

ETHICS CODE

With this Code, Forging Steel Products intends to promote an ethical and responsible behaviour in the development of its activity, beyond even the mandatory compliance with the law.

The Code of Ethics is a reflection of the values and principles that should guide the conduct of the people who belong to the company. Likewise, it should inspire the procedures and conduct that order relations with customers, employees, the environment and with society in general.

Forging Steel Products gives priority to compliance with this Code without exceptions to it. Therefore, all the people who are part of the organization have the obligation to know and comply with these rules of conduct, and must commit to respect the spirit of this document and its role in the company not only with strict compliance with the applicable legislation, but avoiding and in his case denouncing any practice that is not ethically acceptable under strict criteria of honesty and moral integrity.

The content of the Code cannot address all possible situations, however, it has an inspiring principle that should govern the performance of employees: act in an integral and professional manner in any situation that presents itself.

Forging Steel Products manifests its absolute rejection to any type of illegal and / or criminal practice, leaving express record that such practices are totally prohibited, without exception or limits within the company.

COMMITMENT TO OUR EMPLOYEES:

- Acting resolutely against any form of discrimination based on sex, race, age, nationality, disability, ideology, religion or any other personal or social condition that is not related to their conditions of merit and ability.
- Do not allow any form of violence, harassment or abuse at work.
- Treat each employee with dignity, respect and justice.
- Transparency, providing detailed management information. Profitability, with a solid model and future.
- Ensure that the company's internal recruitment and promotion policies are based on criteria of professional value, linking the remuneration and promotion of employees to their conditions of merit and ability.
- Procure the reconciliation of work in the company with the personal and family life of the employees.
- Provide training and make available to employees the tools necessary for the performance of the job.
- Forging Steel Products has as General Policy the Management of Occupational Risk Prevention guaranteeing safety and hygiene at work and adopting all reasonable measures to maximize the prevention of occupational risks.

COMMITMENT OF OUR EMPLOYEES:

- Comply with all internal operating rules, acting in a clear and transparent manner, making sure that none of its actions can be interpreted as a hoax.
- Use facilities, work equipment with absolute respect and exclusively for the functions that have been assigned.
- Ensure the physical and intellectual property of the company.
- No worker of this company will intentionally provide incorrect, inaccurate or inaccurate information that could mislead the recipient.
- Respect their colleagues and ensure the harmony of the work environment.
- Protect and prevent disclosure of information under your responsibility. All strategic information about the company, as well as any information about customers, shareholders, employees or suppliers that is accessed for work purposes, must be considered confidential and therefore, treated as such.
- Be an example of conduct abroad and feel proud of belonging to the company.

COMMITMENT TO OUR CUSTOMERS:

- Personalized attention and constant improvement in customer service through relationships based on trust and mutual respect.
- Guarantee the products and services of our company and respond quickly and effectively to the claims of our clients seeking compliance with current regulations.
- Search for the excellence of our products (continuous improvement) so that our customers obtain the expected satisfaction from them, at appropriate prices and fulfilling the agreed delivery deadlines
- Encourage transparency and sufficient, truthful, timely and adequate information.

COMMITMENT TO OUR SUPPLIERS:

- Search and select only suppliers whose business practices respect human dignity, do not violate the law and do not endanger the reputation of the company.
- Select suppliers based on the suitability of their products and / or services, as well as their price, delivery conditions and quality, not accepting or offering gifts or commissions, in cash or in kind, that may alter the rules of the free competition in the production and distribution of goods and / or services.

COMMITMENT TO THE ENVIRONMENT:

- Commit to the protection and respect of the environment, including the prevention of pollution, complying with the applicable environmental legislation and regulations and other requirements such as the sustainable use of resources, the adequate management of waste, the control of atmospheric emissions and of the spills ... contributing to the mitigation of climate change and the protection of biodiversity and ecosystems and also to the continuous improvement of the environmental management system to improve environmental performance.

COMMITMENT TO THE COMPANY:

- Business based on absolute respect for human rights, free association and strong rejection of forced labor, child labor and discrimination, as described in the principles of the United Nations Code of Conduct.
- Show with the rest of society, the same values that guide our day to day work.

ANTI-CORRUPTION / BRIBERY COMMITMENT:

- Publicly declare its commitment to act ethically and transparently before its stakeholders, prohibiting at all times any behavior or practice of bribery, corruption or influence peddling in all its business relationships.
- Conduct business in a socially responsible manner, prohibiting both employees and other interested parties, understood as customers, suppliers, shareholders, subcontractors, ..., make, offer or accept bribes, payments or anything else for the purpose of improperly obtaining or maintaining contracts, business, fiscal regulations or any other improper business advantage.

For all this, the people who integrate Forging Steel Products in their relationship with third parties cannot offer or accept gifts or entertainment that go beyond the purely symbolic or that could be interpreted as an attempt to improperly influence a commercial, professional, administrative or business relationship.

Expenses or services that may be considered customary or usual in the market, in reasonable amounts, taking into account their nature, frequency and amount, are not included in said prohibition.

NONCOMPLIANCE OF THE ETHICAL CODE:

- Forging Steel Products has "zero tolerance" against breaches and will take disciplinary action in accordance with the applicable Labor Agreement (Bizkaia Metal Convention) against personnel who violate the laws, this code of conduct or the policies of the organization.

COMMUNICATION CHANNEL:

Forging Steel Products makes it easy for all the people who form part of the organisation, as well as the rest of the interested parties, to consult doubts and notify irregularities or breaches that lack ethics, integrity or go against the guidelines established in the Code of Ethics, through the following channels or any other means that the group may establish in the future:

- Email address: canaldedenuncias@forgingsteelproducts.com
- Postal address:
Forging Steel Products, S.L
Bº Arregui, s/n
48340 Amorebieta (Bizkaia)
- Suggestions box

Notifications and enquiries are handled by the compliance officer and will be treated confidentially. The data of those involved will be managed in accordance with the provisions of the applicable data protection laws.

Retaliation against those who have, in good faith, made use of the ethics channel to report possible irregularities will not be tolerated.