

CODE OF CONDUCT

INTRODUCTION

This Code of Conduct applies to VITRINOR, S.A.L., to all its employees, managers and executives and as well as to its Suppliers and Subcontractors throughout the world (unless the applicable legislation at each moment and in each country establishes higher standards)

The objective of this Code of Conduct is to ensure compliance with certain social and environmental standards in accordance with the regulatory framework on which it is based, and which refers to:

- Convention and Recommendations of the International Labour Organization (ILO)
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women
- UN Global Compact
- United Nations Guiding Principles for Business and Human Rights
- OECD Guidelines
- Labour legislation applicable locally
- Local legislation on environmental matters, and in the absence of this, the related international law.

This Code is based on 10 points:

1. Right to Freedom of Association and Collective Bargaining

The right of all workers to form, organize and join trade unions of their choice and to negotiate collectively on its behalf with the company without reprisals and / or being subject to any type of discrimination, harassment or intimidation, will be respected.

Where the rights to Freedom of Association and Collective Bargaining are restricted under law, the company must allow workers to freely choose their representatives and the appropriate channels to ensure a reasonable and independent exercise of such rights must be designed.

2. Prohibition of discrimination

The company must not apply any type of discriminatory practice in hiring, remuneration, access to training, promotion, termination of contract or retirement based on sex, age, religion, race, caste, birth, social origin, physical or mental disability, ethnic and national origin, nationality, sexual orientation, marital status, union or political affiliation or any other condition that may be reason for discrimination.

3. Wages

The company must guarantee that the wages paid to its workers meet at least the minimum legal or collective agreement, should this latter be higher. In any event, wages should always be sufficient to cover, at least, the reasonable additional needs of the workers and their families.

No withholdings and / or deductions will be made on workers' salaries for disciplinary purposes, nor for any reasons other than those provided in the applicable regulations without their express authorization.

Workers will be provided with clear and detailed information in writing about the particulars of their wages both upon their recruitment and at the time of the periodic salary payments.

The company will ensure that wages and any other allowances or benefits are paid on time and are rendered in full compliance with all applicable laws and specifically, that payments are made in the manner that best suits the workers

All overtime will be paid at a special rate as established by national laws or as agreed by the partners and workers of the company.

4. Not excessive number of working hours

The company will adjust the length of the working day to the provisions of the applicable legislation or of the collective bargain agreement applicable for the sector in question, if this is more favourable for the worker.

Overtime must be voluntary, shall not be demanded on a regular basis and must be settled within the established period. It will not suppose a significantly higher probability of occupational risk.

Exceptions to this rule will only apply when the following conditions are met:

- a) The national law allows that the working hours exceed this limit; And
- b) A collective agreement which is freely agreed upon, is in force and allows average times at work, including adequate rest periods.

5. Health and Safety at the workplace

The company will provide a safe and healthy work environment and will take effective measures to prevent accidents or potential damage to the health of the workers that may arise from, be associated with or occur during the course of work, minimizing, as far as reasonably possible, the causes of risks inherent to work environment, taking into account the current knowledge of the sector and any specific risk.

A set of clear rules and procedures must be established about occupational health and safety, and they must be complied with, especially the provision and use of protective equipment, access to clean toilets, and access to potable water.

Likewise; when needed, sanitary facilities should be provided for storing food that in all cases comply with the applicable hygienic-sanitary legislation.

All personnel shall have the right to move away from a serious and imminent danger without obtaining permission from the company.

Any practice and condition in the workplace that represents a violation of fundamental human rights is prohibited. Especially, young workers will not be exposed to dangerous, unsafe or unhealthy situations.

The company will appoint a representative of the management, responsible for the health and safety of the personnel and for the maintenance and implementation of the standards and documents that guarantee it.

All staff will receive, on a regular and documented basis, health and safety training. This training will also be given before the incorporation of newly hired and / or reassigned personnel.

The company will establish systems to detect, avoid or respond to possible threats to the health and safety of all personnel.

6. Prohibition of Child Labour

Child labour is prohibited, as established in the conventions of the ILO and the United Nations and / or the laws of the country. Of all these regulations, the strictest must be followed. Any type of exploitation of children is prohibited. Work conditions that resemble slavery or that are harmful to the health of children are prohibited. The rights of young workers must be protected.

The company can hire young workers, but when these young workers are subject to compulsory education laws, they can only work outside the school hours.

Young workers (under 18) should not work during night hours or under hazardous conditions according to ILO Recommendation 190.

7. Prohibition of Forced Labour and Compulsory Disciplinary Measures

Any form of forced or involuntary work is prohibited, as well as the requirement to workers of any deposit or retention of employees' identity documents at the beginning of their employment.

Likewise, work by inmates that involves a violation of fundamental human rights is prohibited. Neither the company nor any entity that provides services to the company will retain any part of the salary, benefits, property or documents of any employee to force said employee to continue working for the company.

Employees shall have the right to leave work facilities after the end of the standard working day and shall be free to terminate their employment given they communicate it to the employer in a reasonable way.

Neither the company nor any entity that provides services to the company will be involved nor will it support the trafficking of human beings.

The company will treat all its employees in a dignified and respectful manner. The company will not be involved or tolerate the use of corporal punishment, physical or mental coercion or verbal abuse against its employees.

8. Environmental Commitment

The company will maintain a constant commitment to the protection of the environment, as a minimum, it will comply with the standards and requirements of the applicable local and international Laws and Regulations, and there must be procedures for the management of waste, handling and disposal of chemical products and other hazardous materials and the treatment of emissions and discharges.

9. Ethical Business Behaviour

This principle is fulfilled when no employee, manager or executive of VITRINOR as well as any of its Suppliers and Subcontractors is involved in any act of corruption, extortion, embezzlement or bribery.

VITRINOR must be informed of any situation that may be considered a conflict of interest and reveal whether any employee of VITRINOR or any professional hired by VITRINOR had an interest of any kind in the supplier's business or any type of economic link with the supplier.

The provider must have systems in place that allows to claim, report or manage the complaints and claims of customers, suppliers and the general public, appointing a responsible person to continuously supervise the complaint mechanism.

All personal information that is collected in the management of claims (including that of workers, commercial actors, customers and consumers in its sphere of influence) should be treated in a manner that complies with the legislation on privacy and information security, as well as with the regulatory requirements.

10. Implementation of the Code

Responsibilities of Suppliers and Subcontractors:

- Implementation and maintenance of the Code of Conduct as well as the establishment of necessary control measures that allow its continuous improvement.
- Appointment by Management of one or more members of the leadership for the implementation of the Code of Conduct.
- Communicate the requirements of the Code of Conduct to all its employees, suppliers and / or subcontractors. A copy of the Code, translated into the local language, shall be displayed in accessible locations to all workers.
- Authorize VITRINOR, S.A.L. or to any organization that represents it, to carry out audits with or without prior notice in its facilities.
- Do not allow access to this Code of Conduct to third parties.
- The production destined to VITRINOR may not be subcontracted to third parties without prior written authorization from its part.