



Introduction

Our Ethic Code aims to promote and share the values and the way for HMY Group to conduct business. We aim to help everybody understand what they can expect from us: employees, managers and the executive committee we develop the sense of belonging thanks to our integrity and trustworthiness towards every person and company that we work with on a daily basis. We are committed to transmitting the HMY SPIRIT AND VALUES.

We act worldwide with responsibility. Integrity is an essential base of our current and future strategy together with other values such as satisfaction for our clients, people care, positive results, and international spirit.

Integrity involves acting soundly and decently. We behave with integrity to make sure that the public can recognize the values and reputation of our Company and its brands, which are present in more than 50 countries.

The Ethics Code is present in all of our actions and characterizes the behavior of the representatives of HMY Group and the responsibility we have towards our clients, providers, public administrations, the society as a whole, and also, ourselves.

We must all abide by the law, act with integrity and honesty in every sense and be responsible for our behavior and actions. Each one of us should set an example regarding both what we do and how we do it.

Our goal is to offer an excellent place to work in HMY Group.

What is expected from Managers and Executive Directors of HMY Group

Managers and executive directors should foster an ethics culture and sense of achievement, and always be a model of perfect behavior. Apart from other responsibilities:

- Each BU Director will be in charge of the interpretation of the Ethics Code together with the President of HMY Group.
- They will create an atmosphere that encourages respect for each person, trust, loyalty and solidarity amongst all the members of HMY Group.
- They will make sure that everyone under their management understands their responsibilities according to the Code and other Company guidelines.
- They will create opportunities to analyze the Code with employees and reinforce the importance of ethics and its compliance.
- They will create an atmosphere where the employees feel relaxed and can say what they think at ease.
- They will note down behaviors regarding the Code and other Company policies when evaluating the employees.
- They will observe the local laws of the country where they work.
- They will not force employees to achieve commercial or economic results that are against the ethical behavior that the Code and the Law call for.
- They should be attentive and actively listen to the questions posed by the employees and give an answer; ask for clarifications and additional information; respond as much as they are able to, but without replying too quickly; ask for the help that they need; and let the local or HMY Group Human Resources Department know about controversies that the employees find regarding the interpretation of the Code.



- For some exceptional situations when conflicts arise, the written approval of the BU Director for a specific activity is necessary.

1. Accuracy of commercial and financial records

Accuracy is essential in a successful company. We all must make sure that our records, whatever they are, are exact and meticulous. Please find below, some situations when we have to be careful:

Clients that want to pay the price of a purchase using different bank accounts, partly in cash, using checks, etc. This could be money laundering, etc.

All mistakes which are detected, even those regarding a Superior, must be reported and corrected so that they will not create further and more important problems.

Travel expenditure sheets must be accurate, detailed, accompanied with receipts. The type of expense must not be modified, even if it doesn't affect the total amount.

2. Safety and quality of the product

The quality and security of our products reflects our commitment and respect of the client. Every member of the team that develops, manufactures, commercializes, distributes, installs and puts together our products must fulfil the regulations, thoroughly check them in order to guarantee the safety, make sure that they pass the quality control, and properly orientate our client's requests in order to offer a quick and satisfactory solution.

The quality, safety, or environmental problems detected in the manufacturing process will be immediately reported in order to solve and correct them. We will not neglect our duty and let the problems pass, thinking that "they are others' responsibility".



3. Use of the resources, assets and goods of the company

As a general rule it is forbidden to use company resources, assets, and goods for personal use, be it telephone or e-mail. Sometimes it is acceptable but an excessive use of them is considered unfair and dishonest.

Protection of the company goods means taking care of them to avoid their loss, damage, waste, and selling or donation without authorization.

Inappropriate use of the information systems and e mail accounts of the company and the Internet must be avoided.

Every member of the company is responsible for taking care of the HMY products, machines, premises, etc.

