



CODE OF ETHICS MARTICO



EXPLANATORY STATEMENT

This Code of Ethics is mandatory for all entities that make up the MARTICO group. Each of the entities, as a whole and individually, is committed to fully adhering to the principles, values and guidelines established in the Code of Ethics, ensuring that their actions, decisions and behaviors are aligned with the ethical and corporate responsibility standards that this document promotes.

At MARTICO it is intended to generate, disseminate, maintain and update an authentic ethical culture which shall have a positive impact on the organisation's personnel and, therefore, on the normal development of our own activities.

Through the documentation of a Code of Ethics, MARTICO. declares a series of principles which shall govern the actions of the entire personnel of the organisation, which shall enter into a continuous training and learning process in relation to the legal requirements that must be complied with and the ethical principles that must be abided by.

In drawing up the Code of Ethics, the organisation has taken into account two essential elements.

On the one hand, that stipulated in the current regulations applicable to the activity of MARTICO, which establish limits that the company and its members may not exceed under any circumstances whatsoever, thus defining the framework within which the organisation's activity must be undertaken.

And on the other, the socially accepted customs and practices, which enable MARTICO to attain higher levels of quality through maximum commitment to the public.

Nevertheless, in order to attain these objectives, the acceptance of the Code of Ethics by all members of the organisation is necessary. To this end, all employees must be advised as regards the existence of the Code of Ethics itself and it is essential to develop training activities which would enable everyone to understand what principles are established and what it is intended to be achieved.

In this manner, it will be possible to identify practices that must be eliminated as these adversely affect compliance with the regulations or for being contrary to the ethical principles upheld by MARTICO.

The ethical knowledge which personnel must internalise is fully applicable to all employees, regardless of the specific job assigned thereto or the specific functions performed, which can be verified by analysing the issues addressed in the Code of Ethics.

In the event that any of the employees unequivocally fails to comply with the provisions of this Code of Ethics, that set forth in the labour and employment regulations with regard to the application of sanctions, complying with the due proportionality in their implementation, shall apply.

The application of the disciplinary system is not intended to impose a coercive system, but rather seeks to ingrain the Code of Ethics in the organisation in order to equate its content with any other employment obligation which employees must take into account in his/her workplace.

The Code of Ethics must be established as the cornerstone for guiding the management and behaviour of employees of MARTICO in all areas, an objective which can only be attained by the widest dissemination of this document as possible.

For this reason MARTICO shall endeavour to disseminate the contents of the Code of Ethics among the organisation's stakeholders, recommending that any company or professional with whom a business relationship is maintained adhere to same and comply with their obligations.

CHAPTER 1. GENERAL PROVISIONS.

Article 1. Subject matter

The present Code of Ethics establishes the principles and maxims which must govern the behaviour of any member of MARTICO. in the normal performance of the functions assigned thereto.

Article 2. Material scope of application

The present Code of Ethics is applicable to the members of MARTICO., and all are under the obligation to comply with and apply same in their daily work.

Article 3. Territorial scope of application

1. The present Code of Ethics applies to all branches of MARTICO., regardless of the country in which these operate.
2. In the event that MARTICO. operates in a country whose socially accepted customs and practices are radically different from that stipulated in the present Code of Ethics, an ad hoc committee shall be appointed to analyse the specific circumstances of the case.

CHAPTER 2. PRINCIPLES

Article 4. Principle of legality

All members of MARTICO are under the obligation to comply with that prescribed in the legal system, understanding as such the compendium of legislative, regulatory or any other type of provisions which are applicable to the organisation's activity. Likewise, the interpretations of the various supervisory authorities with competence to regulate matters which directly affect the activity of MARTICO must be complied with.

Article 5. Ethical principles

All members of MARTICO are under the obligation to apply socially accepted customs and practices in their daily work, with a view to carrying out an activity in accordance with the community wherein the company operates.

Article 6. Corporate procedures

All members of MARTICO are under the obligation to comply with the guidelines, instructions, requirements and procedures established by the organisation itself.

Article 7. Duty to provide information

1. MARTICO shall provide the members of the organisation with information on legal aspects which must be taken into account in the performance of the activities inherent to his/her job.
2. MARTICO shall publish in the present Code, in addition to other Internal Policies, information on the ethical principles which should govern the behaviour of the members of the organisation.
3. MARTICO shall apprise the members of the organisation as regards the guidelines, instructions, requirements and procedures that are to be established, so that everyone is aware of his/her roles and responsibilities.

Article 8. Compliance

If the information provided or instructions given by MARTICO are unequivocally contrary to the law, the members of the organisation may and must refuse to act in that regard.

