

CODE OF CONDUCT



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INTRODUCTION

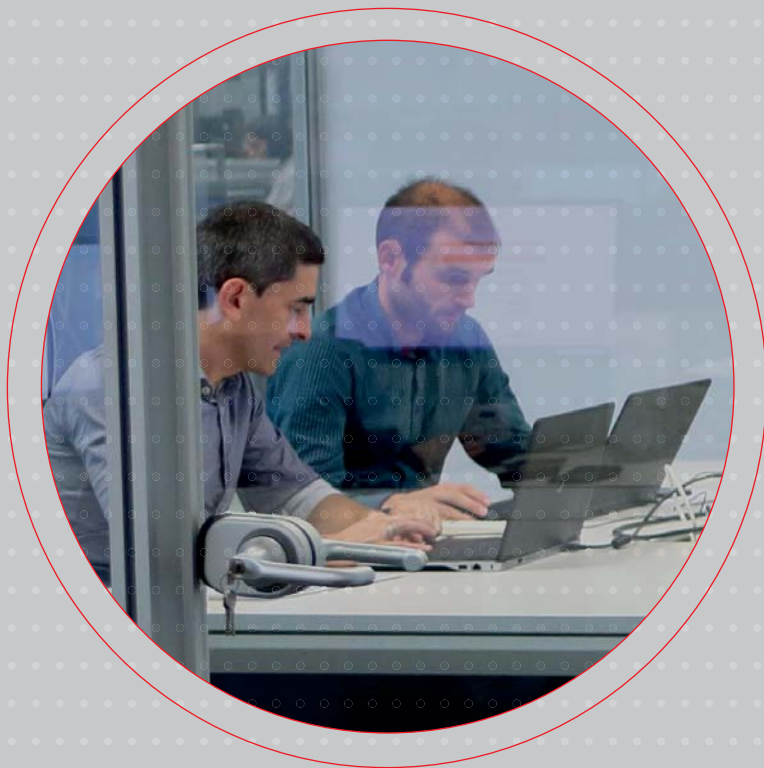
The **ORKLI Group** aims to ensure that its conduct and that of its members comply with current legislation, as well as with the values and ethical principles established in this Code of Conduct.

Objectives:

- a) To establish values and ethical principles based on standards of conduct that must be followed in undertaking professional activities, in all personal relationships within the **ORKLI Group**, and with suppliers, associates, clients, public administrations and society as a whole.
- b) To promote management dynamics in keeping with a culture of collaboration that favour an ethical, sustainable, socially responsible model for shared action.

The Code of Conduct also aims to reflect in writing, and reinforce, the corporate culture already in place at the company.

The **ORKLI Group** does not tolerate any actions that violate this Code of Conduct. Each of the company's corporate bodies (the Supervisory Committee, the Social Council, the Compliance Committee, the Governing Board and the Board of Directors) will ensure that the values and ethical principles established in this Code are effectively applied, and any events of non-compliance will be addressed by the Compliance Committee.



APPLICATION AND COMPLIANCE

2.1 INDIVIDUALS

The Code of Conduct shall apply to all individuals that make up the **ORKLI Group**, irrespective of their seniority, geographic location or role, to subsidiary entities and, to the extent possible, to all other entities in which the company holds an interest, both domestic and international.

The Code of Conduct shall extend to the **ORKLI Group's** providers, associates and clients.

2.2 GENERAL COMPLIANCE

The individuals that make up the **ORKLI Group** have an obligation to be familiar with and comply with the terms of this Code of Conduct, as well as the values and ethical principles contained herein.

2.3 COMPLIANCE BY MEMBERS OF THE ORKLI GROUP'S BOARD OF DIRECTORS, BOARD OF TRUSTEES AND OTHER CORPORATE BODIES

Knowledge of and compliance with this Code of Conduct is **especially necessary** for members of the Governing Board, the Board of Directors and the company's other corporate bodies (the Supervisory Committee, the Social Council, the Compliance Committee, etc.).

2.4 COMPLIANCE BY SUPPLIERS

Compliance with this Code of Conduct shall be compulsory for all suppliers.

