

Grupo Jorge Code of ethics

Presentation

The internal restructuring of Grupo Jorge, as well as the goals established by the 2030 Agenda, have led to a necessary review of the Code of Ethics in force to date, adapting it so that it expresses the ten principles of the United Nations Global Compact.

This Code includes the values, principles, practices and actions that guide the overall conduct of all the companies belonging to Grupo Jorge, its directors and dependent personnel.

The values and principles contained in this document are basic for the development of the ordinary activity of the Group, to the extent that they are an essential step to guaranteeing and balancing the rights and interests of all its members: managers, employees, customers, suppliers and partners.

This document reflects both the wishes of Grupo Jorge to comply rigorously with the legislation in force at any time, of the Bylaws and Social Statutes of each member company of the Group and the existing internal operating regulations, such as our firm commitment to the content of the United Nations Global Compact.

This document was approved on March 12, 2021 by the Board of Administration of the parent company, JORGE, S.L.

Aim

The Code of Ethics reflects the Group's desire to establish certain standards of behavior from an ethical point of view, which contribute to (i) facilitating decision-making processes, (ii) developing business activity consistent with them, which complies at all times with current regulations for each sector of activity in which we participate, and (iii) achieving an upright and respectful work environment that fosters personal and professional development.

For this reason, the Management is aware of the importance of raising awareness in this area, therefore, the dissemination and implementation of this Code is particularly relevant.

Area of application

The scope of the Code of Ethics extends to the following people:

- Group employees, regardless of the type of contract set out in their employment relationship, posi-

tion or geographical area in which they carry out their work.

- Group executives, regardless of the type of contract that determines the relationship, employment, position or geographical area in which they carry out their work. The personnel with high management status, all directors, managers and / or managers will be considered to be executives.
- Members of the Administrative Bodies of companies and other entities that make up the Group, regardless of composition, form and operating regime of the organ in question.
- Customers, suppliers, partners and any other stakeholders, to the extent that the

Code may be applicable to them and provided that the Group has the capacity to do so effectively.

Obligation to know and comply with the Code of Ethics

All the employees, managers, directors and administrators of the Group must acquaint themselves with this Code and comply with it.

Specifically, directors, managers and department heads must:

- Communicate this Code to the teams/staff under them; the Management themselves serving as examples to follow first and foremost.
- With advice from the Ethics and Compliance Committee, apply those systems that ensure compliance with the Code within the scope of the functions attributed to them.
- Actively collaborate in compliance with this Code, informing the Ethics and Compliance Committee of any conduct that may be contrary to it or of any needs that may arise in this matter.

Likewise, employees must:

- Know and apply the content of this Code in the performance of functions that correspond to them.
- Actively collaborate in compliance with this Code, reporting any actions that may be contrary to it or presenting proposals that may lead to its improvement.

Principles and Rules of Conduct:

Taking all this into consideration, the following principles are those that make up the Grupo Jorge Code of Ethics:

1. Commitment to Human Rights

Grupo Jorge upholds the principles contained in the United Nations Universal Declaration of Human Rights, deliberately expressing not only respect for them but also commitment to their promotion and de-

fense, condemning and rejecting any activity involving their violation.

2. Commitment to Animal Welfare

Grupo Jorge complies and undertakes to comply with current regulations at all times in relation to animal welfare.

3. Labor relations

Grupo Jorge is a socially responsible employer, which recognizes its employees as a main driving force of their activity, sharing with them the successes achieved and guaranteeing a motivational work environment that values commitment, hard work and the spirit of facing up to challenges.

The Human Resources Policies and the activities of the Group must contribute towards creating a workplace where everyone has the opportunity to develop both at professional as well as personal level. This development must necessarily start from respect for individuality as an integral part of a team, promoting an open exchange which is respectful of points of view, criticism and ideas, establishing mechanisms for the active participation of employees.

Working practice must respect scrupulously in all cases the maximum limits established for working hours and minimum wages, facilitate reconciliation between family life and work, reject harassment in any of its manifestations, as well as discrimination based on sex, race or religion.

In terms of Occupational Risk Prevention, Grupo Jorge makes available to its workers the necessary material and protocols so that the work environment has optimum health and safety conditions, in response to the needs of each position and in accordance with current regulations at all times.

The consumption of alcohol and/or drugs is expressly prohibited within the scope of work, insofar as it may cause an obvious risk to the integrity of the employee's staff and their colleagues, in addition to the obvious negative consequences for professional performance.