If there is any reasonable doubt whatsoever as regards the legality of the information submitted or the instructions given by MARTICO, the members of the organisation must make bring these facts and circumstances to the attention of his/her hierarchical superiors.

CHAPTER 3. EMPLOYEES

Article 9. Non-discrimination

1. MARTICO prohibits any type of discrimination on the grounds of nationality, race, religion, political opinion, gender, sexual orientation, illness, physical disability, age etc., to which end the company undertakes to draw up policies and procedures which contribute to the creation of a healthy working environment.

2. Members of the organisation are prohibited from engaging in any type of conduct which constitutes, promotes or facilitates a discriminatory situation based on nationality, race, religion, political opinion, gender, sexual orientation, illness, physical disability age etc.

Article 10. Harassment

1. MARTICO prohibits moral harassment, sexual harassment, gender-based harassment and any other conduct which could create an intimidating, offensive or hostile working environment, to which end the company undertakes to draw up policies and procedures which contribute to the creation of a healthy working environment.

2. Members of the organisation are prohibited from engaging in any type of conduct which constitutes, promotes or facilitates a situation of moral harassment, sexual harassment, gender-based harassment or that creates an intimidating, offensive or hostile work environment.

Article 11. Working hours

1. MARTICO shall implement the appropriate measures to ensure that working hours do not exceed the ceiling stipulated in the labour and employment regulations and the applicable Collective Enterprise Bargaining Agreement.
2. MARTICO shall not impose as mandatory the performance of overtime, which the company undertakes to remunerate pursuant to that stipulated in the employment regulations and the applicable Collective Enterprise Bargaining Agreement.
3. MARTICO shall comply with the rest periods within the working day itself, the rest periods between different working days and the vacation periods established in the labour and employment regulations and in the applicable Collective Enterprise Bargaining Agreement.
4. MARTICO shall implement a system of daily working hours recording which complies with the fundamental rights and freedoms of the workers.
5. The employees of MARTICO undertake to include authentic information in the daily working hours recording system.

Article 12. Freedom of Association

1. MARTICO at any given moment ensure the utmost respect for the employees' rights to unionise, freedom of association and collective enterprise bargaining.
2. MARTICO makes itself available to the employees and undertakes to provide all necessary assistance to ensure that the aforementioned rights are exercised freely and effectively.
3. The employees of MARTICO shall exercise their rights to unionise, freedom of association and negotiation pursuant to that stipulated in the employment legislation and the applicable Collective Enterprise Bargaining Agreement, ensuring the utmost respect for the organisation and the activity it carries out.

Article 13. Risk prevention

MARTICO shall ensure that the workplaces have suitable health and safety conditions which enable the employees to carry out his/her duties in an optimum manner in terms of occupational health and safety.

Employees shall contribute to the proper maintenance of health conditions in the workplace, likewise, procuring to adopt a respectful attitude as regards the safety guidelines.

Article 14. Digital disconnection

MARTICO shall ensure that no professional communications or calls shall be sent or made to the members of the organisation who are outside of his/her working hours or during his/her rest periods, leave or vacation.

CHAPTER 4. CLIENTS

Article 15. Quality

MARTICO undertakes to generate quality products and/or services without misrepresenting the conditions or characteristics thereof, which will be able to meet client requirements.

The organisation's personnel understands the level of quality expected by clients in relation to the products and/or services of MARTICO, which enables the company to participate and ensure the excellence of its activity.

Article 16. Safety

MARTICO undertakes to generate safe products and/or service, both in terms their creation and as regards their enjoyment by clients.

The organisation's personnel understands the level of safety expected by clients in relation to the products and/or services of MARTICO, which enables the company to participate and ensure the reliability that characterises its activity.

Article 17. Transparency

MARTICO undertakes to carry out its activity in a responsible and transparent manner, enabling both clients and potential clients to take out a contract without any latent defect.

The organisation's personnel understands that his/her actions must not include surreptitious interests, which shall confer clients and potential clients complete transparency in their relationships with MARTICO.

Article 18. Advertising

MARTICO shall create advertising campaigns with factual information, avoiding at all times disseminating false, misleading information or misinformation in relation to the goods and/or services offered.

Furthermore, realistic content shall be used in all media, avoiding the use of stereotypes or content that is far from the reality of society.

Article 19. Respect

The members of MARTICO shall ensure the utmost respect to any client or potential client of the organisation, precluding that his/her conduct may incur in any type of discrimination based on nationality, race, religion, political opinion, gender, sexual orientation, illness, physical disability age etc.

