

# Code of Ethics and Business Conduct



## OBJECTIVES AND SCOPE OF THE CODE OF ETHICS AND BUSINESS CONDUCT

The Mecwide Group's Code of Ethics and Business Conduct establishes a set of principles, rules and values in matters of ethics and professional behaviour to be applied on a daily basis in our internal relations and those we maintain with external partners. The principles presented are combined with a sense of responsibility, establishing the fundamental rules for professional conduct and ethical premises applicable to all employees of the Mecwide Group and its partners.

It is the document that integrates the set of principles that govern the activity of the Group's companies, as well as the set of rules of an ethical and deontological nature to be complied with by the different players, employees, suppliers and other stakeholders.

This Code of Ethics and Business Conduct also applies to subcontractors or companies acting on behalf of Mecwide.

Under no circumstances may these rules override any laws or regulations in force in the different countries where we operate and do business.

This Code of Ethics and Business Conduct also aims to consolidate the institutional image of the Mecwide Group, which is characterised by the following values:

### OUR VALUES



Determination



Excellence



Ambition



Passion



Commitment

**Ambition:** every day we have a new opportunity to develop our skills. To be more and better professionals.

**Commitment:** To act in a responsible, sustainable and evolving manner.

**Determination:** We always want to be more. We are committed to going further and providing exceptional products and services tailored to our customers' realities.

**Excellence:** The will to do, the desire to exceed targets and achieve results towards the main goal: to be a world reference.

**Passion:** Total commitment to everything we do.

Due to the history that the Mecwide Group has built up over the course of its growth and based on the company's expansion into different geographies and socio-cultural realities, there was a need to define our standards, our clients' expectations, and guidelines in terms of social.

Responsibility in an organized and sustainable way, which were considered when drawing up this Code of Ethics and Business Conduct.

We have therefore based this document on the United Nations Global Pact, a strategic policy initiative for companies committed to aligning their operations and strategies with the ten universally accepted principles in the areas of human rights, labour practices, environmental protection and anti-corruption.

All employees of the Mecwide Group are aware of this document and it is available for consultation in the company's various internal and external communication mechanisms.

Each employee must respect this Code and ensure that it is publicised and complied with.

## MESSAGE FROM THE CHAIRMAN OF THE EXECUTIVE COMMITTEE

Throughout its history Mecwide has hired and trained an excellent team of professionals and management, always with the aim of providing its clients with the best service. Over the years we have acted with simplicity and sobriety, training our staff and establishing the fundamental **values** that define who we are and where we want to be.



It has become essential to establish our **Code of Ethics and Business Conduct** so that our employees, customers, suppliers, shareholders and other partners can clearly and transparently access and share our way of acting.

The attached document reflects our point of view and our way of doing business with regard to human rights, labour practices, environmental protection and anti-corruption. We will maintain our firm commitment to our Core Values, developing our business with the same attitude as we have done so far, convinced that we are on the right track for the long-term success of our project.

*Carlos Palhares, Founder and Chairman of the Executive Board*

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## **I - RESPECT FOR FUNDAMENTAL HUMAN RIGHTS**

### **1. Respect for the law.**

Companies in the Mecwide Group must respect the laws and regulations in force in the countries where they are based or carry out their activities. In this particular sense, we endeavour to scrupulously respect the human rights set out in the Universal Declaration of Human Rights, as well as the other international instruments referenced in the Mecwide Group Policy.

### **2. Child Labour Ban.**

At Mecwide Group companies we do not have any employees under the age of 16, regardless of legislation or regulations on child labour. The same applies to suppliers and all types of partners. The Mecwide Group, its suppliers and partner companies must ensure compliance with the provisions issued by the International Labour Organisation (ILO) on this matter.

### **3. Elimination of Forced Labour.**

We promote free choice of employment without any form of forced or compulsory labour. Every employee is free to decline continuity with the Mecwide Group. The same applies to our suppliers and all our partners.

### **4. Respect for the environment.**

As part of our activities, we sensitise all employees to the responsibility and impact we have on protecting the environment, with a particular focus on the following activities:

- Reducing waste production, as well as optimising products for recycling and minimising products for final disposal.
- Preservation of natural resources:
  - Monitoring consumption for analysis and action.
  - Reduced consumption of fossil fuels.
  - Reduced energy consumption.
  - Reduced water consumption.
  - Reduction of greenhouse gas emissions.

We promote a culture of minimising polluting impacts, extending these concerns to our suppliers and business partners.

