

DATE: 01/06/2018

PAGES: 1 of 9

Ethical organizational principles, good corporate governance and professional ethics of employees are the pillars on which INTERFABRICS, S.L. bases its activities.

# EMPLOYEE CODE OF CONDUCT.

All employees shall be guided by the following ethical values:

### Equal opportunity and non-discrimination

The basic principle of action at INTERFABRICS is to provide people with equal opportunities in accessing work and professional promotion, ensuring at all times the absence of discriminatory situations due to gender or sexual orientation, race, religion, origin, marital status or social condition.

Consequently, employees involved in recruitment, selection and/or professional promotion processes shall follow objective processes in their actions and decisions, showing attitudes that are open to diversity with the aim of identifying people who correspond to the profiles and needs of the post to be covered and promoting equal opportunities at all times.

This basic principle is included in the commitments established in the INTERFABRICS EQUALITY PLAN.

# Respect for people

Harassment, abuse, intimidation, lack of respect and consideration, or any type of physical or verbal aggression are unacceptable and shall not be allowed or tolerated at the workplace, and people with staff responsibilities must promote and ensure, with all the means at their disposal, that such situations do not occur.

All employees, and especially those performing management functions, shall promote at all times, and at all professional levels, relationships based on respect for the dignity of others, participation, equality and mutual collaboration, fostering a respectful work environment so as to achieve a positive work climate.

# Prevention of occupational hazards

INTERFABRICS considers that occupational health and safety of all employees is fundamental to achieving a safe and convenient working environment, and in this respect the permanent improvement of working conditions has been established as a priority objective.

Based on this reasoning, employees shall respect at all times the applicable preventive measures in terms of occupational health and safety, using the



DATE: 01/06/2018

PAGES: 2 of 9

resources established by the organization and ensuring that team members carry out their activities in safe conditions.

Environmental protection and social and environmental responsibility policies

Within the scope of their respective competences, employees shall actively and responsibly commit themselves to the conservation of the environment, respect legal requirements, follow the recommendations and procedures established by the company to reduce the environmental impact of their activities and help to improve the sustainability targets established in the company's corporate social responsibility protocols.

Compliance with regulations (general and internal) and ethical behaviour

- 1. Employees shall comply with both the general provisions (laws, regulations, circulars from regulatory bodies, supervisors and self-regulators) and the internal regulations of the Group that may be applicable to their activities.
- 2. Any employee who is charged, indicted or accused in a criminal court proceeding shall inform the Human Resources Department of this as soon as possible. Similarly, employees shall inform the Compliance and Human Resources management of the existence of any administrative cases affecting them, either as alleged perpetrators, witnesses or otherwise, which may filed by the authorities or supervisory bodies of company activities, even when their participation in said procedures may not be derived from their professional activities.
- 3. Furthermore, employees shall only engage in professional conduct that is fair, impartial, honest and in accordance with the principles of the company's corporate social responsibility. Employees shall refrain from participating in illegal or immoral activities or soliciting business for the company by undertaking such activities.

# Noncompetition

1. Employees shall prioritize performing their functions in the company, and shall not provide professional services to other competing entities or companies, regardless of whether it is remunerated or not and of the relationship on which they are based, unless expressly authorized by Human Resources following a favourable Compliance report.



DATE: 01/06/2018

PAGES: 3 of 9

2. Employees who carry out other professional activities or wish to do so shall notify this circumstance to the Human Resources Department as soon as the situation may arise.

### Responsibility

Employees shall employ their technical and professional capacities and the appropriate prudence and care in carrying out their activities within the company. In particular, and without prejudice to said general rule:

- 1. They shall be responsible for achieving the necessary skills and training to perform their duties to the best of their abilities.
- 2. They shall be subject to external and internal regulations as applicable and depending on the type of operation they are involved in, and, where appropriate, on the rules and rates established by the company in determining prices and conditions for operations in which they take part.
- 3. They shall respect internally established procedures, especially with regard to the exercise of powers and the application of risk management limits.
- 4. They shall carry out the accounting of contracted operations with accuracy and rigour, and shall keep all such files and records as required for their activities with the same criteria.
- 5. They shall observe all rules related to safety and hygiene at work, with the aim of preventing and minimizing occupational risks.

