






CODE OF ETHICS AND CONDUCT



CODE OF ETHICS AND CONDUCT

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(*) Signature on behalf of the Compliance Committee.

LIST OF REVIEWS

Rev.	Date	Modifications
00	26/01/2015	Original edition
01	23/11/2015	Update due to the development of the Compliance Model in accordance with the requirements of Article 31bis of the Criminal Code.
02	23/03/2018	Update of corporate values. Adherence to the Global Compact.
03	06/07/2020	Update of principles in business ethics, equality, working conditions and human rights derived from the review of the organisation's risk map

[Changes with respect to the previous review, marked in blue in the document]

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1 EFFECTIVE DATE

This document, its contents and amendments to the previous version, if any, shall enter into force without any retroactive effects from the date shown in the footnote to the document.

2 SCOPE AND APPLICABILITY

This Code of Ethics and Conduct (hereinafter the Code of Ethics) sets out the guidelines and standards of behaviour to be followed in order to bring conduct into line with the values of the Sesé Group. All Sesé Group members and collaborators must conduct themselves transparently and with integrity regarding the applicable laws and regulations.



SESÉ GROUP STAKEHOLDERS

This Code of Ethics applies to all companies in the Sesé Group and its Foundation.

It links together all its employees, managers and members of the administrative bodies, as well as all those workers or collaborators who are not included in the Company's staff.

This Code is endorsed by the Board of Directors, and compliance is monitored by the [Compliance Committee](#), which is appointed for this purpose.









Its enforceability will be extended, by contract, to the companies, suppliers or subcontracted persons that provide the Group with services.

The Sesé Group will make this Code of Ethics publicly available and encourage its suppliers, subcontractors and collaborators to take on its principles and contents as their own.

3 SESÉ GROUP VALUES

Everyone in the Group must understand and comply with the expectations of this Code regarding how to act in the work environment and in the business environment.

The values of the Sesé Group are:

 RESULTS ORIENTATION	 TEAMWORK
 CUSTOMER FOCUS	 ETHICS AND INTEGRITY
 EXCELLENCE	 INNOVATION
 SENSE OF BELONGING	 PASSION

Since September 2016, the Sesé Group has been a **signatory to the United Nations Global Compact** and explicitly supports the 10 principles of this pact relating to human rights, labour rights, the environment, and the fight against corruption.



On an annual basis, the Sesé Group publishes its **Corporate Social Responsibility Report**, prepared in accordance with the essential standards of the Global Reporting Initiative according to the GRI Standards document published in 2016.

This Report is also the tool used for presenting information on the status of the non-financial position of the Sesé Group and, therefore, forms part of the organisation's management report, thus responding to the requirements of Law 11/18 on non-financial information and diversity.



Through the use of an external audit carried out by an independent body, this Report is verified annually against GRI requirements and the requirements of Law 11/18.

4 ACCEPTANCE AND COMPLIANCE





The conduct set forth in this Code is **mandatory** for all personnel **within the “Scope and Applicability” of Section 2 of this document**, in the performance of their professional activity in the Group **or in the development of their collaboration with the Group**.

This conduct must also be enforced, and part of this commitment is to report any non-compliance by other individuals, if applicable. **Failure to comply with this Code may be sanctioned** in accordance with the regulations in force, without impairing the other responsibilities the offender may have.

The application of the content of this Code may not, under any circumstances, result in the violation of applicable legal provisions, nor should it be understood as a limitation of workers' rights.

The Sesé Group has a **Compliance Committee** whose function is, inter alia, to ensure that codes and policies of conduct are properly defined, to ensure their implementation, to deal with and resolve any incidents arising from the application of the Code of Ethics, and to follow up on any complaints made.

As a member and/or collaborator of the Sesé Group your obligation is:

	To be aware of the behaviour guidelines established in this document.
	To apply and comply with the above-mentioned practices.
	Not to tolerate behaviour that violates this Code of Ethics.
	<p>To consult if in any doubt:</p> <ul style="list-style-type: none"> ▪ Your line manager. ▪ The HR Department. ▪ The Compliance Committee. ▪ Anonymously through this email: canal-etico@gruposese.com

Any employee, collaborator or third party related to the Sesé Group who becomes aware of conduct that may constitute a breach or violation of this Code may report it confidentially by sending a message to the e-mail address:



canal-etico@gruposese.com

All complaints received will be treated confidentially and the identity of the complainant will be protected.