## 5. Promoting Safety and Health at Work.

Safety for our employees' working conditions is one of the cross-cutting pillars that the Mecwide Group focuses on and prioritises.

We promote a health and safety culture for all our employees, implementing active prevention policies and regularly assessing their applicability and effectiveness. We promote and hold all our employees accountable in terms of health and safety and accident prevention. We demand the same type of attitude from our subcontractors and suppliers in our facilities and projects.

We also promote respect for and compliance with health and safety policies and all legislation and regulations in force in the countries where we are based or where we provide services.

To this end, and given the importance of Health and Safety for the company, we have promoted safety pillars:



- **Safe Behaviour:** we have Safe Behaviour as the first pillar of safety, because we believe that our employees' commitment to safety is decisive for the organisation's performance.
- **Protective Equipment:** we ensure that tasks are carried out with the necessary collective or individual protective equipment in accordance with safety rules.
- **Tools and Machinery:** we have a policy of maintaining machinery and tools to ensure the safety of our employees. We also encourage tasks to be carried out with the right tools.

- **Cargo handling:** we promote controlled management with respect for safety rules, particularly in special risk activities such as cargo handling. We carry out these activities in an organised manner, only with trained and qualified people and with the appropriate work permits.
- **Work at Height:** work at height, a special risk activity, is carried out with special care in its preparation, with a view to strict compliance with safety rules. We only carry out this activity with people who are trained and qualified for the purpose, guaranteeing all health and safety requirements and the appropriate work permits.
- **5S's Methodology:** we are committed to a culture of selective quality control, considering various stages of optimisation. To this end, we apply a 5S's culture in our different sectors of activity: Seiri (sense of use), Seiton (sense of organisation), Seiso (sense of cleanliness), Seiketsu (sense of standardisation) and Shitsuke (sense of discipline). This method allows us, in a practical way, to direct all our efforts at these five different levels, with the aim of promoting a high level of performance.

## II - PROMOTION BY ECONOMIC AND SOCIAL FACTORS

### 1. Freedom of expression and social dialogue.

We promote an open culture of communication that extends to all levels of the company, so that the various levels of the organisation can share their suggestions for continuous improvement in terms of safety, health, the environment and the working environment.

We organise consultations with our employees in order to gather everyone's opinions, thus guaranteeing a wide-ranging contribution.

### 2. Right to Association and Freedom of Association.

Mecwide recognises the right to freedom of association and to fight for workers' rights in order to improve conditions in organisations. Within the framework of this freedom, we are committed to protecting leading trade union members and not incurring any discrimination associated with this.



### **3. Contract Policy.**

Since the Mecwide Group has centralised management, we guarantee a negotiation policy that takes into account the legal organisation of the different locations where we are located. We also guarantee strict compliance with the Collective Labour Agreements relating to the business associations with which we are associated.

### **4. Industrial and Social Restructuring.**

As we produce a product adapted to the requirements of a wide range of customers, often using raw materials with specific life cycles and innovative working methods and technologies, the Mecwide Group adopts a forward-looking approach to our industrial and social operations in order to limit social impact.

## **III - SKILLS DEVELOPMENT**

### **1. Equal Treatment and Non-Discrimination.**

The Mecwide Group prioritises the people who are part of it, acting and focusing on them:

- To promote fair employment and offer equal treatment to all its employees, regardless of age, gender, belief or religion. When selecting and recruiting, the Mecwide Group does not take any discriminatory factors into account when identifying human resources. All employees have the right to a healthy working environment, free from any hostility or harassment.
- Do not tolerate harassment or other types of offensive behaviour, whether in relations with colleagues, customers or suppliers.

### **2. Insertion in training development.**

The Mecwide Group is committed to promoting the vocational training of its employees in order to encourage the professional integration of young people:

- Access to various types of contracts for young professionals on the labour market.
- Access to internships at the company.

### 3. Professional Development and Employability.

The Mecwide Group is based on investing in the skills of its employees, taking into account the nature of its activities, and therefore internally promotes the promotion and development of employability on an inter-departmental, inter-geographical and inter- societal basis.

We actively promote the training of our employees, contributing to their professional growth, guaranteeing equal opportunities and internal professional mobility. Due to its nature and geographical dispersion, the Mecwide Group encourages the mobility of human resources, with the aim of guaranteeing the permanence of our employees in the short, medium and long term.

