	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

A07.- EXKAL CODE OF ETHICS

1. Presentation

Exposición y Conservación de Alimentos, S.A. was born in April 2005, combining the ideas of a select group of professional experts, with the intention of influencing the food trade sector, promoting change and innovation, and with the desire to lead it technologically.

As a result of the work carried out, there has been an extraordinary generation of business in the Group, which has led to the corresponding need to increase production in the Company. As a result of the above, there has been significant territorial expansion, both at the national and international levels. This territorial expansion has been made possible by the mission, vision and values established by the property.


Due to the strong growth of the organization, geographical dispersion and the constant situation of change in the market, the need has been identified from exKAL's ownership to generate and transfer to all the areas of the organization the standard that governs the expected behaviors of the Group's employees.

Mission:

- "The design and manufacture of products that meet the current and future needs of customers, applicable regulations and sustainable development".
- "Pollution prevention, impact assessment of the environmental aspects generated, in order to prevent, eliminate or minimize them."
- "Maintain and improve the working conditions and safety of all workers by training and motivating the entire workforce, as well as to carry out compliance with the Applicable Regulations in all its areas, especially in the workplace, tax, occupational and environmental risk prevention."
- "Establish mechanisms to ensure compliance with established social responsibility requirements".

Values:

- **Respect:** We interact by recognizing the collective interests, individual diversity and sustainability of natural resources. Our commitment requires learning to listen actively, from empathy.
- **Tolerance:** We respectfully accept opinions contrary to ours. We do not disqualify people for having views that we do not share and accept with genuine respect all people, even if we do not understand each other.
- **Equity:** We proceed with justice, equality and impartiality seeking a positive and inclusive social impact. We promote equal opportunities for our entire refrigeration

 <small>FOR FUTURE GENERATIONS</small>	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

equipment-discriminatory work environment, giving fair and equal treatment to all our stakeholders.

- **Integrity:** We act with firmness, righteousness, objectivity, honesty, coherence and sincerity. We do the right thing, even when no one is around and no one is watching. The security and credibility that integrity generates helps build relationships that value truth, without deception or cheating.
- **Responsibility:** We assume the consequences of our actions and fulfill our commitments and obligations to others.
- **Loyalty:** We work on the generation and conservation of stable relationships based on the values that are transmitted, without conforming to passenger benefits.
- **Quality and continuous improvement:** We listen to the needs of our Stakeholders and incorporate them as requirements in our management system. We promote innovative and quality solutions in our processes, products and services.
- **Collaborative work:** We work in refrigeration equipment, generating positive synergies and achieving common results, always having as a fundamental pillar safety and health at work. The success of our organization is built together.
- **Focused on sustainable development:** We understand sustainability as the balance between economic, ecological and social. We seek solutions that improve the use of natural resources and reduce polluting emissions, by improving energy efficiency and reducing direct emissions.
- **Social responsibility:** We are committed to the development, well-being and improvement of the quality of life of our Stakeholders (Community, customers, employees and suppliers), which is why we try to bring value to each person and a half with justice and relevance. We influence local economic development by generating employment and wealth in our environment.

2. OBJECT OF THE CODE OF ETHICS


The EXKAL Code of Conduct aims to define the behavioural commitments to be fulfilled in their daily performance with stakeholders, for the implementation and continuous improvement of their values.

This Code, in addition to implementing and enhancing a culture of Social Responsibility, as a basic and integrated function of the management of the organization, aims to disseminate values as a common project of the organization, with the purpose of promoting also greater credibility and reputation.

EXKAL adheres to this Code of Ethics because it believes in the company as an entity capable of generating progress for all stakeholders.

EXKAL shares the values and practices it expresses in this Code and is willing to promote them in the organization as a starting point. EXKAL is air return that the effort made by the organization is also shared by all suppliers, customers, companies in the sector and in general, other stakeholders in order to make our sector a business example of competitiveness, prosperity and well-being.

EXKAL is willing to always improve and is proud to be seen as an example of good Social Responsibility practices, putting its sector aloft and incentivizing other industries to do the same.

	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

EXKAL wants the refrigeration furniture sector to be seen as a proactive sector in the face of the globalization process willing to compete with clear ethics and rules.

Whoever joins this Code will be welcome to be part of refrigeration equipment work group committed to achieving excellence in business conduct.