Regarding the consumption of tobacco, this is subject to the legislation in force at each time and in each country, always, in those cases in which tobacco smoking is allowed, being attentive to the rights of any non-smokers present.

The right of all workers to form and join a union of their choice, without fear of intimidation or reprisal, in accordance with current legislation in each country. To this end, as many policies and anti-discriminatory measures as are necessary will be established with respect to union organization and union membership in decisions on promotions or dismissals.

Likewise, in accordance with the regulations in force at any time, collective bargaining will be used as a constructive forum with which to address the conditions of labor and employment and the relations between employers and workers or their respective organizations.

4. Rejection of forced labor and eradication of child labor

Grupo Jorge rejects any practice related to forced labor and/or child labor, agreeing not to maintain com-

mercial relations with countries that do not guarantee their commitment to the abolition and eradication of such forms of exploitation.

5. Respect for the environment and the territory

Grupo Jorge operates responsibly and sustainably, committed to its philosophy and its activity with respect for the environment and natural resources, always from a preventive point of view.

For this reason, it undertakes to carry out an efficient and responsible use of said resources, minimizing the environmental impact of all its activities and products through the promotion of circular economy, the reduction and/or offsetting of its greenhouse gas emissions and energy generation from renewable sources.

Grupo Jorge will ensure that its production processes, technologies and products meet the regulatory standards at European, state, regional and local levels, intending them to be sustainable at all times, reducing the production of waste as much as possible, ensuring its treatment and favoring the prevention of contamination through the use of environmentally sound techniques.

Likewise, Grupo Jorge is aware of the impact that its activity has at a social level, for this reason, it works to create alliances with local entities and in the social environment. in which it operates, collaborating on the integration of its workers, the promotion of local economy and, ultimately, contributing to the sustainable development of the area.

6. Corrupt, fraudulent practices or obstruction of Justice

Grupo Jorge is directly opposed to and expressly condemns corruption both between individuals as well as with members of the Public Administrations and does not tolerate practices that seek to obtain business or benefits through improper and illegal means.

No employee, manager or executive of Grupo Jorge or any third party acting on their behalf is authorized to offer, receive or accept money and/or any type of benefit or perks ("gifts") from or to third parties, including members of any Public Administration, which could compromise objective and fair decision-making.

For this purpose, the subjects bound by the content of this Code will refrain from offering or accepting gifts for any reason to (or from, as the case may be) clients, suppliers, partners, etc. of the Group, as well as to (or from) members of any Public Administration, for a value greater than €50 per gift, without this limitation serving as justification for the circumvention of the obligation described previously.

The receipt and/or delivery of any gift must be reported, prior to or immediately on receipt, to the head of each department. In the case of a gift above the aforementioned quantitative limit having been received, and it being impossible or very difficult to return the gift, it will be raffled among the employees of the department to which the person who received the gift belonged.

Likewise, Grupo Jorge rejects any conduct that can be classified as fraud or fraudulent conduct, in any of its expressions, defending at all times the transparency of the Group's business activity, as well as the accuracy and veracity of the information given to markets.

In this sense, all employees, managers and administrators of the Group must alert management of any

payment made to/by third parties other than the parties involved in each contract, as well as any anomaly in the form of payment or in the accounts

streams of origin and/or destination of payments, which is different from the usual behavior in the ordinary transactions of each company, especially if they are related to tax havens.

Finally, any conduct, or failure to act, that deliberately constitutes an obstacle to any inspection carried out by the Administration (local, regional or state) and especially to the work carried out by the Administration of Justice is expressly prohibited.

7. Confidentiality

All files, materials and information (whether verbal, written or on any other medium), as well as any analysis, compilation, study or other document prepared, used or created expressly, relating to any company of the Group or to the activity carried out by any of them, is to be considered Confidential Information, and must be kept as such; its disclosure, reproduction or publication is not allowed without the express consent of the affected company or any of its people responsible/legal representatives, even if they are no longer part of the company's staff.

The foregoing will apply especially to intellectual property, industrial property (patents, trademarks and utility models), and substantial information on investment, engineering or manufacturing know-how, designs, databases, files and financial reports of the Group or its companies.

8. Data protection

The companies that make up Grupo Jorge are responsible for the custody, protection and use of data, personal data and its possible handling by authorized personnel, in compliance with the provisions of the regulations in force at any time on this matter.

