



SUAVAL Group
LEGAL COMPLIANCE AND ANTI-BRIBERY POLICY
LCP002

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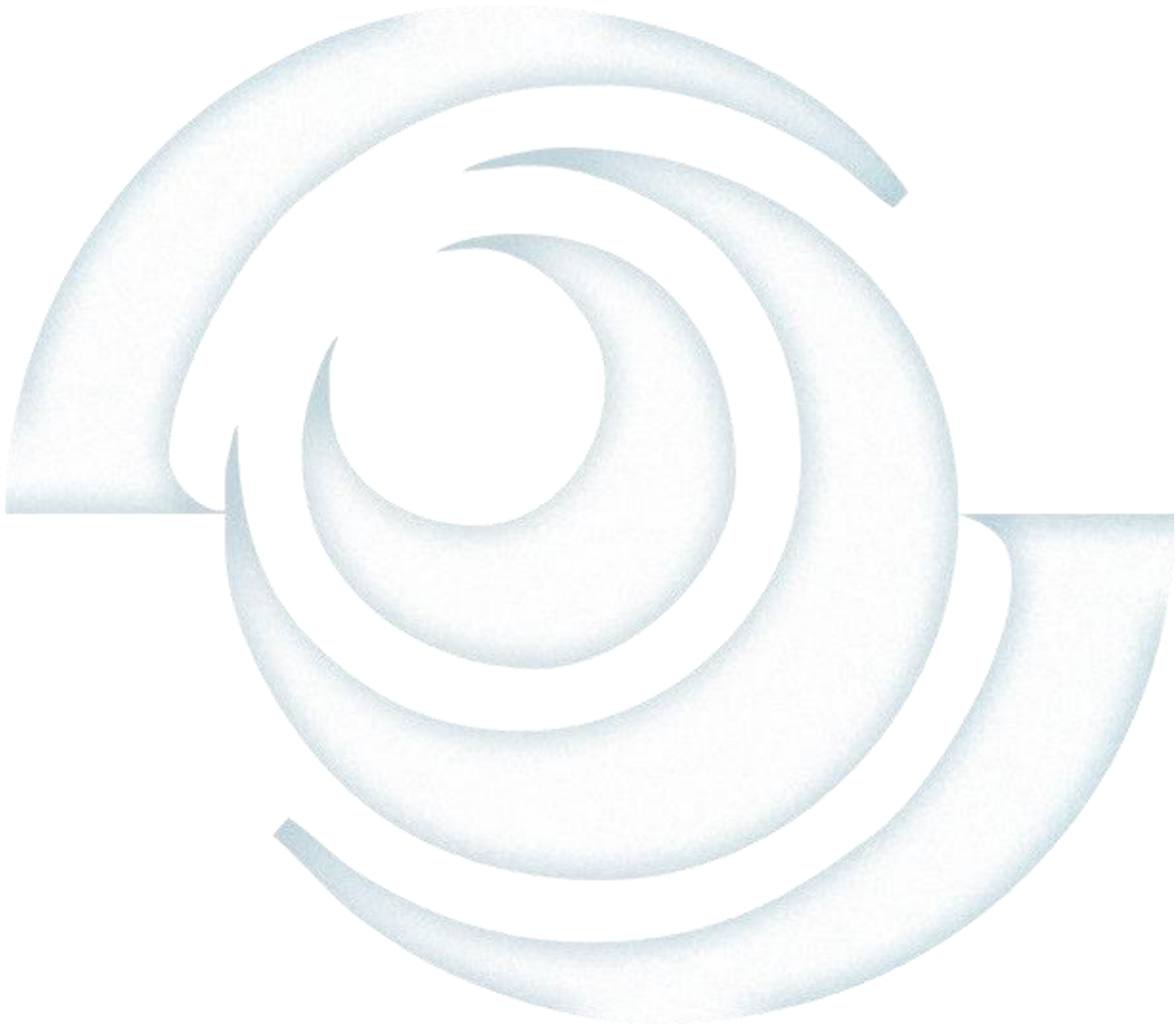
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00	20/02/2018	<i>Initial document</i>
01	13/03/2018	<i>Revision</i>
02	26/04/2019	<i>Format revision and coding adaptation</i>
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INTRODUCTION

This Compliance, Bribery Prevention and Crime Prevention Policy reflects that our organization has and permanently exposes a high commitment to the development of its activities with the highest level of ethics and compliance with the current legislation.