The organisation's personnel understands the level of safety expected by clients in relation to the products and/or services of MARTICO, which enables the company to participate and ensure the reliability that characterises its activity.



CHAPTER 5. SUPPLIERS

Article 20. Consideration

The members of MARTICO shall interact with the organisation's suppliers in a respectful, considerate and ethical manner, always within the limits stipulated by law.

Article 21. Objectivity

1. MARTICO shall select the organisation's suppliers based on objective criteria and following completely transparent processes.

2. The members of MARTICO shall be able to demonstrate the criteria under which the organisation's suppliers have been selected, always focusing on economic elements and ignoring personal interests and interests unrelated to those of the organisation.

3. No employee of MARTICO may accept or offer gifts, favours or compensation, in cash or in kind, whatever their nature, when this influences the decision-making process in relation to the performance of the functions derivative from his/her job position or office.

Article 22. Proprietary information

MARTICO shall determine the commercial information that each member of the organisation may use, distinguishing same according to its importance for the continuity of the entity.

In this regard, the members of MARTICO shall protect commercially sensitive information and shall not disclose same to third parties, regardless of the purpose pursued.

Article 23. Third party information

MARTICO shall not request or accept information as regards its suppliers in order to obtain an advantageous situation in relation thereto.

In this regard, the only objective that members of the organisation must pursue is to establish stable commercial relationships with suppliers.

CHAPTER 6. CONFIDENTIALITY

Article 24. Duty of secrecy

1. All members of MARTICO are subject to a duty of confidentiality which precludes same from using the information of the organisation for purposes other than the undertaking of the entity's own activity.
2. The duty of confidentiality extends to all types of information that MARTICO requires to undertake its own activity.
3. The duty of confidentiality is unlimited in time, which is why it shall be maintained even if the employee's relationship with MARTICO has ended.

Article 25. Data protection

MARTICO shall adopt the technical and organisational security measures necessary to ensure the protection of information in relation to any natural person related to the organisation.

Members of the organisation, once advised of his/her personal data protection obligations, shall act diligently and ensure the security of the personal information to which same have access, using that information only for the specific, explicit and legitimate purposes, for which it has been obtained.

Article 26. Protection of privacy

The members of MARTICO shall ensure the utmost respect to the personal and family privacy of all natural persons related to the organisation.

To this end, the members of MARTICO are recommended to focus on solving specific issues from a purely professional point of view, preventing any personal relationships of trust which may exist resulting in a leak of information concerning the privacy of any person.

CHAPTER 7. INTELLECTUAL AND INDUSTRIAL PROPERTY

Article 27. Intellectual Property

MARTICO shall ensure the highest protection and consideration for original literary, artistic or scientific creations expressed by third parties in any medium or support.

To that end, the members of MARTICO must verify that the organisation has obtained the necessary rights or permits to lawfully use the original creations developed by third parties.

Likewise, the members of MARTICO must verify that the original creations of third parties which are intended to be used are not protected by copyright and, therefore, may be used legally without obtaining any right or permission whatsoever.

Article 28. Industrial Property

MARTICO shall ensure all due respect for the current industrial property regulations as regards patents, trademarks, domain names, reproduction rights, design rights, database extraction rights, own and third-party distinctive signs or rights over specialised technical knowledge, among others.

The members of MARTICO shall ensure to develop new products and/or services which are sufficiently original, avoiding at all times reliance on goods protected by industrial property.

Article 29. Advertising

The members of MARTICO shall only use for advertising purposes the brands, images, texts and, in general, any distinctive sign which has been duly authorised by the organisation.

Article 30. Employees' Creations

1. The original creations resulting from the work of the members of MARTICO belong to the organisation, notwithstanding the moral right corresponding to the author.

2. Innovations in relation to industrial property (patents, trademarks, domain names, reproduction rights, design rights, database extraction rights, own and third-party distinctive signs, or rights over specialised technical knowledge, among others) resulting from the work of the members of MARTICO belong to the organisation, which must register same appropriately.

Article 31. Nature of the signs

MARTICO shall use distinctive signs of original creation which cannot be applied for political, religious purposes or, in general, for any purpose other than the purely commercial purpose that gave rise thereto.

If any distinctive sign is used by a certain group to defend purposes other than the purely commercial purposes which gave rise thereto, all relevant proceedings shall be initiated to protect the ownership of the sign and preclude its use by third parties.

CHAPTER 8. CORPORATE SOCIAL RESPONSIBILITY

Article 32. Social commitment

MARTICO shall voluntarily develop all the necessary actions to actively contribute to social, economic and environmental improvement, which allows the organisation to continue its own activity in a sustainable manner.

