

Code of Conduct

Grupo Ramón García



1. Introduction

GRUPO RAMÓN GARCÍA (Grupo RG) is a Galician company with international projection dedicated to design, manufacture and logistics of products derived from wood. In its activity, Grupo RG combines the most advanced technologies with the good work of traditional carpentry.



2. Why a code of conduct?

The Code of Conduct of Grupo RG expresses its willingness to operate in accordance to the applicable law and its commitment to values that conform its own business ethic.

The Code of Conduct neither replace the more detailed business policy nor action protocols nor standard work procedures (SOPs) that regulate the activity of the personnel or with associated companies or stakeholders. In case of controversy, the most stringent regulation will apply.

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3. Scope of application

- **Internal area.** All those natural or legal entities who directly work for Grupo RG or act in their behalf.
- **External area.** The principles gathered in the Code may be extended, in whole or in part, to any other person, natural or legal entity, who is related to Grupo RG.

The personnel of Grupo RG and its representatives must know and comply with the Code, which will appear on the corporate website in order to ensure that clients and suppliers can access it.

If failure to comply it occurs, disciplinary actions will follow, and, if applicable, the facts will be reported to the judicial or administrative authorities.

4. Fundamental values

All GRUPO RG personnel have the obligation to perform their tasks according to certain values:

- **Responsibility** in the performance of the assigned tasks.
- **Creativity** and proposal of ideas to improve or innovate.
- **Overcoming** and continuous improvement in a competitive global market.
- **Professionalism** to achieve efficiency and quality.
- **Integrity** in labour, commercial and businesses relations.
- **Respect** to consolidate an adequate work environment.
- **Equality** of treatment and opportunities between women and men.
- Local **development** and wealth creation in the areas in which it operates.



5. Principles and values

5.1 Dignified and fair work environment

Grupo RG defends human rights and neither maintains commercial relations nor another kind, with those who consent the infringement of such rights. Any threat, abuse or harassment, whether physical, verbal or visual, is unacceptable.

The company respects the social rights of its personnel and promotes the conciliation of work and family life. The salaries are adjusted to the sector standards and national laws. Overtime will be paid according to the law.

Grupo RG rejects any discrimination based on sex, origin, beliefs, religion, ideology, age, nationality, sexual orientation, marital status or any other reason. The selection and promotion processes are based on skills and knowledge and seek to include all social sectors.

5.2 Safety at work

Every person subjected to this Code must ensure their own safety and that of others, comply with the regulations, use the safety material established for each activity and attend the training appointments that are held.

Those who have personnel under their charge will report on aspects of special attention in each job position, identify and communicate the training needs and perform periodic evaluations to avoid lacking of knowledge to be a risk justification factor. It is prohibited to consume substances that affect the fulfillment of professional obligations.

5.3 Responsibility in the market

Grupo RG operates in accordance with the principles of the social market economy, competes loyally, pursues deceptive or fraudulent conduct and it has internal controls to prevent anticompetitive practices, including possible agreements with commercial or business partners (pricing, distribution of markets or production quotas ...).

In each transaction, objective criteria will be followed, juggling the most advantageous offer with the value provided by the usual supplier companies. The suppliers of Grupo RG must know and respect this Code.

Group personnel are prohibited from accepting or asking suppliers for information about other companies. Information about competition obtained in an unfair manner or breaking confidentiality will be reported.

Relationships with companies which are our clients are based on professionalism. In the offers of goods and services their characteristics neither be distorted nor will proposals be made that lead to error. All Grupo RG products and services must comply with the highest quality standards. The group offers consultation and complaint procedures on all its products and services.

5.4 Observations of the law and delimitation of responsible areas

All Grupo RG personnel must adjust their behavior to those provided by the laws of their workplace, the agreements signed by the company, the internal regulations and the mandates of this Code..

Decisions that may affect third parties, cause labor or financial risks or be punishable by criminal or administrative system, as well as those taken in financial procedures (especially billing and collections) will be subject to traceability processes so that they can be verified at the request by the people affected, of by the authorities or by the RG Group.

In each management process, the roles and people involved will be determined, clearly differentiating who initiates, who authorizes, who executes and who verifies, in order to identify responsibility and prevent errors or breaches. The people responsible for each area must verify that the personnel who is under their charge know their task and responsibility.

