



CODE OF ETHICS FOR THIRD PARTIES



Review 01 – 02/06/2023

The background of the slide features a close-up photograph of a black pen with a silver nib, resting on a white piece of paper. The paper has a checklist with several empty square boxes. A blue vertical bar is overlaid on the right side of the image, containing the text 'TABLE OF CONTENTS' written vertically in white.

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SCOPE AND APPLICABILITY

This Code of Ethics establishes the **guidelines and standards of behaviour that third parties who carry out commercial and/or business activities involving any Sesé company** must follow in order to bring their conduct into line with the values of Sesé.

This Code of Ethics is applicable and contractually enforceable for the following groups:

- **Direct suppliers** who provide services or supply products to any Sesé company.
- **Business partners** that form part of any business association (consortium, UTE, Joint Venture, etc.) involving any Sesé company.
- **Non-profit entities and organisations** that collaborate with any projects led by the **Sesé Foundation** or with any **corporate volunteering** projects of any Sesé company.

ACCEPTANCE AND COMPLIANCE

The conduct set out in this Code of Ethics for Third Parties is **mandatory**.

The Third Party signing this Code of Ethics undertakes to adopt measures to prevent, mitigate and manage any compliance risks associated with its activities, as well as to comply with all applicable laws, rules and regulations.

They shall undertake to adopt and internally implement those regulatory compliance measures that are suitable for preventing and mitigating the risk of committing crimes or irregularities related to corruption and bribery, money laundering and the financing of terrorism or the illegal financing of political parties, providing evidence of this to Sesé if so required.

They shall be obliged to adopt and internally implement those compliance measures that are suitable to prevent and mitigate human rights violations.

They shall also be obliged to advise regarding and enforce compliance with this Code of Ethics and its principles vis-à-vis both its employees and its direct suppliers (i.e. supply chain due diligence).

Any **serious breach** by the Third Party of **any regulatory compliance obligation that affects the legal integrity of the activities and operations of Sesé**, whether mandatory or voluntarily assumed, may result in the termination of the contract with the third party by Sesé, or the precautionary suspension of any contracts in force.

Likewise, other **serious breaches** of the requirements of this Code of Ethics may result in the precautionary suspension and/or termination of the contract with the third party by Sesé.

Sesé reserves the right to verify compliance with the requirements of this Code, for example, through self-assessments and audits, whether conducted by Sesé or by third parties.



Since September 2016, Sesé has been a **signatory of the United Nations Global Compact** and explicitly supports the 10 principles of this pact relating to human rights, labour rights, the environment and the fight against corruption.



Sesé actively encourages you, as our partners and collaborators, to adopt the guiding principles of the United Nations Global Compact in the governance and management of your organisations and to work towards the achievement of Sustainable Development Goals.

We also encourage you to act as a driver within your supply chains by extending this ethical commitment to your partners and suppliers.

SDGs worked on as part of Sesé's CSR strategy

OUR VALUES



COMMITMENT



RELIABILITY



ACCOUNTABILITY



FLEXIBILITY



PASSION

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PRESERVE CONFIDENTIALITY, INTELLECTUAL & INDUSTRIAL PROPERTY

It is not enough to merely avoid negative impacts — it is vital to act as an agent of development, launching **initiatives aimed at causing positive impacts that change the way business is done and provide a real return for society as a whole.**

Sesé considers it essential to uphold the **principles of honesty, justice and integrity**, and is committed in all its activities to respecting human rights and, where necessary, establishing mechanisms to evaluate, verify and guarantee compliance with them.

These **7 ethical principles** must be known and respected by all third parties who work or collaborate with Sesé, and they must internalise them, reflecting them in all their actions.

- **Know the laws** that apply to the organisation's business, work and activities in all the territories where it operates.
- **Comply scrupulously with the legislation in force applicable** in all the territories where it operates.
- **Never knowingly collaborate with third parties in the violation of any law**, nor participate in any action that compromises respect for the principle of legality.

Sesé has had a Compliance Model since 2015. It is now going a step further and sharing its principles of action with its business partners

- **Respect human rights and civil liberties** in all countries where the organisation operates. Require the same level of compliance from its direct suppliers.
- **Understand and manage** the company's human rights risks.
- Have **Equality Policies** and **policies for the prevention and management of sexual and/or workplace harassment**. Ensure equal treatment of staff.
- **Comply with labour and wage legislation** (the commitment extends to temporary work agencies, outsourcing and recruitment):
 - Remuneration policies based on principles of fairness, competition and equality, respecting the legal minimum reference wages at all times.
 - Freedom of association (forming, joining and participating in trade unions) and bargaining must be guaranteed. No forceful measures will be used to repress these rights.
 - Prohibition of forced labour practices and all forms of slavery.
- **Sexual harassment is prohibited, as are bullying and/or discrimination** on the basis of sex, race, religion, gender identity, marital or maternal status, age, political affiliation, nationality, disability, sexual orientation, ethnicity or any other aspect of identity.
- **Do not allow offensive, intimidating, discriminatory, malicious, humiliating or belittling behaviour, harassment, etc.**

Human rights compliance throughout the supply chain is the responsibility of each and every company.