2.5 COMMUNICATION OF THE CODE OF CONDUCT

This Code of Conduct shall be communicated to all individuals that make up the **ORKLI Group** via the Integration Plan. The Plan states that reading and complying with the Code of Conduct is compulsory.



COMMUNICATION AND MONITORING

3.1 ENTRY INTO FORCE

This Code of Conduct has been in force since its approval by the ORKLI, S. Coop. Governing Board, that is, since 20 March 2019, and shall remain in force unless it is expressly agreed to revoke, amend or update it or the adoption of a new code that replaces it. The Compliance Committee shall be notified of any violation hereof.

3.2 INTERPRETATION

In the event of inconsistency between this Code of Conduct and any control contained in the **ORKLI Group** Compliance Programme, the Code of Conduct shall prevail. Furthermore, such controls shall be interpreted in accordance with the spirit and purpose of this Code of Conduct.

The Compliance Committee shall be charged with interpreting and resolving any queries regarding the content of this document.

3.3 THE COMPLIANCE COMMITTEE

This body ensures compliance with the Code of Conduct, reviews the same and keeps it up to date, and proposes the controls that make up the **ORKLI Group** Compliance Programme.

The Committee's composition, operation and duties, along with all other matters relating to it, are governed by its organisational and operating rules.

3.4 NON-COMPLIANCE; NOTIFICATION THROUGH THE ETHICS CHANNEL

Non-compliance with this Code of Conduct may result in employment-related or corporate sanctions, without prejudice to any administrative or criminal sanctions that may also be applicable.

Any person having knowledge of an event of non-compliance must communicate the same directly to the Compliance Committee, through the **Ethics Channel**. This communication is to include:

- The identity of the person engaging in the communication.
- A detailed description of the facts (date of the event of non-compliance, persons involved, etc.).
- Any proof in such person's possession (documentation, names of witnesses, etc.).

Failure to report a known event of non-compliance will be considered a violation of this Code of Conduct.

The person engaging in the communication will be kept informed regarding the progress of such communication made through the Ethics Channel.

3.5 CONFIDENTIALITY OF COMMUNICATIONS; PROHIBITION OF REPRISALS

The **ORKLI Group**, through the obligations undertaken by the members of the Compliance Committee, shall ensure that the identities of the persons engaging in communications through the Ethics Channel are kept confidential, complying with all requirements set forth in applicable regulations on the protection of personal data.

The adoption of any measure that constitutes a reprisal or any type of negative consequence for having issued a notification is prohibited.

This prohibition on reprisals shall not, however, prohibit the adoption of disciplinary measures which, in the event applicable, may be imposed where an internal investigation determines that the communication made is false.

3.6 ETHICS CHANNEL PROCEDURES

The Compliance Director shall keep a log of all communications he or she receives through the Ethics Channel and will be the person charged with directing the Committee to initiate an internal investigation.

During the internal investigation, the Compliance Committee may gather all information and documentation it deems appropriate from any of the **ORKLI Group's** divisions or businesses. In the event the communication affects a member of the Committee, such person may not participate in handling such matter and the rules on Conflicts of Interest shall apply (see section 6.1).

The procedure will end with a resolution, which will contain a corrective action or proposal that, in the event applicable, will be approved by the Governing Board or appropriate corporate body with authority over the same. The proposal will set forth, in the event applicable, the pertinent disciplinary measures to be taken in applying labour laws.



VALUES HELD BY THE ORKLI GROUP

Our values are the ethical principles upon which the **ORKLI Group's** culture is based, and are shared by all individuals that make up the company. We express them in the **first person singular, emphasizing setting high standards for ourselves and exercising individual responsibility:**

4.1 COMMITMENT

I agree to take on my responsibilities and the decisions that pertain to me, and will make an extra effort when necessary. I set high standards for myself and take advantage of opportunities to learn and become a better professional, as well as to help others grow.

4.2 CUSTOMER ORIENTATION

The **customer is my number one priority.** I want the customer to view me as a partner, someone who's close to them and adapts well to their circumstances. I stand out as a result of my reliability and excellence in carrying out my work, exceeding expectations with a spirit of service, agility and responsiveness.