Retaliation of any kind against employees or third parties who report an illegal practice, infringement, or breach of regulations from the point of view of good faith and good practice will not be tolerated.

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The Sesé Group has a totally confidential complaints channel available for any doubts, suggestions regarding improvements to the model or complaints about alleged behaviour that goes against the principles and rules of the organisation's model.

This is the working outline a complaint should follow when activated through the ethics channel:



This communication channel can also be used for queries and/or questions.

Before deciding, you need to ask yourself the following key questions:

	Is the action within the framework of the reference legislation?
	Is the action in line with the Sesé Group's values and/or policies?
	Would you act the same way in similar cases?
	If it were someone else who was behaving like this, would you support them? Would I find this behaviour appropriate and/or professional?
	If this behaviour were made public, would it be considered appropriate and/or professional? Would you still support the decision?
<p>If all the answers are yes, the behaviour is in line with the Sesé Group's principles and values. If any of the answers are negative or you do not know what to say, consult the Ethics Channel.</p>	
	canal-etico@gruposese.com

5 BASIC PRINCIPLES OF THE CODE OF ETHICS AND CONDUCT

In all its strategies, the Sesé Group is committed to going beyond the gaining of respect, i.e., it is not enough not to cause negative impacts on stakeholders and society as a whole, but rather it advocates acting as an agent of development, launching initiatives aimed at causing positive impacts that change the way business is done and provide a real return for society as a whole.

The Sesé Group assumes as essential the principles of honesty, justice and integrity and is committed in all its activities to respect human rights and to establish, where necessary, mechanisms to evaluate, verify and guarantee their compliance.

The **basic principles** that guide the Sesé Group's activity are as follows:

	<p>To pursue strict compliance with the law and internal regulations.</p>
	<p>To guarantee equality, fairness, respect and dignity in the treatment of all employees, collaborators, partners, suppliers, competitors and other related third parties.</p>
	<p>To work for the protection of the most vulnerable groups.</p>
	<p>To safeguard a responsible commitment to health and safety. The prevention of accidents and the assurance of safety in the development of activity will run in parallel to the Group's activity.</p>
	<p>To develop activities while showing respect for natural resources and natural heritage, adopting a preventive approach that favours the environment, thus seeking to achieve sustainable business development through the use of environmentally friendly technologies and pursuing economic prosperity without losing sight of social justice and environmental protection.</p>
	<p>To ensure transparency, objectivity and professionalism in the development of all activities and relations with all stakeholders.</p>
	<p>To respect the right to privacy of the Group's employees and collaborators, adopting the necessary measures to preserve the confidentiality of personal data and protect the intellectual and industrial property of third parties.</p>

All the Group's employees and collaborators must be aware of and respect these **principles**, they must become really acquainted with them and reflect them in all their actions.

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STRICT COMPLIANCE WITH THE LAW AND INTERNAL REGULATIONS

The law and the internal regulations imposed by the Group must be observed and complied with. Illegal practices and non-compliance with regulations will not be tolerated within the Group, and appropriate information must be provided when these situations are detected. It is everyone's obligation:

- ✔ To be aware of the laws affecting the scope of the work undertaken, requesting, if necessary, the precise information through the line manager concerned or making use of the appropriate instruments and bodies.
- ✔ To scrupulously comply with internal regulations and legislation in force, both in Spain and in the other territories where the Sesé Group operates.
- ✔ In relations with suppliers (contracting processes and execution of contracts), to strictly comply with laws, rules and procedures, ensuring neutrality, objectivity and non-discrimination.
- ✔ Not to knowingly collaborate with third parties in the violation of any law, nor participate in any action that compromises respect for the principle of legality, even if the order was given by a superior.
- ✔ To inform Sesé Group competent bodies of any action that is contrary to current legislation.

Procedures and policies in place should be followed, and if needs are identified that require changes or improvements, they can be proposed to the appropriate manager or by using the email canal-etico@gruposesese.com.



Since 1999, the Sesé Group has been **certified with ISO 9001** "Quality Management System".

Since 2016, the Sesé Group has been **certified under IATF 16949** (formerly ISO TS 16949).

