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## 1 GENERAL PRINCIPLES


### 1.1 Mission and Vision

Since the very beginning, the people who make up "Disseny, Estudi i Mecanització, S.L." (hereinafter **DEM**) have shared the same entrepreneurial goal, the same **Vision: *To be leaders in the machining of copper and aluminium parts, offering outstanding quality and lead times***

We also share this **Mission: *"To offer outstanding solutions to any industrial requirement related to copper or aluminium machining"***. (machining line) and, ***"To offer outstanding solutions to any industrial requirement related to process automation."*** (engineering line).

In our quest to fulfil both of these missions, at **DEM**, we always strive to be one step ahead, responding to the needs of our customers and their professionals with the overriding goal of surpassing their expectations:


- Those of our customers, meeting their needs through the quality of our service and the knowledge of our multidisciplinary teams.
- Those of their professionals, selecting and retaining the best talent, developing their potential, providing them with training, remuneration

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and appropriate to the market, and supporting them in their professional and personal development.

- Both our stakeholders and the community place their trust in **DEM**, and it is our reputation for delivering on our commitments and principles that ultimately underpins the value of our brand.

The behaviour of all our professionals must align with the values and core principles of our Code of Ethical Conduct.

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## 2. ETHICAL PRINCIPLES

### Integrity


- We are transparent and honest in our professional opinions and business relationships.
- We are truthful about the services we provide, the knowledge we possess and the experience we have acquired.

### Quality

- We deliver the expected value where it is needed.
- We do not improvise as a matter of course.
- We use proven methods and best practices.

### The conduct of our professionals

- We comply with laws, regulations and professional standards. We avoid any action that could discredit ourselves or the business community.
- We understand the broader impact that our work has on society, our workforce, our suppliers and our customers, and we have their interests at heart when doing business.
- We strive to do not only what is legal but also what is right.

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### **Objectivity**


- We form opinions objectively.
- We do not tolerate bias, conflicts of interest or improper influence from others.
- We do not offer, accept or solicit gifts or other favours in an attempt to influence our own or others' business decisions.

### **Competence**

- We assign professionals with the necessary competence to every customer and project according to their needs.
- Innovation and new ideas provide the foundation for improving the added value and delivery of our services.
- We understand that our clients expect our work to meet the highest professional standards.

### **Fair business practices**

- We respect our competitors and are committed to fair business practices.
- Our prices reflect the value of our products and our accountability for them.

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- We make decisions based on our values and expect the same from the companies, entrepreneurs and professionals we deal with.

### **Confidentiality, privacy and data protection**


- We take all reasonable steps to safeguard the confidential and personal information in our possession by collecting and processing data in accordance with the applicable laws, obligations of all kinds and our in-house data management policies and practices.
- We do not disclose the confidential and personal information entrusted to us unless we are required or authorised to do so by law.
- We do not use confidential information about our suppliers or customers for our benefit or the benefit of others.

### **Anti-corruption**

- Under no circumstances do we tolerate corruption or the acceptance or offering of bribes, either by us or by third parties on our behalf.
- We support all efforts to eradicate corruption and financial crime.

### **Supply chain**


- We do not tolerate illegal or unethical behaviours by our suppliers, contractors or alliance partners.

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- We choose suppliers through fair processes.


### **Social responsibility**

- We contribute to society by interacting with non-profit organisations to positively impact the geographical areas in which we operate.
- We support initiatives to drive sustainable development, and we promote and respect human rights.
- We respect the environment and seek to minimise any negative impacts our activities may have on it.
- We foster a culture and working environment in which our personnel are treated with respect, courtesy and fairness, promoting equal opportunities for all.
- We promote and value a diversity of people, views, talents and experiences.
- We create inclusive work environments that not only address individual needs but also enable our staff to draw on their strengths.
- We do not tolerate any form of harassment or discrimination in our work settings.
- We understand that our individual behaviour influences our organisation, our colleagues and society, and we strive to always act responsibly.

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### **Professional development**

- We invest in our people so that they acquire the knowledge and skills they need to fulfil their roles effectively.
- We help our people achieve their potential by investing in professional and personal development and progression programmes.
- We provide a safe working environment for our people and expect our partners to do the same.

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### **3 RESOLVING ETHICAL ISSUES AND CONFLICTS OF INTEREST**

When dealing with situations involving legal or ethical conflicts, as well as conflicts of interest, we use our best judgment and seek professional advice or assistance from third parties where necessary or appropriate.

We consider a conflict of interest to have occurred when the two parties to a bilateral relationship are linked, either because only one person is a party to both or because one of the parties to a relationship consists of, directly or indirectly, a person who is the spouse or significant other, or a relative by blood or marriage up to the fourth degree of kinship, of the other. In all cases, if something comes to light that contravenes the provisions of this document or the Code of Ethical Conduct, we proceed as follows:

1. We further our knowledge of the facts
2. We analyse them
3. We address the situation by looking at the different aspects and considering the various possible approaches.



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### 3.1 Procedure for addressing issues with ethical implications


The **channels that DEM** makes available for the transmission of information, complaints, suggestions, concerns or situations relating to issues with ethical implications or conflicts of interest are as follows:

#### **For DEM personnel**

- The person in the chain of command or organisational chart who is immediately above the person who should or wants to raise the issue, as the case may be.
- If that hierarchically superior person is involved, it should be communicated to whoever is above them in the organisational chart or the chain of command.
- In all cases, any member of the Board of Directors.
- DEM has a public Whistleblowing Channel, which guarantees anonymity.

#### **For all other people**

- The person immediately above the person involved in the issue in question in the chain of command or the organisational chart.
- In all cases, any member of the Board of Directors other than one who, as a member of the Board of Directors, is involved in the issue to be raised.

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- DEM has a public Whistleblowing Channel, which guarantees anonymity.

### **3.2 Duty to inform or, where appropriate, report**

Everyone at **DEM** is obliged to raise any concerns they may have about ethical issues and communicate or, if necessary, report any situations with ethical implications or conflicts of interest.

### **3.3 Guarantee of indemnity**

Nobody who, in good faith, informs, raises a concern, or reports a situation with ethical implications will suffer reprisals from **DEM**.

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### **Dissemination:**

This *Business Ethics Policy* document is available on the company's website [www.dem-barcelona.com](http://www.dem-barcelona.com). Our suppliers and external customers –or the recipients of the goods and services produced by **DEM**– can access it through the website, and our internal customers –in other words, those of us who form part of **DEM**– have first-hand knowledge of it as well as being able to consult it on the website.

### **Entry into force of this Code. Its interpretation and compliance policy.**

This document is effective as of 01 June 2023. It was drafted by the Board of Directors and is therefore known to them.

It will remain in force until the approval of any alteration to it, which will be duly communicated.

Failure to comply with the policy set out in this document may lead to disciplinary measures, including the possibility of dismissal, without prejudice to the exercise of any other legal recourse that may be appropriate.