MACOGA, SA Code of Ethics and Conduct



Code of Ethics and Conduct

The success of our company depends on the trust of our employees, customers and partners.

We earn credibility by honouring our commitments, showing honesty and integrity and achieving our goals only through honourable conduct.

What is our Code of Ethics and Conduct?

The Code of Ethics and Conduct of MACOGA, S.A. defines the basic principles of conduct and corporate values that operate in our professional relationships, constituting the fundamental pillars of our way of working.

This code establishes a framework of behaviour applicable to all MACOGA, S.A. personnel.

All the workers and managers of MACOGA, S.A. must respect the Code of Ethics and Conduct and promote its dissemination and respect by their collaborators.

Fundamentals of the Code of Ethics and Conduct

Compliance and respect with legislation

At MACOGA, S.A., each and every employee and manager complies with the legal regulations applicable at all times. These regulatory requirements must be respected by the employees and managers of MACOGA, S.A., and they shall ensure compliance with them. At the same time, MACOGA, S.A. staff must adhere to the internal regulations agreed by the Company Management and the workers' representatives.

MACOGA, S.A. aims to create an atmosphere of trust at all levels of the company, inviting all staff to express themselves freely.

In the same way MACOGA, S.A. recognises the freedom of unionisation in accordance with the law and not to practice any type of discrimination related to its activities.

Respect for people. Equal treatment. Non-discrimination. Harassment

Respect for people is a fundamental principle of our company. All staff will ensure that every person in our environment is treated in a fair, equitable and respectful manner.

At MACOGA, S.A. we are committed to providing a workplace free from discrimination of any kind and from abusive, offensive or harassing behaviour. Any employee who feels harassed or discriminated against should report the incident to their manager or our human resources department.

All MACOGA, S.A. employees are also expected to support an inclusive workplace by adhering to the following standards of conduct:

- Always treat others with dignity and respect.
- Address and report inappropriate behaviour and comments that are discriminatory, harassing, abusive, offensive or unwelcome.
- Promote teamwork and employee participation by encouraging representation of different employee perspectives.
- Seek the views of employees with different experiences, perspectives and backgrounds.
- Avoid jargon, jokes or idioms that may not translate or be understood in other cultures or languages.
- Keep an open mind and listen when you are given constructive advice about others' perceptions of your conduct.

MACOGA, S.A. will not tolerate discrimination, harassment or any abusive, offensive or unwelcome behaviour or language.

At MACOGA, S.A. we guarantee equal treatment, respect and non-discrimination for reasons of race, age, sex, religion, nationality and any other type of circumstance protected by law for all our staff.

Any of our collaborators must comply with this principle and will ensure its fulfilment. MACOGA, S.A. pursues and

















denounces harassment in the workplace, and we encourage any of our employees to report any type of situation that could be considered harassment.

Respect for Human Rights

All MACOGA, S.A. personnel must respect the laws and regulations that are implemented in each of the countries where MACOGA, S.A. carries out its activity.

MACOGA, S.A. complies with both national and international laws related to child labour and we always ensure that our suppliers and customers comply with this premise, following the guidelines set by the International Labor Organization (ILO).

At MACOGA, S.A. we are fully convinced that work is a right, not an obligation, and for this reason we condemn any type of forced labour or service that is carried out against one's own will and under the threat of punishment.

Safety, occupational health and environment

We work every day to provide a healthy and safe environment in our organisation and we understand that favouring this situation generates a positive atmosphere and benefits everyone.

MACOGA, S.A. is committed to providing our employees with the necessary resources so that they can carry out their duties safely and in a healthy environment.

It is the obligation of each of our company's employees to ensure and respect the rules relating to health and safety at work and to use the equipment and facilities to which they have access correctly, ensuring their own safety and, in general, that of all persons who may be affected by their activities.

We protect the integrity and health of our employees through an occupational health and safety policy, based on strict compliance with all regulations and laws.

MACOGA, S.A. carries out its activity with respect for the environment, complying with all the standards and regulations established in this respect.

In MACOGA, S.A. we are committed to sustainable development, establishing policies and actions that allow us to minimise the environmental impact.

Use of our resources and equipment

The workers of MACOGA, S.A. have the obligation to use the resources offered by the company in an adequate, responsible and efficient way, respecting the purposes for which they are assigned. Any type of activity not intended for the benefit of MACOGA, S.A., in which its resources are used, is totally forbidden.

All MACOGA, S.A. employees who make use of computer, telephone and internet equipment must remember that this equipment has been made available to them with the aim of improving their performance, so they must be used responsibly and exclusively for their professional use.

Those employees who, due to the activity they carry out in our company, are responsible for handling company funds, are responsible for using them appropriately and efficiently, and always under authorisation and following the guidelines established for this purpose.

Protection of information

No employee of MACOGA, S.A. shall disclose confidential information relating to our company to other natural or legal persons outside MACOGA, S.A. At the same time, this type of information shall not be disclosed internally, unless its use is necessary for the normal exercise of the functions of each of the jobs.

In the event of having to share confidential information with suppliers and/or clients, this must be done with the utmost responsibility and always informing your immediate superior of this situation.

Conflicts of interest and transparency

All decisions taken by MACOGA, S.A. employees must be based on the best interest of the company and must never be based on personal interest. When we select our collaborators and suppliers, we will always do so following only and exclusively professional criteria and never guided by personal benefit.

If, due to the exercise of their functions, any of the employees of MACOGA, S.A. finds themselves in the situation of being able to contract the services of any collaborator and/or supplier with whom they have family and/or friendship ties, in such a way that there may be doubts about the objectivity of this decision, they will automatically inform their immediate superior of this situation and the decision will always be made in accordance with the values of our company.

The acceptance or offering of gifts, services or any other type of consideration by MACOGA, S.A. employees to our collaborators or part of them is not allowed under any circumstances, except those due to usual commercial practices or courtesy and whose value is symbolic.

Company image

The corporate image of our company is very important to us, for this reason we encourage our employees to follow and promote the values of integrity, honesty, sincerity, equality and respect, which the Management of MACOGA, S.A. tries to spread every day with the aim of making MACOGA, S.A. a dynamic, modern company that encourages creativity, the achievement of its goals and a sense of responsibility.

















Distribution

This Code of Ethics will be communicated and distributed among the members of MACOGA, S.A. and interested parties, in accordance with the means and resources available.

The persons subject to this Code have the obligation to know its content and the corporate values of MACOGA, S.A., as well as to respect it and help the rest of the persons and entities in its fulfilment.

Application of the code

Our code of ethics and conduct expresses the position of MACOGA, S.A. on those aspects that we consider to be of the utmost importance and is intended to be a guide in the decisions that its employees take on a daily basis in their jobs.

Any MACOGA, S.A. employee who becomes aware of a breach of any of the rules defined in this code of ethics or conduct must report it to their direct manager and/or to the human resources department of our company.

All MACOGA, S.A. employees are encouraged to report and denounce any type of breach of this code of ethics and conduct of which they are aware.

WARNING: The English version is a translation of the original in Spanish issued for information purposes only. In the event of a discrepancy between the content of the English version and the original Spanish version the latter shall prevail.