Since 2017, Sesé Group is a **Tier 1 "A" supplier qualified according to Formel Q**.

Since 2018, the Sesé Group has held the **AEO** (Authorised Economic Operator) **certificate** and **IATA accreditation**.

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EQUALITY, EQUITY, RESPECT AND DIGNITY AT WORK

In all labour, commercial and social relations, the utmost respect, fairness and dignity in terms of treatment shall prevail, in as far as relations with employees, collaborators, partners, suppliers and competitors are concerned, as well as regarding other third parties linked to the company.

Activities will be carried out against a backdrop of absolute and constant **respect for the Human Rights and Public Freedoms** included in the Universal Declaration of Human Rights.

- 👍 All staff have the right to have their dignity respected and are obligated to treat those with whom they interact for work purposes with respect. The Sesé Group defends these principles of **equality** through its **Equality Plans** and policies for the prevention of sexual **and/or labour** harassment.
 - Sexual harassment, bullying and/or discrimination on the basis of **sex, race, religion, gender identity, marital or maternal status, age, political affiliation, nationality, disability, sexual orientation, ethnicity or any other dimension of identity** is prohibited.
 - Such behaviour will not be permitted or tolerated under any circumstances. It must not be overlooked. And it will be robustly sanctioned. **The company is committed to establishing mechanisms for the detection of new inequalities, as well as to implementing the necessary procedures that contribute to continuous improvement within the area of equality.**
- 👍 Offensive, intimidating, discriminatory, malicious, humiliating or demeaning behaviour, harassment, etc. towards employees or third parties linked to the Group is not permitted and will be reported if appropriate. All individuals and entities will be treated in a non-discriminatory fashion and objectively. **Any abuse of a situation of superiority (the power to take decisions) for the possible purpose of imposing forced labour or exploitation for criminal activities will not be permitted.**
- 👍 All the Group's employees and collaborators are committed to creating a dignified, safe and professional working environment that supports and respects people, their rights, their dignity, their personal conditions, and that promotes **mutual respect** and collaboration. **Any behaviour that creates an intimidating, hostile, humiliating or offensive working environment must be avoided.**
- 👍 The Sesé Group believes that the comprehensive development of its employees is positive both for them and for the company, which is why it encourages measures aimed at achieving a balance between the family/personal and professional responsibilities of its employees.
- 👍 The processes of selection and promotion, both internal and external, will be based only on the professional qualifications and abilities of the candidates and guided by objective criteria regarding competence.
 - All employees shall be given equal opportunities in their professional career, always based on the **principle of merit**.
 - In these processes, inclusion and diversity will be promoted, without allowing the influence of other factors which could affect the objectivity of any decision.
 - Direct family members of a person subject to this Code may not be candidates for positions that are hierarchically or functionally dependent on their family member. Family status does not make up for the absence of skills requirements. In the event that selection team family members are taking part in any vacancy filling process, either through external or internal selection, this fact will be communicated to Corporate HR Management.
- 👍 The Sesé Group is committed to developing training plans to ensure all employees are properly trained, plans which specify the tasks and objectives for each one of them. Likewise, the Sesé Group is committed to **promoting the talent** of its employees through training and coaching in their jobs. **It also undertakes to apply the maximum objectivity and rigour in performance evaluation processes.**
- 👍 In all countries where activity is carried out, both labour and wage legislation will be complied with. This commitment is extended to temporary employment, outsourcing and the recruitment companies we collaborate with.
 - Remuneration policies must be based on the principles of equity, competition and equality.
 - Freedom of association and negotiation must be guaranteed.
 - Abusive labour practices will not be tolerated. Forced labour practices are prohibited.



PROTECTION OF THE MOST VULNERABLE GROUPS

The Sesé Group will not tolerate any form of forced labour or labour obtained through threat, punishment or coercion, focusing on the most vulnerable groups.

- 👍 The Sesé Group recognises and protects the basic rights of children in accordance with the precepts set out in the Convention on the Rights of the Child and the United Nations International Bill of Human Rights.
- 👍 Thus, the Sesé Group is committed to protecting children's rights by prohibiting any activity that involves economic exploitation, as well as the performance of any work that is potentially dangerous or that prevents access to their education, or that is harmful to their health or physical, mental, spiritual, moral or social development.
- 👍 It is mandatory to comply with the minimum age provisions set out in the legislation of the country in which projects are carried out, and to comply with international provisions on the matter.
- 👍 Appropriate and reliable mechanisms will be used to verify the age of recruitment, as well as the specific mechanisms defined in terms of occupational safety for the development of their functions within the company.