3. PRINCIPLES OF THE CODE OF ETHICS

The purposes of EXKAL are:

1. Being able to form suppliers and other stakeholders Responsible recognizing and promoting good social practices in their sector.
2. Report all situations that violate human, social and economic rights.
3. Set channels of dialogue and spaces for discussion that generate conflict resolution processes between stakeholders
4. Intervene as far as possible in social reality, previously assumed, through meaningful social action.
5. Stimulating Participation stakeholders on issues affecting them and deepen fundamental values.
7. Encouraging a culture of solidarity that influences the creation of a true social awareness of solidarity among stakeholders.

4. CODE OF ETHICS

A. Legal and regulatory compliance.

EXKAL is fully involved in strict compliance with the legal system.


Recipients are required to take all appropriate measures to comply with current legislation. In this regard, and in case of any doubts that may arise, consultation with the EXKAL Ethics Committee should be consulted.

B. Conflict of interest.

Any situation in which (or could enter) the Company's interest, on the one hand, and the personal interest of the person subject to compliance with this Code, on the other hand, shall be considered a conflict of interest. There will be a personal interest where the matter affects you, either directly, or indirectly through a person with it linked to it.

Some situations, not exhaustive ones, in which a conflict of interest may arise are:

- Work as a consultant to an EXKAL provider or customer.

 <small>FOR FUTURE GENERATIONS</small>	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

- Conduct self-employment business whose nature is similar to the work done at EXKAL.
- Obtain a personal advantage or economic gain, regardless of normal remuneration, in an agreement or business relationship with a third party involving EXKAL.

C. Confidentiality and confidential information.

The practice has demonstrated the very level of competition that exists in the market, which makes preserving the confidentiality of the Company's initiatives and strategies a priority objective.

However, the practice demonstrates the ease with which, not only decisions, but mere internal reflections, are made public through different means.

It is of crucial importance to raise awareness of all the people who provide their services in one way or another for EXKAL, to maintain a high level of refrigerated storage in the use of the information to which they have access by the mere fact of being part of the organization.

Therefore, disclosure outside the scope of the company of all information, without exception, to which any EXKAL worker or manager has access in the performance of his/her duties is prohibited.

All EXKAL employees are responsible for protecting the company's information to which they have access, developing diligent behavior based on custody and monitoring of it to prevent inadvertent disclosures of such information.

No information will be handled outside the appropriate working channels. Likewise, letters, reports, contracts and any type of document should not be left exposed at tables or any place where it can be easily accessed by persons outside of such material.


The confidentiality of the information must be observed for the duration of the relationship with the Company and once it is terminated. In addition, confidential information should not be used for its own benefit.

Recipients will not use anti-law or ethical means to acquire confidential information from any competitor, supplier, customer or third party.

The recording, sound or audiovisual, of any activity carried out in the installations (own or leased) of EXKAL, through any audiovisual or electronic device, that does not obey the normal development of the tasks of the work will not be allowed.

D. Privileged information and integrity, accountability and transparency of financial information.

EXKAL shall delimit persons or bodies that may decide to activate the mechanisms for any information to be treated as privileged.

	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

All EXKAL information must be accurately, diligently and respectfully recorded and submitted in a manner that ensures proper accounting of all the Company's assets, activities and responsibilities.

E. Equality and non-discrimination.

Equality between men and women is a recognized fundamental right and a universal legal principle contained in various normative texts. Thus, as part of the legal compliance to which the company is committed in its Policy, EXKAL has an Equality Plan that responds to the specific reality of the organization with regard to equality between men and women.

EXKAL promotes the promotion of equal opportunities in terms of access to employment, working conditions, training, development and promotion of professionals.

EXKAL assumes responsibility for maintaining a working environment free from discrimination and any conduct involving personal harassment.

The relationship between EXKAL employees, managers and Property will be governed by mutual respect for personal dignity and fair and courteous treatment with others.

EXKAL promotes non-discrimination on the basis of race, nationality, ethnicity, gender, age, disability, personal and family status, marital status, physical appearance, sexual orientation, maternity or pregnancy, religion, ideology, political opinions, beliefs or any other prohibited by law.

EXKAL has a "zero tolerance" policy regarding any abusive, humiliating, offensive or harassing behavior, both physical and psychological. Especially those based on race, colour, sex, religion, ethnicity, nationality, age, personal and family situation, sexual orientation, disability, fitness or any other behavior prohibited by law.


No one shall behave in a manner that induces, promotes, favors, facilitates or determines that qualified facts, activities or relationships occur or that may be classified as prostitution or corruption of minors.

