



FAE

CORPORATE POLICY OF THE FAE GROUP



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LETTER FROM THE CHAIRMAN

Dear Collaborator:

The FAE Group encourages compliance with a Corporate and Ethics Policy in its business practices and in its contractual relationship with all its employees.

We have a firm conviction that the culture of having a Corporate and Ethics Policy, and above all complying with it, represent an essential factor for winning our clients' trust and satisfaction, as well as for ensuring a sense of belonging and commitment among our employees.

We also believe that personal and professional integrity is a key driver for achieving growth that is sustainable, profitable and respectful to the socio-economic environment in which the companies of the FAE Group are established and operate.

Through this Code of Conduct, we aim to specify the behaviours and conducts through which we wish to materialise our ethical commitment, which have to inspire all our employees and collaborators and, therefore, which are to determine the FAE Group's position in the market.

This Code may, therefore, be supplemented by any other regulation which expands on it and, where applicable, it will take into consideration the provisions set out in the collective labour agreements that apply to the workforce in each of the factories across mainland Spain.

We ask you to dedicate the time necessary to carefully read and understand this Corporate Policy, which has been drawn up with a view to providing a solid base to ensure that all employees and collaborators behave ethically.

Thank you very much.

Yours sincerely,



Francisco Marro

FAE Group Chairman

SCOPE

Compliance with this Corporate and Ethics Policy is compulsory for all employees of the FAE Group.

Employees who join or are incorporated into the FAE Group following the approval of this Corporate Policy will receive it as part of their welcome process and will expressly accept it upon joining the Group.

It is also applicable to all individuals and organisations related to the FAE Group through company connections. Therefore, it is also applicable to all our Collaborators and to their employees. The notion of Collaborators includes, but is not limited to, the following groups of companies:

- Suppliers
- External Service Providers
- Subcontractors
- Distributors
- All other similar parties who provide goods or services to, for or in the name of the FAE Group.

APPLICATION

This Corporate Policy is to be applied on a daily basis by our employees in the ordinary course of the duties that have been assigned to them and in accordance with the responsibilities applicable to their role.

Our Collaborators should apply and communicate this Corporate Policy to their employees, as well as to their subcontractors and suppliers, and should periodically ensure that it is being complied with.

We ask you to contact the Human Resources department of the FAE Group if you require any further information on the way in which you should act in accordance with this Policy.

NON-COMPLIANCE WITH THE CORPORATE POLICY

Failure to comply with the Corporate Policy or the legal regulations on which it is based, as well as with any of the standards that expand on it, has serious consequences. These include the application of our Disciplinary Code in the case of our employees, which in turn can lead to their employment contract being terminated as well as potentially to other pertinent actions being taken.

For our external collaborators, failure to comply with the Corporate Policy will result in them losing future business opportunities with the FAE Group, as well as the termination of all contracts and, furthermore, any other pertinent legal action being taken.

INTEGRITY OF THE PARTIES CONCERNED

The FAE Group is committed to a sustainable future, by working on reducing the impact that our operations have on the natural and social environment and on the people in the locations where we have a presence.

That is why we are committed to certain universal values that govern the behaviour of the Group in all its activities:

Supporting fundamental human rights. In addition, an effort is made to avoid and report any participation in business operations that abuse these rights.

Defending the freedom of association and the effective recognition of the right to collective bargaining.

Supporting the elimination of all forms of forced labour or work performed under coercion.

Respecting the legislation in force in each country relating to working hours.

Applying salary policies in accordance with local legislation, including respecting the minimum wage and staff benefits.

Advocating the eradication of child labour.

Promoting the abolition of discrimination practices in employment and the workplace.

Guaranteeing an effective Occupational Health and Safety Management System.

ANTI-COMPETITIVE PRACTICES

All our employees and collaborators have to comply with the same rules and must abstain from entering into agreements with competitors and taking part in price fixing, market allocation and tender manipulation practices, as well as from exchanging sensitive commercial data with competitors with a view to restricting competition.

Our third-party collaborators that participate in the FAE Group in projects that affect competitors must behave properly and comply with our integrity standards. Such collaborators include service providers, contractors and students undertaking internships, among others.

BRIBES

Bribery and corruption are completely forbidden in the FAE Group: we comply with all of the applicable national laws.

Our employees are not authorised to accept any presents, gifts or invitations from clients or suppliers of any form (specifically, cash, goods, services, entertainment or trips, etc.), except for when the present, gift or invitation has a symbolic or courtesy value, in which case it will fall under the various activities undertaken by the company to increase staff motivation (prize draws, competitions, etc.).

We do not take any actions that could be considered an attempt to unduly influence clients' or the Administration's decisions that may affect the FAE Group.

We even avoid situations in which the FAE Group may be perceived as an entity that is open to active or passive bribery, which is why we apply a zero-tolerance policy.

The FAE Group's anti-bribery and anti-corruption Corporate Policy is also applicable to our direct and indirect operations with civil servants or public agents and with the administrative organisations and the authorities.