The Sesé Group works actively, through the Sesé Foundation and its Special Employment Centres, to promote and facilitate the **social and labour integration of disabled people and/or people at risk of exclusion** through the development of sustainable employment projects. At all times, work will be done to ensure full universal accessibility in the working environment for people with disabilities.



Since 2017, the Sesé Group has held the **RSA Seal** (Social Responsibility of Aragón) from the Government of Aragón.

Since 2018, the Sesé Group has held the **RSA+ Seal** for its initiatives in the areas of equality, reconciliation, corporate volunteering and the dissemination of culture.

The Sesé Foundation has been awarded the **Exceptional Solidarity Certificate** for promoting the inclusion of people with disabilities into the workplace.

**COMMITMENT TO HEALTH AND SAFETY**

The Sesé Group promotes initiatives on the **safety, protection and prevention of occupational risks** and establishes the necessary lines of action through its **Occupational Risk Prevention Plan**, in order to adequately manage and mitigate the risks associated with the Group's activity.

These plans are periodically reviewed and the necessary resources are provided for their maintenance and improvement.

- 👍 The concept of a preventive culture will be promoted in order to create **safe and healthy working environments**.
- 👍 Peoples' safety will be prioritised with the clear objective of **zero accidents**, opting for safe and healthy working conditions that encourage the prevention of injuries and/or accidents.
- 👍 Healthy habits will be promoted that aim to improve the physical health, emotional well-being and quality of life of the organisation's staff both inside and outside the workplace.
- 👍 The Occupational Risk Prevention Plan will be based on the use of technologies, elements and systems that help to improve health and safety in the workplace.
- 👍 The prevention of accidents and ensuring safety in the development of the Group's activity will always go hand in hand with such activity and operations.
- 👍 Employees and collaborators will be trained so that they can adequately carry out their tasks, prioritising safety in all areas. They are also provided with all the resources necessary to ensure such safety.
- 👍 Working under the influence of alcohol or drugs will not be tolerated. Such behaviour is strictly forbidden and will lead to the imposition of the maximum penalties envisaged under existing legislation. Under no circumstances is the possession, sale, consumption or distribution of illegal drugs allowed in the workplace or its facilities.



Since 2012, the Sesé Group has been **accredited with SQAS** (Safety & Quality Assessment for Sustainability) and promotes safety-based behaviour.

Since 2018, the Sesé Group has been a **signatory of the Luxembourg Declaration** on health promotion at work in the European Union.

The Sesé Group has had an **ISO 45001 certification** for "Occupational Health and Safety Management Systems" since 2019.



COMMITMENT TO THE ENVIRONMENT

The Sesé Group is committed to a philosophy of sustainability that helps the organisation to be an integral and active part of climate change mitigation:

- 👍 The Sesé Group will carry out its activities showing **respect for natural resources and natural heritage**, promoting the conservation of the environment, biodiversity and areas of special ecological, scientific or cultural interest.
- 👍 **Environmental legislation will be scrupulously respected** and the most appropriate processes and techniques will be applied to identify the risks of any activity, to control and minimise the associated environmental aspects and to assume any environmental responsibility that may be generated by the provision of any service.
- 👍 The adoption of a **preventive approach that favours the environment** will be undertaken, an approach that achieves sustainable business development through the use of environmentally friendly technologies and pursues **economic prosperity without losing sight of social justice and environmental protection**.
- 👍 It will adopt a plan to measure, communicate, reduce and compensate for its **carbon footprint**, as a strategy for the progressive reduction of **greenhouse gas** emissions and the improvement of the **air quality**.
- 👍 Opting for the application of technologies and practices that lead to a responsible use of natural resources will be encouraged, favouring the reduction in consumption of **energy, water, raw materials** and other **natural resources**.
- 👍 Initiatives aimed at reducing the generation of **waste** and **dumping** will be encouraged.
- 👍 Procedures will be implemented for restricting the use of **chemicals and products which pose a danger** to health and the environment.
- 👍 In compliance with the requirement for a commitment to the environment, the Sesé Group has an **Integrated Management Policy**, which must be complied with by all employees, managers and members of the administrative bodies.
- 👍 **Good Practice** in Environmental Management has been defined and the necessary **operational procedures** for its implementation have been put in place.