The organisation understands that the “Triple Bottom Line” is the only viable manner to maintain the normal development of its own activity, something which is constantly conveyed to the employees.

Article 33. Use of resources

MARTICO shall use the minimum necessary resources so that the organisation may continue with the normal development of its own activity, always ensuring the quality of the products and/or services offered is kept intact.

The members of the organisation shall avoid abuse in the use of resources, ensuring that the use of means and goods is the minimum necessary to carry out his/her work.

Article 34. Consumption

1. MARTICO shall prioritise the consumption of those products which have been generated causing a lower impact on the environment and that are based on the minimum use of resources.
2. MARTICO shall prioritise the use of those services which have been generated causing a lower impact on the environment and that are based on the minimum use of resources.
3. MARTICO shall preferably resort to suppliers whose activity generates a lower impact on the environment and which base their activity on the minimum use of resources.

Article 35. Waste

1. MARTICO shall implement however so many measures as are appropriate to prevent the generation of waste during the normal development of its activity.
2. MARTICO shall appropriately manage the waste generated during the undertaking of its activity, seeking to generate the minimum risk to health and the environment.
3. The members of the organisation shall endeavour to generate the minimum possible waste, subsequently managing same with such diligence as to generate the minimum risk to health and the environment.

Article 36. Operations

MARTICO shall record all operations with economic significance in which the company participates.

The members of MARTICO shall take care to clearly and accurately record all the commercial operations in which the organisation participates, using for this the appropriate and legally provided accounting records.

Article 37. Public Administration

The members of MARTICO shall cooperate with anybody which makes up the Administration in a respectful and completely transparent manner, submitting any action undertaken to that stipulated in the legal system.

CHAPTER 9. COMPLAINTS

Article 38. Duty to report

The members of MARTICO are under the obligation to notify his/her superiors, through the channels provided for the purpose, of any breach of the present Code of Ethics of which he/she may be aware and which may be likely to adversely affect the Corporate Social Responsibility of the organisation or entail legal consequences of any kind.

Article 39. Guarantee of indemnity

No disciplinary or coercive measures shall be adopted against members of MARTICO who report facts and circumstances which may breach the provisions of the present Code of Ethics.

Article 40. Resolution of doubts

Any member of MARTICO who has any doubts or concerns in relation to certain actions which may be considered contrary to the present Code of Ethics, may contact the Corporate Social Responsibility officer to receive a response in that regard.

CHAPTER 10. GUARANTEE OF COMPLIANCE AND DISSEMINATION

Article 41. Dissemination

MARTICO shall disseminate the contents of the present Code of Ethics among the personnel of the organisation, using a means which enables substantiating the forwarding of information and its subsequent reception and understanding by the recipients.

The dissemination shall be undertaken via corporate media, avoiding at all times the use of the employees' personal information and guaranteeing his/her right to digital disconnection.

Article 42. Adherence

MARTICO shall apply the necessary efforts to ensure that any entity or professional with which a commercial relationship is maintained accepts the present Code of Ethics and adheres thereto.

In the event that the third party with whom the commercial relationship is maintained has its own Code of Ethics, MARTICO shall verify that the principles therein are consistent with those set forth herein.

Article 43. Penalty System

Non-compliance of that stipulated in the present Code of Ethics may likewise entail penalties of an industrial relations nature as prescribed in Royal Legislative Decree 2/2015, of 23 October, whereby approving the revised text of the Workers' Statute and the applicable collective enterprise bargaining agreement, without prejudice to the fact that the proceedings may entail the imposition of criminal sanctions by Courts and Tribunals pursuant to that set forth in Organic Law 10/1995 of 23 November, on the Criminal Code.

CHAPTER 11. GENERAL PROVISIONS

Article 44. Ethics Committee

In order to ensure compliance with that stipulated in the present Code of Ethics, an Ethics Committee has been appointed to address the various complaints of non-compliance or the diverse inquiries in relation to the interpretation of its content.

The contact person for the Ethics Committee is as follows: ana.funez@martico.com

The Ethics Committee shall generally act on the request of a party, although it may act on an ex officio basis if it is considered that certain facts and circumstances of which it is aware make it advisable to analyse the situation in depth.

Article 45. Revision

The present Code of Ethics shall be revised whenever there are substantial regulatory, social or organisational structure changes, avoiding the obsolescence thereof.

The present Code of Ethics shall be revised and updated, as appropriate, on a biennial basis.

Article 46. Validity

The present Code of Ethics has been approved by the Management of MARTICO., and is effective from the day following the date of its signing.