There will be no unfair treatment, retaliation or contempt for those who in good faith report the existence of behaviors described above or participate in the investigation of a claim.

Given the importance of this aspect to the management of the company, EXKAL has decided to include this topic as one of the main points in the superstructure of its Integrated Management System.

F. Occupational health, safety and environmental protection.

Within its industrial, business and professional relationships, EXKAL is committed to the protection, safety and health of its employees, customers, suppliers and the general public. Our ongoing effort is aimed at complying with laws and regulations on occupational risk prevention, health protection and occupational safety.

	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

Based on the means offered by the Company, all employees are responsible for ensuring that the work environment meets health and safety requirements, and for carrying out its activity within the most scrupulous compliance with occupational health and safety standards and policies.

In the performance of its functions, the behaviour of EXKAL employees will be totally respectful of natural resources and the environment, as well as with the laws and provisions provided for the protection of the same. Any work activity will always be carried out in possession of the appropriate administrative and environmental authorizations.

All employees should observe the instructions and master lines made available to the company for compliance with health, occupational safety and environmental protection standards.

EXKAL has policies, procedures and standards for the prevention of occupational risks and health protection accessible to all its employees. In turn, as part of its Integrated Third Party Certified Management System, EXKAL has internal systematics in place for documented monitoring of legal compliance.

G. Drugs and alcohol.

It is strictly forbidden to possess, distribute or consume any type of illegal drug during working hours.

Alcohol consumption during working hours is not allowed. Exceptionally, alcohol may be consumed moderately in celebrations, meals and other situations typical of culture or customs and provided that it does not affect the performance of work-related tasks.

H. Material resources and means for the development of professional activity.


EXKAL makes available to its professionals the necessary and appropriate material resources and means for the development of their professional activity.

EXKAL employees and managers shall make responsible use of the resources and means made available to them, carrying out with them exclusively professional activities in the interests of the company, so that such resources and means are not used or applied for particular purposes unless expressly authorized by the competent person. This entails the duty to protect such material from unauthorized use and to preserve it from theft, loss, damage, illegal or inappropriate use.

No value element owned by the Company shall be removed from the work of the Company's premises or destroyed without appropriate authorization.

Non-exhaustive examples of prohibited behavior include:

- Theft of material and supplies, equipment, documents, money or other properties.
- Improper use of corporate credit cards, phones, computers, printers and faxes or any other refrigeration equipment similar features.
- Retain any information or assets owned by a third party belonging to the Company.

 <small>FOR FUTURE GENERATIONS</small>	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

I. Business and competition relations.

All stakeholders (employees, customers, suppliers, organizations, institutions, etc.) are key to EXKAL's reputation and business benefit. Relationships with them must be frank, honest, loyal, respectful and ethical.

Any act in contraven than the rules on the defence of competition and unfair competition is prohibited.

J. External communication.

It is essential to safeguard the Company's image and reputation to present the company as a serious and consistent Organization.

Unless a position, attribution or mandate expressly permits, no opinion will be communicated or leaked, officially or unofficially, nor will any document or information be published on media, social media, forums, blogs on the internet or similar.

All communications by external means of communication will be made exclusively by the persons and departments authorized to do so.

Any contact or attempt to contact a member of the organization with the intention of obtaining media relevant information about the Company should be, as soon as possible, communicated to management.

K. Email, Internet and telephony.


The Internet, shared servers, email, mobile telephony and the other means that the Company makes available to its employees and managers are working tools for the development of the EXKAL business. Inappropriate use of these tools is not permitted. Exceptionally, these means may be used for personal matters in a limited and non-abusive manner and provided that it does not interfere with the Work or Business of the Company or disturb the rest of the Organization.

All communications and information transmitted, received, created and/or hosted on EXKAL's computer or telecommunications hardware or software systems is the property of the Company. EXKAL will implement all necessary measures to prevent computer damage and denial-of-service attacks. EXKAL has an Integrated Third Party Certified Management System that includes the Information Security area (according to ISO 27001).

Computer equipment and electronic means of communication are the property of EXKAL, made available to users for the performance of their functions, may be subject to control as to their use. Such control can be carried out, where appropriate, by recording and monitoring the number of accesses, places visited, emails sent and contents thereof.

In this sense, EXKAL is empowered to:

- Take appropriate disciplinary action as a result of assessing misuse and/or misuse.
- Limit access, blocking or cancelling its use temporarily or definitively.

