

1. INTRODUCTION

G.O.C. was founded in Vigo (Spain) in 1986 as a company dedicated to technical assistance and quality control in the construction of buildings and infrastructures. The permanent creation of added value for our clients is the idea that has always driven our development. To this end, we make every effort to improve the overall knowledge of the organisation, both by training our staff and by attracting talent.

G.O.C., in the fulfilment of its objectives, remains faithful to the fundamental ethical principles that have always characterised it: **transparency**, **honesty** and **respect**. These principles are set out in this document, establishing the general guidelines to be complied with by all members of the organisation in relation to the different stakeholders, which are a priority in the company's strategic vision.

G.O.C. wants to differentiate itself from its competitors through **quality**, customer service and the adoption of social values such as **environmental protection** and **occupational risk prevention**, values that are transmitted to all levels of the organisation. We have a Quality Management System (UNE-EN-ISO 9001), Environmental (UNE-EN-ISO14001) and Occupational Health and Safety (UNE-EN-ISO 45001).

As a sign of this commitment, G.O.C. is in the process of joining the Global Compact (United Nations Global Compact), an international initiative proposed and sponsored by the United Nations which aims to achieve a voluntary commitment by companies to social responsibility, through the implementation of Ten Principles based on human rights, labour, environmental and anti-corruption.

2. PURPOSE AND SCOPE

The aim of this Code of Ethics is to establish the guidelines that must guide the conduct of G.O.C. and the people who form part of it in order to guarantee ethical and responsible behaviour in the performance of their work, even beyond the obligatory compliance with the law. This Code of Ethics shall be applicable to:

- All persons within the organisation and those working on its behalf in the performance of the activities for which they are responsible.
- Management of customer needs and expectations.
- Planning and management of competitors, suppliers and partners.
- The establishment of relations with the social and environmental surroundings.

- The planning of relations with the competent administrations and relevant institutions.
- The management of confidentiality.
- The resolution of potential conflicts of interest between the above-mentioned groups.

3. VALUES THAT DEFINE US

3.1. INTEGRITY AND HONESTY

G.O.C. acts in accordance with current legal regulations, professional ethics and the company's internal requirements, which are clearly reflected in the Quality, Environment and Occupational Risk Prevention Policy.

G.O.C.'s image is linked to our values, actions and the way our employees act, so every single person who is part of the company is responsible for the good reputation of the company socially.

3.2. TOLERANCE

G.O.C. is characterised by the respect it shows to any person, whether or not they are part of the company. We do not accept any kind of discrimination, abuse or harassment, whether based on sex, race, religious beliefs, ideology, age, sexual orientation, physical or mental disability.

3.3. DATA PROTECTION

G.O.C. guarantees, in accordance with the legal regulations, that it carries out an adequate management of the information, so that it is truthful, confidential and secure.

We ensure that our employees have access to information relevant to their work and access to this information is regulated throughout the company.

All employees are expressly prohibited from using and disseminating confidential information for purposes unrelated to the performance of their professional activity.

3.4. CONFLICTS OF INTEREST

In carrying out our activities, we avoid situations that could give rise to conflicts of interest, both for the company and for our employees.

Any remunerated activity related to the company's activities must be known to our superior. The facilities and equipment at G.O.C.'s disposal may only be used for the company's own activities.

3.5. FREE COMPETITION

G.O.C. considers free competition as a factor in the growth and improvement of the company. The competitiveness of the company is based on the quality of our services and projects and not on the discrediting of our competitors.

G.O.C. will seek relationships based on the free market, which are conducive to the enhancement of its own values, without undervaluing those of others, and which are always in the best interests of the parties concerned.

Relationships with competitors will be sought in order to "share best practices" with a view to exchanging experiences and improving the products and services offered.

3.6. QUALITY AND TRANSPARENCY

All information disseminated by G.O.C. is transparent, comprehensible and accurate.

We have a comprehensive quality system in order to carry out our work with the best possible quality, respecting the environment and ensuring optimum safety conditions. This system is reviewed annually and we set ourselves new objectives every year in order to achieve continuous improvement.

4. STAKEHOLDER RELATIONS.

4.1. EMPLOYEE RELATIONS

The people who form part of G.O.C. are the driving force that facilitates the development and continuous adaptation of the company to the changing needs of the environment.

At G.O.C. we make sure that the people who form part of our staff have:

- The continuous training necessary for the performance of their duties.
- The compatibility of their work and family life.
- A relaxed and friendly atmosphere that generates the integration of everyone.
- Paying special attention to situations of sexual, professional or moral discrimination or harassment.
- Awareness and involvement of people in ethics, quality, hygiene, safety, psychosociology, ergonomics, environment and social responsibility.
- Open communication by being receptive to the concerns of others and providing information so that your staff feel motivated and involved in the company and its achievements.
- Shared values and a culture of trust and accountability that foster people's involvement.