Sesé works actively via the Sesé Foundation and its Special Employment Centres to promote and facilitate social and labour integration of persons who are disabled and/or at risk of exclusion.

- There must be zero tolerance for any form of labour that is forced or obtained by threats, punishment or coercion, with a special focus in this regard on the most vulnerable groups (minors, people with disabilities, groups at risk of exclusion, etc.)
- The basic rights of children must be recognised and protected in accordance with the precepts set out in the Convention on the Rights of the Child and the United Nations International Bill of Human Rights.
- A commitment must be made to protecting children's rights by prohibiting any activity that involves economic exploitation and any work that is potentially dangerous or that prevents access to their education, or that harms their health or physical, mental, spiritual, moral or social development.
- It is vital to comply with the minimum age provisions set out in local legislation where projects or operations are carried out, as well as with international provisions on the subject. Appropriate and reliable mechanisms shall be used to verify the candidate's age at the time of recruitment.
- Collaborate to promote the integration of people with disabilities into the labour market.



Sesé promotes initiatives to support human health as well as the safety, protection and prevention of occupational hazards through a culture of accident prevention

- Comply with occupational health and safety legislation.
- Prioritise human safety with the **objective of 0 accidents**, by focusing on **safe and healthy working conditions**.
- Establish initiatives and lines of action (**Occupational Risk Prevention Plans**) to guarantee the prevention and management of occupational risks.
- **Healthy habits must be promoted** that aim to improve the physical health, emotional well-being and quality of life of the organisation's staff both inside and outside the workplace.
- **Employees and collaborators must be trained** to ensure the proper and safe performance of their tasks, as well as to ensure compliance with occupational safety regulations.
- Provide employees with the **necessary protective resources** to ensure their health and safety at work, especially against chemical and biological agents.
- **Working under the influence of alcohol or drugs must not be tolerated.**
- Under no circumstances will the possession, sale, consumption or distribution of illegal substances or drugs be allowed in the workplace. All of these are strictly prohibited and unacceptable behaviours.

BASIC PRINCIPLES OF THE CODE OF ETHICS

- Comply with environmental legislation.
- Identify environmental risks of operations, working to control and minimise the environmental impact of the organisation's activity as well as detrimental environmental changes.
- Respect reserves and protected areas (**biodiversity**.) Respect the spaces and territories occupied by **local communities** and the resources that sustain them.
- Opting for the application of technologies and practices that lead to **responsible use of natural resources** will be encouraged, favouring **reduced consumption of energy, water, raw materials and other natural resources**. A commitment to the use of **renewable energy sources** must be made.
- Adopt strategies for the **progressive reduction of greenhouse gas emissions** and the improvement of air quality, actively participating in international initiatives such as SBTi, CDP, Lean & Green, etc. that promote and support this reduction in line with the Paris objectives and the ultimate goal of zero emissions by 2050.
- Work to reduce the production and use of **persistent organic pollutants (POPs)** as well as to ensure their proper management and disposal.
- Encourage initiatives aimed at **reducing the generation of waste and dumping**. Comply with the relevant legislation regarding storage, transport (import/export) and disposal, being particularly careful with regard to **hazardous waste**.
- Implementing procedures for **restricting the use of chemicals and products which pose a danger to health and the environment**. Ensure no production and/or use of **banned chemicals** (e.g. mercury).

A close-up photograph of a young green plant with several leaves sprouting from a mound of dark, rich soil. The background is a soft, out-of-focus green.

Sesé is committed to a philosophy of sustainability that helps the organisation to be an integral and active part of climate change mitigation.

Business
Ethics

Sesé bases its internal and stakeholder relations on ethics, honesty, professionalism and transparency.