 <small>FOR FUTURE GENERATIONS</small>	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

Under no circumstances shall these tools be used to carry out acts that are illegal or prohibited by this Code. For example, EXKAL tools and computer systems will not be available to send, receive, host, or publish:

- Abusive, offensive, hostile, sexually explicit or discriminatory information.
- Information that involves a risk of computer virus attack.
- Materials with intellectual property rights, industrial secrecy or similar without the proper authorization of the rights of third parties involved.
- Messages or files with any intent contrary to ethics and morals or that violate, damage or may violate or cause harm to EXKAL, as well as recipients.
- Activities that in some way induce or lead to the commission of electronic scams.

L. Privacy and data protection.

EXKAL complies with current data protection and privacy legislation in relation to its stakeholders.

All information provided by suppliers, auditors or consultants in general, who maintain an employment, commercial or professional relationship with the Company is properly guarded, so that privacy is guaranteed and all data protection laws, rules and regulations are complied with.

In compliance with such legislation, EXKAL's policies and procedures in force for privacy protection and data protection will be observed.

It is not allowed to seize, use or modify, without due authorization, reserved data of a personal or family nature of a third party, which are registered in files or computer, telematics or in any type of support or registration using means of the Company.


Likewise, it is forbidden to seize letters, papers, emails or any other document or personal effects without the consent of its owner, including interception of communications or the use of means of listening, transmission, recording or reproduction. Access to data or software is also not permitted in violation of corporate security measures.

The company's means and tools may be audited and monitored by EXKAL in accordance with current legality.

M. Fraudulent practices and misleading promises.

In relations with interest groups, no misleading promises or false proposals will be made, manifestly contrary to good faith and involving the attempt or commission of any practice of corruption, bribery, fraud or any other conduct criminalized by the Penal Code. Relationships with stakeholders will be honest and fair.

No deception or transactions that misdirect, harm or impair the personal, commercial and business relationships in which the recipients are involved shall not be used, especially using computer manipulations or telecommunication devices, credit cards, debit cards or any other means of payment.

 <small>FOR FUTURE GENERATIONS</small>	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

N. Communication Duty and Complaint Channel.

EXKAL is committed to fostering a work environment in which employees feel free to communicate any situation or event that concerns them or deems important to the Company.

In this sense, any member of the Organization who is well founded to suspect the existence of practices contrary to the principles and values of this Code or the Law shall make them known to the Organization through the "Complaints Channel".

No one can be criticized or belittled in any way—even if it is revealed at the end of the investigation that the suspicions were wrong—for having communicated facts or circumstances that, in good faith, he thought he should bring to the knowledge of the Organization. In this sense, no retaliation or unfair or discriminatory treatment is permitted or tolerated.

The Complaint Channel is governed by the "Whistleblower Channel Procedure" and will in no case be a means of communicating situations of personal discontent or at work or that has no involvement with the Company.

O. Gifts, payment of illegal commissions, donations and illegal benefits.

As a general rule, it is not permitted to offer, accept or request gifts, payments or invitations in relation to any customer, supplier, public authority or public official (national or international), outside of common uses and local customs and against the regulations in force in each case.

Similarly, donations or loans to political parties, non-governmental organizations and associations made on behalf of EXKAL will only be permitted when approved and provided that they comply with current legislation.

5. FOLLOW-UP AND EFFECTIVENESS OF THE CODE OF ETHICS


In order to ensure efficiency, an exkal management will carry out a series of actions that allow us to monitor and ensure compliance:

- Definition of the **Committee Integrated Management System** for follow-up Social Responsibility actions.
- Conducting Audits and Compliance Checks (reference in the management specification) **Social Responsibility (IQNet SR10)**.
- Establishment of follow-up reports and compliance with commitments.

6. OBJECTIVES FOR EACH INTEREST GROUP

In conclusion, when we talk about the different stakeholders **EXKAL highlights** the following objectives **for every interest group**:

Customers

 <small>FOR FUTURE GENERATIONS</small>	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

High Quality of Services: EXKAL has set a priority objective to meet the needs and expectations of its customers equally, always offering them a high level of quality in their services.

Likewise, to guarantee the highest levels of quality, EXKAL uses in its services the most advanced technology available, developing on the one hand own research, development and innovation projects / products and on the other, acquiring proven cutting-edge technologies already successfully.

