



CODE OF ETHICS

March 2021





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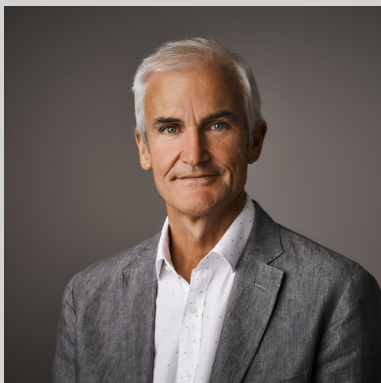
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Antoni Cammany
CEO



Mireia Cammany
Deputy General Manager

1 WELCOME

This EPIfoc Code of Ethics establishes the basis for the Code of Conduct within our EPI INDUSTRIES family of companies, hereinafter EPIfoc, and is developed in line with the Corporate Purpose, values and management principles of our Group and all the companies that form part of it.

It summarises the key aspects of the behaviour and responsibilities of the Organisation and its entire team of employees towards its various stakeholders: its own employees, customers, suppliers, creditors, competitors, shareholders, the administration, the environment and society, as well as the behaviour expected towards EPIfoc from all its employees.

It is not intended to be an exhaustive list, but it is hoped that, through its dissemination and development as a model for action, a style of behaviour of its own will be established.

This Code of Ethics will be subject to adaptations and improvements when the conditions of the environment so require.

Antoni and Mireia Cammany



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CORPORATE PURPOSE, VALUES AND MANAGEMENT PRINCIPLES

CORPORATE PURPOSE





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VALUES

RESPONSIBILITY

This is a fundamental value to guarantee the achievement of our long-term Vision: to gain the trust of our customers. This implies fulfilling our commitments on a day-to-day basis as an essential management premise towards third parties.

ETHICS

We believe in the social work that every organisation must carry out to help create a fairer and more balanced world. And this must be translated into an ethical attitude towards our team, our customers and suppliers and all other stakeholders and as such we have this Code of Ethics and we ensure its compliance.

DIVERSITY

Family of Companies is a vocation for diversity, for the culture that each company, each person, needs their own identity and their ability to understand and interpret the reality of our environment. At EPI INDUSTRIES Family of Companies we want to reinforce diversity as a symbol of wealth to build a wider world.

TEAMWORK

We consider essential to generate work environments and design professional projects that allow the creation of teams of collaborators who can develop positive and challenging teamwork. By uniting everyone's work, we can always go further and achieve more interesting challenges.

PASSION

We strongly believe that no project can move forward without a connection that goes beyond mere rationality. Many factors of human dynamics are fostered and developed in the culture of a sense of belonging, a feeling of duty and loyalty to shared ideas.

SUSTAINABILITY

Faced with a fragile and vulnerable environment, we consider it our responsibility to align our business projects with social, environmental and economic sustainability. Our aim is to share, learn and spread our sustainable experiences with all our collaborators and stakeholders around us with the challenge of achieving a better world.



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MANAGEMENT PRINCIPLES

CUSTOMER ORIENTATION

This is the constant focus of our organisation. We organise our resources to meet our customers needs.

MEDIUM-LONG TERM ORIENTATION

Our Family Business mentality allows us to design and understand our strategies and value propositions as commitments to be maintained in the medium and long term with our portfolio of customers, suppliers and partners in general.

INNOVATION

Evolution requires a clear commitment to innovation in new products and services developed internally or learned from the environment that allows our customers to have the latest developments existing in the market.

TEAM DEVELOPMENT

Only with a clear vocation for training and creating learning opportunities for our human team can we guarantee our customers a better service every day.

EXCELLENCE

Our entire management and customer service model is based on a solid vocation for excellence in each and every one of our processes with the ultimate aim that guarantees our reliability and trust.

PROFITABILITY

Our companies must generate profitable business models as the maximum guarantee of stability and security of service to our customers.



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COMMITMENT AND RESPONSIBILITY TOWARDS OUR STAKEHOLDERS

The development of the activity of all the companies in the EPIfoc Group is closely related to the activity carried out by our stakeholders.

