

# Code of **CONDUCT**



## Addressees

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The GLOBALTEC Code of Conduct is addressed to all the company employees, managers and members of the administrative bodies, who are compelled to know it, comply with it and facilitate its implementation, regardless of the legal contracting modality and its geographical or functional location.

Suppliers, subcontractors, clients and any third parties that maintain legal relations with GLOBALTEC will be covered by the principles of this Code of Conduct as far as they are applicable to them.

### (A) General principles

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The Code of Conduct is defined as an ethical commitment that includes the basic principles and standards for the proper development of the relationships between GLOBALTEC and its main stakeholders wherever the company develops its business activities.

All GLOBALTEC operations will be developed under an ethical and responsible approach.

- Compliance with the legislation in force in each country where GLOBALTEC operates is a necessary part of this Code of Conduct.
- The behaviour of GLOBALTEC employees will be in accordance with the spirit and the letter of this Code of Conduct and Responsible Practices.
- All persons, natural or legal, who maintain directly or indirectly any labour, economic, social or industrial relationship with GLOBALTEC, will be treated fairly and with dignity.
- All GLOBALTEC activities will be carried out in the most environmentally friendly manner, favouring the conservation of biodiversity and the sustainable management of natural resources.

## **(B) Shareholder and Owner Commitment**

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- To configure the company as an instrument at the service of wealth creation, making its unavoidable purpose of obtaining profits compatible with sustainable social development and respect for the environment, ensuring that all its activities are carried out in an ethical and responsible manner.
- To seek a fair balance between capital and labour so that employees receive a fair return for their labour through their wages.
- To appoint as directors and managers persons who have the appropriate qualifications and experience and who exercise their management professionally, ethically and responsibly.

## **(C) Directors and Senior Management Commitment**

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- Not to carry out, whether on their own account or on behalf of another company, a professional activity similar to the one carried out at Globaltec.
- To carry out a professional, ethical and responsible exercise of their activity.
- To comply and enforce compliance with the generally accepted accounting principles and standards and to establish internal and external risk management and control systems applicable to the company features.
- To maintain the company's books and records accurately and honestly in order to enable information to be obtained and decisions to be made in an informed and responsible manner.
- To provide external and internal auditors, if any, with all the information and explanations they require to perform their work.
- To subordinate one's own interests to those of the company when acting in the name and on behalf of the company, and not use corporate assets for one's own benefit except, with due transparency and subject to the authorisation of the relevant corporate body and through appropriate compensation suitable in the market.
- To immediately notify the Board of Directors of any fact or situation that could involve or lead to a conflict between the interests of the company and to the individual ones of the director or the manager, and to refrain from intervening in its resolution.

- To maintain the utmost confidentiality related to background information, data and documents to which he/she has access by reason of his/her duties in the company, even after he/she has left the company.
- To choose their employees and subordinates according to the principles of merit and ability, with the sole interest of the company in mind.
- To deal with the company's suppliers and customers in an ethical and lawful manner.
- To seek and select only suppliers whose business practices respect human dignity, do not violate the law and do not jeopardise the company's reputation.
- Not to abuse a dominant or privileged position in the market.
- To compete fairly with other companies by cooperating to achieve a free market based on mutual respect between competitors, refraining from unfair practices.
- Not to solicit customers from other competitors through unethical methods.
- Not to discriminate against employees on grounds of race, religion, age, nationality, sex or any other personal or social condition unrelated to their merit and ability.
- Zero tolerance policy towards bribery and corruption. From GLOBALTEC we show an absolute rejection towards any conduct that can be understood as corrupt, both between individuals and public officials, beyond the legality and customs of the jurisdiction in which they are circumscribed.
- For this purpose, it is mandatory that any company's employee is aware of the key information of the company's anti-bribery management system, in particular:
  - The Anti-bribery policy.
  - The persons and bodies responsible for ensuring the company's legal compliance (Sustainability Committee and the person in charge of the management system).
  - The good practice in relation to bribery (Principles of Bribery Control).
  - This Code of Conduct.
  - The system of penalties for non-compliance with the above-mentioned.

## **(D) Compliance with the Code of Conduct. Governing Body, Ethics Channel.**

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In order to ensure compliance with this Code of Conduct, a Sustainability Committee is set up, composed by:

- The Quality Manager.
- The Financial Manager

The Sustainability Committee may act on its own initiative or at the request of any GLOBALTEC employee, manufacturer, supplier or third party with a direct relationship and legitimate commercial or professional interest, by means of a complaint made in good faith.

To this end, communications made under this Code of Conduct, whether they contain claims of non-compliance or queries regarding its interpretation or application, may be sent to the company by any of the following means, which constitute the company's Ethical Channel:

- Post mail to the address: GLOBALTEC (for the attention of the Sustainability Committee) Calle Velázquez, 10 -3º dcha. 28001 Madrid (Spain).
- E-mail address: [sostenibilidad@globaltecingenieria.com](mailto:sostenibilidad@globaltecingenieria.com)
- Whistleblowing channel on the web: [www.globaltecingenieria.com](http://www.globaltecingenieria.com)

The Sustainability Committee reports to the Board of Directors and has the following core functions:

- a. The supervision of the compliance and internal dissemination of the Code of Conduct among all GLOBALTEC employees.
- b. The receipt of all types of documents related to the application of this Code of Conduct and their referral, where appropriate, to the body or department of the company responsible for processing and resolving them.
- c. The control and supervision of the files processing and resolution.
- d. The interpretation of questions arising from the application of the Code of Conduct.

In the exercise of its functions, the Sustainability Committee shall ensure:

- a. The confidentiality of all data and background information handled and of the actions carried out, unless the law or a court order requires information to be disclosed.
- b. The exhaustive analysis of any data, information or documents on which its action is promoted.
- c. The conduct of proceedings appropriate to the circumstances of the file, in which the Committee will always act independently and with full respect of the right to a hearing and the presumption of innocence of any person concerned.
- d. The indemnity of any complainant as a result of the submission of bona fide requests or claims to the Committee.

The Sustainability Committee shall have the necessary means to ensure the implementation of this Code. The decisions of the Sustainability Committee will be binding for GLOBALTEC and the employee.

In Madrid, March 2022.



**COMPANY NAME**

GLOBALTEC DESARROLLOS E INGENIERÍA SA

**MAXIMUM AUTHORITY**

MR. Francisco Javier Valero Artola

**ACTIVITY**

Technical engineering services and other activities related to technical consultancy.

Document prepared with the advice and collaboration of GWSpain, a transformation and sustainability consultancy.

[www.somosgwspain.com](http://www.somosgwspain.com)

Thank you for all your support  
and efforts in the fight to achieve  
the SDG goals.

**contact**

**HEADQUARTERS**

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