Since 1999, the Sesé Group has had the **ISO 9001** "Quality Management System" certification. Likewise, since 2015, the Sesé Group has had the **ISO 14001** "Environmental Management System" certification.

Since 2019, the Sesé Group has been externally verifying its **carbon footprint**.

Since 2019, the Sesé Group has had a **Chair at the University of Zaragoza**, which aims to develop innovative solutions for supply chains with a view to reducing their **carbon footprint**.

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TRANSPARENCY, OBJECTIVITY AND PROFESSIONALISM

The Sesé Group as an entity, its employees, collaborators and managers, will base their internal relations and relations [with their stakeholders](#) on **ethics, honesty, professionalism and transparency**.

Corruption is understood to mean: "the soliciting, offering, giving or accepting, directly or indirectly, of a bribe or any other undue advantage, or the promise of an undue advantage which affects the normal exercise of a function, or the required behaviour of the recipient of such bribe, undue advantage or promise of an undue advantage."



This is dishonest behaviour that in practice has at least two protagonists:

- the party who fraudulently uses their powers or influence to favour third parties in return for a benefit;
- and whoever proposes or provides this benefit.

Furthermore, a person who favours an act of corruption will be considered an accomplice, and a person who takes advantage of this act by receiving an undue advantage in return will be considered a recipient. Both people will incur responsibility.

- 👍 The fight against **corruption** and fraud is fundamental to the development of the Sesé Group's activity. It is not only a question of each Sesé Group employee behaving impeccably, but also one of each employee taking part in the corruption prevention system while carrying out their daily work.
- 👍 The Sesé Group **does not permit the falsification, concealment or simulation of data, entries or accounting operations**, the keeping of double-entry books for the purpose of evading payment or obtaining any illicit profit, to the detriment of the tax or social security authorities.
- 👍 The **accounting of contracted operations** shall be carried out **with accuracy** and rigour and the required files and records shall be maintained with equal criteria. The personnel responsible for accounting are obligated to prepare any accounting information in accordance with the true and fair view of the Group's assets and financial situation.
- 👍 The Sesé Group shall establish those internal controls and management systems it considers most appropriate at any given time to ensure the **reliability of financial information** and the accuracy of the organisation's records.
- 👍 **Legitimate and honest competition** will be facilitated, avoiding any harm to competing individuals or entities. **Any practices involving unfair competition are prohibited** and compliance with applicable laws on competition in countries where it operates will be actively ensured.
- 👍 **Relationships with suppliers** or any type of provider, contractor or collaborator will be guided by **impartiality and objectivity**, with the application of rigorous criteria regarding suitability, quality, efficiency and cost. [This applies both to personnel in the Purchasing areas and to any person in the organisation who deals with or has a relationship with suppliers.](#) Suppliers shall be selected through objective and transparent processes in accordance with the relevant procedures and requirements defined in the General Terms and Conditions of Purchase.
- 👍 The Sesé Group as an entity, and all its employees and managers, shall **collaborate with the authorities, the justice system, public regulatory bodies and other public entities**, diligently and properly, without placing obstacles in their way or generating errors or omissions, as well as facilitate their work in all the Group's relations with them, and providing them with all the information requested and that is appropriate and/or obligatory.
- 👍 All company employees, collaborators and managers will carry out their work to high standards of quality, with diligence, professionalism, transparency, honesty, looking to provide value, to improve efficiency, making others aware of any risks, deficiencies and/or improvements, innovating, making **rational and appropriate use of all resources, and safeguarding the Company's assets**. [Resources made available by the Sesé Group must be used appropriately and effectively. They cannot be used for private purposes or for purposes other than those established in the organisation.](#)

