

CODE OF BUSINESS CONDUCT AND ETHICS

Think Big, Act Nano

About us

Who we are

TECNOLOGÍA NAVARRA DE NANOPRODUCTOS, S. L. (TECNAN) was founded in December 2007, solidly supported by an innovative Technological Centre with deep national and international experience in the industrial application of nanotechnology and fine chemistry and which participates as company's shareholding.

They have jointly developed totally innovative production lines, obtaining own designed production systems, unique in the world. This fact, leads TECNAN to develop and manufacture exclusive products for large-scale consumption (surfaces treatments for different business areas), which have a successful impact due to the advantages and benefits offered.

Our goal

TECNAN was created with the aim of converting the raw materials produced, nanoparticles and fine chemicals, into mass consumption products, both for professionals and end consumers. Providing added value to the services and products offered by companies in the market, as well as facilitating the day-to-day life of end consumers.

This goal focuses on delivering value to the involved parties:

- Our **People**: employees and shareholders
- Our **Customers**
- Our **Suppliers** and **Partners**
- **Society**

Our commitment

TECNAN is a signatory to the United Nations Global Compact which means that we support 10 principles of responsible business within four important areas: human rights, labour, the environment and anti-corruption. For further information on the UNGC go to: www.unglobalcompact.org.

TECNAN supports and is committed to applying public policies to maintain the highest ethical standards, and conducting business in a safe, sustainable, responsible manner in compliance with all applicable laws, regulations, and internationally recognised standards. Therefore, improper business conduct will be not tolerated by the company as our actions as based on respect for values: honesty, leadership, excellence, concern for the environment, social responsibility, long-term approach, financial soundness, customer focus, innovation, and care for people.

The Code of Conduct thus forms the basis of the Company's ethics and compliance model. This culture aims to steer the relationships between employees; their dealings with customers, shareholders, suppliers, and outside collaborators; and their relationships with public and private institutions, and with society as a whole.

Contents

1. INTRODUCTION.....	4
2. HEALTH & SAFETY.....	4
a. Public Safety	
b. Worker Safety	
c. Wellness Program	
3. ENVIRONMENT & SUSTAINABILITY.....	5
a. Compliance with Environmental Legal Requirements	
b. Waste Reduction and Recycling program	
c. Self-Consumption Solar Installations	
4. BUSINESS CONDUCT & INTEGRITY.....	6-7
a. Duty	
b. Bribery & Corruption	
c. Anti-Competitive Behaviours & Fair Competition	
d. Tax Evasion & Anti-money Laundering	
e. Legal Matters	
5. HUMAN RIGHTS.....	7-8
a. Freedom of Association and Employment	
b. Child Labour	
c. Fair pay and benefits	
d. Diversity & Inclusion Vs. Harassment & Discrimination	
e. Workplace Violence	
6. CONFIDENTIALITY.....	8-9
a. Confidential and Protected Information and Intellectual Property	
b. Data Privacy and Protection Policy	
c. Computer & System Security	

1. INTRODUCTION

The Code of Conduct is established by the values that should govern the behaviour of TECNAN and of the third parties with which it interacts. It also sets out to help to consolidate business conduct that is accepted and respected by all employees, management staff and directors of TECNAN (hereinafter, "persons" or "people").

If you have questions or concerns regarding any aspect of this Code, please contact our ESG Executive Representative at tecnan@tecnan-nanomat.es

2. HEALTH & SAFETY

Safety of the community, our employees, shareholders, customers, suppliers and partners are more than just a priority at TECNAN, it is a core value. As a condition of engagement, TECNAN works safely and in compliance with all applicable safety, health and environmental related laws, standards, procedures, rules and with this Code, it is a must. Thereafter, basic safety and health expectations and requirements are set forth:

a. Public Safety

TECNAN is aware of and comply with the health and safety protection regulations and ensure its own safety, the safety of other employees, customers, suppliers, collaborators and, in general, of all people who may be affected by its activity. TECNAN works to guarantee that there are no potential public safety or health hazards associated with neither its activity neither its products.

b. Worker Safety

A safe, clean and healthy environment shall be provided by TECNAN in compliance with legal standards for a health and safety workplace. TECNAN is responsible of identify, monitor and manage the work safety hazards via risk assessments, safety analysis and other procedures. In this sense, any hazard shall be amended, handled or mitigated appropriately. For this, TECNAN shall provide its workers with appropriate safety training, adequate personal protective equipment (PPE) so that they can carry out their activities in a safe and healthy manner. Our goal under the worker safety is to achieve zero workplace incidents, injuries or ill-health, so any unsafe condition, act, injury or illness, regardless of severity, must be reported to the Work Risk Management Coordinator, as soon as possible.

c. Wellness Program

TECNAN guarantees a healthy workplace for their employees. A wellness place is achieved through simple matters like lightning, comfort, appropriate temperature, and cleanliness of the facilities. But also, TECNAN is aware of other needs of the workers, such as, assume part of the cost of a private health insurance, give employees autonomy or offer them flexible working hours.

