



nirvel

CODE OF ETHICS FOR CUSTOMERS, SUPPLIERS AND CONTRIBUTORS

CODE OF ETHICS

The company Nirvel S.L., is committed to guaranteeing ethical principles and respect for the people, the society and the environment, within its sphere of influence, extending its responsibility to all its interest groups.

We are aware of how important it is to create and maintain a work environment where the fundamental principles of human rights protection and labour standards are respected, where corruption and bribery practices are not allowed, and with the objective of guaranteeing environmental sustainability, and the health and safety of all the agents involved.

We are committed to the responsibility of establishing and respecting lines of action aimed to complying with these principles that the Company considers as basic, in accordance with different international treaties such as: the Universal Declaration of Human Rights, the ILO Conventions, and the Ten Principles of the United Nations Global Compact.

The company are firmly committed to effective equality of treatment and opportunity between men and women, and to the elimination of all forms of discrimination, whether direct or indirect, irrespective of the circumstances or conditions, in all areas of the company.

The following principles apply to all company activities, regardless of their nature and location.

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HUMAN AND LABOUR RIGHTS

HUMAN AND LABOUR RIGHTS

1. FREE CHOICE OF EMPLOYMENT

- **1.1** The company does not approve of forced or coerced labour, either directly in the company, or indirectly through suppliers or subcontracted companies.
- **1.2** People working in the company are not required to leave 'deposits' or identity documents and are free to leave the company after the required legal communication.



2. FAIR REMUNERATION

- **2.1** Salaries and benefits are paid on time and regularly, and comply with national legal regulations, industry benchmark regulations, or any superior regulatory framework.
- **2.2** Each person working with us is provided with written and understandable information on their salary and working conditions before accepting employment and during each pay period.
- **2.3** No salary deductions can be made as a disciplinary measure, unless they are provided for in the applicable regulations
- **2.4** Salaries are paid by company directly to the staff.
- **2.5** The company keeps records of each person hired and payments made to them.



HUMAN AND LABOUR RIGHTS

3. DECENT WORKING DAY

- **3.1** Working hours comply with national legislation, applicable international conventions and reference industry standards, or those frameworks that offer greater protection.
- **3.2** People working for the company do not regularly work more than 40 hours a week, and have at least one day off for an average of 7 days.
- **3.3** Overtime shall be governed by the provisions of the collective bargaining agreement.
- **3.4** An adequate schedule is established to ensure that people working in Nirvel S.L have a rest and holiday period in accordance with applicable national legislation and international conventions.



