

CODE OF ETHICS

GALETES CAMPRODON S.A





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1. Introduction

Galetes Camprodon S.A. sets and always maintains the highest ethical standards as part of its goal of building a sustainable, highly productive company with a human touch which is the preferred choice of our consumers, customers and partners. This Code describes the regulatory framework guiding these standards of conduct, our position on related issues and the principles which are to be followed in case of non-compliance.

Employees should seek advice if they are uncertain about the plan of action in any given situation as the absolute responsibility of each employee is to “do the right thing”, a responsibility which cannot be left to others.

Employees will always be guided by these core principles:

- Refraining from any conduct which might harm or jeopardise Galetes Camprodon or its reputation
- Acting lawfully and honestly
- Prioritising the company’s interests over personal or other interests

2. Commitment to our consumers, customers and suppliers

The satisfaction of our consumers, customers and suppliers is essential to our success. Hence the quality and safety of our products and our service are our paramount concern.

There is no room in our dealings with customers for any kind of corruption, favouritism or any activity which is contrary to the law, human rights or customs and practice or which may threaten the health of the public.

We are committed to honest and fair negotiations with our suppliers without discrimination and/or imposition.

3. Legal and regulatory compliance

Galetes Camprodon and its employees are governed by law. Compliance with all applicable laws and regulations may never be compromised. Employees shall also adhere to internal rules and regulations as they are applicable in any given situation. Such internal rules are specific to the company and may go beyond statutory requirements.



4. Conflict of interest

There is a conflict of interest when an employee's personal interests or the interests of a third party run counter to the interests of Galetes Camprodon. It may be difficult in such circumstances for the employee to act fully in the best interests of Galetes Camprodon.

Whenever possible, employees should avoid any conflict of interest.

If there has been a conflict of interest or if an employee is in a situation which may involve or lead to a conflict of interest, the employee is to disclose it to their line manager in order to resolve the situation fairly and transparently.

5. Discrimination and harassment

Galetes Camprodon respects the personal dignity, privacy and rights of each of its employees and is committed to maintaining a workplace free of discrimination and harassment. Employees may therefore not discriminate by reason of origin, nationality, religion, race, gender, age or sexual orientation or engage in any form of verbal or physical harassment based on the aforementioned or any other grounds.

Employees who feel that their work environment does not comply with the above principles may raise their concerns with their plant manager. Galetes Camprodon has a mechanism (Bústia Grogà) which enables employees to confidentially inform the management of any issues related to the safety, integrity, quality or legality of products and any harassment or bullying in the workplace which the employee may experience or which they may have observed in their co-workers. There is also a protocol in place for preventing and detecting instances of harassment in the workplace.

6. Non-compliance

It is the responsibility of each employee to ensure full compliance with all aspects of this Code and if necessary seek assistance from their line manager. "Doing the right thing" and ensuring the highest standards of integrity is the personal responsibility of each employee and cannot be left to others.

In case of uncertainty, employees should always be guided by the basic principles set out in the introduction to this Code.

7. Reporting illegal or wrongful conduct

Employees are to report to their line managers any practices or actions which they believe to be improper or even illegal under this Code. Wrongdoing may be reported directly to management whenever the nature of the event makes it appropriate to do so.



All complaints will be properly investigated. Galetes Camprodon does not tolerate any reprisals against any employee in respect of complaints made in good faith and protects the rights of the person discriminated against.

Camprodon, 3 April 2021

Victor Marsal
CEO