

EMPLOYEE CODE OF CONDUCT



Quality Department

January 2018

EMPLOYEE CODE OF CONDUCT***INTRODUCTION***

This Code of Conduct is intended to provide all employees with the guidelines to ensure proper conduct toward colleagues and managers, as well as in dealing with customers and the general public.

The aim is to encourage the integrity of employees and therefore of the company.

PLUS FELT'S COMMITMENTS TO ITS EMPLOYEES

- To respect them professionally and personally.
- To offer them an environment and working conditions that facilitate the fulfilment and improvement of their work as well as stable employment.
- To provide adequate means and resources, as well as training the employees for best performance, workplace excellence and professional growth.
- To recognise the diversity of people as a rich source for the company and, consequently, to establish the appropriate talent and diversity management policies so that each person can contribute to the company's success.
- To promote equal opportunities for men and women.
- To support employees in achieving a personal and professional work-life balance.
- To encourage, promote, channel and recognise employees' creativity.
- To foster teamwork, delegation, cooperation, coordination and other forms of mutual support by encouraging success as a group.
- To encourage participation in decisions that affect them.
- To promote the necessary tools to ensure that communication between employees and the company flows properly.
- To promote transparency, transmit and share necessary information for workplace performance.

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WHAT PLUS FELT EXPECTS FROM ITS EMPLOYEES

- Commitment to Plus Felt and its values.
- Commitment to their own professional development and to the training and improvement opportunities offered by the company.
- Compliance with the company's policies and standards.
- Loyal dedication to the company in the established timetables, as well as the honest and efficient use of the necessary time and resources to perform the work, avoiding the use of the said time and resources for non-work related purposes or for their own benefit.
- Respectful, fair and honest behaviour in the workplace and in relationships with all the parties with whom we operate, and especially with our customers.
- Impartiality, fairness and integrity in dealing with other employees, customers, suppliers or any other person who has a contractual relationship with Plus Felt, avoiding any displays of favouritism, or obtaining personal advantages, partiality or abuse of power or position.
- Loyalty to the company by not performing other functions, positions, responsibilities, conducting activities or participating in partnerships that involve unfair competition, conflicts of interest, or interference with their employment obligations.
- Treating information confidentially as well as restricting its use to the scope of our work showing particular attention to respecting the privacy of the customers.
- Maintaining relationships with customers governed by professionalism, attention to details, courtesy, kindness, trust and availability, personal interest and speed when attending to their needs, as well as a proactive, creative and entrepreneurial attitude.
- Their contribution to creating a good working atmosphere so that all our stakeholders (employees, customers, etc.) enjoy a positive experience in their relationship with Plus Felt.

EMPLOYEE CODE OF CONDUCT***INSTRUMENTS USED FOR THE DEVELOPMENT OF THESE COMMITMENTS BY PLUS FELT***

- The creation of stable employment.
- Employee listening channels (climate survey, departmental meetings, workplace committees, etc.)
- Employee communication channels (Intranet, Plus Felt's website, objective monitoring meetings, etc.)
- Training plans.

1. OBJECTIVE AND SCOPE OF APPLICATION

- This Code contains the most significant rules and principles of conduct for all employees.
- The Code applies to all Plus Felt personnel, including all the people who work outside of the company's offices.
- Plus Felt's Management is responsible for ensuring the publication and implementation of the Code of Conduct.
- Those who work in external companies which are subcontracted by Plus Felt must also respect the Code.
- The purpose of the Code is to provide information on ethical management and clear guidelines to employees about the basic legal requirements they must observe when carrying out their work at Plus Felt.

2. SOCIAL CONDUCT

- Our aim is to foster and maintain a working environment of trust and camaraderie, cultivating social and responsible behaviour among all of Plus Felt's employees. This includes showing respect for the personal dignity, privacy and rights of each individual. All employees must consider it an obligation to prevent and avoid discrimination or unfair treatment on the grounds of race, gender, religion, ideology, disability, age or sexual orientation. In the same way, bullying, violence, threats, harassment or any other antisocial behaviour will not be tolerated and will be stopped immediately.
If you are in any doubt, consult the Internal Audit Department.

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Employees should avoid the situations listed below which may lead to conflicts between the company's interests and personal interests. Any unavoidable personal conflicts of interest should be brought to the attention of the employees' direct managers who will apply this Code in order to resolve them.

3. CONFLICTS OF INTEREST

- **GRANTING OF BENEFITS AND GIVING OF GIFTS**

Employees may not offer or grant unjustified benefits in the context of their professional activities. Gifts and invitations to stakeholders (customers, doctors, partners) must remain within the limits of what is appropriate and not aim to unlawfully influence business decisions. The criterion for deciding whether a gift or an invitation is appropriate is normal business practice. Business practice can be considered normal if there have been several comparable cases in which, after being informed, the direct manager has not raised any objections.

- **ACCEPTANCE OF BENEFITS AND GIFTS**

Employees and people related to them must not accept gifts, invitations or other benefits beyond the limits of those considered appropriate. In this case, the standard of "appropriate" is also considered as normal business practice. The acceptance of direct economic rewards is prohibited without exception. Employees can accept invitations to lunches, dinners, or work-related events.

- **BENEFITS OFFERED TO PUBLIC OFFICIALS**

Public officials, politicians and other representatives of public institutions should not be offered gifts, rewards or invitations that might compromise their independence or integrity.

- **BRIBES AND CORRUPTION**

No employee shall offer or grant bribes. In dealing with public bodies or authorities, special attention should be paid not to promise or offer payments or benefits in order to influence the decisions or actions of a civil servant or any other public official.