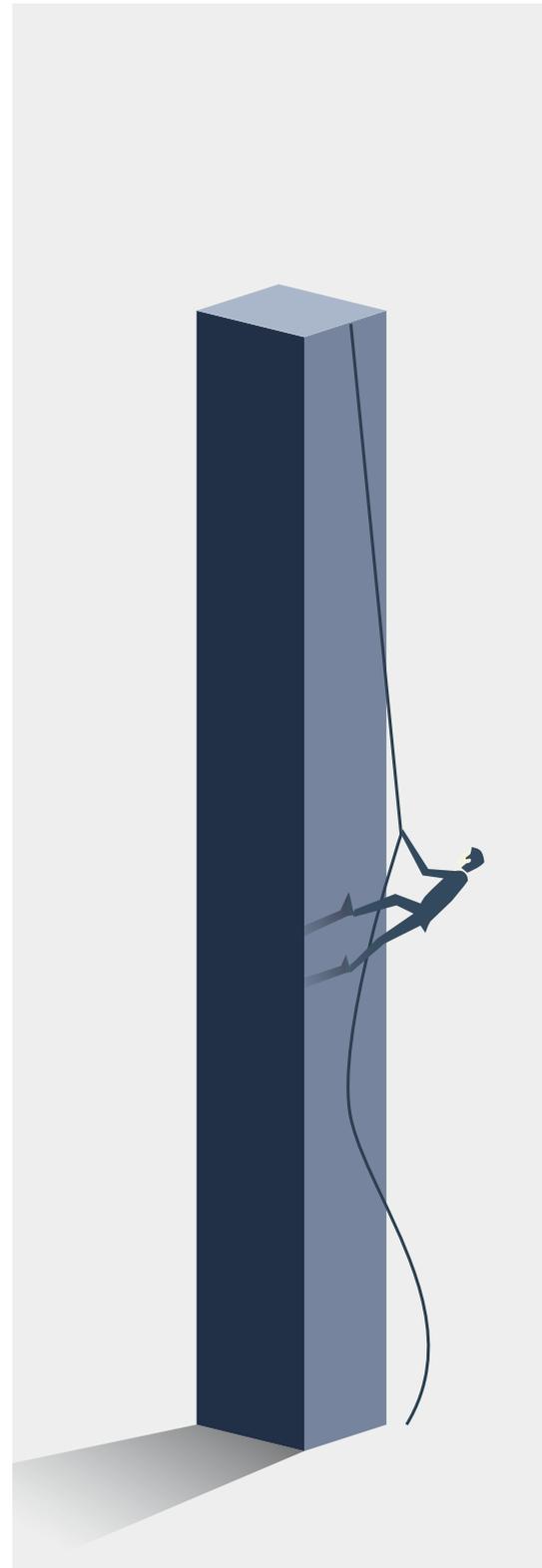
4. REGULAR WORK

- **4.1** In every respect, the work performed is based on recognised employment relationships, as established through national legislation.
- **4.2** The obligations towards the people who work for the company, subject to labour legislation and regulations deriving from regular employment relationships, shall not be avoided through the use of contracts other than those required by law, depending on the duties and responsibilities to be performed.



5. CHILDS LABOUR

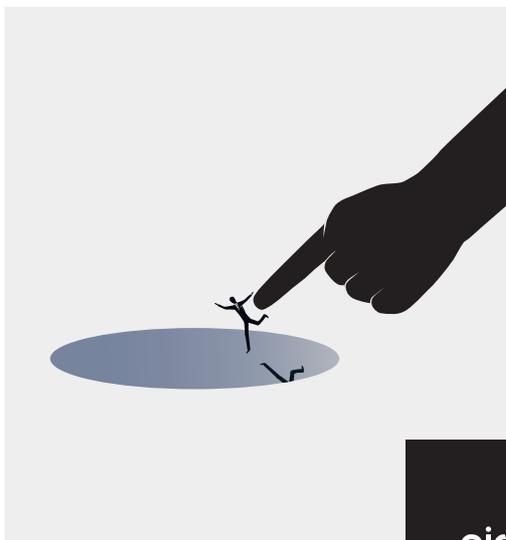
- **5.1** No children under 16 years old (or the minimum working age according to ILO labour standards) are employed.
- **5.2** Young people under 18 years old are not employed for night work or in conditions of special risk.



HUMAN AND LABOUR RIGHTS

6. NON-DISCRIMINATION

- **6.1** Non-discrimination in employment practices based on race, colour, age, gender, sexual orientation, marital status, pregnancy, parental status, religion, ideology, nationality, social status, medical condition, functional diversity, trade union membership, or any other matter, is guaranteed at all times.
- **6.2** People working for us do not perform tasks that are incompatible with their capabilities.
- **6.3** People working in the Company on a temporary employment contract have the same rights as the equivalent permanent employees.
- **6.4** Selection processes for new personnel are based solely and exclusively on the person's ability to perform the job, based on their qualifications, attitudes, skills and/or experience, with no exclusion or distinction based on other issues.



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7. FAIR TREATMENT

- **7.1** Abuses of any nature, whether physical or psychological, as well as any form of intimidation, such as workplace or sexual harassment, verbal abuse, threats, or any other forms of psychological harassment are not tolerated.
- **7.2** Under no circumstances may the human rights of any of the people working for the company, or of third parties working for the company, be violated.
- **7.3** All disciplinary procedures must be properly communicated to all the persons concerned. A written procedure must be established whenever required by regulation or convention.



8. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

- **8.1** People working for the company Nirvel S.L., without distinction, have the right to join or constitute trade unions of their own choosing, as well as to bargain collectively.
- **8.2** The company adopts an open attitude towards union activities.
- **8.3** Staff representatives are not discriminated against and have access to carry out their representative duties based on the applicable collective bargaining agreement.
- **8.4** Where the legislation restricts the right to freedom of association and collective bargaining, the company shall facilitate the development of parallel means to associate and negotiate freely and independently.