It is strictly forbidden for Collaborators of the FAE Group, as well as any third parties that interact with government officials in our name, as our representatives or in our interest, to offer or promise to offer, to give, to pay or promise to give any gift, or to pay any amount in any form, whether directly or indirectly, in exchange for favourable action on the part of an entity of the government, the administration or any other intermediary.

CONFLICTS OF INTEREST

A "conflict of interest" exists when an employee's private interests overlap or interfere with the interests of the FAE Group, or when an employee or a close relative can personally benefit from a transaction that affects a company of the FAE Group.

Employees who take business decisions must base those decisions exclusively on what is in the best interests of the FAE Group, and they are forbidden from having any kind of conflict of interest.

QUALITY AND PROFESSIONALISM

The FAE Group strives to ensure that the innovation and quality of our products and services are valued by our clients and partners, and that they are awarded by third parties in our sector for their excellence.

We believe that the high quality of the products and services we offer our clients depends on the integrity and reliability of our manufacturing systems.

The FAE Group establishes rigorous production and quality-control standards to guarantee that our products meet all the applicable legal and statutory requirements, as well as our clients' demands.

This goal to constantly improve quality both motivates and empowers all of us who work in the FAE Group, all of this guided by our values, and it is the employees of the FAE Group themselves who are responsible for implementing these quality-control procedures.

Aligned with the IATF, any products that fail to conform to these standards are segregated in the FAE Group and destroyed and disabled by our waste residue managers.

Nevertheless, being proactive is also key, since vigilance and notifying Management of any problems that are identified early on (such as defective parts or production problems, whether actual or potential), as well as transparency, are core elements of how we manufacture and deliver as a business.

Thanks to professionalism, our company and our relationships can grow and prosper.

CONFIDENTIALITY

Here in the FAE Group, we protect our operational, commercial, financial and technical information, as well as our copyright. This information is considered confidential and strategic and, therefore, it must be safeguarded.

This is why we pay a lot of attention to the integrity and security of our network and computer devices, as well as to how information is exchanged, whether directly, using computer systems or on social networks.

We also respect the copyright and confidential information of third parties, as well as the confidentiality of their data, projects, trade secrets, copyrights and other intellectual property rights, including software programs, images and publications.

For this reason, we demand that our employees and collaborators strictly comply with the regulations regarding data protection, both in general and in particular when using devices provided by the FAE Group. We also require them to respect confidentiality or any rights corresponding to any information they deal with, and we require them to use any information that has been disclosed, or any rights that have been granted, exclusively for the purposes of fulfilling their obligations in relation to the FAE Group.

Employees and collaborators of the FAE Group may not disclose any information they are privy to, except for cases in which they are expressly authorised to do so and exclusively using the channels which have been set up and enabled by Management for such purposes.

The custody and preservation of the files of the FAE Group will be the responsibility of the company's employees, in accordance with the functions that are stated on their job descriptions and with any guidelines they have received with regard to data protection.

TRUTHFULNESS OF INFORMATION

The truthfulness of information is fundamental for the FAE Group's development and solid growth.

Therefore, no employee should falsify information of any kind, nor should they deliberately enter any false information into any report, record, register or file which may lead to deception.

Furthermore, employees may not employ any practices or behaviours that involve impersonation or usurpation of functions, nor may they take on any contractual obligations that exceed the scope of their responsibilities.

All employees of the FAE Group should fully collaborate with auditors and inspectors, ensuring that any documentation that is required from them contains information that is accurate.

PROTECTION OF ASSETS

It is important that all employees of the FAE Group use the company's assets appropriately and responsibly. Such assets are considered to include goods, time, confidential information, business funds and staff teams.

Following on from this, any conduct that involves such assets being wasted or used improperly should be avoided.

Furthermore, reports, programs, patents, computer systems, manuals, videos and other elements that have been created, developed or improved by the FAE Group should not be used for employees' own benefits, nor for the benefit of any third party. Internal knowledge generated in the FAE Group outside of the company's premises should be preserved.

EXPORT/IMPORT REGULATION

Employees and collaborators shall act in accordance with the laws and regulations that govern the import and export of goods, services, technologies and information, including re-exports and parallel trade.

These possible restrictions may include, but are not limited to, bans of imports or exports from or to a country that is under sanctions, shipments to a country under sanctions via an unsanctioned country, and investments that affect sanctioned countries.

It is important to take into consideration all the potential risks when conducting cross-border operations. For example, exports are not limited to just physical goods; they can also encompass services or technologies that are shared by email or other forms of communication.

WHISTLEBLOWING

In the event that any employee or collaborator has any doubts or suspicions regarding any activity that may constitute an infringement of the FAE Group's policies or of any other applicable regulations, we would ask them to immediately contact their superior.

If they do not receive any reply from their superior, or if they have reason to suspect that this superior is implicated in the conduct which they wish to report, they can contact the FAE Group's HR department.

In accordance with regulations regarding data protection, such reports cannot be anonymous, but in any case, the identity of anyone who reports a conduct which is allegedly contrary to this Corporate Policy will remain confidential.

The FAE Group does not tolerate any form of reprisal against any internal or external party for having reported in good faith a possible case of non-compliance with this Corporate Policy, or for their participation in any aspect of an investigation or course of action.