4.3 INTEGRITY

I interact with others from a position of **respect, sincerity, honesty** and **trust.** As such, I am consistent between what I say and what I do; I actively listen and discuss matters constructively and on a reasoned basis; and I open myself up to different points of view because I believe that diversity enriches and adds value.

4.4 SEARCH FOR THE COMMON GOOD

I agree to place the ORKLI Group's objectives ahead of my own, contributing to the long-term commitment that has characterised ORKLI since it was founded. Collaboration and generosity are the foundations of a shared project, and I contribute to the perpetuation thereof. I make the collaborative model my own and demonstrate solidarity and engagement with the group, environment and communities in which we operate.

4.5 EAGERNESS TO EXCEL

I ask myself how I can improve my work on a daily basis. I am ambitious, challenging myself and presenting myself with new opportunities, and taking risks when necessary. I rise to challenges, tackling them with optimism and perseverance. I rely on others and accept their help to tackle major challenges and difficulties.



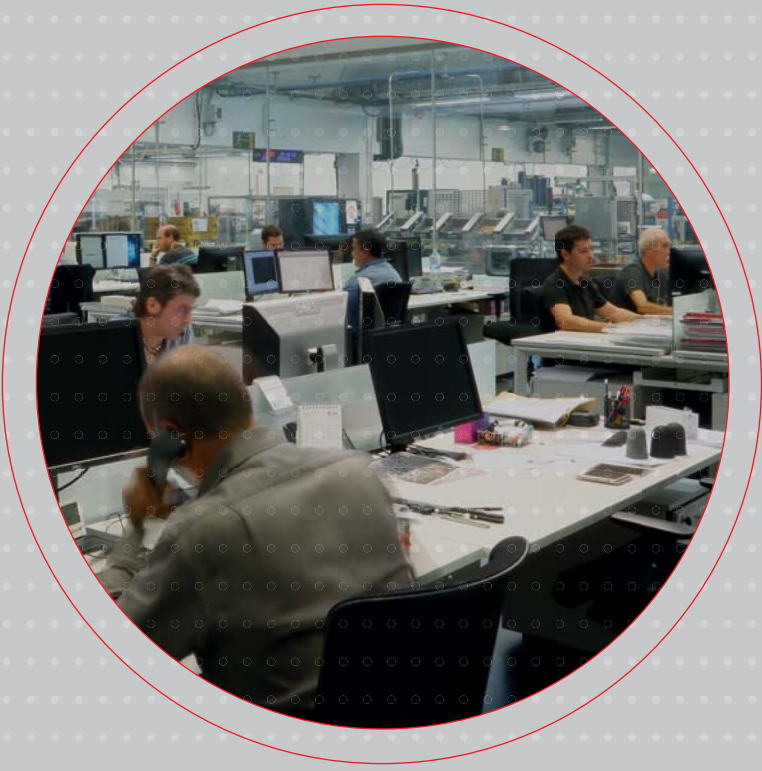
SHARED PROJECT. MISSION

Our **Mission summarises** our "what" and "what for". It defines what we do, the needs we meet and the basic, differentiating elements we use in our quest to do it.

mission

To develop highly efficient solutions tailored to the customer that contribute to personal well-being, in keeping with the principles of collaboration and sustainability that underpin our business endeavour.





ETHICAL PRINCIPLES AND RULES OF CONDUCT

6.1. GENERAL RULES OF CONDUCT

- **Professional and upstanding**

ORKLI Group members' conduct is rooted in professionalism and integrity.

- a) **Professionalism:** diligent, responsible, prudent, efficient conduct.
- b) **Integrity:** loyal, honest, good-faith conduct, displaying respect for oneself and toward others in the exercise of one's professional activities.

Individuals shall apply the values and ethical principles established in this Code of Conduct to themselves and others, and shall not exercise their professional activities for purposes other than those with which they have been entrusted.

- **Respect for legality, internal rules and contracts by which the ORKLI Group is bound**

All individuals shall carry out their professional activities displaying respect for applicable laws, internal rules and contracts by which the **ORKLI Group** is bound, and shall comply with this Code of Conduct and all controls that make up the Compliance Programme.

In addition, they must respect all obligations and commitments undertaken by the **ORKLI Group** in its contractual relationships with third parties and the customs and best practices observed in countries in which its professional activities are carried out.

