

- ✓ Select contractors, suppliers, suppliers or collaborators under criteria of objectivity, impartiality, integrity, capacity and non-discrimination, promoting competition and fair treatment in business, with the aim of being a benchmark in ethical behavior.

### **3.5.- Confidentiality**

- ✓ The organization's objective is the protection of privacy and personal data. All levels of the company must be committed to this goal.
- ✓ The organization implements security measures established in current data protection regulations based on the level of sensitivity of the data being processed. These measures are applicable to data stored on computer and paper media. Compliance will be controlled internally, as well as the suppliers. All levels of the company have an obligation to respect and enforce these security measures.
- ✓ The required reserve and confidentiality must be maintained regarding the information provided to us for the development of our work, especially everything that affects intellectual and industrial property and other intangibles of the company or of the third parties with which it is related.
- ✓ Maintain the confidentiality of ELS information that has not been made public and that affects internal matters concerning the organization and equipment of the company, prices, sales, benefits, markets, customers, manufacturing, research, development and other aspects or internal and non-public business figures.
- ✓ Maintain confidentiality with regard to non-public information relating to suppliers, clients, collaborators, agents, consultants and other third parties in accordance with legal and contractual requirements.
- ✓ Protect confidentiality even after the termination of the corresponding relationship, since the publication of confidential information could harm businesses or clients regardless of when it is published.

### **3.6.- Impartiality and conflict of interest**

- ✓ The organization opposes any criminal activity that is discussed in the field of business activity based on an abuse of power by those people who, within the mercantile companies, exercise functions, both in fact and in law, and alter the proper functioning of the company, even deteriorating the assets of third parties.
- ✓ Avoid situations that compromise impartiality in the performance of our duties and warn of any conflict of interest that affects our activity or decision, as well as those that may affect our collaborators. Such conflict will be reported, analyzed and resolved by the corresponding internal body.
- ✓ Refrain from participating in any management in which there could be a conflict between personal interests and those of ELS.
- ✓ Avoid conflicts of interest or even the appearance of conflict of interest, both our own and those of our collaborators.
- ✓ Make business decisions in the interests of the company and above personal

interests.

- ✓ Avoid getting involved in activities that may produce situations of preference of personal interest over the interests of the company.
- ✓ Inform the management team of any personal interest that may exist in relation to the performance of their professional obligations.
- ✓ Avoid using companies with which the company has business dealings for personal activities, if any personal advantage could be derived from this.

### **3.7.- Responsible and efficient use of assets**

- ✓ Make efficient use of the assets, material, economic or any other type of resources that ELS makes available to us for the development of our work.
- ✓ Only use the organization's equipment (telephones, photocopiers, computers, machines.) that are adequate and reasonable and proportionate to the purpose for which they are to be used.
- ✓ Make intelligent and efficient use of these resources, using them as much as necessary for the activity of the company but ensuring proper maintenance of them.
- ✓ Seek responsible consumption of products that may have an environmental impact. Implement "paperless office" work systems whenever possible.

### **3.8.- Truthful information and confidentiality**

- ✓ Ensure the traceability of all our negotiations and provide the information that is necessary for the proper functioning of the internal control systems established by the company, duly documenting business relationships and helping to identify or correct deficiencies or weaknesses in management control procedures.
- ✓ Handle and transmit only truthful and relevant information. Always have clear communication, both internal and external, based on accurate and verified information.
- ✓ Maintain effective processes and controls so that transactions are documented and executed as authorized.
- ✓ Detect and prevent unauthorized use of information.
- ✓ Ensure that the company's reports, whether they are to be included in a public record of an official body or if they are to be used for private commercial transactions, reflect complete and accurate data and conform to the principles and standards that are applicable.

### **3.9.- Professional responsibility**

We dedicate our efforts to getting to know the customer, offering products and services according to their needs, seeking excellence and placing customer satisfaction as a priority of our service. We devise, design and market products and services of the highest quality,



providing our customers with differential value compared to the rest of the market offers.

We transparently communicate the characteristics of our products and services, providing rigorous, truthful, complete and understandable information.

ELS professionals are committed to:

- Apply quality and excellence at all levels of business activity.
- Extend the culture of quality throughout the company and all its activities.
- Encourage teamwork and support the personal development of each professional.
- Encourage people to link to the objectives of the company.
- Create a stimulating and collaborative work environment.
- Value personal effort so that merit is recognized and rewarded.
- Encourage people to grow professionally and improve every day.

### **3.10.- Responsibility with clients, suppliers and public officials**

- ✓ All ELS employees, as well as any associated representative, are obliged to act, in their relationships with clients, suppliers and public officials, in accordance with criteria of consideration, respect and dignity, taking into account the different cultural sensitivity of each person and not allowing discrimination in treatment based on race, religion, age, nationality, gender or any other personal or social condition prohibited
- ✓ The selection of suppliers will be governed by criteria of objectivity and transparency, reconciling the interest of the company in obtaining the best conditions, with the convenience of maintaining stable relationships with ethical and responsible suppliers. All suppliers that work with ELS must commit to respect the human and labor rights of all employees hired, as well as to involve and transmit these principles to their business partners. The violation of any of these principles will in no case be accepted by ELS. Likewise, suppliers are obliged to respect all the anti-corruption regulations identified in instruction IT06-01 Ed.2 that can be found on the company's website. [www.els-industries.com](http://www.els-industries.com) .
- ✓ ELS staff, as well as any associated representative, undertakes not to receive any gift, gift, gift or favor from suppliers that go beyond a promotional gift or an item for the common benefit of the company. In any case, any delivery of gifts or gifts must be notified to the address to determine acceptance or return. Any type of cash gift is strictly prohibited.
- ✓ Clients, for their part, undertake and accept the general conditions of sale IT03-01 Ed.0, which include commitments on anti-corruption matters. As a general rule, no ELS employee may offer, grant, request or accept, directly or indirectly, gifts or gifts, favors or compensation, whatever their nature, to or from any clients, authorities or officials. Only gifts and entertainment of little value that are proportional and reasonable according to legal practice, transparent, given for legitimate, socially acceptable, and sporadic interests are excepted from the previous rule, to avoid that their content or regularity could lead to a independent third party to doubt the good faith of the employee or the company. Cash gifts are expressly prohibited.

### **3.11.- Equality and non-discrimination**

- ✓ Respect and constantly promote the principles of equality, diversity, respect for the diversity of people and non-discrimination.
- ✓ Comply with the rules on equality and not tolerate any type of discrimination for reasons of age, race, color, gender, religion, ideology, belief, sex, sexual orientation, social or ethnic origin, physical capacity, pregnancy, health status, physical or mental handicap, public opinion, union membership, marital status, relationship with other workers or use of any language. Reject any attitude of abuse of authority, workplace harassment or conduct that offends people's rights.
- ✓ Respect the reservation of social hiring for the disabled in accordance with the applicable legislation.
- ✓ Maintain a productive environment in which workers are treated with dignity and respect.
- ✓ Comply with the rules on wages, working hours, remuneration, social benefits and breaks for workers, promoting and maintaining the conciliation between the professional and personal life of workers in accordance with the applicable legislation and the World Labor Organization Conventions.
- ✓ Respect the right to privacy in all its manifestations, with special attention to personal information.
- ✓ Respect the free choice of employment, rejecting forced or compulsory labor, as well as child labor.

### **3.12.- Security and health at work**

- ✓ Protect health, strictly comply with occupational risk prevention measures.
- ✓ Protect the health and safety of professionals at work in accordance with the laws. Adopt the best possible accident prevention measures.
- ✓ Defend healthy lifestyle habits. Avoid the influence of tobacco, alcohol or drugs in the professional environment.
- ✓ The withdrawal or neutralization of any safety or ergonomic measures implemented in the workplace is prohibited.
- ✓ All the work carried out in the company will have a prior evaluation of the risks it generates and an identification of the security measures to be implemented. These measures cannot be withdrawn.
- ✓ Respect the notices and signs indicating risk warnings, security obligations and prohibitions.
- ✓ Respect the environment, developing prevention policies and avoiding activities that pose environmental risk.
- ✓ Carry out activities respecting the environment and continuously improve the environmental aspect of the company through ecological production and the preferential use of ecological products.
- ✓ Ensure compliance with the laws and establish work procedures, which contemplate

- a design that respects the environment, technical safety and health protection.
- ✓ Commit all company workers to their duty to contribute to the preservation of the environment with their own behavior.

### **3.13.- Extension of commitment**

ELS expects its suppliers, vendors, contractors or collaborators to act in accordance with these principles and:

- Comply with all applicable laws.
- Respect the confidentiality of information that is of this nature and is not public.
- Guarantee the privacy of personal data.
- Do not participate in acts of corruption.
- Respect the basic human rights of your employees.
- Comply with laws that prohibit underage work and forced labor.
- Comply with the regulations regarding the preservation of health and occupational safety.
- Act in accordance with the laws relating to the protection of the environment.
- Have integrity in their business relationships.

### **4.- KNOWLEDGE AND EXTENSION**

The culture of integrity must be known and applied by all your staff. This Code is fully incorporated into business activity, promoting its dissemination and extension throughout our sphere of influence.


The ethical culture in an organization must come from the management team and be transmitted to all employees through exemplary personal behavior and clearly committed to these standards. In this way, the ELS management team assumes a special commitment with this code, that of becoming a promoter of these values.

Exemplary conduct is the main channel of transmission of principles that must always be kept alive and in which all professionals who work with us must participate.

Each person in the organization must know, share and value the importance of ethical conduct and incorporate it into their daily activities.

Conduct is a fundamental attitude required and promoted in ELS, which through this code is always defined as mandatory, in all activities and in all circumstances. Therefore, the company will value and encourage compliance, and will penalize its violation accordingly.

### **5.- COMMUNICATION**

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The ELS professionals to whom it is addressed must commit to its application and guide their way of working, their protocol for relations with clients and suppliers, their use of available resources and, ultimately, their way of doing business and creating a company.

Through the following contact method: [compliance@els-industries.com](mailto:compliance@els-industries.com), communications will be made to identify breaches of the Code and prevent potential weaknesses, as well as making inquiries and suggestions for improving internal control.

Communications to the Channel are received and processed, guaranteeing their confidentiality by the Organization's Compliance Officer.