

CODE

OF

CONDUCT

— **relationships**
based on
mutual respect
and
efficient effort.

1 INTRODUCTION

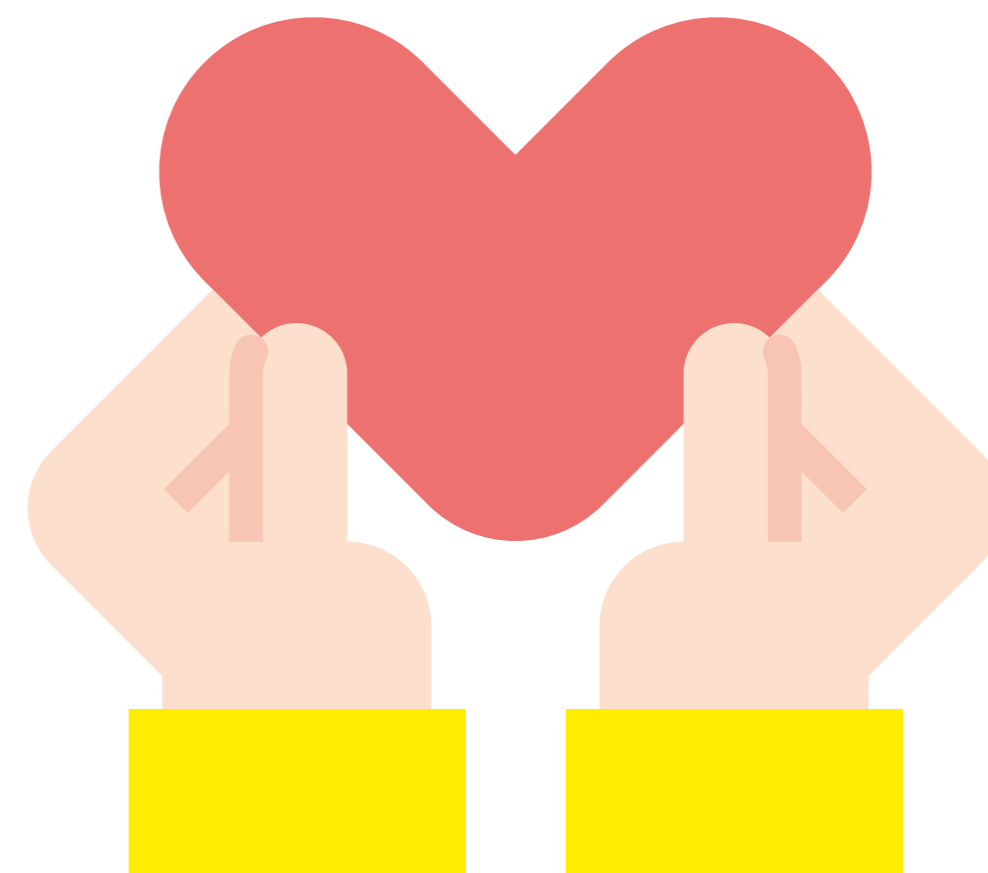
At Grupo Finsa, since our inception more than 90 years ago, we know that without a solid base of principles supporting the different value proposals we offer to society, it is not possible to maintain relationships **based solely on people's trust and our professional performance.**

Our trust in this code of conduct is anchored in our values, and this allows us to set it in writing today, being aware that it commits us and is en-

forceable upon everyone, regardless of the tasks or positions we have in the Organisation. It will serve us as a reference to continue having relationships based on mutual respect and efficient effort.

We thank you for your commitment in the compliance with this code of conduct and we hope it helps you in your work performance anywhere in the world. If you have any doubts understanding

this document or consider that there are difficulties to implement it, do not hesitate to discuss them with the Personnel Department, Grupo Finsa's Legal Department or the *Compliance Officer*.



2 OUR VALUES

Values are one of the basic pillars upon which the character and identity of a company are built. At Finsa, we are fully convinced our business culture must guide our daily actions. Thus, we aspire to create a culture based on shared values, developed from two main principles: mutual respect and efficient effort.



Mutual respect

To foster the best possible response in others, we seek personal relationships where these features predominate:

Simplicity: acting calmly, not ostentatiously, appreciating the importance of small details.
Honesty: sincerity and frankness in approaches, seeking trust.

Generosity: listening to others and including them in our goals, involving ourselves in helping them attain their goals.