For the development of this **SUAVAL Group COMPLIANCE POLICY**, the requirements established by the current standards, laws and regulations regarding Criminal and Anti-Bribery Compliance in the area of criminal responsibility of our company in the development of its activities have been taken into consideration as a starting point.

We are committed to tackle BRIBERY, CRIMES and ANY NON-ETHICAL PERFORMANCE by establishing principles that guide the behavior of all our employees and business partners who have a contractual relationship with SUAVAL group.

SUAVAL Group Management has approved this **COMPLIANCE POLICY**, which have been developed in collaboration with the **Compliance Department**.

SUAVAL Group Management expressly prohibits any type of behavior or action that may involve a violation of current legislation. Furthermore, in **SUAVAL Group** we strictly prohibit bribery in any form, included directly or indirectly through an agent or other third part, either in relation to a public official or a private person. In this sense, a bribe is described as the act of giving, offering, promising, requesting or receiving something of value as consideration for an improper benefit or an inappropriate advantage or as compensation for the performance of any public or private function, regardless of whether or not such offer, promise or request is for himself or a third party, or under the proper name of this person or on behalf of a third party.

For this purpose, we have provided the necessary resources for the proper implementation of a **Criminal and Anti-Bribery Compliance Management System** in the development of our activities, aimed at preventing, controlling, and managing any possible risk of committing criminal offences and bribery to which the organization, related persons, business partners and controlled companies are exposed.

1. AREA OF APPLICATION, SCOPE AND OBJECTIVES

The present **COMPLIANCE POLICY** is applicable to **SUAVAL Group** in all its offices located in Spain:

- **Main Headquarters:** Asturias. P.I Tabaza, parcela 20. C.P.: 33469 (**Aislamientos SUAVAL, S.A.**)
- **Commercial Headquarters:** Madrid. Calle Velazquez nº10, Planta 1, C.P.: 28001 (**Aislamientos SUAVAL, S.A.**)
- **WANNER Headquarters (subsidiary):** Madrid. Calle Velazquez nº10, Planta 1, C.P.: 28001 (With 14 indirect positions since December 2015) (**WANNER Technical Insulation, S.A.**)

In the development of its **activities**:



- Supply, prefabrication and assembly of thermoacoustic insulating materials for the industry in general (*including nuclear plants*).
- Design, supply, rental, assembly and disassembly of scaffolding in industrial projects.
- Supply and installation of passive fire protection systems (*protection of structures with fireproofing mortar and /or intumescent paint, sealing of holes and protection against fire from cable trays*).
- Application by projection and injection of rigid polyurethane foam manufactured “in situ”.

The area of application of this **POLICY** extends to all the members of **SUAVAL Group** and to the entities that at any moment are part of its Business Group, as well as those personnel hired, subcontracted, related agents, partner, collaborators and prescribers and other persons and legal entities that act in an authorized manner in the name or on behalf of our organization.

All the legal and physical persons indicated in the scope of application are obliged to develop their activity in accordance with the existing legal provisions.

For the **Criminal and Anti-Bribery Compliance Management System** design, in **SUAVAL Group** we have taken into account the compliance with the minimum requirements established by the UNE standard 19601:2017 as indicated in numeral 5 of the article 31 bis of the Spanish Penal Code, as well as in the ISO Standard 37001:2016 and the related legal aspects of application.

