



CORPORATE RESPONSIBILITY POLICY

31/12/2017

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Since 1966 the industrial group SATUERCA is devoted to the production and distribution of special parts designed to provide solutions for different sectors, especially for the automotive sector.

The sustainable and long-term success of SATUERCA GROUP depends essentially on the correct behaviour of all the administrators, executive, senior and middle managers, employees, and collaborators.

Our corporate values are results-oriented, continuous improvement and professional rigor. We constantly strive to improve the security, the protection of the environment and the professional development of our professionals. Furthermore, we encourage team work and the full respect for the diversity of whatever kind.

All these values are enshrined within the framework of fundamental principles and public freedoms, the observance of the applicable law at all times and good entrepreneurial practices to prevent any kind of damage to persons and the environment.

This belief arises from the Management Board of SATUERCA GROUP and is shared by all the professionals of the Group and is reflected in our Code of Conduct.

Based on these principles, we can build together our growth policy that will benefit our customers and of course ourselves.

I would like to thank you in advance for your full adherence to our code of conduct in order to reach our goals.

Mr González Landazuri

CEO

- For the purpose of the present Code of Conduct, please find below the definitions that will be used henceforth only for information:
- **SATUERCA GROUP.-** an industrial group devoted since 1966 to the production and distribution of special parts designed to provide solutions for different sectors, especially for the automotive sector.
- **Code.-** The present Code of conduct defined and approved by SATUERCA GROUP.
- **Staff and collaborators.-** All the professionals who participate and cooperate in the development, progress and evolution of the entrepreneurial activity of SATUERCA GROUP.
- **Audit and Compliance Commission.-** Commission under the CEO whose main competence regarding the purposes of the present Code is to ensure its due enforcement.
- **Compliance officer.-** Collaborator in charge of receiving, analysing, evaluating and when necessary to dismiss or to refer to the Audit and Compliance Commission all matters being brought to light regarding the application, interpretation, and possible breach of the code.

The Code will be applied to all the Collaborators who integrate SATUERCA GROUP. In other words, all the members shall be subject to its compliance from the Management Board down to all the Collaborators part of SATUERCA GROUP, i.e. all its employees, executive, senior and middle managers, and any other representative members of other management bodies who integrate their own group of companies.

Furthermore, the scope of application of the Code will be extended to any other natural and legal person of the Code involved with SATUERCA GROUP.

SATUERCA GROUP is fully aware of the impact of its activity and, therefore, promotes an environmental friendly production and respects the interest groups concerned. Furthermore, the development of its entrepreneurial activities is carried out with the strictest standards of rigour, ethics, and professionalism.

The professional activity of SATUERCA Group should have as an economic result a sufficient increase in value to compensate satisfactorily its Collaborators and shareholders and to carry out investments that will contribute to its sustainable growth in the future.

In this context, the Collaborators of SATUERCA GROUP will always act according to the following fundamental principles:

The principles of the Universal Declaration of Human Rights.

SATUERCA GROUP is committed to the protection of the internationally recognised Human Rights.

The fundamental principles of the International Labour Organisation.

GRUPO SATUERCA rejects any kind of physical or psychological harassment, bullying or abuse of authority.

The collaborators of SATUERCA GROUP will treat in a respectful manner the members of their labour environment, regardless of their hierarchic level, by contributing to a friendly, healthy, and safe work environment.

The principles of the UN Global Compact.

SATUERCA GROUP respects the United Nations and the European Union's decisions, especially regarding the selection of its geographic facilities.

- RESPECTING OUR CUSTOMERS

GRUPO SATUERCA seeks at all times industrial and commercial excellence to provide its customers with quality products and services to retain their loyalty and strengthen long-term relationships.

Furthermore, SATUERCA GROUP strives to offer a constant improvement of its products and distribution processes to ensure its customers have the appropriate quality, safety, and innovation at all times.

SATUERCA GROUP is committed to the practice of fair competence and to strictly comply with the current legislation.

- RESPECTING OUR EMPLOYEES

We provide our Collaborators with a privileged environment within our scale of values and we acknowledge that without their support and co-operation it would not be possible to reach our strategic goals.

Furthermore, we encourage and expect our Collaborators to express a shared sense of corporate integrity at all times by expecting them to avoid, in a responsible manner, all types of situations that could lead to a conflict of interests.

The protection of health and security in the workplace is our main concern. Due to the fact that we are highly aware of the impact and risks, our priority is to perform our activity in a safe work environment.

In this context each Collaborator is responsible for the activities carried out under his/her authority. They must be performed according to the extensive internal norms regarding health, safety, and the environment.

Labour rights

GRUPO SATUERCA assumes the principle of equal opportunities between persons by ensuring that its Employees and Collaborators carry out their responsibilities in a work environment where no one is discriminated against on the grounds of race, sex, religion, party or trade union membership of any kind.

