

# INDUSTRIAS TAPLA S.L.



## CODE OF CONDUCT

IATF 16949

ISO 9001

ISO 14001

EDITION Nº 1 JULY 2017

	ELABORATED	REVIEWED	APPROVED
<b>Position</b>	Responsible SIG	Steering Committee	Steering committee
<b>Date</b>	04/07/2017	04/07/2017	04/07/2017

**GENERAL INDEX**

1. INTRODUCTION .....	3
2-SCOPE OF APPLICATION .....	3
3-DEVELOPMENT OF CONDUCT .....	3
3.1-CONDUCT RELATED TO INDUSTRIES TAPLA RESOURCES .....	3
3.2-RESPONSIBILITY TO HUMAN RIGHTS .....	4
3.3- OPPORTUNITIES AND RESPECT EQUALITY .....	4
3.4-CULTURE OF ADMINISTRATION AND COOPERATION.....	4
3.5-CONFLICT OF INTEREST .....	4
3.6-CONFLICT OF INTEREST IN THE PURCHASE FUNCTION .....	5
3.7-DATA PROTECTION AND SAFETY.....	5
3.8-CONFIDENTIALITY .....	5
3.9-LABOUR AND HEALTH PROTECTION .....	5
3.10- ENVIRONMENT PROTECTION.....	6
4-FULFILLMENT OF THE CODE OF CONDUCT .....	6

## CHANGE CONTROL

Nº Ed.	Date	Summary of Changes

## 1. INTRODUCTION

Industrias Tapla and its employees are committed to the following code of conduct where our ethical bases are defined and they are based on working with honesty, quality and responsibility.

This code defines the basis of ethics and conduct of the company, which will be ruled by the following objectives:

- To Proceed responsibly for the good understanding and achievement of the objectives of the company.
- To Base the methodology of work of each department or process with the defined ethics of Industrias Tapla and this will be respected by all personnel
- To Perform actions to maintain and continuously improve the prestige and correct performance of Industrias Tapla to all interested parties.

All members of Industrias Tapla team must be aware of the code of conduct in order to know what the specific instructions are and how to proceed; this also provides them with a guide that should help them to face the ethical challenges of daily work.

Industrias Tapla is committed to an honest, and respectable performance that fulfill the rules and the code of conduct.

## 2-SCOPE OF APPLICATION

The code of conduct is valid for all members of Tapla Industries. Also for third parties acting on behalf of the company (subcontractors and employees)

The code of conduct will be public and accessible to all people involved.

## 3-DEVELOPMENT OF CONDUCT

In order to accomplish the objectives set out above, we will work with the ethics, vision, and values of the company.

### 3.1-CONDUCT RELATED TO INDUSTRIES TAPLA RESOURCES

Industrias Tapla offers to all its employees or collaborators the necessary resources for the performance of their professional activity. All of them are committed to protect and to be responsible when using the company resources, including: facilities, computer equipment, furniture, work tools, machinery, software, hardware, confidential information, intellectual or industrial property rights

And even Industrias Tapla's own name and Brand. There must be a responsible use of the assigned resources.

The office equipment, landline and mobile telephone services, mail, computer hardware and software from Industrias Tapla have been acquired for the only purpose of professional activities of the company. Under no circumstances employees will make use of the company equipment to install or download programs or computer applications without the supervision of the computer person in charge of Industrias Tapla.

Employees will not use the resources professionally assigned, for personal and private use.

Employees and managers will not use funds or economic resources of the company for illegal activities, inappropriate practices, socially unacceptable behaviors or for private use.

The inappropriate use of resources is an ethical violation that can be considered as a punishable act.

### **3.2-RESPONSIBILITY TO HUMAN RIGHTS**

Industrias Tapla respects the human rights recognized by the United Nations and we support its accomplishment.

We respect the minimum age to work in Spain.

We reject the use of forced and obliged labour.

