

In the fulfilment of our responsibilities you can have access to commercial information that is not public knowledge, nor should be known by competitors, or other parties that can disseminate it to them such as:

- Information about the business, strategic plans or operations.
- "Secrets" the business, technological information, purchases or resources.
- Clients lists, information, terms or contract tariffs or trade.
- Information, price and supplier discounts
- Among others: marketing plans, development of systems or products owned by the company, possible transactions with other companies or confidential information about other companies, etc.

Share such information with intentional or unintentional external or internal people so could affect the objectives of GIS and in some cases lead to negligent or fraudulent action allegations, to the detriment of free competition.

It is not allowed to disclose to anyone outside the company, or use such information for their own benefit or third parties. The disclosure of such information is grounds for administrative, civil and even criminal penalties.

6.7 *intellectual property and trademark protection*

Brands and innovations are among the most valuable assets of any company, so all we are obliged to protect intellectual property belonging to GIS or related third parties.

Proper and responsible use of the brand, corporate image, copyrights and patents, must follow the guidelines and principles that are held for the management of the brand, both by workers, collaborators, and by third parties working with these.

Publications and software programs developed by GIS should be protected under local laws on copyright; as well as the practices, methodologies, writings, programs and other works created within the company and that should have this protection.

With the same conviction, the intellectual property of other companies, their brands and other aspects of visual identification must be respected. Any use of the trademark requires approval from the owner of the intellectual property.

7 **Conflict of interests**

Global Inspection Services (GIS) behaves in its business activity in accordance with the principle of that conflicts of interest must be managed fairly, both between GIS and its customers and between a customer and another.

With this conviction, GIS has structured a series of corporate policies and practices that seek the consolidation of a culture based on ethics, the development of business in equilibrium and socially responsible conditions, in order to strengthen the trust of its partners, customers, suppliers, employees, government, and society in general. As an inspection service provider, GIS periodically confronts real and potential Conflicts of Interest. Its policy is to take all reasonable steps to maintain and implement organizational and administrative arrangements to identify and manage relevant conflicts.

GIS Directorate is responsible for ensuring that systems, controls and procedures adopted are adequate to identify and manage conflicts of interest, both real and potential.

GIS has defined practices and procedures to be followed for the proper management of conflicts of interest that may arise in the development of the social order and to ensure that decisions made are devoid of interference to the independence, impartiality and integrity its determinations.

7.1 **Definitions**

7.1.1 **Conflict of interests**

Situations that could cause a significant risk of harming the interests of a client.

They may arise between:

- ✓ GIS and a client;
- ✓ A person involved and a Customer;
- ✓ Two or more GIS Clients in the context of the provision of services by GIS to those Clients;
- ✓ A GIS Provider and a Client.

7.1.2 **Clients**

- ✓ Current and potential (those with whom, GIS seeks to have contractual relations with respect to services);
- ✓ Old clients with whom fiduciary relationships or other responsibilities still exist.



7.1.3 Regulated activities

A "regulated activity" refers to all types of activities such as the Notified Control organism under accreditation according to ISO 17020 for the evaluation of conformity on the CE marking of Pressure Equipment (directive 2014/68 / EU), or also the accreditation according to ISO 17025 for evaluation as an accredited laboratory on non-destructive testing.

7.1.4 Involved person

- ✓ An administrator, partner or equivalent, director or appointed representative of GIS.
- ✓ An employee to GIS, as well and any natural person who puts their services available and under the control of GIS that is involved in the realization of GIS regulated activities;
- ✓ A natural person who is involved in the provision of services to GIS under a subcontracting system for the purpose of providing GIS services and inspection activities.

7.1.5 Relationship with suppliers of GIS

Relationship that GIS has with a service provider, not only to entities that provide outsourcing services to GIS, and provide services to GIS.

7.1.6 Rules and Regulations

Regulatory and normative bodies publish standards and guidelines regarding conflicts of interest. GIS policy is to adhere to such rules and norms where applicable.

This does not replace the obligation to observe any local regulatory requirements when identifying and managing Conflicts of Interest.

- It performs the same activity as the Client; I
- Receives or will receive an inducement of another person other than the client in relation to a service provided to the customer in the form of money, goods or services, apart from the standard commission or fee for that service.

7.3 Potential conflicts

All GIS employees have a contractual obligation of loyalty to the company and conflicts of interest with GIS should be prevented. In some cases, they represent a particularly high risk to reputation or business interests of GIS, and must necessarily prevent such conflicts.