3. ENVIRONMENT & SUSTAINABILITY

TECNAN is aware of its responsibility to minimize the impact on the environment through the effective management of its business activities. Environment is one of the main goals within the UN Global Compact, as a signatory, TECNAN strives to embrace and promote all its values.

TECNAN is committed to complying with all applicable national and international environmental laws and regulations and operating in an environmentally sensitive manner consistent with our values and our Global Sustainability Approach and Policy. In this manner, TECNAN also calls for suppliers who must be sensitive to these issues and, of course, comply with all existing regulations.

a. Compliance with Environmental Legal Requires

TECNAN complies with all applicable environmental laws, regulations, and standards. In addition, TECNAN is committed to use materials and processes which support sustainability and minimize their environmental impact.

b. Waste Reduction and Recycling program

Waste reduction and the implementation of a recycling program is taken into account by TECNAN, in order to reduce or eliminate pollution and improve the efficiency of resources and materials.

c. Self-Consumption Renewable Energy Sources

TECNAN is fully engaged with renewable sources of energy. In fact, TECNAN has an implementation plan of a self-consumption PV solar installation in its facilities, prioritizing the use of clean energies.

4. BUSINESS CONDUCT & INTEGRITY

a. Duty

TECNAN is committed to:

- Complying with all applicable laws and regulations, and with this Code.
- Managing its business in accordance with the highest ethical standards.
- Ensuring that products are, as far as practicable, from sustainable sources.

b. Bribery & Corruption

TECNAN is enormously committed to supporting national and international efforts to combat bribery and corruption. TECNAN complies with the anti-bribery and anti-corruption laws of each market where it operates. Thus, this is also a must for suppliers, shareholders and workers.

Business Partners shall not get involved in any form of bribery, corruption, extortion and embezzlement and shall have an adequate plan of action to prevent it. Bribes or other means of obtaining undue advantage are not accepted by TECNAN. We have zero tolerance for bribery and we do not accept improper payments, benefits or gains.

c. Anti-Competitive Behaviours & Fair Competition

TECNAN is engaged to do business fairly and ethically. We are a fair and honest competitor and we require our suppliers to likewise conduct their companies in a way, which is legal, ethical and honest. TECNAN expects that any involved party conducts in full compliance with fair competition laws and does not participate in anti-competitive behaviour, price-fixing or bid sharing with others improperly.

d. Tax Evasion & Anti-money Laundering

TECNAN will not knowingly help to evade tax to anyone, neither tolerate any forms of financial crime with any supplier, customer, worker or entity who works or collaborates with us.

TECNAN applies the utmost strictness in preventing and avoiding money laundering from criminal or illegal activities. All TECNAN's people must comply with applicable laws and pay special attention to cases where there is evidence of a lack of integrity of people or entities with which business relations exist, including, among others, payments that appear to be unusual due to the nature of the transaction, payments to persons or entities residing in tax havens or bank accounts held in branches located in tax havens.

e. Legal Matters

The parties shall inform TECNAN if they are involved in any criminal investigations or charges, as well as any other claims or litigation against it or any of its affiliates or employees so that TECNAN can evaluate the potential impacts of such investigations, charges, claims or litigation.

5. HUMAN RIGHTS

TECNAN is committed to respecting the human rights and public freedoms recognised in the United Nations' Universal Declaration of Human Rights. All of TECNAN's people must follow this commitment, conducting their professional activities while respecting human rights and public freedoms.

a. Freedom of association and Employment

TECNAN do not participate in the exploitation of workers, neither forcing to work or doing involuntary labour to them. We will not tolerate any form of forced or bonded labour in any part of our operations or supply chain. TECNAN will also make sure that their workforce is free to leave the workplace at the end of their working day, and terminate their employment at any moment, once any contracted notice period has passed.

In addition, TECNAN guarantees their employees are free to associate, join or not join labour unions, seek representation and join workers councils in accordance with the law.

b. Child labour

TECNAN do not tolerate the employment of any person under the minimum legal age for work.

Apprenticeship, Internship or Scholarship programs, which comply with all legal requirements and regulations, are accepted by TECNAN. Thus, authorised young workers could be part of the workforce, as long as, it is ensured their safety, health and comply with all current laws.

c. Fair pay & benefits

TECNAN recognises the need to reward fairly for skill, contribution and performance to any worker, or entity who provides goods or services to the Company, ensuring the following:

- Workers are paid fairly with a minimum wage in accordance with the law and, in a timely manner. Working hours must not exceed the maximum allowed by law.
- Any overtime shall be voluntary and workers must receive an adequate and fair compensation. Overtime must not exceed legal limits.
- Legally mandated benefits.

d. Diversity & Inclusion Vs. Harassment & Discrimination

TECNAN is committed to diversity and to equal opportunity in the workplace, as well as maintaining a culture of respect.