### **3.3- OPPORTUNITIES AND RESPECT EQUALITY**

Industrias Tapla always seeks equality of opportunity, avoiding any possible discrimination regarding to ethnic origin, skin color, sex, disability, ideology, religion, nationality, sexual orientation, social origin or political tendency.

Employees are hired and promoted according to their qualifications or skills.

Employees are obligated to avoid any kind of discrimination, harassment, mobbing, and they must be respectful either with partners and co-workers.

### **3.4-CULTURE OF ADMINISTRATION AND COOPERATION**

All those responsible must be a model and must act in accordance to the code of conduct and they have to encourage the members of their team to act according to such code.

Those responsible must prevent or avoid unacceptable conduct and they must inform on a higher scale in the case that certain events violate the code of conduct and ethics of Industrias Tapla, S.I.

### **3.5-CONFLICT OF INTEREST**

The employees of Industrias Tapla must avoid situations that could lead to a conflict between personal interests and those of the company.

Employees will not be able to perform tasks, jobs or provide services to the benefit of companies in the sector or that develop activities that may compete directly or indirectly to Industrias Tapla.

Each employee is responsible for ensuring that he/she avoids conflicts of interest. If he/she is not sure whether an intervention may or may not provoke a conflict of interest, or in the event that the employee is involved in one, he/she must report, according to the case, the conflict of interest to an immediate superior, In order to avoid a possible misinterpretation of his/ her action and to take the necessary decisions in each specific circumstance.

### **3.6-CONFLICT OF INTEREST IN THE PURCHASE FUNCTION**

The purchasing department may receive influences for the adjudication of orders.

If this happens, the person in charge of the department will be ruled by the code of conduct of the company, declining any influence for the adjudication of orders and communicating immediately the incident to the management committee.

### **3.7-DATA PROTECTION AND SAFETY**

All employees are forced to fulfill the legal provisions on protection of personal data (LOPD) as well as legal and business regulations on information security and to protect against undue use the confidential and personal data managed by Industrias Tapla.

We are committed to accomplish the requirements of the LOPD regarding to the security and confidentiality of personal information.

### **3.8-CONFIDENTIALITY**

As part of their work, employees may have access to confidential information, they are not allowed to share such information with third parties that do not belong to Industrias Tapla or use it for the personal benefit of who has it or has access to it.

Confidential information includes the knowledge of strategic forecasts, I+D+I projects, composition and production of material. It is also considered confidential the Information obtained according to the job position, career, remuneration or detailed information of other staff members.

This confidential obligation will remain in effect even after having worked in Industrias Tapla.

### **3.9-LABOUR AND HEALTH PROTECTION**

Industrias Tapla guarantees labor and health protection through continuous improvements in the work environment and different prevention and protection measures, working together with the Prevention Service.

All employees must contribute to the care of their health and the health of the members of the team, and they must accomplish the labor and health protection regulations indicated each time.

### 3.10- ENVIRONMENT PROTECTION

Following the guidelines of ISO 14001 and the legal requirements regarding to environment, we are committed to lead our activities in a way that minimizes the environmental impact.

All employees must make proper use of natural resources to reduce the environmental impact and avoid the exhaustion of natural resources.

The company spreads and carries out training on environmental aspects in order to promote a culture that is respectful to the environment.

## 4-FULFILLMENT OF THE CODE OF CONDUCT

Industrias Tapla encourages the code of conduct and responsible practices throughout the distribution and communication of the code. Using as communication channels, the personal delivery of documentation, information boards located in the facilities, the company intranet and the website.

All employees must accomplish the requirements of the code of conduct and must collaborate with all interested parties for this purpose. (Interested parties are described in the public process map of Industrias Tapla, S.L.).

In case of breaking the code of conduct by any party, the management office will study the consequences of the breach and they will act in an equitable way to the damage caused. All this will be carried out to continue keeping the proper practice of ethics and responsibility for a common benefit.

For any doubt about the code of conduct of Industrias Tapla, S.L., each member of the team must contact his/her manager.