All members of the Governing Board, the Board of Directors and the company's other corporate bodies (the Supervisory Committee, the Social Council, etc.), along with all persons charged with managing or directing teams, must:

- a) Have in-depth knowledge of laws, the Code of Conduct, controls and contracts that affect their respective areas of activity.
- b) Act as leaders as regards the **ORKLI Group's** standards of conduct.
- c) Ensure that the individuals who report to them receive adequate information and training to enable them to become familiar with and comply with pertinent laws, the Code of Conduct, controls and contracts that bind the **ORKLI Group**.

- **Conflicts of interest**

A conflict of interest will be deemed to exist where a member of the **ORKLI Group's** personal interests conflict with, or are influenced or distorted as they relate to, the company's own interests. A "personal interest" will exist when the matter directly affects the person or another party related to such person.

"Related parties" shall consist of: such person's spouse or another person having an analogous affective relationship therewith, such person's ancestors, descendants, sisters and brothers and their spouses (or other persons having an analogous affective relationship therewith), and the entities or businesses in which the person, or other party related to such person, exercises control or serves in a management role, whether directly or indirectly.

Any person who finds him or herself in a situation involving a conflict of interest shall inform his or her direct superior as quickly as possible. In addition, the affected person shall refrain from taking part in or influencing decision-making, from participating in meetings at which such decisions are discussed and from accessing confidential information that bears on such conflict.

6.2 UNITED NATIONS GLOBAL COMPACT

The United Nations Global Compact (UN Global Compact) to promote Corporate Social Responsibility (CSR) requires companies to adopt, support and enact, within their sphere of influence, a set of core values in the areas of Human Rights, Employment Standards, the Environment and Anti-Corruption. To this end, the **ORKLI Group** adopts the Ten Principles of the United Nations Global Compact as its own:

HUMAN RIGHTS

- **Principle no 1.**
Support and respect the protection of human rights.
- **Principle no. 2.**
Not be complicit in human rights abuses.

LABOUR

- **Principle no. 3.**
Uphold principles of freedom of association and the right to collective bargaining.
- **Principle no. 4.**
Eliminate forced and compulsory labour.
- **Principle no. 5.**
Abolish all forms of child labour.
- **Principle no. 6.**
Eliminate discrimination in respect of employment and occupation.

ENVIRONMENT

- **Principle no. 7.**
Support a precautionary approach that favours the environment.
- **Principle no. 8.**
Undertake initiatives to promote greater environmental responsibility.
- **Principle no. 9.**
Encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

- **Principle no. 10.**
Work against corruption in all its forms, including extortion and bribery.

6.3. HUMAN RIGHTS

- **Respect for individuals**

All persons are to promote relationships based on mutual respect, integrity, cordiality, trust, collaboration and effort in teamwork. In addition, they are to foster a respectful work environment, with the aim of achieving a positive work atmosphere.

Disrespect, disregard, insults, defamation, intimidation, abuse, harassment and any type of psychological, physical or sexual aggression will not be permitted or tolerated.

6.4 EMPLOYMENT STANDARDS

- **Prohibition on forced labour and hiring policies**

The company rejects and does not use or resort, directly or indirectly, to the use of labour obtained by coercing employees through threats, punishment, deprivation or the application of forms of slavery or semi-slavery.

The **ORKLI Group** follows a hiring policy that complies with current legislation, providing legally-stipulated leave (holidays, illnesses and accidents, maternity and paternity leave, retirement, etc.), and has established a remuneration policy to allow for a dignified standard of living.



The **ORKLI Group's** workday and work schedule do not exceed the limits imposed by law under any circumstances, and its employees are compensated for overtime work in accordance with the provisions of applicable law.

- **Protection of minors**

The protection of minors is one of the **ORKLI Group's** ethical principles and entails not resorting to child labour, which is understood as work that deprives children of their childhood, their potential and their dignity and is prejudicial to their physical and psychological development.

- **Equal opportunity and non-discrimination in employment**

The company respects and facilitates effective equality of opportunity and treatment in hiring and promotions, ensuring that situations involving discrimination on the basis of race, sex, ideology, sexual orientation, age, disability, illness or any other circumstance do not occur at any time.