Employees may purchase finished company products at a special employee rate, but only if the products are for personal use. If this is the case, a written request must be addressed to the Manager .

4. Confidential information

Information is one of the most important factors to be protected in HMY Group. Therefore, we will only share the confidential information with the company members that require it to accomplish their work. It is essential to avoid spreading confidential information amongst people outside the company and we will not share information about plans, strategies, products, designs, investments, people, technology, and innovation with them.

We will be extremely careful when destroying documents and when talking in trains, planes, public waiting rooms where people can overhear us.

If you are aware of information leaks, you must let your Department Director know about it.

Employees that work with personal and private data or information about other employees will be especially cautious and will only use the required data; they will not spread or share this with other people (within the company or outside the



company). Only authorized people will be allowed to work with private and personal information.

5. Presents and invitations

Presents and invitations are efficient tools to create and improve relationships with external people and members of our company, but can create personal and professional conflicts too.

The key is letting others know when we receive a present. Giving clear information about the company ethics code regarding this aspect is important when starting out a professional relationship with suppliers and people outside the company.

No employee is authorized to give their personal address to receive presents offered by suppliers or anybody outside of HMY. The presents will be handed over to the Human Resources Department, who will hold a raffle or use them as rewards for outstanding performance in different departments of the company.

Always reject, never offer cash as a present, and make sure that the presents offered and received in the Company are consistent with the values of HMY. Any gifts from customers or institutions superior to 500€ must be authorized by the BU General Manager and Finance Director.

HMY's reputation depends on the way each of us behaves.

6. Health and safety at work

Every employee in HMY Group has the right to enjoy a healthy and safe environment. Therefore, we fulfil the regulations that the company health and safety policy requires. We make sure that the workplace is safe and that we all avoid endangering ourselves and other people. We read, understand and get updated information on every emergency plan, on the people in charge of the prevention and safety procedures, and on the behavior to adopt in case of an accident, on who to call in case of an emergency. The manager will immediately be informed whenever any of us detects unsafe behaviors or risk inside the premises.



In HMY Group we are committed to the preservation of the health of every worker both inside and outside our premises. For this reason, every worker that drives a company car is provided with a hands-free phone set, we hold workshops and conferences on nutrition, ergonomics, back pain prevention, healthy habits, safe driving, sport events, etc.

We also aim to create harmony between the personal/family life and the professional one for each employee.

7. Respect and diversity

Our employees come from different countries and cultures. This variety is considered an asset for HMY Group. It helps promote important values such as creativity, innovation and dynamism. Equal treatment is therefore essential: no discrimination is tolerated whatever the reason: gender, race, religion, disability, family situation, sexual orientation, age, political ideas, cultural and social origins, etc.

These principles are taken into consideration not only when recruiting, but also throughout the entire period during which the employee work for HMY Group.

Respect is a way of preventing bullying, and intimidating behavior. Sexual harassment is unacceptable and must be immediately reported to the Human Resources Department.

All of our employees can take part in political activities as long as they do not interfere with their job. Moreover, the company will never be involved or represented in these activities.

It is forbidden to work with suppliers, companies or other institutions who employ children.

8. Conflicts of interest

Preventing these situations and activities than can result in a conflict between our personal interests and our professional life is crucial. The solution to any conflict is



to speak openly about it when the situation arises. For example, when a member of our family works at a supplier, or is an associate of a supplier contracted by the company, or when 2 family members work in the same department etc. Any conflicts of interest must be immediately communicated to the General Manager.

9. Environmental commitment

Every single activity that we do in our daily life has an environmental impact. Our joint commitment is to reduce this impact as much as we can. The little actions that we carry out to reach this objective are important and transform us into an environmentally committed company.

All of the means provided by the company for a correct recycling process must be properly deployed. We will not create extra waste we will use materials, packaging, and processes with the least environmental impact possible. We will report actions and behaviors that are against our environmental promise to the nearest manager.