## IV - BUSINESS ETHICS AND ANTI-CORRUPTION

### 1. Use of Mecwide Group funds, services and assets.

The use of Mecwide Group funds, services or assets for any unlawful or illegitimate purpose is prohibited. It is forbidden for individuals or companies to obtain privileges or special benefits on behalf of the Mecwide Group through the payment of bribes, gratuities or any other form of reward in cash or kind. Likewise, no gifts in cash or kind may be accepted from individuals or companies. In this regard, the Mecwide Group is governed by the following principles:

- **Anti-corruption:** the Mecwide Group will not make, nor allow anyone representing it to make, any illegal payments of any kind, directly or indirectly. The use of Group funds or assets, or of the position of a representative of any Mecwide Group company for any illegal or improper purpose, is strictly prohibited. Any direct or indirect participation in bribes, commissions, indirect contributions or any other similar improper payments is expressly prohibited, even if they may promote the legitimate business interests of the Mecwide Group.
- **Regularity of Accounts, Books and Records:** All expenditure associated with resources, responsibilities and transactions must be controlled and recorded in the Company's control mechanisms and accounts, and must be kept in a regular manner and in accordance with the applicable recording principles, standards and laws.

## 2. Relations with civil servants.

All relations between representatives of the Mecwide Group and any public officials must be conducted in such a way as not to compromise the integrity or negatively affect the reputation of any member of the government or public official, the Mecwide Group or its subsidiaries. Even the appearance of an inappropriate relationship with a public official is improper and unacceptable. The Mecwide Group will not make any kind of illegal payment, directly or indirectly, from corporate funds or assets. Any participation, directly or indirectly, in bribes, commissions, indirect contributions or similar payments is expressly prohibited, regardless of whether or not these promote the Mecwide Group's business interests. It is strictly forbidden to give, offer or agree to give a "benefit" of any kind to a "public official" for the purpose of influencing the performance of their duties or functions, or the acts or decisions of a government official or public organisation, or to obtain any other business advantage. It is strictly forbidden to ask, or knowingly allow, another person - an agent or a third party - to give, offer or agree to give any benefit to a public official for any inappropriate purpose. These prohibitions apply regardless of whether a public official requests the payment. Violations of these prohibitions are considered a violation of the laws of the countries in which the Mecwide Group operates. A "benefit" includes any service, gift, bribe, admission or preferential hiring, and certain charitable contributions, political donations or sponsorships. "Public Officials" includes leaders of local communities, members of a political party, political candidates, family members of members of the government, members of a royal family, employees of state-owned companies and employees of international public organisations. The Mecwide Group will keep accurate books and records, as well as supporting internal controls to deter corruption and bribery. The use of company funds or assets for any illegal or improper purpose is strictly prohibited. All representatives are responsible for following the Company's procedures for carrying out and reporting business operations.

## 3. Relations with clients, subcontractors and suppliers.

- **Relations with clients and suppliers:**
  - **Acceptance of Gifts:** Mecwide prohibits the acceptance of gifts/gratuities of any kind from clients or suppliers (in particular sums of money, merchandise, services, trips, etc.) with a value of €100 or more. These, once delivered, must be returned to the sender. If the refusal or return is considered impolite, the decision to be taken with regard to the offer under the terms of this Code of Ethics and Business Conduct should be checked with

- the Legal Director and the respective member of the Executive Committee.
- **Offering Gifts:** it is forbidden to offer or grant a gift in cash, in kind or otherwise, to any representative of a customer or supplier, with a view to obtaining any commercial or financial benefit.
- **Selection of suppliers and services:** the selection of suppliers or service providers for the Mecwide Group must be based on the principle defined in the corresponding work instruction, and follow the quality, performance and price standards defined by the Mecwide Group.
- **Consultants and other providers:** whenever it is necessary to use consultancy services or similar services, it should be borne in mind that they must make clear the type of service, base rates and prices in accordance with the requested need. Payments must correspond to the services contracted. Agents for this type of service are prohibited from acting on behalf of the Mecwide Group, unless authorised to do so in writing by the Board of Directors.
- **Prohibition on investments in suppliers:** no employee should, directly or indirectly, invest in a supplier that maintains relations with the Mecwide Group.

#### 4. Respect for competition laws.

- **Competition law:** the Mecwide Group does not get involved in agreements that could limit competition, and values strict compliance with competition rules and legislation, thus prohibiting any understandings, plans or agreements between competitors that involve prices, territories, market shares and/or clients. Likewise, any employee who intends to join a professional association with competition representatives must obtain written authorisation from the relevant member of the Executive Committee.
- **Conflict of Interest:** there may be a conflict of interest whenever an employee or their close family member is likely to benefit from decisions negotiated with clients or suppliers, as well as whenever an employee selects, or intends to select, a supplier, company or service belonging to a close family member. In these cases, for the sake of total transparency, if there is any doubt, the decision should be validated with the relevant member of the Executive Committee.