# Commitment to the company

Employees shall always act in the best interest of the company, making appropriate use of the means made available to them and avoiding actions that may cause harm to same. They shall refrain from using business opportunities of interest to the Company for their own benefit.

#### **ANTI-BRIBERY POLICY**

INTERFABRICS prohibits offering, paying, requesting or direct or indirect acceptance of inappropriate payments (for example, bribes and illegal tips) in whatever form.

The Anti-Bribery Policy applies to all company directors and employees, including temporary or contracted personnel. Employees shall not involve themselves in



DATE: 01/06/2018

PAGES: 4 of 9

any way in the payment of bribes or illegal commissions, in either the public or the private sector, and shall be obliged to understand and comply with applicable anti-corruption legislation.

Bribery may be described as the act of giving or receiving by any person of something of value (usually money, gifts, loans, rewards, favours, commissions or entertainment) to induce or reward others for securing business or other benefits.

### Relations with suppliers

- 1. Employees, in particular those intervening in decisions related to contracting supplies or services or establishing economic conditions, shall avoid any kind of interference that may affect their impartiality or objectivity in this respect.
- 2. Whenever possible, exclusive relationships shall be avoided.
- 3. Contracting external supplies and services shall be carried out in accordance with the procedures established for this purpose in the company's Supplier Quality Manual.

#### Relations with customers

- 1. No employee may personally accept, unless prior written authorization as been given by the Human Resources Management, fiduciary commitments, mandates or powers of attorney for the performance of their operations in the company, except for those resulting from family relationships or powers of attorney from legal entities in which the employee has a relevant participation or exercises a management position.
- 2. Efforts shall be made to avoid exclusive relationships with a customer that may lead to excessive personal ties or restrict access on the part of other employees or company channels.
- 3. In no case shall customer operations be encouraged to benefit another customer, unless both customers recognize their respective positions and expressly agree to carry out the operation.
- 4. Employees shall inform customers of any financial or other relationships that may imply any conflict of interest.



DATE: 01/06/2018

PAGES: 5 of 9

5. Employees are not authorized to unilaterally modify data provided by customers, as it is customers themselves who must modify their own data following the established procedure, except in the case of manifest error.

#### INFORMATION CONTROL AND CONFIDENTIALITY

### General duty of secrecy

- 1. In general, employees shall maintain professional secrecy regarding all non-public data or information they may come to know in the exercise of their professional activities, regardless of whether said data or information are derived from or refer to customers, the company, other employees or managers or any other third party. Consequently, and without prejudice to the foregoing general rule:
- a) They shall use said data or information exclusively for the performance of their professional activities in the company, being allowed to make it available only to those other professionals who need to know such information for the same or a similar purpose, and refraining from using said information for their own personal benefit.
- b) All data and information related to accounts, financial positions, financial statements, businesses and, in general, customer activities, shall be treated confidentially and only be transferred to third parties outside the company with the express authorization of the customer and in accordance with legally regulated procedures.
- c) Information related to other employees, managers and directors, including, where appropriate, information on remuneration, evaluations and medical reviews, shall be protected with the same standards as customer information.
- 2. This obligation of secrecy persists even after an employee relationship with the company has ended.
- 3. The indications of the preceding paragraphs are understood without prejudice to the requirements formulated by competent authorities according to applicable regulations. In the event of any doubts, the Compliance Department shall be consulted.

As an additional clause in all employment contracts, express mention is made of the company's non-competition terms.



DATE: 01/06/2018

PAGES: 6 of 9

### Personal data protection

Employees are obliged to respect the personal and family privacy of all people, both employees, customers, and any other person to whose data they have access as derived from company activities, which includes all data of a personal, medical, economic or other nature which may in any way affect the intimate and personal area of the data subject.

All personal data shall be treated in a particularly restrictive way, so that:

- 1. Only necessary data shall be retrieved.
- 2. Data retrieval, processing and use shall be carried out in such a way as to guarantee their security, veracity and accuracy, people's right to privacy, and compliance with the obligations of the company resulting from applicable regulations.
- 3. Only employees authorized to do for the performance of their duties shall have access to such data and only to the extent as may be required.