GIS respects the rights and choices of their employees and do not want to interfere with private life. However, prevention of conflicts of interest of the people involved is an important to maintain the integrity and sustainability of our business, and contributes to strengthening trust and support among our colleagues and also with our main partners:

TYPE OF CONFLICT	THAT MUST BE PREVENTED OR ELIMINATED
personal relationships in the workplace	Anyone involved should avoid: <ul style="list-style-type: none"> ✓ Found in a supervisory relationship, subordination or control (e.g. have the authority to influence the conditions of employment) persons closely associated with them; ✓ Take part in hiring decisions closely related persons (including internal / external recruitment).
external commitments, including employment	Anyone involved must not have any external commitment, paid or not, with: <ul style="list-style-type: none"> ✓ Partners or competitors of GIS, unless it is to fulfil a business purpose of GIS; ✓ Any other person or company if this has any impact on their performance in GIS.

7.2 Identification

All the facts are considered and taken into account, among other things, whether GIS, supplier or any other relevant person:

- It is likely to get an economic benefit, or avoid a financial loss, at the expense of the Client;
- Has an interest in the outcome of the service provided to the client or a service performed on client's behalf, which differs from the Client interest in that outcome;
- Have an economic or other incentive to favour the interest of one Client or of a group of Clients over the interests of another;



<p>Personal financial interests</p> <p>Relationships with business partners and competitors</p>	<p>Anyone involved should avoid:</p> <ul style="list-style-type: none"> ✓ Have interests equal or greater than 1% in companies that compete or maintain a business relationship with GIS ✓ Negotiate on behalf of GIS with entities in which they have a substantial interest or with which they have a close relationship; ✓ Act as responsible or advisor any government agency with regulatory authority or oversight on GIS.
<p>Gifts, invitations, travels, entertainment *</p>	<p>Anyone involved shall not solicit or accept, directly or indirectly, from any business partner or competitor GIS:</p> <ul style="list-style-type: none"> ✓ Compensation in cash or equivalent (p. g., shares, gift vouchers, discounts not derived from collective agreements, etc.). Here's This includes business partners and current and potential competitors; ✓ Gifts. If, despite everything, gifts are received, they must be returned if they influence or be perceived to influence the decision criterion of the GIS representative; ✓ Invitations, travel or entertainment activities, unless primarily fulfil a commercial objective of GIS, they are made in the company of a representative of the company that provides and do not influence (nor can they be perceived to influence) business judgment of the representative of GIS. The acceptance of invitations for extraordinary or exceptional entertainment activities requires the approval of the superior.
<p>Fees, commissions, services and other favours</p>	<p>Anyone involved must not:</p> <ul style="list-style-type: none"> ✓ Request or receive fees, commissions, services or other favours from business partners or GIS current or potential competitors.

7.4 *Gifts and entertainment*

All employees must abide by the commitment to refrain from soliciting, accepting or giving gifts either in the form of money, valuables or receive preferential treatment and care that may influence or appear to influence, professional judgment and objective and that may affect the good GIS name.

They are not the subject of discussion these attentions of advertising elements such as agendas, pens of little economic value and participation in certain academic events.

Regular courtesy offerings, of a non-binding nature for the awarding of projects (dinners, accommodation ...) may be accepted with the following limits:

- Members or representatives of GIS can never accept gifts or offerings (such as food or lodging) above 50 euros value.
- Beyond this value, and up to 150 euros, it is to be communicated to the person responsible for authorization.
- Any gift or offering whose market value is more than 150 euros will be strictly prohibited. The member or representative of GIS kindly reject the proposal and inform their superiors if necessary, to take any additional action.

7.5 *Communication*

GIS is aware that it is not always possible or practical to prevent a conflict of interest. When it cannot be prevented, we have to communicate it.

Having a conflict of interest is not necessarily bad, but it can become a problem or legal issue if you try to influence the outcome of commercial results for your own benefit, direct or indirect. That is why transparency through communication is essential and helps to protect the integrity and reputation of GIS and Personnel Involved.

As soon as the Person Involved notices a probable conflict of interest have to inform, if possible, before being immersed in it.

The staff has recently joined GIS have to report any conflicts of interest they have with the company during the hiring process, so inform the hiring responsible.

When communicating a conflict of interest, the first thing to do is consult the superior, and write a record of the communication.