## 5. Prevention of Money Laundering and Terrorist Financing.

The Mecwide Group undertakes to:

- a) promoting a culture of prevention and ensuring compliance with legal and regulatory standards, approving and complying with internal policies and standards applicable to the prevention of fraud, the prevention of the use of the financial system for the purposes of money laundering or the financing of terrorism and the application and enforcement of restrictive measures approved by the United Nations and the European Union;
- b) provide and participate in appropriate training for the purpose of detecting operations that may be related to money laundering or terrorist financing;
- c) acting with particular care and diligence in carrying out the procedures established for identifying, accepting and getting to know clients and in the ongoing monitoring of the business relationship, in particular through the scrupulous application of internal control and risk management procedures, analysing the operations carried out in the course of this relationship and verifying the existence of any conduct, activities or operations which, in the light of professional diligence criteria and suspicion indicators published by the authorities, are considered to be suspicious of being related to criminal activities or related to the financing of terrorism, refraining from participating in these activities or refusing to carry out these operations;
- d) co-operate with the authorities and report, in accordance with the law, situations in which there is sufficient reason to suspect that the funds or other assets, regardless of the amount or value involved, come from criminal activities or are related to the financing of terrorism.

## 6. Safeguarding the Assets of the Mecwide Group.

- **Safeguarding the Group's Assets:** all employees are responsible for the correct use of the company's assets, namely those relating to intellectual property, technology, computer material and support, software and hardware, real estate, equipment, machinery and tools, components, raw materials and company assets, in particular:
  - The use of the Company's assets in accordance with the rules and procedures in force within the Mecwide Group;
  - The protection of passwords and authentication codes to prevent unauthorised access to computer data belonging to the Mecwide Group;
  - The prohibition, without authorisation, of copying software developed within the Mecwide Group, procedures, codes,

- manuals or other information that may be sensitive without having obtained authorisation to do so from Management;
- The holding and control of information in accordance with the rules in force for the various authorised information and communication technologies.
- **Confidentiality:** all employees must maintain strict and permanent confidentiality with regard to all information obtained in the course of their duties. This applies to any type of information obtained, including strategic information, management models and processes, business plans, financial information, merger and acquisition processes, contract terms and negotiations with clients and suppliers.
  - **Protection of personal data and employee privacy:** The Mecwide Group collects and retains personal data relating to the employment relationship with its employees. The Mecwide Group collects and retains only the personal data required by law and necessary to ensure effective operations in any of the Group's companies. The Mecwide Group guarantees the right of employees to review and correct their personal data, in strict compliance with the applicable legislation in force. Employees responsible for maintaining personal data (whether from employees or any other entity or person with whom the Group has a relationship) and those who have been given access to said information, must not by any means disclose it or use it for any purpose other than that established by the Group, under penalty of violation of the applicable legislation and the Mecwide Group's privacy and personal data protection policy. Access to personal records is limited to personnel who have the appropriate authorisation and a clear business need to access such information.

## V - REPORTING BREACHES OF THE CODE OF ETHICS AND BUSINESS CONDUCT.

Whenever infractions of the rules regarding compliance with this Code of Ethics and Business Conduct occur, they must be reported. Failure to comply with this code may lead to disciplinary action. All employees, clients, suppliers and other interested parties can request clarifications or testimonies, as well as report events that may be in breach of this code by emailing: [codeofconduct@mecwide.com](mailto:codeofconduct@mecwide.com). The Board of Directors of the Mecwide Group guarantees the utmost confidentiality as to the origin of such information and will not tolerate any retaliation for reporting actual or potential violations of the Code of Ethics and Business Conduct that are made in good faith.

Whenever an offence or request for clarification is reported, an investigation will be carried out. Once this has been completed, notification should always be sent to the person(s) involved.

For the purposes of external audit or consultation by the Governing Bodies of the Mecwide Group, within the applicable legal limits, a record of all alleged irregularities reported and actions taken is made available for consultation.

## **VI – POLICY REVIEW**

The Mecwide Group will regularly review this Code of Ethics and Business Conduct to ensure that it fulfils its purpose and complies with the legislation and legally enshrined principles. Based on the results of such a review, this Code may be amended accordingly.