Any person subjected to the Code that faces a criminal prosecution or a sanctioning administrative file will inform the body responsible for compliance.

5.5 Responsible use of company goods and services.

The personnel of Grupo RG is responsible for the good use of the facilities, services and means put at their disposal, which can only be improved or replaced with previous authorization. The computer systems and technological platforms of the Group must be used professionally and safely. It is prohibited to install add-ons or download programs or computer applications without permission.

The technological means for the use of the personnel will be able to be monitored according to the Workers Statute. The control measures will be justified and will respect the right to privacy and the communications confidentiality.

Personnel housed in hotels or other establishments should remember that the means offered therein are made available, indirectly, by Grupo RG, and will use them with the same criteria. All Group personnel must keep the documentation of their activity.

Likewise, it must inform Management, and adopt measures to prevent the loss, theft or damage of machinery, equipment and vehicles. The management will control the terms of revision of machinery, equipment and vehicles available to personnel.

When the use of the Group's resources is authorized both for professional use and for private use (telephones, computers, mail accounts ...), it will always be used correctly and in accordance with the Group's guidelines and in good faith.

The material owned by the Group will be returned when required, when it is not necessary for the task that is performed and when the employment or professional relationship ceases.



5.6 Protection of public resources and fight against corruption

Grupo RG fulfills its obligations with the Public Treasury and Social Security, provides all the information required by the Public Administration and has internal audits that verify their accounting and tax data. The persons responsible for the Group's finances will comply with tax and accounting legislation and will ensure that the books reflect an accurate image of the company. Apart from the criminal consequences, intentional alteration of the records will constitute a serious infraction. Only files with prior authorization may be destroyed. Under no circumstances may the elimination of documents, records or files related to pending administrative proceedings or open judicial procedures be authorized.

It is prohibited to offer or promise to another person the granting, direct or indirect, of any monetary incentive, commission or reward to act or stop acting to favor a certain business or obtain an undue business advantage. Likewise, it is prohibited to authorize, promise or offer bribes or payments to civil servants or public entities or to private entities to expedite judicial or administrative procedures or obtain favorable treatment. These payments are prohibited, whether they are made directly to people with public or private responsibility or to people or entities indicated by them.

From this are excluded occasional invitations that do not exceed reasonable limits, merchandising items and tickets and passes to cultural or sporting events in which Grupo RG participates for social purposes.

Grupo RG rejects money laundering and tax havens. All foreign investment requires the articulation of a financial control system that allows verifying the legality of the operations carried out.

The people responsible for financial matters should know the client companies, will not open anonymous accounts or authorize transfers without identifying that company or its representative and will try to obtain information about the origin of the funds. The Group's financial control incorporates the principles of the COSO Report, records all payments and transactions, prohibits off-the-books accounts, controls cash payments if they occur, and has an audit system.

When intermediation is used in relations with public entities, a file will be opened to ensure that the contracted person or entity offers an unblemished record. The hired person will be informed of the contents of this Code and will be subject to its regulations.

In relations with public administrations, the established rules will be followed and meetings will be dated and documented in order to maximize transparency. When a person subject to this Code receives an official requirement, they must inform the Group's management.

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5.7 Political impartiality

Grupo RG does not intervene in the politics of the states in which it operates. The relationship with governments, authorities, institutions, political parties and electoral candidacies will be based on the principles of legality and neutrality. Contributions in cash or in kind to parties, candidacies and public authorities made on behalf of Grupo RG are prohibited.

GRUPO RG recognizes the ideological freedom of its personnel and its right to participate in legal political activities compatible with its function and that take place outside of working hours and outside the company's facilities.

5.8 Conflict of interests

No one may use the position in Grupo RG to obtain advantages, patrimonial or personal. Personal, family or friendship situations that entail a collision between private interests and those of the company will be avoided.

The position in the company or the name of the company for your own benefit or to favor a third person can not be use.

5.9 Information transparency and presence on the internet

Grupo RG will have specific tools to ensure information veracity and transparency in management.

The personnel of Grupo RG who participates in social networks, blogs or other forms of community communication will do so in their personal capacity. Using the name of the Group or any reference to it may be considered contrary to the Code.