The **Criminal and Anti-Bribery Compliance Management System** designed and implemented, which is subject to periodic evaluations and reviews, has as main **objectives**:

- **Reduce exposure to criminal and bribery risks in our activities.**
- **Prevent actions or behaviors that violate current legislation or are perceived by our stakeholders as ethically unacceptable.**
- **Train and sensitize people, professionals, managers, shareholders, business partners and similar about the criminal and bribery risks to which their actions are exposed, as well as the adequate response mechanisms established by our organization.**

For this purpose, we periodically identify and evaluate the criminal and bribery risks to which our activities are exposed, documenting the results in our **RISKS MATRIX of criminal compliance and anti-bribery** and establish control plans for the risks assessed above “low risk” with the clear objective of preventing and reducing its probability of occurrence, as well as establish monitoring and control mechanisms.

“A COMMITMENT OF ALL”

Any employee, partner, stakeholder, manager, representative and / or person acting in an authorized manner in the name or on behalf of our organization, has the obligation to inform and / or report about any action, conduct, information or evidence that is susceptible or suspected to infringe the present policy of our organization and may involve a criminal act.

SUAVAL Group has provided the following means so that any person can report any type of suspicious act or behavior or can raise any kind of doubts or query about it:

- Sending an email to the following email address: info@suaval.com
- Registration of communications through the secure Whistleblower Channel provided by our organization accessible on the website of our company (www.suaval.com) or by accessing the link https://suavalgroup.intedyacloud.com/canal_denuncias.

In **SUAVAL Group** we value positively the communication of any indication or suspicion of violation of legality by any member, person or organization associated to our entity, for which we appreciate as much detail as possible in the exposition of the informed / reported facts.

Our organization has provided mechanisms and internal secure processes to guarantee the confidentiality of the complaints and communications received, as well as to protect from any type of threat or coercion the people who participate with our objectives of criminal compliance and anti-bribery through communication and complaint.

For the maximum guarantee of independence, our organization has designated a specific position within our organization chart, called **Compliance Department**, a position endowed with adequate capacity, independence and authority, so that, depending directly from the Management, it ensures the correct implementation and improvement of our **Criminal and Anti-Bribery Compliance Management System** according to the defined and agreed requirements. This Department is formed by two members, whose posts will be: HR Deputy Director and IMS manager, who act in solidarity in the development of their compliance functions. That is to say, both exercise the tasks related to compliance jointly, except in cases of conflict of interest, in other words, when the corresponding action affects the rest of their functions (outside the scope of compliance functions) within SUAVAL Group; in this last case, decisions on compliance matters will be developed by the other member of the Compliance Department that is not affected.

The designated Compliance Department is available to all members of our organization to advise, guide and support them in matters of ethical performance and compliance. Likewise, our organization will have all the necessary resources, in a proportionate manner, to perform the actions, measures and controls planned in our **CONTROL PLAN** of Crime and Bribery Compliance Risks.

At **SUAVAL Group** we have a **CODE OF CONDUCT**, which is in force and has been approved by the **Directorate General**. This **CODE OF CONDUCT** will apply to the contracted personnel and external staff integrated in the organization at the same level as an employee, who is informed of it upon incorporation into the company. Failure by members, both in fact and de facto, for the organization, **the CODE OF CONDUCT** or this **POLICY**, will apply to them appropriate legal measures in accordance with current legislation.



As a result of the internal and external mechanisms for the assessment of the effectiveness of our **Criminal and Anti-Bribery Compliance Management System**, as well as based on the information collected, analyzed and evaluated, mechanisms have been established to continuously improve the effectiveness of our **Criminal and Anti-Bribery Compliance Management System**, with the objective of creating a true "living system" capable of adapting to the changing circumstances of the market and the improvements, opportunities and failures detected.