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- 👍 The Sesé Group stands against any unethical practices aimed at inappropriately influencing people's actions to obtain advantages. Conduct that could constitute **extortion, bribery or attempted bribery**, or the **facilitation of payments**, even if not intended to obtain an undue advantage, is prohibited.
 - **No employee, collaborator or manager shall accept gifts, invitations, handouts, services or favours that may affect their professionalism, objectivity and/or their own impartiality in their professional relationships**, which may give rise to the generation of a commitment or return of a favour, within the scope of the Group and its environment, and/or that may imply fraud, illegality, unethical practices or cause harm to third parties.
 - Likewise, **no employee, collaborator or manager shall offer gifts, invitations, handouts, services or favours to individuals or institutions that may affect the objectivity and/or impartiality of the latter** in their commercial or professional relations, which may generate a commitment or return of a favour, within the Group and its environment, and/or which may involve fraud, illegality, unethical practices or cause harm to third parties.
- 👍 In order to **avoid conflicts of interest**, the company's employees, collaborators and managers shall not have any economic or other type of interest, nor shall they carry out activities with companies or institutions related to the Group. If such a circumstance should arise, it should be communicated to the Management to be evaluated with the assistance of the legal advisor, and, if deemed appropriate, the necessary measures should be taken.
- 👍 It is not permitted to carry out **professional activities outside of the Sesé Group** that could lead to a decrease in the performance of work, limit availability or compete with the Sesé Group's activities.
- 👍 It is prohibited, on account of an individual's position in the Group, to use their resources, powers, influence or other facilities, for their own benefit or that of their immediate environment. It is also strictly forbidden for an individual or entity to act in the name of or on behalf of the Group without prior consent, as well as to use such name, means, relations with third parties, position or influence for their own benefit or that of their immediate environment.
- 👍 **Scrupulous compliance with import/export formalities** is guaranteed to ensure the prevention of any type of activity contrary to that defined by the customs authorities and to prevent possible smuggling activities.
- 👍 In compliance with the requirements for transparency, objectivity and professionalism in the carrying out of all its activities and relationships with stakeholders, the Sesé Group has a **Prevention of Conflicts of Interest Policy**, an **Anti-Corruption Policy** and a **Gifts and Services Policy** that must be complied with by all employees, managers and members of the administrative bodies.



Since 2018, the Sesé Group has been accredited with the "Ecovadis" Gold Medal for its work on CSR.

**PRIVACY, PROTECTION OF DATA AND CONFIDENTIAL INFORMATION, INTELLECTUAL PROPERTY**

- 👍 The Sesé Group will respect the right to **privacy of its employees and collaborators**. The request and processing of personal data will be limited to that information which is essential for the normal activity of the Group and for the timely compliance with applicable regulations.
- 👍 The Sesé Group will take the necessary measures to preserve the **confidentiality** of the personal data it holds and to ensure that it is processed and that rights of access, rectification, cancellation and opposition are exercised in accordance with the legislation in force on this matter. The Sesé Group is committed to **protecting the intellectual and industrial property of both the Sesé Group and third parties**.
- 👍 The Sesé Group's activity may generate knowledge and commercial information whose value lies largely in keeping it reserved. **Sesé Group employees shall make discreet and professional use of the information to which they have access and shall keep** the content of their work **confidential**. In any case, they shall refrain from using information, data or documents obtained in the course of their activity for their own benefit.
- 👍 The information of customers, employees, suppliers or any third party that is accessed for the development of normal professional activity is confidential, must be kept reserved and the necessary measures must be adopted to collect, store and access this data in accordance with current data protection regulations and comply with the stipulations of the **Information Security Policy** and procedure **PG-12-06 Personal data management**.
- 👍 The **logo, brand, image, corporate identity and name of the Sesé Group** may only be used within the framework of professional activity and always in compliance with the provisions of the Corporate Identity Manual. It is obligatory to respect the Sesé Group's intellectual and industrial property: software, documents, processes, technology, know-how, etc. as well as information about clients, products, strategies and operations, which must only be used for the Sesé Group's own professional purposes.
- 👍 E-mail and computer tools are working tools that should be used only for the development of work functions.
- 👍 In compliance with the requirement of Privacy, data protection and confidential information, the Sesé Group has a **Privacy and Confidentiality Policy** and an **Information Security Policy**, which must be complied with by all employees, managers and members of the administrative bodies.



proteccion.datos@gruposes.com

If you have any questions about data protection, you can send them to this e-mail address.



Since 2019, the Sesé Group has had an **ISO 27001 certification** for "Information security management systems".