TECNAN selects and promotes employees on the basis of skills and the performance of professional functions, in addition to the criteria of merit and ability defined in the requirements of the post and the principle of diversity. TECNAN encourages promotion and internal mobility as means of retaining talent within the company. It seeks to provide stability for the employees and further their development and motivation. All professionals must actively participate in the training plans that TECNAN places at their disposal, involving themselves in their own development and committing themselves to updating their knowledge and skills, with the aim of facilitating their own professional development, and contributing value to TECNAN's customers and shareholders and to society in general. Managers must act as the facilitators of the professional development of their collaborators.

TECNAN does not tolerate any kind of discrimination, bullying or harassment. Any kind of discrimination on the basis of age, race, colour, gender, religion, ethnicity, cultural background, political opinion, nationality, pregnancy, sexual orientation, social origin or disability, or under any other category protected under the Human Rights. Thereafter, we expect business parties to share and uphold these standards and promote such equal treatment. TECNAN supports and is committed to the application of public policies established to promote diversity and inclusion under the principle of equal employment opportunities.

e. Workplace Violence

TECNAN has zero tolerance to any form of violence, harassment, corporal punishment, threats, coercion, including all forms of physical, sexual, verbal or psychological abuse, and any harsh or inhumane treatment and any form of intimidation.

Any act or threat of violence will not be allowed and it will be sufficient reason to cease the contractual agreement with TECNAN, and also may result in civil or criminal legal proceedings.

6. CONFIDENTIALITY

TECNAN considers information and knowledge to be among its main assets and essential for business management, and as such they should be afforded special protection. TECNAN's people must transmit all information, internally and externally, in a truthful and complete manner; in no event must they knowingly provide incorrect or inaccurate information that might give rise to an error by the person who receives it. Moreover, TECNAN's people must treat all reserved information to which they have access as a result of their professional activity in strict confidence and must not use it inappropriately for their own personal benefit or to the benefit of others.

Code of Business Conduct and Ethics

All TECNAN's people when hired must accept and sign the policies established by the Company in this regard, and as many times as may be required as a result of any update or amendment. When in doubt with regard to the nature of information, employees should consider it to be reserved unless they are informed otherwise. All the information and knowledge generated within the scope of the Company is the property of TECNAN in accordance with the applicable legislation. With regard to information about the market and competitors, TECNAN's people may not use information that has been obtained by inappropriate means or that may be confidential without the express authorisation of its rightful owners.

TECNAN complies with the applicable legislation in terms of data protection and protects the personal data entrusted to it by customers, employees, candidates in the selection process and other individuals. Moreover, it pledges to request and use only the data necessary for the efficient management of its business. People who for professional reasons have access to information on fellow employees must treat it in strict confidence and with the utmost respect, and will use it in a professional and responsible manner. Our technologies, products, intellectual property, and confidential information are crucial to our business, so we protect them from unauthorised access, use and disclosure.

a. Confidential and Protected Information

Involved parties shall maintain and safeguard our confidential and protected information, as well as, our intellectual property, supplied by TECNAN, except when disclosure is legally mandated or is authorized by TECNAN. Client information, legal documents, contracts, proposals, intellectual property and trade secrets are considered Confidential and Protected Information. If there is any data breach, they shall report it to us immediately.

b. Data Privacy and Protection Policy

TECNAN is committed to the protection and security of the personal data of our people, including our employees, customers, partners, suppliers, and others, in line with national and international regulations about data protection (LOPD, GDPR, etc.). Data refers to any information describing or relating to an identified or identifiable person, such as a name, an email, an identification number, among others.

TECNAN ensures the protection and privacy of any personal data collected:

- Process, amend or disclose any personal data from TECNAN, if it is required by TECNAN.
- Not share any personal data without the prior written consent of TECNAN.
- Ensure the reliability of any staff who have access to Personal Data with a confidentiality agreement.
- Sharing personal data to a third party is not allowed, unless there is a specific agreement that incorporates these obligations.
- Notify TECNAN if any instruction received might infringe applicable Data Protection Laws.
- Immediately cease processing any Personal Data upon the termination of contractual relation or collaboration with TECNAN.

c. Confidential and Protected Information

TECNAN is responsible for the storage, processing or transmission of the information and ensures that the security of those systems comply with the applicable cyber security policies and standards. Any loss of information and/or equipment must be immediately reported. Passwords, computer accounts and other authorizations must not be shared with others.



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