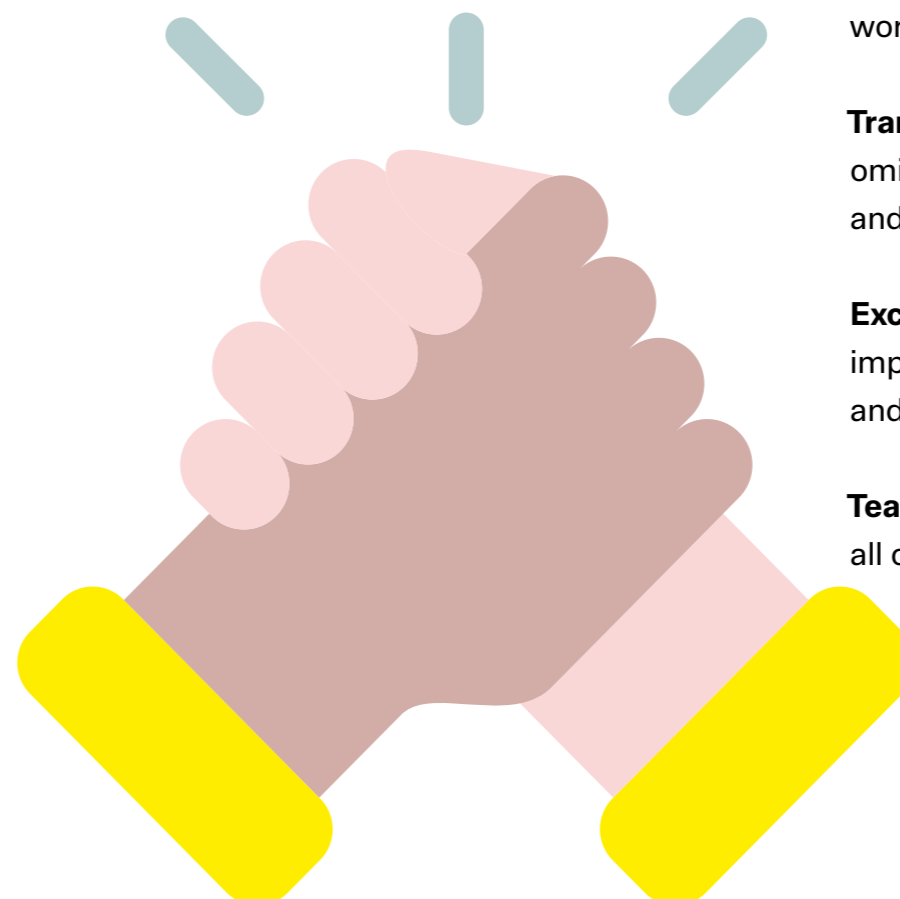
Efficient effort

It is essential to ensure a sustained generation of resources that guarantees independence in building the company where we would like to work. We need to face problems with:

Transparency regarding our actions and omissions, elements of judgement, the risks, and consequences of our decisions.

Excitement, positive attitude, motivation to improve, perseverance in our performance and seeing mistakes as opportunities to learn.

Teamwork, being participative, considering all opinions, seeking common interest.





3 ■ OUR COMMITMENTS AND RESPONSIBILITIES

I. We are committed to the health and safety of people.

Protecting the health and safety of people is a priority for us and, for this reason, we are committed to keep and drive the adoption of health and safety measures, in order to provide a safe and healthy environment for everyone in our work centres, as well as overseeing compliance with the applicable rules in this matter wherever we develop our business activities.



We consider that everyone must take part in the dissemination and compliance of occupational health and safety rules, within the scope of our tasks, for our own safety, and that of the people who may be affected by our activities.

II. We foster labour relationships based on trust and ongoing improvement.

Us people are the main asset of the organisation. For this reason, we promote development and qualification, so each person, with their intelligence and wit, may continue and improve their contribution to the evolution of the Organisation.

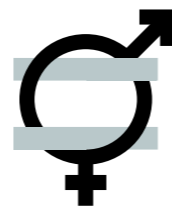
We keep a close relationship with the people who exercise labour representation tasks **based on trust, dialogue, and respect**. We need their contribution in maintaining and developing the best working conditions for people and in building the value proposals we offer to the market.

III. We defend diversity, equal opportunities, and non-discrimination.

We promote relationships based on criteria such as respect and non-discrimination.

All of us are responsible for helping to ensure a labour environment free of discrimination, intimidation, harassment, abuse, sexual harassment and/or harassment on the grounds of gender.

It is essential to ensure equal treatment and opportunities among people, regardless of their race, ethnic origin, sexual orientation, political inclination, gender, age, disability or any other personal or social condition.



IV. We promote taking care of the environment.

We believe that using wood from forests that are managed in a sustainable manner, as well as the use of recyclable materials, contributes to fight climate change and its effects and to develop the circular economy.

In our manufacturing processes, we promote the use of recycled wood. We promote the use of wood that comes from adequately managed forests, and we comply with all the requirements set by the benchmarking forest certification systems PEFC (PEFC/14-35-00006), FSC® (FSC-C041397), EPD®, EUTR, to ensure sustainable management and the lawful origin of wood.

We dedicate resources to improving the efficient use of energy, the use of natural resources and to reduce carbon emissions, to limit the impact our activities have on the environment as much as possible.

We work towards the environmental perspective being included in all the processes carried out in the organisation and the value proposals we offer to the market.



V. We will use information in a sensible manner and never for our personal benefit.

We understand the responsibility we undertake when handling personal data. Therefore, we commit to protect them and **ensure their confidentiality**.

In addition, personal data, among other, we consider all the internal business procedures, financial reports, sales reports, business reports, corporate reports, budgets, product formulas and business strategy documents to be confidential. We will never use the information we can access for our personal benefit.

