



**vergara.**

**CODE OF CONDUCT**  
**ALFREDO VERGARA SL**



## BEHAVIOUR GUIDELINES

### **Respectful personal relationships:**

The Company rejects any manifestation of physical, psychological, sexual, moral, or abuse of authority, as well as any conduct that may generate intimidating or offensive environment with the rights of people. That is why all employees need to be treated in a respectful way, and create a pleasant, healthy and safe work space.

### **Alcohol y Drugs:**

The Organization prohibits the possession, consumption or trade of illicit drugs and alcoholics beverages in the workplace, as well as working under their effects.

### **Order and cleanliness in the workplace**

Since we work in shared spaces, we have to be respectful of colleagues, and therefore the jobs have to be kept tidy and clean, using the services and common areas appropriately.

### **Corporate Image and Reputation**

During work hours, we do it on behalf of the Company, and therefore our actions are associated with our brand. This makes it essential for us to take care of our actions: all employees must ensure that the image and reputation of the company are preserved in each and every one of its actions.

### **Prevention of occupational hazards:**

The Company provides safe working conditions, and complies with all laws and regulations related to health and safety. Likewise, it provides all employees with the necessary training so that they can carry out their tasks safely. Employees are required to disclose any circumstance that may be considered unsafe or dangerous; so that it can be analysed, and if necessary corrected, it will be announced to the person in charge of Administration.

### **Relationship with Clients:**

The relationship with clients must be totally complete and respectful. The company seeks to have long-term relationships with customers, and for this reason, a climate of mutual trust must be established. All customer relationships must be based on providing clear and truthful information, and with an attitude of service and collaboration.

### **Relationship with Suppliers and Collaborators (PARTNERS)**

The relationship with suppliers and collaborators must be cordial, upright and respectful. The treatment must be equal to equal, and always within the legal framework. Any worker who participates in the selection of a supplier, must act with independence, impartiality and objectivity, adjusting only to the criteria of quality, cost, and ethical, social and environmental standards. The acceptance of gifts, gifts or any other gratification that could be interpreted as a bad intention for influencing a business decision is prohibited.

### **Environment**

We are a company committed to the environment. This is why all employees must join this commitment, and minimize any environmental impact derived from the performance of their



professional tasks as much as possible. Specifically, it is mandatory to use all the recycling means that the company makes available to you.

### **Bribery, Gifts and Entertainment**

Practices that result in a personal benefit or enrichment are not allowed, due to taking advantage of work functions, nor favouring it for third parties.

Employees are prohibited from offering or accepting gifts that may be construed as disproportionate. In all cases, after accepting any gift, it must be communicated to the Person in Charge of Administration, who will decide whether to accept it or not, and if accepted, it will be drawn among the workers who show interest in it.

### **Conflict of interests**

Employees must try to avoid situations in which personal interests may affect the interests of the Company, and in any case prioritize the latter. Specifically, employees are not to take advantage of opportunities, or make use of corporate property or information, or take advantage of their workplace for their own benefit, or compete with the company directly or indirectly.

Employees may not work in external business organizations that may adversely affect their development, unless authorized by the company.

### **Use of Company Resources:**

Employees must make rational, efficient and appropriate use of the resources that the company makes available to them for the development of their tasks. In addition, the company asks its workers to protect them as much as possible, avoiding improper use.

## **INFORMATION: REGISTRATION AND USE**

### **Information integrity:**

The information recorded from professional development has to be completely true so that all records are completely reliable and accurate. In addition, the reflection of the information in any of the company's systems must be complete, without altering or falsifying the contents of the documents, information or data.

The employee agrees that he will follow the principles of truthfulness, integrity and completeness, in all the records that he has to carry out in the development of his tasks.

### **Information Confidentiality and Data Protection**

The employee may have access to confidential company information, and therefore agrees not to disclose it, and to use it only for work purposes. Any transmission of this information to another employee of the company, can only be done when it is strictly necessary for the development of the tasks of the second.

Every employee has the obligation to protect the information, both from the company and from third parties that may be obtained for work purposes, and use it only for the purpose for which it was obtained.



The employee agrees to maintain the Professional Secret of the data, reports, accounts, balances, strategic plans, client list, supplier list, price lists, costs, ... and all the activities of the company and its employees that they are not of a public nature, unless it is required by law or in compliance with a judicial process, or has the express authorization of the appropriate person to be able to do so.

The obligation of confidentiality will also be maintained after the employment relationship between the employee and AV has ended.

Likewise, the company guarantees that all the information that is collected for work purposes is duly protected, and undertakes to maintain its confidentiality.

#### **Inside Information:**

AV requires its workers to refrain from using privileged information, and to maintain the confidentiality of the information they access in their tasks, without using it for their own benefit or that of others.

## **COMPLIANCE WITH INTERNAL LAWS AND RULES**

The company and all employees are governed by law. The laws and regulations in force must be followed. In addition, we provide ourselves with internal regulations that are mandatory for all: in this way we ensure that we do not compromise business continuity in the face of inappropriate practices. Notwithstanding the foregoing, the company makes available to employees the necessary mechanisms to be able to promote improvement initiatives in internal regulations, in such a way that they are 100% modifiable and adaptable to the needs of the changing environment.

## **RESPONSIBILITY**

The employee is responsible for applying this Code of Conduct, and helping others to do so. The knowledge or suspicion of a violation of the Code, must be duly communicated so that the Company carries out an investigation process in this regard.

AV guarantees that there will be no retaliation for those who make a complaint in good faith; notwithstanding the foregoing, false allegations will not be tolerated.

Failure to comply with the Code will be analyzed in accordance with internal procedures and legal regulations, and the corresponding disciplinary measures will be applied.

No one, regardless of hierarchical rank, can request an employee to violate the Code of Conduct. Likewise, no employee may use the order of a hierarchical superior as an excuse for having breached the Code, nor their ignorance.