10. Advertisement campaigns and public messages

We create a wide range of tools and documents to commercialize our products and present our company to institutions and organizations. They convey the image of our Group to the public therefore, we must take the appropriate measures to offer reliable and trustworthy information than can be easily understood, and convey in a positive and beneficial way the strength of the company and our values. We will carefully assess beforehand the effect that our message could have on different religious, cultural, social groups.

All communications must be validated by the Marketing Department and Top management before being published.

11. Integrity in negotiations with external people

The nature of our business requires interaction and negotiation with many suppliers, government officials and all kinds of public and private institutions all over the world.



Some presents and business lunches that are authorized by the manager can boost commercial relationships, but it is forbidden to pay or receive cash, presents and amounts that are considered improper and forbidden to give or receive gifts with a value of over 500€ without the consent of the General.

Manager and Finance Director.

We will not get personal benefit directly or indirectly from any contract that has been signed on behalf of HMY Group or any of its companies. We will not hire government officials, or arrange payments to third parties, political parties, etc. It is strictly prohibited to take part in any activity which is directly or indirectly linked to money laundering or financing terrorism.

HMY Group selects its suppliers according to impartial and objective criteria; we demand a high level of professionalism but our requirements and the expectations of the clients can be achieved because the conditions to be observed are clear and fair. In HMY, we only work with suppliers whose ethics are consistent with our own.

Respect of competitors:

- HMY Group believes in fair rivalry and aims to comply thoroughly with local laws that are applied in the countries where competitors are present; we respect the prohibition of divulging and diffusing confidential commercial information and procedures.
- The Company management will be told about any unfair activity or behavior in this area.
- We should never take part in illegal activities to get information on people, competitors, or providers.

12. Control system

In ethics, as in many other matters, the constant evaluation of employees' knowledge and behavior is an essential part of a continuous improvement process.



The Human Resources Department is required to apply the ethic procedures, and therefore, it must define the appropriate conformity controls (audits and special investigations if required), and make sure that the Ethics Code is properly observed everywhere inside the Company. Noncompliance with the Ethics Code will result in disciplinary sanctions.

The employees should immediately consult their superiors or the Human Resources Manager about conflicts or controversies that arise regarding the Ethic Code.

Please note that there is an e-mail address where you can ask any questions about our Ethics or make any suggestions of improvements in this area. This email address ensures the complete confidentiality of the sender:

global@ethicshmy.com

Disciplinary code in case of breach of ethical code or any of the good governance and compliance rules of the HMY group

Introduction

The HMY GROUP has had a Code of Ethics in place since 2015 that serves as a guide for the practices and behavior of all HMY Group employees worldwide. This Code and strict compliance with it mean that we have the highest standards in our business with clients, suppliers, employees, public administration and other institutions with which we maintain relationships in all the countries where we provide our services.

This ethical code is complemented by this disciplinary code, which includes in all cases the consequences and the way to proceed in case of non-compliance.

General principles

- a) HMY Group employees, in addition to complying with current legal regulations, have the obligation to:
 - Know, comply and enforce internal policies, rules and procedures, according to their role, responsibility and workplace.
 - Promote among partners, suppliers, contractors and collaborating companies the adoption of behavioral guidelines consistent with this standard and to make sure that the conduct of third parties is consistent with that required by HMY.

- b) Employees who manage and direct teams will have, additionally, the following responsibilities:
 - Ensuring that the people under their responsibility know, understand and comply with the Code of Ethics.
 - Managing and leading by example.

- c) No one may justify improper conduct based on ignorance of this Standard.
- d) Neither will they be obliged to comply with orders or instructions contrary to this Code of Ethics or current legal provisions.
- e) HMY will communicate, publish and make available to all employees the contents of the Code, and will ensure that new employees who join, or become part of the HMY structure, can access it.
- f) Failure to comply with the rules established in this Code, without prejudice to any other administrative or criminal liability, may give rise to applicable disciplinary sanctions.

