

# CODE OF ETHICS

## THE REASON FOR A CODE OF ETHICS

The Code of Ethics of La Farga is based on the definition of the **mission, vision and values**. Its aim is to establish the **rules of ethical behaviour within the company in its daily task**. This code governs the relationships and interactions between: the company, the shareholders, the workers, clients, suppliers and external collaborators, public and private institutions and society at large (interaction groups).

## RULES FOR ETHICAL BEHAVIOUR

La Farga considers that the relationship of the company and its workers towards the groups of interaction and vice versa is based on INTEGRITY (behaving ethically, honestly and in good faith) and PROFESSIONAL RESPONSIBILITY (proactive and efficient actions and focussed on excellence, quality and the willingness to serve). With this in mind, the following **commitments** are established:

### Compliance of the law

La Farga takes on the commitment to act at all times in accordance with the legislation in force and respecting and obeying all the state and local laws in the geographical areas in which it works. All the workers must know the laws that affect their job in a proactive way.

### Respect

Reject any manifestation of physical or psychological harassment or abuse of authority, as well as any other behaviour that might produce an intimidating or offensive environment regarding the rights of people.

### Development and equality

Professional activity must be guided by honesty, mutual respect and the unity of individual efforts in order to achieve the common goal. All those people who have management roles over other members of staff must be responsible for their own actions and that of their collaborators.

1 Situations that may lead to a conflict of interests: acting dishonestly with the competition in the sector against La Farga, or using La Farga's inventions or discoveries in other areas. In addition, managers's external posts must be previously approved by the General Management.

La Farga promotes the development of all its workers and guarantees equal opportunities. As much as possible, and on the condition that service to the client is not affected, La Farga will help staff to balance their personal and work life with policies of flexibility. The selection and promotion of workers is based on the competences, skills, performance and execution of the professional duties shown by the individual. People who undertake management positions must act as facilitators of the professional development of their collaborators.

### Loyalty and commitment

The workers must avoid situations that may lead to a conflict of personal interests and of the Group.<sup>1</sup> Faced with situations of doubt, they will consult their immediate superior. Additionally, to use any opportunity that arises or is discovered through the use of the property, information or company post for personal gain or to compete directly or indirectly with La Farga is not allowed. The workers of La Farga must maintain confidentiality regarding all the information used, even when they no longer form part of the Group. In this sense, no worker has the right to privacy of information and knowledge produced within the sphere of the company, which are the property of the Group.

### Precision

The information that the worker provides and uses must be precise in its content. Additionally, La Farga is committed to the use and updating of the technical and electronic means as support for the development of the Group. La Farga is committed to undertaking audits in a transparent and honest way, as well as collaborate on those produced of the financial state of the company. It is also committed to provide this information to whoever requests it.

### Taking care of people

La Farga promotes the adoption of health and safety at work policies, applying the preventive measures established in the legislation in force, and all workers must watch out for their own safety and that of the people who may be affected by their activity.

2 Industrial property: the patents, trademarks, technical reports, research and development, secrets, commercial and marketing plans, and any economic and financial reports, as well as all non public information that might be useful to competitors or might damage the interests of the Group.

Additionally, La Farga is committed to the application of the regulations for the protection of the environment, through which all the workers must make every effort to minimise the environmental impact.

### Cooperation

La Farga provides a setting of cooperation and teamwork for the best use of all the skills and resources. All the workers must work efficiently, making full use of the time and the resources they have available and contribute the maximum value to all the processes in which they take part. All the workers must use the resources available of industrial property in a responsible, efficient and appropriate way in the setting of their professional activity and must act with a spirit of cooperation in order to avoid improper actions.<sup>3</sup>

The workers must make available to the other organisational units that make up the Group the know-how and/or resources that may facilitate the achieving of the company's objectives and interests. In this sense, La Farga promotes the suitable flow of information and know-how between all the workers in order to facilitate the management of the activities and strengthen the development of people.

### Responsibility

All the workers must safeguard the maintenance of the good image and reputation of La Farga in all its professional actions and work for the commitments taken on in the Corporate Responsibility (CR) policy, running responsibly all the economic, social and environmental resources.

### Fair relations

No worker may take advantage of any other person through manipulation, hiding or abuse of privileged information, distortion of material facts or any other unjust or unethical practice. In this sense, the workers of La Farga cannot favour or provide any person with payments that may be illegal and/or incorrect.<sup>4</sup>

### ACCEPTANCE AND PROCEDURES OF COMPLIANCE

La Farga will communicate and inform all its groups of interaction of the contents of this Code of Ethics. All the workers who join or come to form part of the Group must expressly accept the values, principles and rules of behaviour that are established in this Code. Any doubt that may arise in the application of this Code must be taken to the immediate superior or to the Ethics Committee.

<sup>3</sup> Inappropriate actions: thefts, misuse of assets (unauthorised use and distribution of this information), material damage connections to the internet for purposes unrelated to work, waste of resources, etc.

No-one, irrespective of their level or position, is authorised to ask a worker to breach that established in the Code of Ethics. No worker may justify improper behaviour, seeking protection from an order from higher up or ignorance of the Code.

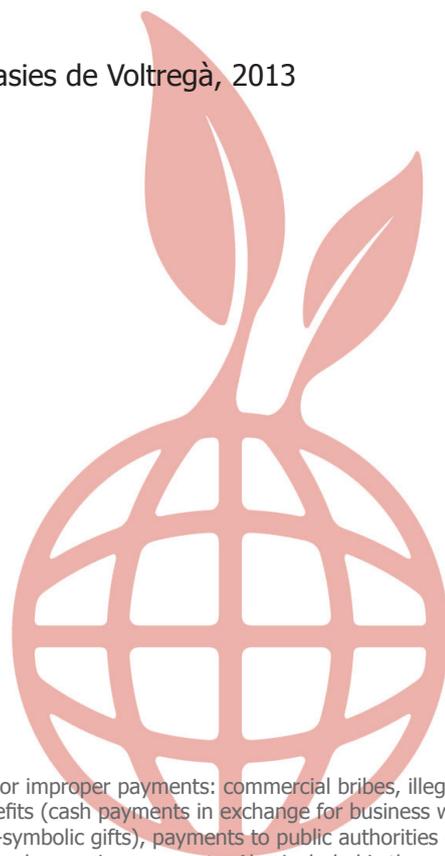
The workers must inform the Ethics Committee of any non-compliance or breach of the behaviour compiled in this document. There will be no type of reprisal allowed against the workers who inform, in good faith, presumed breaches.

The Corporative Ethics Committee has an e-mail address, **yourcoppersolutions@lafarga.es**, so that any worker from the Group may make enquiries regarding the Ethics Code or state any concern they may have about ethical compliance in the work setting.

### VALIDITY OF THE CODE OF ETHICS

The Code of Ethics enters into force on the day of its issue and will be valid while its cancellation is not passed. It will be revised and updated periodically by the Board of Directors at the proposal of the Ethics Committee, which will take into account the suggestions and proposals that the workers make, the commitments acquired by the Group in questions of social responsibility and good government and the legislation in force.

Les Masies de Voltregà, 2013



<sup>4</sup> Illegal or improper payments: commercial bribes, illegal commissions and benefits (cash payments in exchange for business with La Farga, and non-symbolic gifts), payments to public authorities or to political parties, and excessive payments. Also included is the prohibition of accepting gifts or compensation in order to be influenced to take any improper action - only gifts that are purely symbolic and valued at less than 200 € can be accepted - and accepting loans, business opportunities, travel, etc. In case of doubt, always talk to the direct superior.