We will not punish our staff for abiding our policies and procedures, even if *SUAVAL Group* loses business or money as a result. If you have any concerns or suspicions about any person conduct or about cases in which there may be a breach of this POLICY, it is important that you notify them promptly so that they can be swiftly investigated and respond to these concerns and suspicions. The actions of that member of the organization who retaliates, even if they are tentative, will be subject to the measures applicable in each case, according to the **SGCPAS** and the legislation in force at the time of the facts, guaranteeing the full protection of the personnel who ensure compliance with this **POLICY**.



Sgd: Guillermo Suárez-Valdés Suárez
Chief Executive Officer
Carreño (Asturias), 16/12/2020




SUAVAL Group
GIFTS, HOSPITALITY, DONATIONS AND SIMILAR
BENEFITS POLICY
LCP003

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1. GIFTS, HOSPITALITY, DONATIONS AND SIMILAR BENEFITS - POLICY

This **POLICY** constitutes a minimum standard of compliance, applicable to all **SUAVAL Group** employees, third parties and business *partners*.

At **SUAVAL Group** we **have** a zero tolerance for bribery and are committed to acting professionally, impartially and with integrity in all our activities wherever we operate.

The objective of this **POLICY** is to define the guidelines to be followed in **SUAVAL Group** for the management of gifts, gifts, courtesies and other benefits - whether in cash or in kind - of third parties (suppliers, customers, intermediaries, public administration or by any third party) by employees or anyone who has contractual relationship with **SUAVAL Group**.

Accepting gifts, gifts, courtesies, and other benefits can be a legitimate way to foster good business relationships, but it's important that they're never used to unduly influence decision-making processes or make others perceive that there was an illicit influence.

Acceptance of gifts, gifts, courtesies and other benefits should always be made in accordance with the law and business practices of the place.

It is important that all possible precautions are taken when accepting gifts, gifts, courtesies and other benefits, to protect the reputation of third parties *and* **SUAVAL Group** against allegations of unlawful conduct and to ensure that they do not comply with anti-bribery regulations.

In general, gifts, gifts, courtesies, and other benefits should not be requested from **anyone with whom SUAVAL Group does** business, including suppliers, customers, business partners, and government officials.

2. SUAVAL GROUP STAFF OBLIGATIONS

- You must ensure that you read, understand and comply **with this POLICY** and any supplementary information issued in connection with it.
- The prevention, detection and reporting of bribes is the responsibility of all those who work **for SUAVAL Group** or under the control of **SUAVAL Group**. Each employee is required to avoid any activity that might suggest or lead to a violation of this **POLICY**.
- Any irregularity or **suspected** as soon as possible, if a violation of this **POLICY** is deemed to have occurred or may occur in the future, through the **SUAVAL Group** Complaint Channel. *For example, if a vendor or potential vendor offers you something to gain a competitive advantage from SUAVAL Group or a customer tells you the need for a gift or payment to secure a business.*

3. MAKING GIFTS, GIFTS, COURTESIES AND OTHER BENEFITS TO THIRD PARTIES

Commercial gifts and invitations are widely accepted in the day-to-day business and commercial activity. Giving or receiving invitations or promotional expenses are considered acceptable if:

- In relation to events related to commercial activity
- Offered and received in good faith
- Allowed under local laws and customs
- Offered and received in accordance with this **POLICY**

However, commercial invitations of considerable value can also be used as a cover for bribery.

All gifts, gifts, courtesies and other benefits offered to third parties (government officials, customers or suppliers) must:

- Be reasonable and usual for circumstances
- Not being motivated by a desire to improperly influence the government official, client or supplier
- Be tasteful and in accordance with generally accepted professional courtesy standards in the country where it is offered and in the country where **SUAVAL Group** has our main offices
- Offered in an open and transparent way
- Offer yourself in good faith and with no expectation of reciprocity
- Offer yourself in connection with a recognized holiday or event in which they are usually exchanged present, in the case of gifts
- Offer in connection with a legitimate and good faith business purpose, in the case of travel and courtesies
- Do not offer to any government official, customer or supplier with a regularity or frequency that generates inadequate perception or undermines the purposes of this **POLICY**
- Comply with local laws and regulations that apply to government official, customer or supplier

Before offering a gift or arranging a courtesy service, the employee or representative of the company in charge of organizing them should consult **with the SUAVAL GROUP Compliance Department** to learn about the latest laws and regulations in force in the jurisdiction of the government official.