Regime and disciplinary liability

- 01. Employees who breach any of the behaviors required by this Disciplinary Code may be sanctioned, in accordance with instructions concerning the corresponding procedure, for violation of the disciplinary regime established herein.
- 02. The Executive Committee (EXCO) of the HMY GROUP is the competent body to adopt the agreement that imposes the sanction on the person responsible for the violations provided for in this Disciplinary Code.
- 03. No sanction may be imposed without the prior instruction of the corresponding procedure in which the alleged perpetrator may exercise their rights as recognized in current legislation and, in particular, those of allegation and defense.

Violations

- 01. Violations are classified as minor, serious and very serious.
- 02. The following constitute minor offenses:
 - Minor negligence in complying with the precepts of the Code of Ethics,

agreements or instructions issued by the EXCO.

- Minor wrong behavior in the performance of professional work.
- Unjustified absences from attending meetings or relevant appointments scheduled with clients and suppliers.
- Lack of consideration for and disrespect of colleagues.
- Not responding to requests made by the company management.
- Minor lack of diligence in the custody, administration and use of HMY's assets, both tangible and intangible.

03.The following constitute serious offenses:

- Repeated minor violations For this effect, repetition shall be understood to be the committing of at least three minor violations within a period of one year.
- Intentional breach of precepts detailed in the Code of Ethics or of agreements adopted by EXCO. In a special way, the intentional inaccuracy of records and annotations that have a financial impact on the Company will be considered a serious offense. Failing to follow the security measures dictated by the company and its managers, not following quality measures that may harm our products and the environment.
- Lack of consideration, contempt or serious offense to colleagues, as well as to the people or institutions with whom they are related as a result of their professional practice.
- Injury, slander and insults to other people in the workplace.
- Unlawful acts that impede or alter the normal operation of the company or impair the guidelines issued by the HMY Group management bodies.

04.The following constitute very serious offenses:

- The committing of intentional crimes to any degree of participation as a consequence or on the occasion of the exercise of their work duties, as well as those that affect the prestige of the Company.
- The committing of at least two serious offenses within two years.
- Violation of professional secrecy and external publication of sensitive information that can be used by third parties to compete with or harm HMY.
- Offering or receiving bribes from any person or public or private institution, whatever the amount. This section refers not only to money bribes, but also to other gifts whose value is considered inappropriate and goes beyond what may be a regular business activity.
- Allowing, encouraging or engaging in racist practices, work with minors, pornography, or clearly discriminatory.
- Using physical violence or strong insults and offenses against other people internal or external to the company.
- Establishing parallel businesses directly or indirectly that take advantage of or compete with products and services of the HMY Group. Benefiting relatives by awarding contracts or jobs without prior authorization from the President and the HMY Group's Financial and Human Resources Departments.

Sanctions

Sanctions that may be imposed on HMY employees, after investigation and processing of the corresponding procedure, will be the following:

For minor offenses:

- Private verbal warning.
- Warning with written communication with annotation in the personal file.
- Penalty of employment and salary of up to 2 days.

For serious offenses:

- Penalty of employment and salary of up to 20 days, with annotation in the personal file.
- Suspension or transfer of their normal professional activity for the period of time that the Company considers necessary for the repair or correction of the damage caused.

For very serious offenses:

- Suspension of employment and salary for a period of up to 60 days.
- Disciplinary dismissal.

Sanctioning procedure

01. The disciplinary procedure will begin when the Human Resources Department of the BU or of the GROUP learns of the violation. The HR department will open an investigation of the facts, gathering the appropriate information and documents. The agreement to initiate the investigation will be notified to the interested parties.

Prescription of violations and sanctions

01. Very serious violations will prescribe after 4 months, serious infringements in 2 months and minor infringements after 20 days. The prescription period will start from the day the offense was committed and will be interrupted by the initiation, with the knowledge of the interested party, of the sanctioning procedure.