As a result, all individuals who take part in processes involving hiring, selection and/or promotions will abide by objective standards, with the aim of identifying those persons who best fit the profile and needs of the position to be filled, promoting equality of opportunity.

- **Workplace health and safety**

The **ORKLI Group** engages in risk prevention as it relates to personal health and safety by integrating preventive activities into the organisation and adopting necessary measures designed to prevent work-related accidents, injuries and illnesses.

Individuals shall respect preventive measures in the area of workplace health and safety at all times, utilising resources established by the **ORKLI Group**.

- **Ongoing training**

The company will provide resources to contribute to individuals' learning, training and updating of their knowledge and skills in order to facilitate their professional development and provide increased value to customers and society as a whole.

All staff members must take training courses in line with their duties and professional activities within the **ORKLI Group**, and shall strive to benefit from such courses to the greatest degree possible.

- **Respect for external activities**

The realisation of social and public activities will be respected, provided always that they do not interfere with professional activities.

One's affiliation, membership in or collaboration with political parties or other types of entities, institutions or associations outside of his or her professional activities with the company shall be carried out in such a way that the personal nature thereof is made clear, thus avoiding any relationship with the **ORKLI Group**.

6.5. ENVIRONMENT

- **Environmental protection and management**

The **ORKLI Group** is firmly committed to environmental protection, conservation and improvement and, as such, the company's activities will be carried out in such a way as to minimise adverse effects on the environment.

To this end, each person commits to using energy efficiently on the company's premises in undertaking his or her activities, with the aim of conserving natural resources.

- **Precautionary approach and environmental responsibility**

The **ORKLI Group** is aware of the risks that future generations will face if essential ecosystems are endangered and, as such, it commits to managing products and manufacturing processes in a responsible manner from a health, safety and environmental perspective.

- **Environmentally-friendly technologies**

The company embraces the challenge of developing and distributing technologies that are beneficial to the environment. These technologies pollute less, utilise resources in a sustainable way, recycle their discharge and by-products more, and manage their waste in a more acceptable manner than the technologies they replace.

6.6. ANTI-CORRUPTION

- **General considerations**

The **ORKLI Group** hereby asserts its opposition to the corruption of all kinds, and shall ensure that it does not unlawfully influence the will of third parties to obtain a benefit or advantage. Acts of corruption and bribery are expressly prohibited, including offering or promising, whether directly or indirectly, any type of unlawful advantage, along with influence peddling.



- **Gift policy**

Gifts are intended to promote the **ORKLI Group's** brand image. Gifts, favours and compensation may not be given or accepted, whether directly or indirectly, in cash or in kind, regardless of the nature thereof, for the purpose of unlawfully influencing relationships with the company.

Giving and accepting gifts is permitted where such gifts have negligible or symbolic economic value or are made as a courtesy or in accordance with commonly accepted commercial practices.

Under certain circumstances, refusing a gift offered in good faith may be interpreted as insensitive or could even damage a business relationship. In these circumstances, gifts will be accepted in the **ORKLI Group's** name and delivered to the Human Resources Department to be put towards social causes.

- **Relationships with public bodies**

No form of bribery may be engaged in or accepted as it relates to authorities, public officials or political parties, whether domestic or foreign.

The **ORKLI Group** refrains from making, whether directly or through intermediaries, donations and contributions, including in the form of loans or advances, that constitute illegal financing of political parties.

- **Social responsibility in the supply chain**

Similarly, no form of bribery may be engaged in or accepted as it relates to suppliers, associates or customers. Relationships with suppliers will be guaranteed to be free of practices involving corruption and bribery.

- **Prevention of money laundering and financing of terrorism**

The **ORKLI Group** complies with all domestic and international provisions on money laundering and financing of terrorism to which it is subject.

The company applies customer identification, information and internal control measures established for this purpose and fully collaborates with the competent authorities.

6.7. TRANSPARENCY, INFORMATION AND COMMUNICATION

- **Ethics in business. Transparency policy**

The **ORKLI Group** undertakes to convey reliable information to markets and society as a whole, accurately reflecting its financial position in accordance with accounting principles and international standards on financial information.