There are a **number of PROHIBITIONS** regarding the making of gifts, gifts, courtesies and other benefits to third parties, both in cash and in kind, by any employee or manager of **SUAVAL Group**.

- Be reasonable and usual for circumstances.

- Do not be motivated by a desire to improperly influence the government official, customer or supplier.
- To be tasteful and in accordance with the generally accepted professional courtesy standards in the country where it is offered and in the country in which **SUAVAL Group** has our main offices.
- Offered in an open and transparent way.
- Offer yourself in good faith and without expectation of reciprocity.
- Offer yourself in connection with a recognized holiday or event in which they are usually exchanged present, in the case of gifts.
- Offer yourself in connection with a legitimate and good faith business purpose, in the case of travel and courtesies.
- Do not offer to any government official, customer or supplier with a regularity or frequency that generates inadequate perception or undermines the purposes of this **POLICY**
- Comply with local laws and regulations that apply to government official, customer, or supplier.

Corporate, institutional and commercial events in which the organization and the selection and/or control of guests are excluded from these prohibitions are centrally carried out by the corporate services of **SUAVAL Group**. In addition, they will be allowed in all acts in which guests do not have an economic relationship (direct or indirect) with **SUAVAL Group**.

4. ACCEPTANCE OF GIFTS, GIFTS, COURTESIES AND OTHER BENEFITS

As a general rule, no EMPLOYEE or manager of **SUAVAL Group** may request or/accept any type of payment, gift, gift, commission or remuneration of any third party with which professional relationships – clients, suppliers, intermediaries, public administration, etc. – are in any legal or natural person. Its regulation for the management positions of **SUAVAL Group**, whatever its area of activity or hierarchical level, is especially critical.

This general prohibition specifically includes the receipt of any gift consisting of cash, as well as any gift or check card or equivalent for the purchase of goods or services in any establishment.

At **SUAVAL Group** we DO NOT allow the use of gifts or gifts of any kind that:

- They can influence business relationships, whether with customers or suppliers, so that any advantage, difference in treatment, business expectation, ability to influence or obligation (direct or indirect) to contract with them is created.
- They may affect in any way the professional activity of **the SUAVAL Group employee** so as not to perform their work independently and objectively, in the most favorable way for the interest of **SUAVAL Group**.
- They are contrary to any legislation, regulation and / or regulations, whether external and general or internal and own of **SUAVAL Group**.

Other complementary guidelines, also mandatory with respect to the acceptance of gifts by THE employees and managers of **SUAVAL Group** are as follows:

- It is prohibited to accept personal financial assistance of any kind provided by a third party, unless it comes from a financial institution acting in its ordinary activity and with non-exceptional or unique criteria.
- Acceptance of cash is prohibited.
- It is not permitted to accept leisure trips or attentions of any kind for the employee and/or any family member, who are paid for by third parties with direct or indirect economic relations with **SUAVAL Group**

However, exceptions **are made** as to the prohibition of receiving gifts, accepting the possibility of receiving gifts, provided that they fall within reason and their value cannot be considered high or exaggerated, as set out below.

Eligible gifts include:

- Regular gifts of a symbolic and promotional nature of low economic value, such as: pens, agendas, notebooks, etc.
- Invitations to conferences, courses, meals, professional meetings, provided that they do not exceed the limits considered reasonable in social uses, depending on the hierarchical level of the employee or manager benefiting from the invitation
- Gifts for special attentions, for specific and exceptional reasons, for consolidated and general customs and customs (e.g. Christmas), provided that the gift is not in cash (including gift/check cards that allow a use as if it were cash) and whose equivalent value is less than 100euros per year for each gift offer.