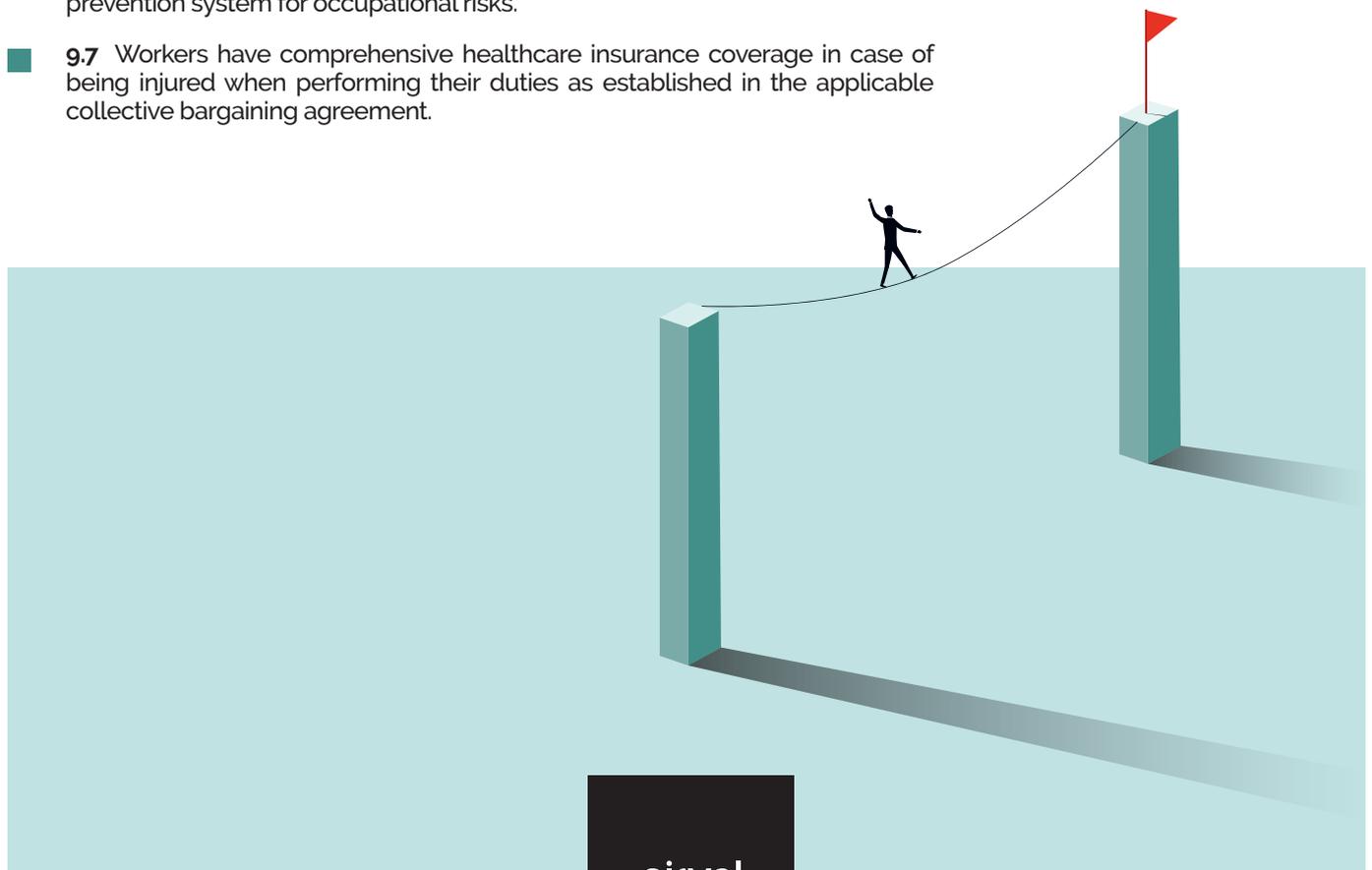


HEALTH AND SAFETY

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9. OCCUPATIONAL HEALTH AND SAFETY

- **9.1** A safe, healthy and hygienic working environment is provided, in compliance with legislation in force; offering protection to the people who work in the company, visitors, contractors, clients and the environment as a whole, against any risk, of any nature, generated by the activity.
- **9.2** Appropriate controls are carried out to prevent accidents and damage to health that may occur when working, and measures are taken to reduce the causes of hazards inherent in the working environment.
- **9.3** Access to drinking water, hygienic sanitation facilities, and places to rest is available.
- **9.4** The company provides protection equipment free of charge for the adequate performance of duties in compliance with the provisions of the industry's collective bargaining agreement.
- **9.5** People who work with us receive regular training on health and hygiene from the beginning of the employment relationship.
- **9.6** In compliance with regulations, the company has implemented a prevention system for occupational risks.
- **9.7** Workers have comprehensive healthcare insurance coverage in case of being injured when performing their duties as established in the applicable collective bargaining agreement.