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- **AVOID CONFLICTS BETWEEN PROFESSIONAL AND PERSONAL INTERESTS**

All employees must ensure that their personal interests do not interfere with those of Plus Felt. This means respecting the interests of the company. Specifically, in the scope of this context, the following rules must be specifically observed:

- Only authorised employees may enter into contracts and place orders on behalf of the company, and always in accordance with existing regulations.
- Employees must inform their line manager if they engage in any secondary professional activities which may affect the interests of the company.

- **EXCLUSIVITY**

The Directors of the company may not carry out any other remunerated work for themselves or on behalf of others which is related to their professional experience, unless expressly authorised by the company's management. Occasional participation in conferences, seminars and training activities not taking more than 15 hours a year in total is exempt from authorisation.

If you are in any doubt, consult the Internal Audit Department.

4. EXCELLENCE AND EXEMPLARY CONDUCT

Plus Felt would like its employees to be the first to promote excellence through their exemplary conduct. This is manifested in the following commitments that must be demonstrated both within the company itself and when the employee represents it externally.

- **RESPECT FOR PEOPLE**

Plus Felt employees must promote respect for people regardless of their position within or outside the company, or of their training, education, profession, age, gender, sexual orientation, religious beliefs or values, language, geographical origin or precedence, etc. As a result, their personal treatment, language and attitudes shall be in accordance with this respect and with the company's values.

Similarly, Management must ensure the reconciliation of the employees' personal and work life balance and match his work demands to the schedules of those who work with them, aiming to promote a work-life balance through their own example.

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Management is responsible for creating and maintaining a good working environment in the company. Counting on the involvement and commitment of the employees working for them is one of the objectives of every Manager and they should contribute to achieving this by setting an example and demonstrating their dedication.

- **TRAINING**

Plus Felt's Managers must take care of their own training and that of their collaborators in order to be able to do their job better as well as offering a better customer-oriented service in which continuous learning can have an impact on innovation to the company's benefit.

- **TRUST AND TEAMWORK**

Plus Felt's Managers will promote the trust and teamwork that must characterise the company both internally and with regard to its external relationships.

- **TRANSPARENCY AND EMPATHY**

Plus Felt's Managers must share knowledge and information internally and externally in order to promote transparency in the company's activities. In this area, dialogue as well as listening and understanding of the expectations, needs and values of the different agencies which the company maintains relationships with will be of particular importance.

- **CONCEALING ANOMALIES**

Under no circumstances may Managers acquiesce with regards to irregular situations which they may have become aware of, with this being considered to concealing them in that case. The Manager must report to the Ethical Adviser about any anomalies in the work or conduct of the personnel violating the company's values, with their identity being safeguarded at all times when notifying the said breach.

If you are in any doubt, consult the Internal Audit Department.

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5. CONFIDENTIALITY AND DATA PROTECTION

- Employees are required to maintain confidentiality in relation to all of the group's internal matters of a confidential nature, as well as confidential information owned by or relating to customers. The information is considered confidential if it is marked as confidential or if it is clearly evident that it contains business or trade secrets. If in doubt, the direct manager can be consulted.
Confidential information usually includes business and operational secrets, as well as accounting data, reports and figures.
- Even when managed internally, confidential information must be protected from disclosure to third parties. Confidential information should only be made available to employees who need it in order to carry out their official duties.
- Employees are obliged to comply with data protection regulations and to actively contribute to ensuring that sensitive data, and in particular personal data (for example, doctors), is not accessible to third parties. Personal data should only be collected, processed and used to the extent permitted by the Data Protection Act, other applicable laws and relevant professional agreements. If in doubt, the employee should consult the company's Data Protection Officer. All employees are required to comply with data protection regulations and to maintain confidentiality with regard to business and operational secrets.
- Intellectual property: show respect for Plus Felt's intellectual property of all software, computer materials, manuals, courses, studies, reports, etc., which have been created, perfected, or specifically developed by third parties through payments by the company for its internal use.
- Knowledge and ways of doing things: undertake to not use the internal knowledge and ways of doing things generated within Plus Felt (understood as its own methodologies or differential "know-how"), outside the company.

EMPLOYEE CODE OF CONDUCT**6. REGULATIONS AGAINST INSIDER TRADING AND MARKET ABUSE**

Employees who have access to privileged information may not participate in operations or transactions with the company, nor may they transmit the said information to third parties, to make investment recommendations. Even when this information is handled internally, as a general principle, it will only be transmitted to those employees who need it in order to carry out their tasks. If you are in any doubt, consult the Internal Audit Department.

7. PREVENT FRAUD AND MONEY LAUNDERING

All employees are required to make every effort to ensure that Plus Felt is not used improperly as an instrument for fraudulent activity. In the event that any employee becomes aware of or suspects any fraudulent activity, it must be reported to the Internal Audit Department.

If there is reason to suspect that a transaction may be illegal, employees must obtain sufficient information about the customer's business environment, the customer themselves, as well as the purpose of the transaction which is intended to be carried out. Transactions that appear to be illegal must be rejected, even if no irregularities can be proven.

8. PROTECTION OF THE COMPANY'S ASSETS

Plus Felt's assets include not only tangible assets and property, but also intangible assets related to the company (intellectual property).

All employees are responsible for the protection of these business assets, which should be used only for appropriate business purposes and under no circumstances for illegal business purposes (e.g., computers, telephones, the Internet and other information technologies).

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9. PROTECTING THE ENVIRONMENT

Plus Felt assumes its responsibility to protect the environment and sustainability. Employees must comply with the environmental laws and guidelines in force. This results in an obligation for employees to take into account the environmental implications of their actions and decisions and to avoid or reduce their negative impact as far as possible.