7.6 Additional Control Measures

GIS maintains access permission policies that are designed to restrict that some information flows between different areas of GIS. The measures are implemented to prevent that GIS and the Persons Involved to carry out activities on behalf of the Clients without being influenced by other information maintained in GIS that could cause a potential Conflict of Interest.

In addition, the following additional measures are available to adequately manage the potential conflict:

- Implementation of information barriers (access permits) specific to *ad hoc* services or other methods of segregation of information, taking into account all relevant information available to management;
- decline to act.

7.7 Treatment by the Directorate

The communication of conflicts of interest provides to GIS transparency about them, whether they are real, potential or perceived. It is a necessary to reduce risk, but communication alone is not enough. It is also necessary that conflicts of interest are addressed.

Addressing a conflict of interest is everyone's responsibility, but mainly of the GIS superior. It is expected from the superior:

- an affair evaluation of the situation regarding the conflict of interest reported by the personnel involved, including the risks that such conflict may harbour for commercial interests and the reputation of GIS;
- Seek for advices, if necessary, from the directly responsible and other departments, including the legal department, HHRR...;
- take a pragmatic decision to address the conflict of interest, in order to minimize risks of GIS and protect, as far as possible, the interests of the personnel involved;
- Communicate the decision and its arguments to the personnel involved and to perform timely follow up to ensure that the employee understands and abides by it;
- Document the decision using, for him/her or the person involved the local online communication system.

7.8 Disclosure of Conflicts and Client Consent

As global inspection service organization, GIS is involved in many activities that may conflict with the interests of their clients. Sometimes, if any conflict remains and where permitted by local regulations, you have to reported to an affected customer to get the client's consent to act. It will be informed so generally and / or about the origins of the conflict that allow the client to make an informed decision.

7.9 Records

When communicating the existence of conflict of interest by the personnel involved, the system of local online communication (email) will be used.

GIS maintains and regularly updates a register of types of regulated activities carried out by or on behalf of GIS which have emerged Conflicts of Interest that entailed a risk of significant damage to the interests of one or more clients or, in the case of a service or an ongoing activity, that arising.

The information contained in the registration facilitates the identification and effective management of any potential conflict of interest.

8 Help, recommendations and guidance

GIS makes a channel available to stakeholders that guarantees total independence, transparency, confidentiality and reliability.

Any complaint or query may be exposed anonymously. It should stand who wish to be identified, GIS is committed to protecting the complainant and ensure an environment free from retaliation.

8.1 Training and awareness

All personnel involved should be familiar with this Code and participate in training sessions to be organized. Superiors should also receive training on their particular responsibility to assess a effectively address conflicts of interest.



8.2 Ethical channel

Compliance with laws, regulations and policies, including this Code of Ethics is the responsibility of all of us. Employees with personnel in charge also have a responsibility to support their teams in all matters relating to the implementation of this Code.

All employees of the company are encouraged to ask questions, seek guidance and report any infringement, suspected or known, whether to this Code, or actual or potential infractions to the laws, regulations, statutes and other company policies.

To share information or concerns about ethical principles should be used regular channels, so GIS will soon make available to all stakeholders an "ethical line" access on the web pages and their internal management software.

GIS will conduct a review and / or complete, impartial and thorough investigation, as appropriate, doing their best at all times to protect the privacy and dignity of employees and any other outside person involved.

8.3 Whistle-blower protection and retaliation-free environment

GIS ensures that no adverse employment consequences as a result of raising report a complaint, complaint or query. It undertakes to release from retaliation and protect the complainant, provided that:

- The statement is in good faith.
- Believe that is true or not try to deflect another research situation.
- Do not act maliciously or make false accusations.
- Do not look for any financial gain or personal with the complaint or inquiry.

Those who report possible misconduct, provide information or provide any other assistance in an investigation into possible misconduct will receive protection against retaliation.

8.4 Disciplinary actions and violations of the Code

Compliance of the established at Ethics Code is mandatory for all GIS workers and breaches thereof will be sanctioned in accordance with the internal regulations, without prejudice to the provisions of local laws.

It is the responsibility of each worker:

- Refrain from authorizing, motivate, approve, participate in or tolerate violations of this Code.
Report violations of the provisions of this Ethics Code.
- Refrain from retaliation, directly or indirectly, or encourage others to do so, against any employee for reporting a suspected violation of the Code.
- Act or intervene in a timely and diligent manner, facts or circumstances that contravene the principles established in this code; especially when a management position is concerned.



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