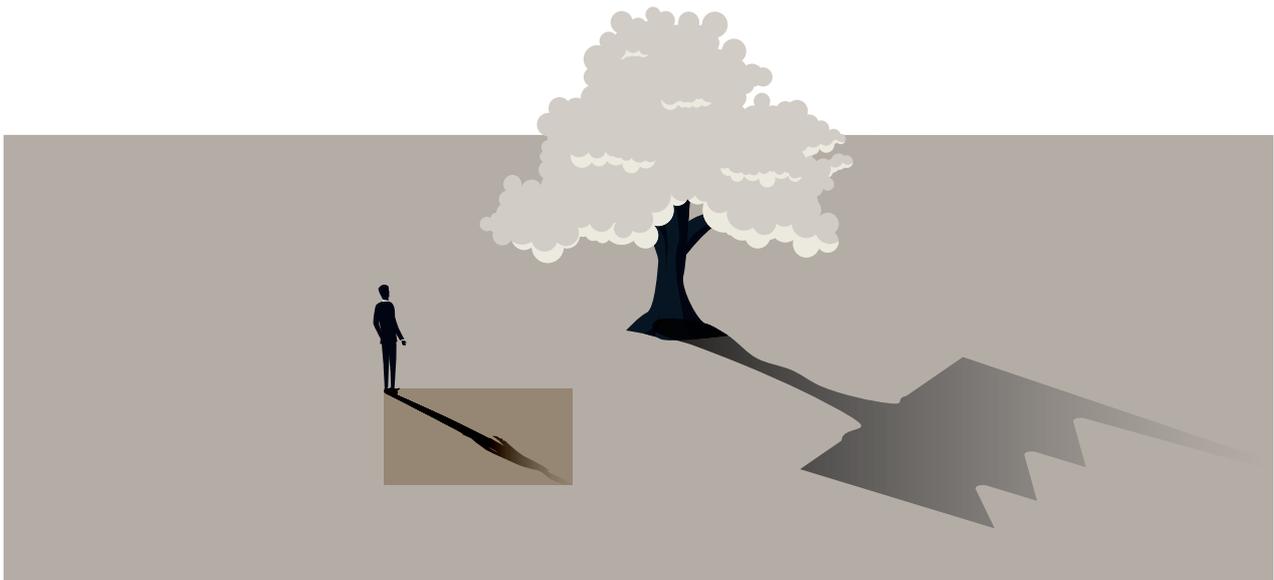


ENVIRONMENTAL SUSTAINABILITY

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10. ENVIRONMENTAL REQUIREMENTS

- **10.1** The company carries out its activity based on respect for the environment, complying with the applicable legal provisions and the Environment Policy, meeting other environmental and sustainability requirements, and keeping the necessary permits, licenses, and registrations updated.
- **10.2** The company is focused on prevention and continuous improvement in environmental issues. Therefore, it promotes environmental responsibility initiatives and favours the development of sustainable production systems and environmentally friendly technologies.
- **10.3** On a regular basis, the company assesses and analyses its environmental management as well as its compliance with measures taken to minimise the environmental impact of the activities.
- **10.4** Action plans are implemented to reduce the inefficient use of resources such as raw materials, energy, and water.
- **10.5** The necessary measures are taken to minimise waste generation and ensure the responsible and safe management of waste.
- **10.6** Air pollution is controlled, trying to reduce any kind of emissions.



BUSINESS ETHICS AND INTEGRITY

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11. REGULATORY REQUIREMENTS

- **11.1** The company Nirvel S.L., is committed to complying with the national and international laws and regulations that are applicable in each country where the company operates, avoiding collaboration with suppliers that do not meet such laws and regulations.
- **11.2** The company complies with all internal management policies, including those related to the Compliance Programme, and provides all workers of the company with continuous training for avoiding risks derived from failure to comply with regulations.
- **11.3** Before starting an employment relationship, the company ensures that the applicant meets all the legal provisions to work. When the services of employment agencies are requested, the company must ensure that all applicants comply with the legislation in force.



