

CODE OF ETHICAL CONDUCT AND SOCIALLY RESPONSIBLE

This Code defines the principles that must guide and guide the behavior of the staff of TECNIRUTA-CONCISA, S.A. within the framework of their work and professional activities and obligations.

TECNIRUTA-CONCISA, S.A. includes the commitment to act in accordance with values that guarantee responsible behavior and with absolute respect for current legislation, in all the company's relations, with its own employees, with its customers, with its suppliers, with its shareholders and with society in general.

All the personnel of TECNIRUTA-CONCISA, S.A., as well as all those who act on their behalf and representation (including subcontractors), must know the principles expressed in this code and are obliged to comply with them:

PRINCIPLES:

Compliance with legislation

All employees will ensure compliance with the legislation and regulations in force in the place where they carry out their activity. Likewise, always they will respect the commitments and obligations assumed by TECNIRUTA-CONCISA, S.A. in its contractual relations with third parties.

Professional development and training

All employees will be informed and accept the principles and criteria in which TECNIRUTA-CONCISA, S.A. bases its professional development, the effectiveness of its management and the strengthening of its commitment to the aims and objectives of the Company.

Each employee must attend to their own training, using all the means that TECNIRUTA-CONCISA, S.A. puts at your disposal, in a constant commitment to yourself and to the company aimed at updating and increasing your training, to achieve your full professional development and the achievement of your personal goals.

Reconciliation of family and professional life

The balance between work obligations and personal and family life is obtained through a human resources policy, which generates measures that make it possible to reconcile the commitment with the company, with the time necessary for the development of a personal life project.

Professionalism at work

Employees of TECNIRUTA-CONCISA, S.A. act in the exercise of those powers that are attributed to them by reason of their positions, putting into practice criteria that lead to the greatest efficiency, at the lowest possible cost, always following the guidelines that are, in each case, the pertinent ones.

Principle of non-discrimination and equal opportunities

Commitment to the creation of a work environment where all employees are treated with impartiality, respect and dignity, paying special attention to promoting equal opportunities and the treatment of all employees in a fair and non-judgmental manner eliminating any type of discrimination, whatever its cause or origin.

Respectful work environment and without harassment

Reject any manifestation of harassment, abuse of authority, as well as any other conduct that may generate an intimidating, offensive or hostile work environment, favoring a pleasant and safe work environment.

TECNIRUTA-CONCISA, S.A. establishes a commitment to a work environment within the legal scope, expressly rejecting any type of forced, slave or involuntary labor at any point in the supply chain.

It also establishes the express prohibition of hiring minors.

Use and protection of business assets

TECNIRUTA-CONCISA, S.A. makes available to its employees the necessary resources for the performance of their professional activity.

All the people who work at TECNIRUTA-CONCISA, S.A. they undertake to make good use of the material and immaterial means available to them.

Conflicts of interest, business opportunities and other activities

Employees of TECNIRUTA-CONCISA, S.A. they are obliged to communicate to their respective superiors the existence of any conflicts of interest that may exist between themselves - or persons linked to them - and the company.

Business opportunities

Employees may not take advantage, for their own benefit or that of a person linked to them, of information or business opportunities of which they have become aware by reason of their work.

Anti-corruption and anti-bribery policy

TECNIRUTA-CONCISA, S.A. is against unethical practices aimed at inappropriately influencing the performance and will of people to obtain advantages. Consequently, no employee shall admit or practice bribery, or offer benefits for the benefit of third parties who are at the service of any organization (public or private) to obtain advantages or conduct business, whatever its nature, denouncing through the established channels any uses of corruption that come to his knowledge.

Other activities

Employees of TECNIRUTA-CONCISA, S.A. may not carry out other activities, either in their own name, or at the service of third parties, remunerated or not, when they are incompatible with the obligations arising from their employment relationship with TECNIRUTA-CONCISA, S.A.

Confidentiality of information

All employees of TECNIRUTA-CONCISA, S.A. are obliged to protect the information, confidential or reserved that they are aware of by reason of their position, whether technical, financial, commercial or of any other nature and not to use it outside the scope of their employment relationship, or disclose it to third parties without the prior written consent of the company, except for those requests for information that are required by judicial or administrative authority, in legal terms.

Those employees who, due to their high responsibilities, have access to particularly sensitive information, may be required by the Company to sign specific confidentiality commitments as an annex to their main employment contract.

The company will guarantee its employees, suppliers, customers and any third parties that have a relationship with it, the faithful compliance with the regulations on data protection, adopting the pertinent measures in its organization so that said regulations have full effectiveness.

Quality of services

The satisfaction of our customers for the services provided by our companies the priority objective of our business activity.

All employees must be aware that success in the relationship with customers lies in the correct provision of the services offered. For this, and to achieve the committed quality levels, TECNIRUTA-CONCISA, S.A. makes available to its employees the necessary means for the development of its activity.

Supplier Selection Policy

The selection of suppliers and subcontractors will be made with criteria of transparency, objectivity, and free competition in order to guarantee the quality of the good acquired or the service transferred and the best economic conditions, valuing, especially, the technical and financial solvency of the supplier and subcontractor and the experience given of previous relations with them.

Relationship with suppliers

Employees must comply with and respect the internal regulations of TECNIRUTA-CONCISA, S.A. when proceeding with the approval of suppliers, as well as in the award of works, supplies and services.

TECNIRUTA-CONCISA, S.A. will put the necessary means to prevent the personal interests of its employees from decisively influencing all the processes referred to above.

TECNIRUTA-CONCISA, S.A. carries out a continuous evaluation of its suppliers and subcontractors, assessing, among others, compliance with environmental, quality, and occupational safety requirements.

Approved by

D. Jacobo Sitges Aparicio

Managing Director



October 1, 2020