

**GIRBAU, S.A.** has in place a Code of Ethics, drawn up as part of the company's ***Crime Prevention Plan***. This Code of Ethics lays out the corporate principles governing the activities of the company and its members, consolidating a culture and guidelines for action that are shared, respected and obligatory.

In this respect, the ***Code of Ethics*** include the following commitments in different areas:

- To abide by ***current legislation*** at all times, honestly and in accordance with the demands of good faith.
- To respect ***people's dignity***, opposing forced labour and people trafficking in whatever form; fostering diversity, rejecting any form of harassment, discrimination or abuse of power at any level; and fostering the creation of a healthy, safe work environment, guaranteeing compliance with the employment and health and safety regulations in force at all times.
- Not to tolerate any behaviour involving ***corruption, bribery and/or influence peddling***.
- To take the pertinent steps in order to prevent any kind of ***money laundering***, assuming transparency of information as a principle for behaviour.
- To avoid, misleading, fraudulent or malicious behaviour, as well as any action that might be considered unfair competition, in accordance with the international, national and/or local regulations in force at any time, in particular with respect to fixing prices of territories with competitors.
- To continue to scrupulously fulfil its ***tax obligations*** as well as those to the social security authorities.
- To ensure that the requirements are met in each case to gain ***public subsidies or assistance*** and, once these have been obtained, to use them for the purposes for which they were granted.
- Not to use ***confidential information*** for purposes not linked to doing its business, and under no circumstances to reveal such information to third parties, or to other members of the company who do not require it to perform the tasks incumbent on them.
- To respect ***third-party intellectual and industrial property rights*** at all times, especially while working to design and manufacture machinery and/or other products, and not to use third-party information protected by confidentiality commitments.
- To fulfil all applicable regulations concerning ***environmental protection***.
- To provide the necessary means and implement appropriate measures to ensure the company's ***commitment to quality*** is assumed and applied by all its members.
- To abide by commitments to suppliers, employees and customers.
- To avoid situations of ***conflict of interest***.

At the time of implementing the Code of Ethics a ***Compliance Officer*** was appointed and an Ethical Channel created and activated, together with training for members of the company to implement all this effectively.

The ***GIRBAU, S.A. Ethical Channel: compliance@girbau.com***, makes it possible to lodge any complaints, make enquiries or report possible breaches of the said Code of Ethics in good faith, confidentially and without any reprisals.