Acceptance of gifts or gifts within the above exceptions may only be accepted if they are voluntarily delivered by the third party and there is reasonably no likelihood that this may influence the objective judgment capacity or obligations to **SUAVAL Group** of its beneficiary.

Because of their exceptional nature, the criteria for admission of gifts cannot be interpreted broadly or by analogy or extension. In case of doubt as to its scope, the most restrictive interpretation for the possible acceptance of the gift should apply.

These rules apply regardless of whether the gift is received at the place of professional activity or at the beneficiary's home address.

Other complementary guidelines, also mandatory with respect to the acceptance of gifts by THE employees and managers of **SUAVAL Group** are as follows:

- It is prohibited to accept personal financial aid of any kind provided by a third party, unless it comes from a financial institution acting in its ordinary activity and with non-exceptional or unique criteria
- Acceptance of cash is prohibited

- Acceptance of non-commercial or promotional gifts regardless of their value is prohibited, unless expressly authorized.
- Acceptance of branded utensils/stationery is permitted without prior authorization (*pens, mugs, T-shirts, etc.* That sponsor an organization), provided that its value does not exceed 10euros. Computer storage devices with commercial or technical information from another organization that are delivered to **SUAVAL Group personnel do** not fall into this category, being at the same level as advertising or technical information published on paper.
- Acceptance of special event plates and/or articles is permitted provided that:
 - Wear the **SUAVAL Group** logo.
 - Be delivered at a public commemorative event or event.
 - They have a symbolic value, at monetary cost, not more than 100 euros.
 - Attendance at sporting events and other events of celebration or entertainment - regardless of their value - is prohibited as a guest of a professional contact. Attendance at these events as a corporate and formal representation of **SUAVAL Group** is exempt, within a common application of social and professional norms and uses.
- It is not permitted to accept leisure trips or attentions of any kind for the employee and/or any family member, who are paid for by third parties with direct or indirect economic relations with **SUAVAL Group**.

In the event that gifts with a value greater than above are accepted, the Compliance Department should **be informed**.

Any attempted bribery must be communicated and reported through **the Complaint Channel**.

5. GUIDELINES OF ACTION BEFORE THE RECEPTION OR DELIVERY OF GIFTS, GIFTS, COURTESIES AND OTHER BENEFITS

At **SUAVAL Group** we establish the guidelines of action to be followed in the event that any third party offers or delivers any type of gift, gift, courtesy or other benefits that violate the POLICY defined **by SUAVAL Group** or where there are doubts about its compliance by the employee or manager regarding the receipt and / or delivery of any type of gift.

These mandatory guidelines are as follows:

- Any type of gift, gift, compensation, advantage, opportunity received from any third party and in breach of this POLICY should be **rejected**, with the specific exceptions that have been defined for the receipt of gifts.
- It is also prohibited to make any type of gift, offer, advantage etc. to third parties that fail to comply with **the SUAVAL Group policy**.
- In the event that a gift that does not comply with the POLICY is **received**, it must be communicated expressly and immediately to the third party that it is not possible to

accept the gift, gift, courtesy, etc. in accordance with **the** POLICY established **by** **SUAVAL Group**. In this case, the gift received must be expressly returned.

- The Compliance Department should **be informed of** any gifts offered or received that do not comply with the limitations contained in this **POLICY**.
- As an exception, the gift may be accepted **on behalf of SUAVAL Group** where there are circumstances justifying this acceptance, such as the objective difficulty in its return, its institutional, symbolic or protocol character, etc. In this case, **at SUAVAL Group** we receive the gift, which is delivered immediately to a non-profit entity (acting in accordance with the provisions for donations and sponsorships). In this case, the gift received is appreciated **on behalf of SUAVAL Group** and the third party is informed of the use made for charitable purposes.