Proper Trust and Communication: Working on this run EXKAL wants to earn the trust placed by its customers, ratifying it with transparent and efficient communication, for this we have established specific communication channels for each client.

Likewise, the communication developed by EXKAL is governed by the principles of transparency, truthfulness and respect, establishing an internal process of review and evaluation of its compliance before being made public.

Equality in our Relations: EXKAL works every day for our clients, demanding equitable treatment of all of them, not being able to develop actions that favor the activities of one in particular, nor distinguish their relationship with attentions, gifts or recognitions to those who have not chosen equally.

Environmental environment

Environmental Respect: EXKAL is aware of the respect for the environment where its activities take place, contributing to the conservation of the environment through training, awareness raising and motivation.


Environmental Management: [As part of the EXKAL Integrated Management System certified by a third party, the environmental area is available \(according to ISO 14001\).](#) EXKAL maintains [systematic implementations](#) reduction of risks in emergencies and environmental accidents. [In turn,](#) prevention actions are regularly reviewed and technical solutions are adopted [Necessary.](#)

Management Commitment: For this reason, EXKAL takes into account the impact on the environment by committing to protect the environment in the planning of its objectives, it is also aware of promoting the development of new technologies to improve the efficiency of the service, promoting energy savings, through the use of renewable energies and promoting improvement initiatives in centers and facilities for the control of waste and discharges.

Employees

Professional Development: EXKAL promotes personal development based on the needs identified, creating an environment of job opportunities, where professional promotion and internal functional mobility are encouraged as ways to retain talent in the organization.

Safety and Health Management: It ensures the safety and health of workers through the adoption of preventive measures, to do so, employees are provided with the necessary means and information to know and comply with the standards of protection. It also provides a working environment that respects the health and dignity of each person and enhances the feeling of

	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

unity: through fair and respectful treatment with peers, superiors or subordinates. [As part of the EXKAL Integrated Management System certified by a third party, the Occupational Risk Prevention area is available \(according to ISO 45001\).](#)

Two-way Fluid Communication: To achieve all of the above, Management makes available to all employees communication channels, of regular and systematic use, where the information is bidirectional: where the employee is informed of changes in the organization and can expose his suggestions, complaints or conflicts, in an absolutely confidential way.

Administration

Fluid Communication: To improve the relationship with the administration we facilitate a fluid dialogue, with specific communication channels, defining the most appropriate partners for each case and addressing the new needs equally, establishing our commitment so that no kind of extortion or bribery can favor particular or other interests.

Constant Work: As a result of this transparent dialogue and our willingness to develop society, we will continue to work on new projects that will contribute to its present and future development.

Subcontractors and Suppliers

Transparent and Objective Procurement: The procurement of new suppliers will be carried out by means of the principle of objectivity, and the adequacy to this Code of Ethics.


Employees involved in the selection of new suppliers and recruitment processes will not use their position to obtain personal benefit and will refrain from disclosing inside information, including to persons with which they have personal or family ties.

Fluid Communication: EXKAL is committed to creating transparent agreements and communications that facilitate the exchange of information and mutual knowledge, both with internal and external providers.

Legislative monitoring and social values of subcontractors and suppliers: Relationships will be maintained only with suppliers who develop their activity in compliance with the applicable regulations, and being respectful of human rights. Aspects such as the public assumption of an Ethical Code and Social Responsibility, the existence of equal opportunities programmes, companies related to sustainable management of resources and companies that promote local development and the insertion of sectors into social exclusion will be positively appreciated. Suppliers with official certificates of social responsibility management, quality, environmental and occupational risk prevention will be valued.

Community/Society

Fluid Communication: To improve the relationship with the community and society we facilitate a fluid dialogue, with specific communication channels, prioritizing our commitment to the environmental and social environment so that the expectations placed towards EXKAL by the community / society are not violated.

	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

Constant Work: As a result of this transparent dialogue and our willingness to develop society, we will continue to work on new projects/products that will contribute to their present and future development.

Owners

Fluid Communication: In order to maintain the optimal relationship between the owners of EXKAL (a company incorporated from a family base), we prioritize our commitment to professional and social development so that the expectations placed towards EXKAL by the owners and workers close to them are met.

Proper Trust and Communication: Working on this run, EXKAL wants to earn the trust placed by its owners and workers close to them, establishing specific channels of communication between the owners and developing principles of transparency, truthfulness and respect. A continuous process of dialogue and good climate is established that guarantees the correct governance and total commitment on the part of its owners.