The commitments and responsibilities towards each of these groups are:

3.1 TEAM/COLLABORATORS AND SHAREHOLDERS

TEAM/COLLABORATORS

EPIfoc establishes as one of its fundamental values to provide its team members with the necessary training and qualification so that they acquire confidence in themselves and in the results of their work, in the pursuit of their personal and professional development.

EPIfoc, and especially the management team, must strive to maintain a high level of motivation among its employees, encouraging their participation, identification and commitment to the purpose, values and management principles of this Code of Ethics.

We must ensure that we maintain and ensure the maintenance of positive relations, genuine collaboration and the promotion of team spirit and teamwork between the different companies, businesses, areas, subsidiaries and delegations of the Group of companies.

EPIfoc assumes the vigilance and fulfilment of the commitments in this Code by the whole team towards the Organisation and, in particular, towards the rest of our colleagues, as described below.



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SHAREHOLDERS

EPIfoc considers essential that the relationship between its collaborators and shareholders should be loyalty, transparency and confidentiality in communication.

EPIfoc's information to its shareholders must always be timely, complete and truthful in order to facilitate the evaluation of the results and the management system.

EPIfoc's management of the resources available must seek to increase the profitability and liquidity of its investments with total legality, collaboration and professionalism of its collaborators in order to guarantee its development and growth in the medium and long term.

3.2 MARKET: CLIENTS AND COMPETITION

CUSTOMERS

Relations with our clients are based on the principle of satisfying their needs through the supply of our products and services. EPIfoc must ensure that all its collaborators are aligned to the achievement of this principle.

All the information we issue and make available to customers regarding our products and services must be truthful to our capabilities. We must avoid making commitments that EPIfoc cannot meet.

We are accountable for the commitments we make to our clients and we ensure that there is a clear understanding of the responsibilities assumed by each party and of the cover provided by EPIfoc for possible damages.

A secure system of control, protection and use of our clients' confidential data is established.



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COMPETITION

We believe in free market relations, seeking to enhance our own values, without undervaluing those of others. We feel responsible for maintaining relations with our competitors that favour the development of "best practices" in order to improve the transparency and honesty of the market.

We encourage respect for competition and intellectual property laws.

3.3 SUPPLIERS AND CREDITORS

EPIfoc understands that relations with our suppliers and creditors must be approached with total transparency and fairness. We seek to establish partnerships for mutual benefit, based on trust, exchange of communication and the pursuit of long-term relationships.

We support our suppliers in everything that can improve their products and services in the belief that this is to the benefit of both parties.

We evaluate our suppliers and creditors on their orientation towards the quality of their products and services, with the final benefit of our customers in mind, as well as on their awareness of sustainability as a corporate strategy in line with our Code of Ethics



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3.4 ENVIRONMENT

MANAGEMENT

EPIfoc understands that relations with Public Administrations must be based on trust and compliance with current legislation..

SOCIETY

EPIfoc seeks the development of our purpose, values and management principles outlined in this Code in all those businesses, projects or actions that have an impact on society.

All actions related to investments or the development of new projects must take into account respect for the environment and sustainability.

As far as possible, we promote cultural, educational, health and social welfare activities through our initiatives.

ENVIRONMENT

EPIfoc has defined a corporate purpose that is closely linked to the sustainability of the industry with the vocation of being an influential player to achieve a sustainable world in the medium and long term. For this reason, sustainability has become part of the Strategic Plans of all the Group's businesses and each EPIfoc collaborator is responsible for collaborating with this vocation.

INTERNATIONAL

EPIfoc has subsidiaries in different countries. This Code of Ethics applies to all the Group's companies, wherever they may be. Ethics knows no borders.



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COMMITMENT AND ACCOUNTABILITY TO THE ORGANISATION

THE MANAGEMENT TEAM

The management team, as the maximum responsible for the management of EPIfoc, must develop a clear leadership of this Code of Ethics in force in the Group of companies. In summary, we understand that the management team must place special emphasis on:

- Knowing how to seek the survival of the organisation and the defence of the interests of all parties.
- Act as a reference model in the implementation of this Code and assume the commitment to disseminate its contents to all its collaborators.