The use of deceit to induce error on the part of third parties is prohibited:

- a) In relationships with suppliers, associates, customers and public bodies, presenting a false appearance of solvency is prohibited.
- b) Falsely attributing to oneself the authority to dispose of, convey or encumber the company's assets is prohibited.
- c) Misrepresenting the true characteristics of goods and/or contractual conditions is prohibited.

The **ORKLI Group** prepares and complies with all contracts in accordance with principles of transparency, truthfulness and good faith, including the following items therein: payment terms, warranties and the signatories' capacity to act in the name and on behalf of the contracting parties.

- **Cooperation and transparency with public bodies**

All dealings with authorities, regulatory bodies and public bodies shall be based upon principles of cooperation and transparency. All obligations vis-à-vis the respective public bodies, in particular those relating to tax and social security authorities, as well as those relating to bodies from which grants or subsidies are received, shall be duly observed.

Conduct aimed at circumventing tax obligations or obtaining benefits to the detriment of tax or social security authorities or similar bodies is expressly prohibited.

6.8. USE OF INFORMATION AND OTHER RESOURCES

- **Protection of the right to privacy. Use of personal data**

The **ORKLI Group** respects individuals' right to privacy in all its forms, as well as the right to privacy in personal communications. In particular, the company respects privacy rights and the right to protection of personal data.



- **Responsible use of assets and resources**

Individuals are provided with all assets and resources necessary to carry out their professional activities, among them communication tools, computer systems and equipment, technological resources, facilities and financial resources. Such individuals, for their part, will use such assets and resources responsibly.

Processing and safeguarding of confidential information

The **ORKLI Group** considers information and knowledge to be among its principal assets and indispensable to the proper management of its business, and thus as deserving of special protections.

Non-public information in the **ORKLI Group's** possession will be deemed confidential and, as such, will be handled with the utmost care, and all necessary measures will be put in place to safeguard it.

All third party information, including information regarding the competition, will be obtained legally, and any information that has been improperly obtained will be refused.

In the event that an individual's employment is terminated, he or she will continue to be bound by a duty of confidentiality and must return all documents, storage devices and confidential information that has been retained.

- **Respect for intellectual and industrial property rights**

All individuals that make up the **ORKLI Group** must respect the company's intellectual and industrial property rights and trade secrets. All exploitation rights over intellectual and industrial property and trade secrets are held by the **ORKLI Group**.

Intellectual and industrial property rights and trade secrets held by third parties not affiliated with the **ORKLI Group** will also be respected.

The company ensures that its computer security is safeguarded and prohibits the use of unauthorised software. Company employees must not install or utilise malicious software or any other computer programs or applications that are not covered by applicable official licenses on **ORKLI Group** computer systems.

6.9. ENGAGEMENT WITH SURROUNDINGS

- **Cultural integration**

Local culture and language are promoted in the workplace through their incorporation into everyday practices and in dealings with customers, suppliers and public bodies.

- **Provision of economic resources**

Part of the **ORKLI Group's** profits are dedicated to activities that foster education, training and development for residents in the regions in which our production centres are located.

- **Protection of free competition and the market**

The **ORKLI Group** shall comply with all regulations relating to competition, avoiding engaging in any conduct that constitutes or could constitute collusion, abuse or restrictions on competi-



tion or price-fixing. Individuals shall refrain from engaging in any conduct that could constitute abuse or an unlawful restriction on competition.

As regards the **ORKLI Group's** participation in other organisations, standards of conduct shall be established as necessary to ensure that prices are set freely.

- **Relationships with suppliers, associates and customers**

The company employs sustainability- and social responsibility-based criteria in selecting suppliers, promoting the application of socially responsible practices throughout the organisation's supply chain. In selecting suppliers, associates and customers, criteria relating to quality, opportunity, cost and sustainability must be applied.

- **Promotion of the ORKLI Group's image and reputation**

The **ORKLI Group** has a strong reputation due to its extensive experience and reliable, loyal technical team, who are committed to the values, ethical principles and know-how that make up its culture.

All individuals must take the utmost care to preserve the **ORKLI Group's** image and reputation in all of their professional activities. They shall similarly ensure that suppliers, associates and customers respect and use the company's corporate image properly.



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