- Freedom of association and collective bargaining, in accordance with the legislation in force.
- A respectful, safe and healthy working environment.
- A decent salary, in accordance with the job and respecting the sector's agreements.
- Recruitment in accordance with the law, prohibiting all forms of irregular work, exploitation and the recruitment of minors.
- Transparent, clear and integrated communication.

4.2. RELATIONSHIP WITH OUR CLIENTS

G.O.C. seeks to establish relationships with customers that ensure trust, satisfaction, loyalty and fluid communication, without generating false expectations.

All workers will subscribe to the organisation's commitment to ensure that:

- The truthfulness of the information provided to customers regarding our products and services.
- The establishment of a secure system for the control, protection and use of data.
- The rejection of commitments that the organisation cannot meet.
- To provide responsible, professional and transparent advice, based on active listening to the client's needs and in accordance with G.O.C. policies.
- Not to conflict with the interests of clients.
- To provide a rapid and reasoned response to all your questions, queries, complaints and claims within the scope of G.O.C.'s activity.
- To know the client, its activity and the origin of its resources, in order to avoid collaborating with irregular or illicit businesses, following the regulations in force.
- G.O.C. undertakes to make available in all its projects the human and technical resources necessary to guarantee the execution of the awarded works within the foreseen deadlines, as well as to implement, review and improve working methods that favour the achievement of this objective.
- G.O.C. undertakes to comply faithfully with the legislation and contractual commitments regarding guarantees.
- We reject all acts of corruption. Giving or receiving bribes is illegal, highly unethical and can have severe consequences for everyone involved.
- We are committed to conducting our operations in a transparent and integrated manner, so all our transactions must comply with anti-corruption laws.

4.3. RELATIONSHIP WITH SUPPLIERS AND SUBCONTRACTORS

Mutually beneficial partnerships and relationships, based on trust, knowledge sharing and integration, will be pursued in order to:

- Support suppliers so that their supplies improve to the benefit of both parties.
- Creating value between the parties, and maximising it
- Support mutual development.
- Ensure that the culture of both parties is compatible.
- Respect the principles of impartiality and transparency.
- Apply selection criteria associated with the quality of products and services provided, including compliance with the ethical principles of this Code.

4.4. RELATIONSHIP WITH THE SOCIAL AND ENVIRONMENTAL SETTING

New projects will seek to have a positive impact on their surroundings, in particular on cultural, social and environmental aspects, listening to local communities when making decisions that affect them and the consequences for the development of future generations.

G.O.C. undertakes the following commitments:

- Advertising shall provide truthful information about products, services and achievements. Advertising based on counter-values or that exploits weaknesses of the targeted social sector shall be avoided.
- It shall respect the human rights and public freedoms recognised in the Universal Declaration of Human Rights, shall not exercise any form of discrimination and shall not tolerate child labour or any form of labour abuse, extending this commitment to all suppliers and collaborating companies.
- Act in accordance with applicable national or international laws and regulations. Under no circumstances will it use or tolerate bribes from third parties to the company or its staff, or vice versa.
- It shall ensure the safety of its installations and minimise their impact so that they do not represent an intolerable nuisance to communities or individuals and respect the environment, within technological constraints and safeguarding the needs of the service and products.
- It will optimise the consumption of raw materials and natural resources and reduce waste generation. In addition, it will establish the necessary instruments to prevent environmental impacts, including climate change strategies.

4.5. RELATIONS WITH THE RELEVANT PUBLIC ADMINISTRATIONS

G.O.C. will comply ethically with all legal obligations (tax, labour, etc.) and with Social Security, in all the territories in which it operates, being ready at all times to satisfy requests for information, regardless of the level of the civil service from which they originate, providing them promptly and in the detail required. G.O.C. shall not seek, nor shall it accept, illegitimate or unethical favourable treatment from the various bodies of the Public Administrations in legal, regulatory and normative aspects, or in financial, fiscal, commercial conditions, etc., in any of the organisation's activities.

G.O.C. shall establish courteous treatment, not including gifts or distinctions, in the pursuit of advantages, maintaining strictly professional relations with the different bodies and representatives of the public administration and with the political authorities.

G.O.C. is committed to working against corruption in all its forms, including extortion and bribery.

5. DISSEMINATION, CONTROL AND MODIFICATIONS

The Management of G.O.C. promotes the dissemination of this Code of Ethics among all the company's personnel. The degree of compliance with the Code of Ethics is reviewed annually, together with the Review of the Integrated Quality, Environment and Occupational Risk Prevention System.

Any employee who wishes to make any clarification or proposal for improvement may contact the quality manager, so that they can be passed on to the Quality Committee and be analysed and included in this Code.

Any breach of the Code of Ethics will be treated as a non-conformity and appropriate action will be taken to ensure that it does not recur.

6. REVISION HISTORY

Rev.	Change Details	Date	Carried out by:	Approved by:
00	Initial Issue	February 2021	Iván Cazapal	Paloma González Novo