The registration and use of personal data collected by the companies of the Group must be previously and expressly authorized by their owners, once advised of the purpose for which they are collected and the length of time they will be kept in the corresponding records. For their part, the holders of personal data will be guaranteed the exercise and protection of all their legally recognized rights and they will be informed of this at the time that express consent is obtained.

9 Use of computer tools

The employees, managers, managers, directors and other personnel dependent on any of the companies that make up the Group, will make responsible use of the tools made available to them (e-mail, internet, telephone, computers, vehicles etc.), in accordance with the development of their professional activity and will avoid their abusive use for personal benefit or in such a way that they could affect the image or reputation of the Group.

Specifically, and in relation to computer tools (internet, e-mail, computers, etc.), employees, managers, managers, directors, etc., may only make use of them by virtue of the corresponding licenses or permits. The deliberate installation of any type of software that could affect the security of the systems or allow the

access of computer viruses is prohibited.

Likewise, special care must be taken not to delete, destroy or alter files or programs owned by third parties.

10. Commitment to Public Administration

Grupo Jorge collaborates with and is committed to collaborating with the Public Administrations in compliance with all the requirements and/or requests for information that are made.

11. Commitment of suppliers and customers

Grupo Jorge pays special attention to the behavior and practices of those suppliers and customers with whom it works, ensuring that all of them share the principles and commitments reflected in this document.

Grupo Jorge will only interact with suppliers and clients that respect compliance with the law, preserve human dignity and, especially, do not jeopardize public image or reputation.

All suppliers and customers must respect the following: Avoid any type of discrimination, especially racial, sexual, ideological or religious.

- Guarantee that its employees, or personnel subcontracted by them, carry on their work in conditions of optimal safety and hygiene, in accordance with current regulations.
- Have the environmentally relevant permits that are required for business activity.
- Reject all conduct that can be classified as corrupt, all extortion, bribery or fraud.
- Develop an active policy in relation to the legal origin of available funds, avoiding at all times any type of practice that may be considered to be money laundering, or irregular due to its possible connection with tax havens and/or the financing of terrorism.

Grupo Jorge takes a positive view of suppliers and customers who accept and comply with all the principles contained in this document, expressly reserving the power to terminate any contractual relationship with those who do not respect it or who violate it.

12. Situations of conflict of interest

A conflict of interest is defined as an ensuing situation of opposition between the particular interests of a person linked to the Group and the Group's own interests. In all cases, corporate interests must always prevail over individual ones. Listed below are the potential conflict of interest situations that will require special attention and supervision:

- The employees, managers, managers and/or directors of the Group must not act as directors, managers, administrators, directors or as mere employees of any organization, when the carrying out of such a position affects or may affect negatively their own motivation or their professional activity

within the Group, or may come into clear competition with the activity carried out by any of the companies that make it up, unless such service is expressly authorized in writing by the competent administrative body.

- Grupo Jorge encourages its employees, managers, managers and executives to commit to community services or activities of solidarity. However, employees must ensure that such activities do not constitute a conflict of interest and are compatible with the work they carry out within the Group.
- Any possible situation of conflict of interest must be reported to superiors, who will proceed in accordance with the provisions of the following point.

13. Ethical Channel

If an employee, person in charge, manager or executive has to raise any incident or claim on the matter dealt with in this Code, including possible breaches thereof, would like to make a proposal or needs to make any type of query in relation to its application or scope, you can communicate this immediately to the Group's Ethics and Compliance Committee, through the channel expressly enabled for this purpose ("Ethics Channel") on the Group's website (www.jorgesl.com).

Said proposals, claims and/or queries, which may be anonymous, must be made in writing, with the attachment of any documentation considered appropriate, in accordance with internally established procedure. Grupo Jorge guarantees that all communications will be treated confidentially, thus guaranteeing the anonymity of those who make use of this channel and the absence of reprisals, always in accordance with the principle of good faith.

14. Penalty Regime

Violations of the Code of Ethics will be prosecuted in accordance with the internal procedure established by the Ethics and Compliance Committee and will have, where appropriate, the corresponding sanctions, in accordance with the internal regulations provided for in this area and with the legislation in force at all times.

15. Validity

Any variation or modification of this Code will require express approval by part of the Board of Directors. Said modifications will be communicated through the channels created for this purpose.

This Code of Ethics entered into force on March 12, 2021, after prior approval by the Board of Directors of the parent company of the Group, JORGE, S.L.

In Zaragoza, on April 9, 2021