- Prohibit any conduct that could constitute **extortion, bribery or attempted bribery**. Comply with applicable laws aimed at combating **corruption and money laundering activities**.
- **Facilitate legitimate and honest competition**, avoiding the use of any malpractice aimed at harming competing entities in bad faith.
- **Immediately disclose any actual or potential conflict of interest** in relation to their activities with any Sesé company.
- **Reject unethical practices (gifts, services, invitations or favours)** aimed at inappropriately influencing the actions and willingness of others to gain advantage. Similarly, do not allow employees or managers to accept any form of compensation to influence decision-making.
- Comply with all applicable laws regarding the sourcing of **minerals and materials from conflict-affected regions and high-risk areas** that could contribute to human rights abuses, corruption or the financing of armed groups.
- **Account for contracted operations accurately and rigorously**. Prepare accounting information that gives a true and fair view of the organisation's assets and financial position.
- **No falsification, concealment or faking of accounting data, entries or transactions** is allowed, nor is double book-keeping for the purpose of evading payment or obtaining illicit benefits.
- Comply with applicable **export control, sanctions and customs laws**, including prohibitions and restrictions. Do not collaborate or do business with any customers, agents, suppliers or subcontractors that are on the **international sanctions lists**.
- **Cooperate with all authorities and judiciary, public and regulatory bodies and other public entities** in a correct, diligent manner without hindering or obstructing them or causing errors or omissions.

- **Comply with the applicable legislation regarding the protection of personal data.** Any requests for personal data, or processing of the same, shall be limited to information that is essential for the normal business of the organisation.
- Comply scrupulously with Sesé's **contractual measures** regarding **information security** and **data protection**.
- **Respect the privacy** rights of employees, customers, suppliers and other partners.
- **Information accessed in the normal course of business is confidential;** this must be upheld, and the necessary measures must be taken to protect it.
- **Protect and respect the intellectual and industrial property** of Sesé companies.
- No information, data or documents obtained in the course of commercial/professional activity involving any Sesé company may be used for personal benefit.
- The required level of **security and control of the information** must at all times correspond to the sensitivity, value and relevance of the information accessed as a result of the commercial, contractual or professional relationship with any Sesé company.
- The corporate image of Sesé may not be used without prior express consent.



The **CONDUCT** of managers and employees

This may give rise to **NON-COMPLIANCE** regarding:

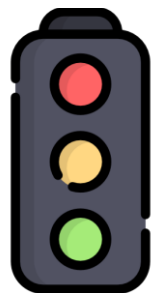
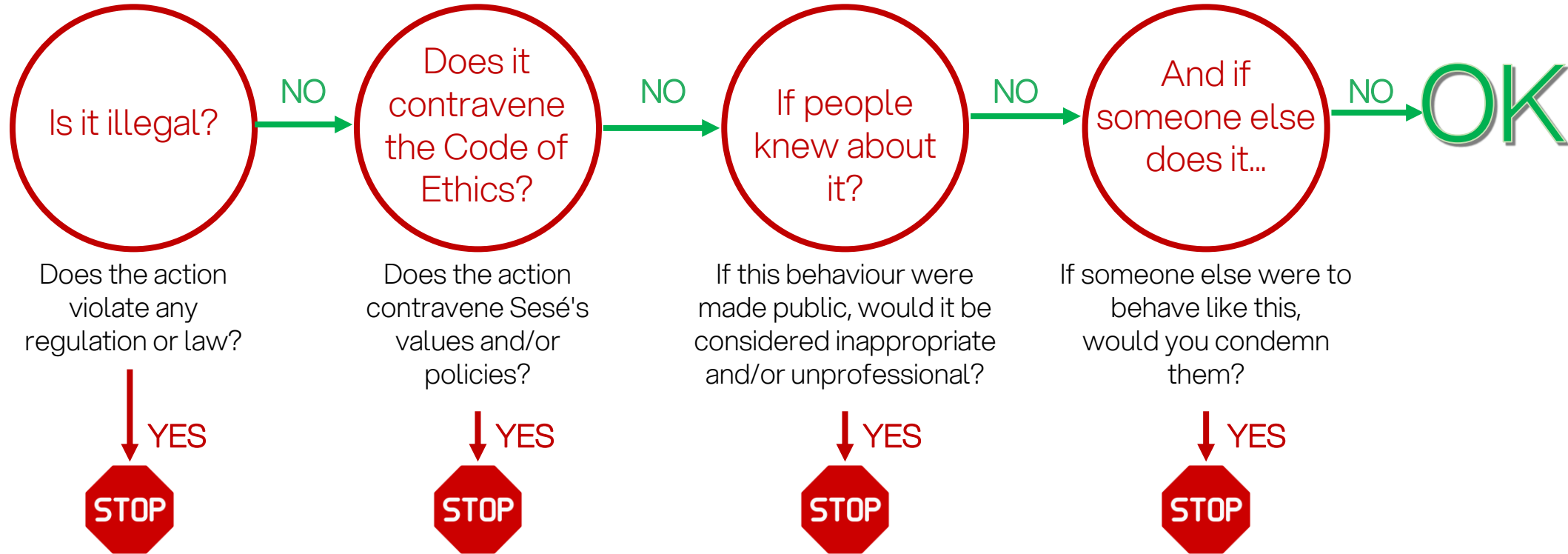
- Laws
- Regulations
- Values and/or principles of the Code of Ethics
- Organisational policies or procedures



Causing **IMPACTS** and **CONSEQUENCES**:

- Legal
- Economical
- Reputational
- Conducive to loss of confidence
- Damaging to third parties

Everyone can always do the right thing
So before you make a decision, think...