- **RESPECTING OUR SUPPLIERS**

SATUERCA GROUP's relations with its suppliers and service providers shall be developed according to the following guidelines:

- Always take into account the interests of each supplier in a respectful way and seek to achieve mutual benefit and economic efficiency.
- Implement rigorously the suppliers' homologation to ensure impartiality and competitiveness based on objective standards such as quality, costs, and lead time.
- Demand at all times the application and observance of the norms established by the present Code.

- **ENVIRONMENT**

GRUPO SATUERCA is concerned about the protection of the environment and the sustainable development and is, therefore, engaged in developing its activity using the necessary resources efficaciously.

Given its industrial activity, SATUERCA GROUP knows the influence it has on the environment and is, therefore, vigilant and encourages clean energy and proper waste management to reduce their impact.

- ACCEPTANCE OF GIFTS

The collaborators shall neither give nor receive personal benefits, presents, gifts or an economic compensation from any customer or provider of SATUERCA GROUP, or from any natural or legal person that tries to engage to do business with GRUPO SATUERCA.

The attendance at social acts, symposiums, conventions, or any other training activity duly authorized, as well as invitations to working breakfasts, will not be considered as a personal benefit to the effects of the present Code.

As a general rule, only promotional or small courtesy gifts will be accepted within acceptable limits, in line with habits and anti-corruption legislation.

SATUERCA GROUP and its Collaborators will ensure the timely dissemination of this criteria among their customers and suppliers.

- PROTECTION OF PROPERTY, ASSETS AND RESOURCES

SATUERCA GROUP puts at the disposal of its collaborators the necessary resources to carry out their professional activity.

The property of SATUERCA GROUP are both the physical assets such as buildings, facilities, equipment, tools or office supplies, and the intangibles assets such as information and software systems, titles, patents, commercial secrets, designs, models, rights, inventions, processes, domains, information protected by a registered trademark or author rights.

The collaborators shall use these resources in an honest, responsible, and appropriate way when developing their professional activity. They shall comply with the norms applicable in specific cases. They shall also protect these assets and make sure that neither of them may be stolen, damaged destroyed nor misused in such a way that they could cause damage to the interests of SATUERCA GROUP, its customers, suppliers and/or associates.

GRUPO SATUERCA specifically recognises the value of intellectual property in all its forms, including the know-how, patents, designs, registered trademarks, commercial benchmarks and industrial secrets. SATUERCA GROUP actively protects the industrial and intellectual property rights and respects the rights of third parties. The intellectual property generated in the projects, developments, consultations and other work undertaken by SATUERCA GROUP and its Collaborators will always be the property of SATUERCA GROUP, unless otherwise contractually agreed in specific cases.

- PROTECTION OF PERSONAL DATA

SATUERCA GROUP obtains personal information not only from its Collaborators but also from its suppliers, customers, and shareholders as a result of the development of its entrepreneurial activity. The personal information belongs to each individual in all cases.

Accordingly in compliance with the current Spanish Organic Law no. 15/1999 of 13th December, on the Protection of Personal Data (henceforth referred to as 'LOPD'), as well as the Royal Decree no. 1720/2007 of 21st December, approving its implementing Regulation, SATUERCA GROUP has designed a global data protection policy in order to protect and ensure the appropriate treatment of personal information.

- ETHICAL CHANNEL

SATUERCA GROUP puts at the disposal its Collaborators an ethical channel so that they can inform the Compliance Officer about the suspect proceedings or possible conflicts of interest that need to be analysed.

Under the LOPD, even though the communications through this channel will not be able to be anonymous, GRUPO SATUERCA will ensure the confidential treatment of both the reported information and the informer.

All the suspect or apparently irregular proceedings which could constitute a breach of this Code shall be communicated clearly and sufficiently with the corresponding identification of the sender through any of the following means of communication:

- Email address: buzonetico@estamcal.com
- Postal address (Attn. Compliance officer): Barrio Muntzaraz, 39, 48220 Abadiño (Bizkaia)

The Compliance officer reserves the right to analyse, assess and, if applicable, to dismiss those communications that do not strictly comply with what is regulated in this Code.

- Dissemination and training

Once the Code has been approved by the Management Board, a global dissemination task will take place to ensure the full adherence to the Code by all collaborators, internal and external, who integrate SATUERCA GROUP.

- Acceptance

The Collaborators expressly accept the general principles of behaviour, as well as the standards of conduct and ethical behaviour established by this present Code.

The professionals who will in the future become part of the set of Collaborators of SATUERCA GROUP will also expressly accept the general principles of behaviour as well as the standards of conduct and ethical behaviour established by the Code.

- Update

The Code will be reviewed and updated according to the changes that may occur. The Compliance Officer may also make improvement proposals. Any revision or update which may imply a modification of the Code will require the approval of the Management Board.

- Approval

The Code was approved at the Management Board meeting held on 27th June 2017 and was last modified at the Management Board meeting held on 23rd January 2018.



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