In order to protect this information, confidential data or information may only be assigned to third parties by people authorised to do so.

We will make a sensible use of the Company's resources for the development of professional activities (information, materials, supplies, software, facilities, etc.) and we will follow the guidelines set for the use of mobile and IT devices.

VI. We commit to the sensible use of the Company's goods and services.

We trust people's criteria in requesting and using the means they require to perform their job.

The Company's goods and services will be used in a sensible manner, and not for personal benefit.

VII. We believe in having an upright and transparent relationship with our suppliers and partner companies and respect the criteria independence of those who take part in personnel selection processes.

We believe suppliers and partner companies are an essential part of our supply chain.

Any supplier or company that thinks they can help us improve and have the necessary means, can contact the different procurement services at Grupo Finsa, who will repond duly address you. The selection process for suppliers and companies will be done bearing in mind objective and non-biased criteria following availability of the necessary products or services, quality, collaboration and contribution.

No company or partner will benefit if they try to gain the favour of any person in our organisation by resorting to methods that are not

strictly professional.

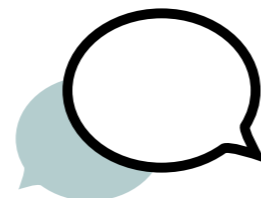
All personnel selection processes ensure criteria independence of the people taking part in them and no recommendation or consideration from any person who is or may be part of the selection process will be admitted or considered.

VIII. We avoid conflicts of interests.

Conflicts of interest may arise in those situations where the interests of the person or the people linked to him/her do not match those of the Company, directly or indirectly, or may interfere in the performance of their duties.

When this happens, such circumstance will be reported to the Company to try find a solution to the potential conflict. As long as this conflict is unresolved, those involved will abstain from representing the Company, intervening or influencing the decision-making process in any situation in which they or the people linked to them have a direct or indirect personal interest.

To avoid the conflict, unless there is express authorisation from the Company, we may not carry out jobs or provide services for other companies that compete or may compete with Grupo Finsa companies.



IX. We take care of our image and reputation on the media and social media too.

We believe our image and reputation is the result of the relationship we have with people based on mutual respect and freedom of expression. We are all responsible through our behaviour for the company's image and reputation.

With the scaling up of media and social media, it is important to understand that any information shared regarding Grupo Finsa companies may become public. Therefore, we must always act discreetly and never disclose private or confidential information without prior authorisation.

If we are present in social media, we must separate our personal profile from our professional profile, to easily identify when we act on behalf of Grupo Finsa companies and when we do on our own behalf.

X. We will make a moderate, transparent, and respectful use of gifts, presents and hospitalities.

We consider that hospitalities and invitations to clients and suppliers, or those received from them, must follow the criteria of moderation, transparency and adequateness to local practices and customs.

In the performance of our duties, we do not accept presents. They will only be allowed if:

- They have an irrelevant economic or symbolic value or are means of advertising of little value.
- They are usual courtesy or attention gestures according to local practices and are infrequent.
- They are not prohibited by law or generally accepted commercial practices.

When they do not meet these conditions, we will reject them or return them explaining the reasons. If it were not possible, we will deliver them to the Personnel Department for their management.

**— We are all
responsible for our
behaviour.**

XI. We respect and protect intellectual property and trade secrets.

For their contribution to the development and maintenance of our Company, we recognise, respect commercial licences, business and trade secrets, and other information held to Company's intellectual property. Intellectual property created by any person in Grupo Finsa company is the property of the Company.

Furthermore, we will respect the intellectual and industrial property rights of third parties. In this regard, we safeguard the confidentiality of the information from third parties to which we have access in the performance of our activities.

XII. We are in favour of free competition and good market practices.

We consider that respect for and compliance with rules defending competition is not only a legal obligation, but part of our responsibility towards clients, suppliers, and consumers in general.

Therefore, we internally promote the development and maintenance of good market practices.

XIII. We trust in the integrity and honesty of people and are against corruption and bribery.

We believe the performance of our job and the practices carried out in the Company must contribute to maintaining the integrity and honesty of people.

In this regard, we cannot receive, offer, deliver directly or indirectly any payments in cash or in kind or any other benefit to any person serving any public or private entity, political party or candidate to a public position, to obtain or maintain, illegally, business or other advantages.



XIV. We value the contribution and rigour of the accounting, tax, and financial areas.

At Finsa, we register, document and account properly all transactions, not omitting, hiding or altering any detail or information; thus, our accounting and operating records show a faithful image of reality, according to the accounting and legal rules in force, and may be verified internally and externally.

Furthermore, compliance with the tax provisions in force and with all the tax obligations resulting in the payment of taxes in the territories where it operates is an acquired duty respected by the company.

XV. We believe in rigour and transparency in the management of public subsidies.

We are aware of the responsibility that requesting and managing public subsidies to build our value proposals and develop our business implies.

We ensure the subsidies requested from or received from Public Administrations are used adequately and that this request is transparent, avoiding changing the conditions to obtain them, or making a different use to that for which they were granted.



IT IS IN YOU