If any of the answers is YES... STOP! You should not go ahead.

If all the answers are NO, the behaviour is in line with principles and values of this Code of Ethics.



ETHICAL CHANNEL

In the event that a Third Party becomes aware of any commission (or risk thereof) of any irregularity, illicit act, crime or non-compliance issue related to the obligations of regulatory compliance, either by its employees, its business partners or by the employees of **Sesé**, they must inform the Compliance Officer of **Sesé** using the **Ethical Channel** enabled on Sesé's website:

www.gruposese.com

Upon learning of anything that may constitute a human rights violation, it is everyone's obligation to react immediately and work together to correct it.

DEFINITIONS

Direct or indirect benefit. Requirement of Article 31 bis of the Spanish Criminal Code in the commission of the offence in order to be able to impute criminal liability to the legal person.

- Benefit is understood to be that advantage, economic or otherwise, that the company obtains as a consequence of the commission of the offence.
- Profit is also understood as the mere expectation or improvement of position in relation to other competitors or the advantage for the profit of the legal entity.
- Profit is considered as such with both an income and a cost saving.

Conflict of interest (COI). A situation in which outside business, financial, family, political, or personal interests may interfere with the judgement of members of the organisation as they carry out their duties.

Corruption: This refers to the soliciting, offering, giving or accepting, directly or indirectly, of a bribe or any other undue advantage, or the promise of an undue advantage which affects the normal exercise of a function, or the required behaviour of the recipient of such bribe, undue advantage or promise of an undue advantage. This is dishonest behaviour that in practice involves at least two parties:

- the party who fraudulently uses their powers or influence to favour third parties in return for a benefit;
- and whoever proposes or provides this benefit.

Furthermore, a person who favours an act of corruption will be considered an accomplice, and a person who takes advantage of this act by receiving an undue advantage in return will be considered a recipient. Both people will incur responsibility.

Crime. Criminal offence. This is typified in the penal code as punishable conduct.

Fraudulent offence. A criminal offence that can only be committed with malice on the part of the perpetrator, i.e. with knowledge of the unlawfulness of his or her conduct and the will to commit it.

DEFINITIONS

Reckless crime. Criminal but unintentional offence committed through the fault or negligence of the perpetrator.

Due diligence. Operational process that aims to obtain and evaluate information to contribute to risk assessment.

Members of the organisation. The members of the Board of Directors, managers, employees, workers or temporary employees or persons under a collaboration agreement, volunteers of an organisation, or any other person under hierarchical subordination of the above.

Criminal risk. Risk related to the development of conduct that could constitute a criminal offence, according to the criminal liability regime for legal persons established in the Spanish Criminal Code (or the equivalent in the local legislation applicable to the Neutral).

Business partner. Any party, other than members of the organisation, with whom the organisation has, or expects to establish, any type of business relationship. Business partners include, but are not limited to, customers, joint ventures, joint venture partners, consortium partners, contractors, commission agents, consultants, subcontractors, suppliers, vendors, advisors, consultants, agents, distributors, representatives, intermediaries and investors.

Third parties. Includes business partners and any other persons and bodies independent of the organisation.

REVISION HISTORY

Revision	Date	Modifications
00	21/12/2022	Original edition
01	26/06/2023	Replacement of the term "Grupo Sesé" by "Sesé". Delation of the email canal-etico@gruposesese.com and reference to the new Ethical Channel hosted on Sesé's website.

<p>PREPARED BY COMPLIANCE AND C.S.R. DIRECTOR</p> <p>ANA MANRIQUE</p> <p>Signature:</p> <p>Date: 02/06/2023</p>	<p>REVIEWED BY QUALITY, ENVIRONMENT AND O.R.P. DIRECTOR</p> <p>BEATRIZ GÓMEZ</p> <p>Signature:</p> <p>Date: 08/06/2023</p>	<p>REVIEWED BY PURCHASING DIRECTOR</p> <p>OSCAR GRAU</p> <p>Signature:</p> <p>Date: 12/06/2023</p>	<p>REVIEWED BY THE APPOINTMENTS, REMUNERATION AND CSR COMMITTEE</p> <p>Reviewed 26/06/2023</p>	<p>APPROVED BY BOARD OF DIRECTORS</p> <p>Approved 26/06/2023</p>
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