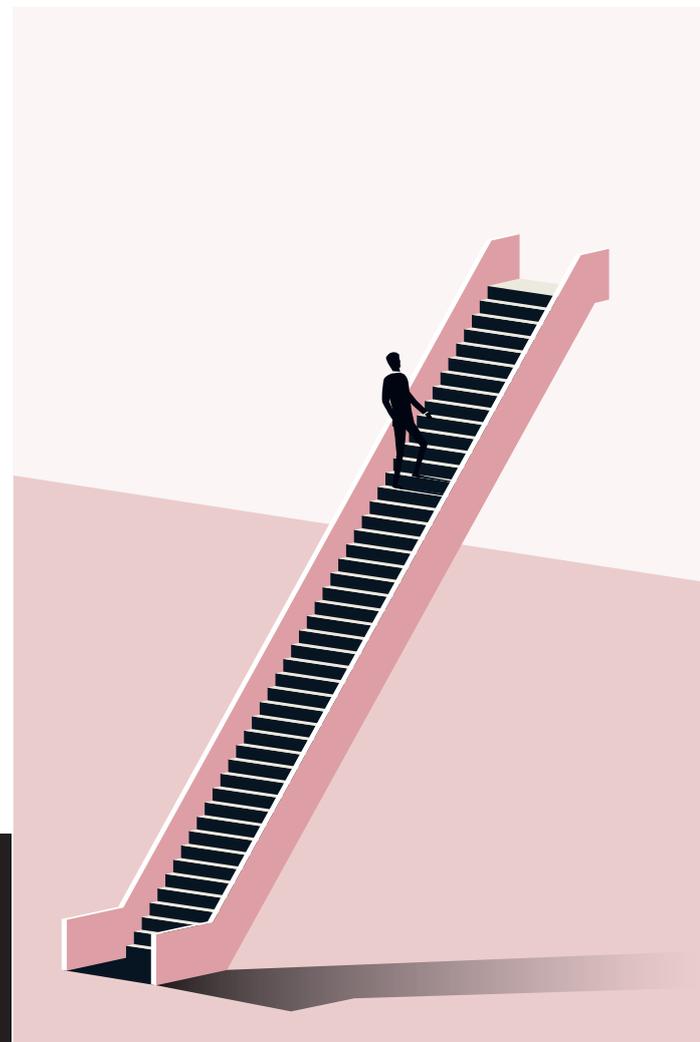
12. ANTI-CORRUPTION

- **12.1** No form of corruption, including extortion and bribery, is tolerated in business or personal transactions within the company.
- **12.2** Any member of Nirvel S.L., may give or accept gifts or presents, unless they have a symbolic value or are given as mere courtesy, are not prohibited by law or by generally accepted business practices, and do not contribute to obtaining commercial advantages.



13. CONFLICTS OF INTEREST

- **13.1** Members of the company must avoid situations that may give rise to a conflict between personal interests and the interests of the company, either directly or indirectly. They must also refrain from representing the company or intervening in decision-making if they or anyone related to them has a personal interest.



COMMUNICATION CHANNEL

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NIRVEL

Nirvel S.L. and subcontracted companies professionals shall be aware of this Code of Ethics. They must accept and comply with it during their performance in the company or while carrying out works for it.

Any person that has doubts about the application of the Code of Ethics or that is aware of any failure to comply with the principles established in it (by a member of the Group, a supplier, a subcontractor, an employee, clients, or anyone acting on behalf of the company) must report the situation to the Regulatory Compliance Committee of the company, which is responsible for assessing and processing any queries and complaints that may arise.

The company guarantees adequate processing of personal data and confidentiality in the management of queries and complaints. It also undertakes to protect the person who, in good faith, has submitted a complaint or has participated in any investigation procedure, from any kind of retaliation.

The company facilitates a Communication Channel in which any query, suspicious behaviour, or complaint about the failure to comply with any provision can be communicated through the following means:

· **Nirvel S.L**

Nirvel S.L- Polígono Industrial Cotes Baixes - cl f 7, Alcoy, 03804
comunicacionnirvelsl@nirvel.es

Any complaint or communication regarding crime prevention that is received by the Compliance Committee and that demonstrate actions that may violate the basic principles of the Nirvel's Code of Conduct shall be communicated to the Compliance Committee, which shall assess the opening of an investigation.

This Code has been initially approved by the Management Body of **NIRVEL S.L.** on 28 May 2020.

Mr Jorge Vaquer

SOLE ADMINISTRATOR



NIRVEL S.L

Date: _____

Supplier/client/contributor's Name and Address: _____

Name and position of supplier/client/contributor representative: _____

Signature: