



<b>AP10C01</b>		
<b>Version: 03</b>	<b>BUSINESS ETHICS POLICY JOSE NICOLAS GONZALEZ, S.L.</b>	

# **AP10C01**

## **BUSINESS ETHICS POLICY**

### **JOSÉ NICOLÁS GONZÁLEZ, S.L.**


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The company JOSE NICOLAS GONZALEZ, S.L., has a Business Ethics Policy, which binds and will be respected by all the directors, middle management and employees of JOSE NICOLAS GONZALEZ, S.L. Its rules and guidelines will be complied with by all the company's employees.


No kind of non-compliance with this code will be tolerated or ignored and no employee who reports suspicious activities, illegal or contrary to this Code may be sanctioned for this reason.

This code of BUSINESS ETHICS obliges executives, middle management and employees to comply with:


- Not to engage in conduct that they know or believe to be illegal or that lacks the minimum ethical standards required by JOSE NICOLAS GONZALEZ, S.L.
- Not to use any property of the company to which it belongs for profit without prior consultation.
- Not to participate in any transaction that does not have a legitimate business purpose.
- Refrain from any conduct based on deceit and/or lies and/or dishonesty.
- To consult on any doubts arising in the application of the provisions of this Code.
- Preserve honesty and transparency: in everything you do, you must be faithful to our clients and our colleagues. No circumstances may justify lying, deceit or dishonesty.
- Work under respectful, dignified and non-discriminatory conditions.
- JOSE NICOLAS GONZALEZ, S.L. is committed to providing all its managers and employees with fair working conditions.
- Harassment or discrimination between colleagues, between superiors and subordinates and/or between subordinates and superiors based on race, sex, sexual orientation, beliefs, ideology, religion, social origin, disability, nationality, age or any other circumstance will not be tolerated.
- Treatment and forms of address to colleagues, between superiors and subordinates, and between subordinates and superiors must always be cordial, polite and respectful, eliminating any haughty, hostile, humiliating or rude element from communication. Harassment of any kind and any behavior or atmosphere at work that does not comply with the provisions herein is strictly forbidden and proscribed.

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- It is strictly forbidden to hire personnel who do not meet the minimum legal age for access to employment and the imposition of conditions in the performance of duties that involve any form of slavery, subjugation, trafficking of workers or that restrict or suppress the rights and working conditions recognized in the laws or collective bargaining agreements in force. JOSE NICOLAS GONZALEZ, S.L. recognizes the right of its members to form part of trade unions and workers' unions.
- All services provided by JOSE NICOLAS GONZALEZ, S.L. are professional, independent, impartial, honest and ethical, observing all methods, practices and policies in force for all interested parties.
- The documents generated in the production process of JOSE NICOLAS GONZALEZ, S.L. must faithfully reflect the results obtained and follow the opinion and behavior of an ethical and responsible company.
- All financial and accounting operations carried out at JOSE NICOLAS GONZALEZ, S.L. will comply with current legislation.
- No manager or employee of JOSE NICOLAS GONZALEZ, S.L. will modify or alter any type of documentary support, tangible or intangible, and may be sanctioned if they do not, and such action may constitute a very serious infraction that could lead to internal disciplinary measures.
- Procurement of goods and services must be carried out with transparency and fairness, in order to ensure the highest quality and the best competitive price.
- Contracts shall not be entered into on the basis of personal preferences, in transactions and contractual relationships.
- It is forbidden to use confidential, privileged, relevant or sensitive information of the company to acquire commercial advantage in a personal capacity, directly or indirectly.
- All managers and employees of the company are obliged to comply with and abide by the law in the performance of their respective jobs and activities.
- It is forbidden to mislead consumers by disseminating false information or information which, although truthful, may mislead them by its presentation or content in such a way that it appears to be likely to alter their economic behavior.
- It is prohibited to engage in behavior that is likely to significantly impair, by means of harassment, threat, coercion or violence, the consumer's freedom of choice or conduct in relation to the good or service, affecting his economic behavior.

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- Disclosure to third parties of inside company information or investment recommendations based on such information is prohibited.
- The acceptance or offer of gifts and/or unlawful advantages that may influence decisions in the public or private sector, as well as actions that may violate any rights, is prohibited. Such inducements may take the form of gifts, presents, bribes, excessive hospitality or hidden commissions, among other forms.
- They also include political donations, unless they have been disclosed, comply with the law or have been previously authorized by the company.
- Respect, care and promotion of the environment is one of the main values of JOSE NICOLAS GONZALEZ, S.L.: it undertakes to carry out its activities in compliance with current environmental legislation and to encourage all its managers and employees to manage their tasks in an environmentally respectful and sustainable manner.
- To this end, JOSE NICOLAS GONZALEZ, S.L. carries out its activities reducing to a minimum the environmental impact they may have on the environment, always seeking a balance between nature and progress.
- All managers and employees are obliged to comply with the environmental regulations that must be observed in the performance of their duties and strictly follow the internal protocols and procedures implemented for this purpose on environmental protection.
- JOSE NICOLAS GONZALEZ, S.L., is committed to providing a safe, healthy and dignified workplace. Compliance with the regulations on the prevention of occupational hazards is an unavoidable obligation for us.
- It is also the responsibility of its employees to observe and comply at all times in the execution of their professional tasks with the regulations implemented by the company to prevent accidents and to promote a correct working environment that meets the requirements of health and hygiene.
- Any subcontracted company or company that provides a service or carries out an activity must comply with the provisions of this Code and AP0A04- JOSE NICOLAS GONZALEZ, S.L. Supplier Code of Conduct.
- Not to promise, offer, grant, accept or request, directly or indirectly, any advantage or benefit (financial or otherwise) to companies or their managers, employees or their relatives, in order to be favored in the acquisition or sale of goods or the contracting of any service.
- It is forbidden to falsify in any way the annual accounts or documents of the company.
- It is prohibited to engage in conduct identified with money laundering.

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- It is prohibited to engage in criminal conduct against the tax authorities, social security authorities, the competent health authorities, the competent environmental authorities and the Ministry of Labor.
- Not to engage in clandestine activities.
- It is forbidden to establish deposits or dumps of solid waste or toxic or hazardous liquids without being duly authorized.
- Not to obstruct any inspection activity.
- Not to manufacture, supply, steal or market harmful substances or chemical products that may cause harm to consumers who are going to consume the products we manufacture.
- It is forbidden to manipulate loading/unloading orders in such a way that data on weight, content, characteristics or elements other than those received or loaded are manipulated.
- It is forbidden to carry out professional activities in disregard of any regulations applicable to the execution of the work assigned.
- It is forbidden to disable, frustrate or circumvent any security measure deployed to safeguard the safety of the worker.

From JOSE NICOLAS GONZALEZ, S.L., we would like to thank you for your commitment and compliance with our company's code of business ethics.

San Pedro del Pinatar, Murcia, 3rd June 2024



CEO: Samuel Nicolás González