6. PHILANTHROPIC CONTRIBUTIONS AND SPONSORSHIPS

Philanthropic contributions include any value object that is donated by companies to support philanthropic causes or activities in sports, art, culture, education and science. Sponsorship is related to the support of activities, acts or organizations that grant rights and benefits to the **sponsoring SUAVAL Group**.

Philanthropic contributions and sponsorships may be made in cash or in kind, including goods or services. The cost of membership of social and philanthropic organizations is also considered a donation.

SUAVAL Group may only make philanthropic contributions and sponsorships when:

- It is done in compliance with applicable laws
- Don't do it to gain an undue business advantage
- It is done to a properly established charitable or non-profit organization or institution and has a valid charitable or community charitable purpose

Philanthropic contributions and sponsorships must always be approved in writing by the **Directorate-General and The Board of Directors**.

Specifically, **SUAVAL Group** establishes **the following** PROHIBITIONS in relation to philanthropic contributions and sponsorships:

- Philanthropic contributions and sponsorships should not be offered or provided in connection with any offer, tender, contract renewal or future business relationship with **SUAVAL Group**.
- At **SUAVAL Group** we do not enter into any agreement on philanthropic contributions and sponsorships with an organization as a means of obtaining favourable conditions from it or its affiliates or affiliated parties in any other trade agreement
- Philanthropic contributions and cash sponsorships may not be made, but only through a **SUAVAL Group** check or a bank transfer authorized by the **Directorate-General/Board of Directors**

7. FACILITATION PAYMENTS

Facilitation payments are small, unofficial and improper payments made to an official to obtain or expedite the performance of a routine or necessary action to which the facilitation payment is entitled.

Facilitation payments are usually handed over to public officials for licenses, certificates and other types of public services. However, such payments may also be made to commercial service providers (such as electricity or gas providers). *For example, some facilitation payments are cash payment (whatever the amount) or deliver any kind of gift or courtesy to a customs agent to expedite the release or processing of a cargo, a member of a local government to expedite the granting of a license, etc.*

Facilitation payments are bribes and, therefore, **at SUAVAL Group** we expressly prohibit the making of any type of facilitation payment.

If during the development of your activity a **SUAVAL Group employee is asked** to make such payments, you must not in any case execute it and immediately communicate the fact to the **Antisoborno** Responsible or through the **Anal C of Denuncias**.

8. WHAT SUAVAL GROUP EXPECTS FROM OUR EMPLOYEES

It is important that you do not accept:

- Discounts on products or services that are not available to all employees, unless they are granted by a social club approved by **SUAVAL Group**.
- Gifts, gifts, courtesies and other benefits granted in exchange for services or business information or as a commercial advantage
- Gifts, gifts, courtesies and other benefits of inappropriate value or nature (e.g. sexual) or in inappropriate places
- Gifts, gifts, courtesies and other benefits that are not intended to foster a valid business purpose or relationship

As a general rule, you should refuse sponsored travel and accommodation offers. If there is a valid business purpose to attend an event or function, **SUAVAL Group** will pay any travel and/or accommodation costs.

Sponsored travel during vacation periods does not make them acceptable.

Any problems, incidents or doubts of interpretation arising in relation to the execution and compliance of **this** POLICY should be made known to the **Anti-Bribery** Officer or through **the Complaints Channel**.

The rules and criteria contained in **this** POLICY are immediately applicable to all employees and managers of **SUAVAL Group**.

Failure to comply with **this** POLICY is considered to be a violation of its own mandatory rules, including as an infringement the omission of the duty of information to the hierarchical superior and is therefore included in the disciplinary power of **SUAVAL Group**.

9. COMPLAINT CHANNEL

Organization website:

https://suavalgroup.intedyacloud.com/canal_denuncias.php