Alliances / Collaborators

Equality in our Relations: EXKAL and its collaborators and alliances work every day for our customers. THE objective of EXKAL is not to develop actions that favor certain alliances or collaborations and that in turn may affect other alliances or collaborations. The relationship between EXKAL and its alliances or collaborations with attentions, gifts or recognitions towards some alliances or collaborations should not be distinguished. It is intended to maintain a constant relationship with all alliances and collaborations equally.

Commitment to EXKAL: Relationships will be maintained only with alliances and collaborators who develop their activity in compliance with the applicable regulations, and being respectful of social and human rights. Aspects such as the public assumption of an Ethical Code, the existence of equal opportunities programmes and the insertion of sectors in social exclusion will be positively valued in partnerships and collaborators. It is intended to disseminate among the alliances and collaborators the ethical commitment made by EXKAL in order to strengthen the values identified therein among EXKAL's alliances and collaborators:


6. DISSEMINATION, APPLICATION AND COMPLIANCE

6.1. Dissemination

EXKAL undertakes to disseminate this Code of Ethics among the staff of its organization and will facilitate, in all informational and informative actions carried out, this Code as a common reference framework within our sector.

Some of the stakeholders may adhere to the commitments of the EXKAL Code of Ethics through the respective contractual agreements with the organization. Although, this Code of Ethics is accessible through the organization's website for EXKAL's set of stakeholders. ([AENOR Certificates - IQNET | Exkalsa](#))

6.2. Compliance

 <small>FOR FUTURE GENERATIONS</small>	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

To ensure that [The Commitment compliance with the Code of Ethics](#), EXKAL will analyze the flows of communications, consultations, participation, complaints, etc. between EXKAL and stakeholders and analyse the corresponding indicators relating to stakeholders [over which the organization has control and capacity to act](#).

Compliance with the Code of Ethics is documented annually as part of the management review.

ExKAL's functions will be:

- Ensure compliance with the Code among subscribed stakeholders.
- Interpret the Code and advise stakeholders to accede to its implementation.
- Collect complaints or complaints that violate the provisions of the Code.
- Develop recommendations and work proposals that will be submitted to EXKAL's governing bodies and respective affiliated stakeholders.
- Encourage, facilitate and promote monitoring, updating, study and implementation groups of the Code at all levels of organizations.

Within EXKAL, statutory frameworks and internal procedure procedures have been established to enable compliance with this Code, in addition to establishing, where necessary, corrective and/or preventive measures to prevent the non-diversion of the basis of the code of ethics.

7. Systematics of action for the prevention of harassment and conflict resolution


EXKAL has a **procedure for the prevention of harassment** and an **instruction action in the face of conflict in the workplace**.

The procedure for action for the prevention of harassment is agile and rapid, giving it credibility, guaranteeing the protection of the right to privacy and confidentiality of the persons concerned and the non-repeated explanation of the facts by the harassed, unless strictly necessary. The safety and health of the victim will also be protected. To this end, the parties that approve this protocol agree to the creation of the figure of "confidential adviser", whose mission will be to channel complaints and complaints that by harassment, in any of its manifestations, occur, acting with the worker, or instead, with the express authorization of the worker, to try to reach a solution to the conflict. This adviser is appointed among the members of the System Committee and will be the Director-General.

To initiate this protocol, the protected person must file a complaint with the Management Systems Area, who will provide information on the development of the procedure and refer him/her to the "confidential advisor" who will provide advice regarding the procedure of action initiated.

A Monitoring Committee for Social Responsibility Actions of EXKAL (System Committee) is established in which it will be monitored for the ethical code situations at work that were detected. This Committee shall be formed, inter-without other positions, by the empowered adviser.

By extending the above procedure and as a particular case of harassment, EXKAL also has a **Protocol for prevention and action in situations of sexual harassment or on the case of sex,**

 <small>FOR FUTURE GENERATIONS</small>	INTEGRATED MANAGEMENT SYSTEM MANUAL	IQNet SR10	Code A07
			Edition: 7

thus emphasizing the importance of gender equality in the organization and collecting the process of managing these situations to protect people who feel harassed, usually, women.

By instructing **action in the face of conflict in the workplace** EXKAL guarantees an objective, effective and confidential process for the parties to a conflict, and proposes the most appropriate preventive measures in each case for the resolution of the work problem detected.

Approved by:

Alfonso ANTONZAS

CEO

Date [May 31, 2021](#)