The obligations regarding Personal Data Protection shall form part of the additional clauses of all employment contracts.

#### COMPUTER SYSTEMS AND INFORMATION TECHNOLOGIES

- 1. Employees shall maintain special protection for computer systems, and ensure strict security measures at all times.
- 2. Employees shall respect specific regulatory rules for the use of electronic mail, Internet access or other similar means made available to them, and shall be prohibited from improper use of same.
- 3. All creation, membership, participation or collaboration by employees in social media, Internet forums or blogs and all opinions or statements made therein shall be carried out in such a way that their personal character is always clear and apparent. In all cases, employees shall refrain from using the image, name or trademarks of the company in opening accounts or registering in said forums and networks.



DATE: 01/06/2018

PAGES: 7 of 9

#### INTELLECTUAL PROPERTY AND INDUSTRIAL PROPERTY RIGHTS

### Intellectual and industrial property rights of the company

- 1. The employees shall respect the intellectual property and user rights corresponding to the company in relation to courses, projects, programmes and computer systems; equipment, manuals and videos; knowledge, processes, technology, know-how and, in general, other jobs and works developed or created in the company, either as a result of their professional activity or that of third parties. The use of said property shall therefore be made only in the exercise of employees' professional activities in the company and all material so used shall be returned to the company whenever requested.
- 2. Employees shall not use the image, name or trademarks of the company except in the due course of their professional activities therein.

### Third-party rights

Employees shall also respect at all times the intellectual and industrial property rights held by third parties outside the company. In particular, employees shall not incorporate, use or employ in the company any type of information or physical or electronic documentation belonging to another company which has been obtained as a result of any previous post or position or without due consent.

# **Human Resources Management**

The Human Resources Department is responsible for making this General Code available to all employees, organizing training for due cognizance, interpreting and in general attending to queries made by employees, as well as the all other functions as established therein.

#### CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with the General Code may give rise to employee sanctions, without prejudice to the administrative or criminal sanctions that may be applicable.



DATE: 01/06/2018

PAGES: 8 of 9

# IRREGULARITY COMPLAINT POLICY

# **Open Door Policy**

- 1. Any company employee who should have knowledge of the commission of an allegedly unlawful act or an act of non-compliance with this General Code may notify said act directly to HUMAN RESOURCES Cristina Llopis / Lola Vañó.
- 2. The notification of an allegedly unlawful action may be carried out by any of the following means:
- i) Telephoning number + (34) 96 654 4000;
- ii) Emailing rrhh@aquaclean.com;
- iii) Directing a written letter to: Carrer del Textil s/n 03830 Muro de Alcoy (Alicante), Spain.
- 3. To ensure the maximum effectiveness of this Open Door Policy, sufficient publicity shall be given on the company Intranet to the possibility of employees making confidential communications.

# Confidentiality of complaints and prohibition of retaliation

- 1. Management shall guarantee the confidentiality of all complaints they receive.
- 2. It shall be strictly forbidden for anyone to take or direct or encourage any retaliatory action against or induce negative consequences for a company employee who has filed a complaint.
- 3. The prohibition of retaliation set forth in the foregoing paragraph shall not prevent the adoption of the disciplinary measures as may be due when an internal investigation determines that the complaint is false and has been made in bad faith.

# Processing of complaints

- 1. Management shall keep a record of all complaints received. Said record shall respect the requirements of all regulations regarding data protection.
- 2. After receiving a complaint, Management shall initiate an internal investigation, unless the complaint is manifestly unfounded or refers



DATE: 01/06/2018

PAGES: 9 of 9

to matters not covered by the Compliance Programme. In such cases, Management shall record the receipt of the notification and indicate a decision not to initiate an investigation in the complaints records. This decision shall not prevent any subsequent initiation of an investigation if additional information is received.

3. In internal investigations carried out by Management, all information and documentation deemed appropriate may be requested from any area of the company.

Signed: Rafael Pascual Bernabeu