THE EMPLOYEES

The ties that bind employees to the Organisation are based on the principles of mutual development. The growth and success of the Organisation is reflected in the constant personal and professional development of all its employees. As this evolution improves, the identification and satisfaction with the work carried out allows the commitment to the achievement of common objectives to increase.

There are certain aspects of personal behaviour towards the company to which employees must commit themselves:

- **Professional responsibility:** All employees must commit themselves to the responsibility assigned to them by fulfilling the objectives of the Organisation in general and of each Company in particular: We understand this to mean executing and defending the Objectives and Strategies established by each Company in the development of its activity, as well as complying with and observing the Corporate Purpose, Values, Management Principles and the Code of Ethics in force.
- **Confidentiality:** It is essential to maintain the



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principle of confidentiality with respect to information relating to the business. This includes taking care of the information and files used in the development of daily activities. Company information shall not be provided to outsiders. All information about EPIfoc, whatever its format, is the property of EPIfoc and may not be transferred to third parties, except for that which is intended for that purpose or under the corresponding authorisation.

- **Use of personal data:** EPIfoc complies with the regulations of Organic Law 3/2018 of 5 December on the Protection of Personal Data and the guarantee of digital rights. Any collaborator who is responsible for managing and using these databases may only use them for EPIfoc's communication and activity, always complying with the GDPR.
- **Conflict of interest:** Situations that could lead to a conflict of interest must be avoided, i.e. when a person uses or could use his/ her situation or position for his/ her own benefit and to the current or future detriment of the company.

- **Gifts, invitations and compensation:** All employees must inform their superiors if they receive gifts, invitations or compensation from an external person or company with which they have professional dealings on behalf of EPIfoc or any of its member companies, in order to determine whether these are likely to constitute malpractice. As a guideline, it is understood that any gift, invitation or compensation of a value greater than the employee's Average Daily Wage must be refused.
- **Image in the environment:** Ensure that the image we convey to the market corresponds faithfully and uniformly to that expressed by our company philosophy in all forms of communication under our responsibility: contact with customers, suppliers and external agents, correspondence and documentation, appearance of the facilities under our responsibility, telephone service, digital communication and social networks, etc.



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COMMITMENT AND RESPONSIBILITY TO SUSTAINABILITY AND THE 2030 AGENDA

The Management of the EPI INDUSTRIES family of companies, S.L. remains fully involved and aligned with social responsibility, promoting, facilitating and leading actions that allow us to make our world a better world.

EPIfoc firmly believes in the importance of ensuring sustainability. For this reason we are aligned with the United Nations 2030 Agenda, promoting actions in the economic, social and environmental environments that allow us to achieve the Sustainable Development Goals where EPIfoc can have an impact.

SUSTAINABLE DEVELOPMENT GOALS 17 GOALS TO TRANSFORM OUR WORLD





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COMMITMENT AND RESPONSIBILITY TO THE CODE

As stated in the introduction, this EPIfoc Code of Ethics establishes the basis for the Code of Conduct within our EPI INDUSTRIES family of companies and is developed in line with the Corporate Purpose, values and management principles of our Group and all the companies that form part of it.

This Code of Ethics applies to all EPIfoc employees, whether they are working on the organisation's premises or outside.

The EPIfoc Code of Ethics is public and can be found in the EPIfoc internal database and on the websites of all the companies in the Group.

It is the responsibility of EPIfoc's Management to make this Code of Ethics known to all employees at the time of its publication and all future members who join EPIfoc will be made aware of it together with all the welcome documentation.

It is the responsibility of all EPIfoc employees to respect this Code and to report actions that are not in line with it.

In the event of non-compliance with the Code, EPIfoc's management undertakes to carry out an investigation, which will always consist of a thorough and objective analysis of the causes and circumstances of the non-compliance and the proposal of the appropriate corrective measures.

Any sanctions that may result will be established in accordance with the labour regulations in force.

We want this Code to be respected by our employees and shared with our stakeholders.



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