Images or audios taken at the facilities of the Group can not be recorded and broadcast for private purposes.

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5.10 Confidentiality and data protection

Grupo RG respects the privacy of its personnel and the people with whom it is related (client companies, suppliers ...) and protects their personal data. The people vinculated to the Group must not disclose information acquired by their activity.

The company guarantees computer security. Those who by reason of their task have access to personal data respond to their custody and must comply with the laws and internal rules for the treatment of such data. Only the use of personal data in specific and justified cases will be authorized.

When the personal data is collected, the consent of the person providing it will be obtained, even when it is not legally required, and the Group's commitment to use it only for the authorized purposes will be informed.

The associates and personnel of Grupo RG can not use for their own benefit or communicate to third parties data obtained by their professional activity or use confidential information of other companies without written authorization.

Unless indicated, the information that is accessed will always be confidential and can only be used for the purposes for which it was provided.

It will be avoided duplicating or storing information in devices outside the company. The obligation of confidentiality lasts after the termination of the relationship with Grupo RG

5.11 Protection of intellectual and industrial property

Grupo RG protects its intellectual and industrial property and respects that of others. The people subjected to the Code must respect and protect copyrights, patents, trademarks, industrial designs, domain names, design and reproduction rights and any other similar rights.

It is prohibited to use creations or distinctive signs of intellectual or industrial property of people or entities outside GRUPO RG without first verifying that they have the relevant license, rights or authorization.

The intellectual or industrial creations of the Group's personnel related to its activity shall be the property of the Group unless the law provides otherwise.

Grupo RG is responsible for the originality of its products and demands the same from its suppliers. The name, image or brands of the Group may only be used with authorization and for purposes related to the activity of the company.

The company guarantees computer security. Only the use of personal data in specific and justified cases will be authorized.



5.12 Defense of the environment

Grupo RG promotes an active and transversal environmental policy, so that all actions of the Group must seek solutions that favor the sustainability and protection of biodiversity.

The company disseminates good environmental practices, participates in training and social awareness programs to defend the environment and promotes policies for the use of clean energy, reuse and recycling. As part of this commitment and, in particular, with the traceability of wood, Grupo RG is part of the Forest Stewardship Council, an international organization that ensures good forest management throughout the world.

6. Compliance control: the regulatory compliance committee

To ensure compliance with the Code and the Regulatory Compliance Program, the Compliance Committee is formed whose members will be appointed by the administrative body of Carpintería Ramón García, S.L.

The functions of the Committee are:

- **Carry out the application of the Code and the rules that develop it.**
- **Investigate, on its own initiative or at the request of a party, possible breaches and process and resolve the related files.**
- **The procedures, rules, and other development tools of the Compliance Program, with the exception of the Internal Rules of the Committee must be raised to the administrative and management body, for its approval.**
- **Determine the contents of the Compliance Program and plan the training thereon.**
- **Inform and advise on any doubts that may arise from the application of the Regulatory Compliance Program.**
- **Elaborate periodic reports on the effectiveness of the measures adopted.**
- **Adapt the Compliance Program to future Group activities, to new risk areas detected and to changes in legislation and jurisprudence.**
- **Elaborate an annual report on the activity derived from the Compliance Program and suggest in it the improvements that should be incorporated.**

The Committee can not intervene in the management of Grupo RG or make decisions that directly affect the operations of the company. Neither may it execute disciplinary measures nor resolve, by itself, contractual relationships, agreements nor conventions previously established.

7. Communication of non-compliance: responsible channel

Any person who works in Grupo RG and knows of the existence of irregular situations or acts contrary to the law or the Code and the regulations that develop it, must immediately report it by any of these means:

- Tell the facts to a person with a higher rank.
- Report the facts to any member of the Compliance Committee.
- Make a complaint through the Responsible Channel.

Responsible Channel is a tool for the personnel of Grupo RG and its suppliers and clients to present claims, suggestions, complaints and denounce any act contrary to the law or the Code. It is a confidential channel and maintains the anonymity of the complainants except cases of bad faith.

Grupo RG encourages its personnel, supplier companies and clients to use the Responsible Channel to prevent illicit behavior and make suggestions and complaints.

8. Entry into force

The Code of Conduct will take effect 30 days after its approval by the company's management body.





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