

CODE OF LEGAL COMPLIANCE AND CORE VALUES





CODE OF LEGAL COMPLIANCE AND CORE VALUES

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OBJETIVE

High standards of ethical, responsible behaviour and compliance with laws and regulations are essential to protecting our long term success expectations and the reputation of our business. We believe in sustainable growth on the grounds of fairness. Each of us, through our actions and decisions, has a personal responsibility for building our reputation and living up to SAICA's values.

The purpose of this Code is to help us do this by setting out the ethical principles that underpin our statement of values and the way in which we conduct our business. This Code sets forth the principles and provides guidance on how to apply these principles in everything we do.

We are all responsible for our actions and we should undertake to follow the Code and apply its principles in our daily work

If there is anything that you do not understand or concerns you, no matter how small it may be, simply ask...And if you see something that is wrong, that makes you feel uncomfortable, you should speak up about it



SCOPE OF APPLICATION

Groupwide. All employees of SAICA Group, its subsidiaries and joint ventures which SAICA controls, are required to comply with this Code.



MESSAGE FROM RAMÓN ALEJANDRO, CHAIRMAN OF SAICA GROUP



One of the fundamental principles of our company, which we have strongly defended since its inception, and which permeates and governs the professional actions of our managers and executives, is ethical and lawful behaviour, aimed at ensuring sustainable growth.

Take the time to read and understand the principles and rules contained in this Code

We should all personally undertake to create a culture in which we can all speak out without the fear of reprisals

Our Code of Ethical and Lawful Business Conduct, which has the approval and full support of our Board of Directors, provides guidance for every employee on how to make legal and ethical decisions. Furthermore, it shows everyone with whom we interact, such as customers and suppliers, how seriously we take ethics and compliance and how fundamental it is to SAICA that we have an engrained philosophy and culture of compliance and ethical business dealings.

You must read the Code: all of it. More importantly, you must follow it, because breaches of the Code or illegal acts will not be tolerated and may result in disciplinary action, no matter who you are or where in SAICA you work. I will not tolerate any improper business behaviour. Following the Code and applying its principles in your day to day business (and asking questions if in any doubt) ensures you will be carrying out your responsibilities with integrity and your commitment demonstrates to others that SAICA operates honestly, fairly and ethically.

We are all accountable for our actions and it is your duty to speak up and deal with anything you are aware of that is wrong or makes you feel uncomfortable. I am personally committed to creating a culture where all of us can speak up without fear of retaliation. If there is anything you don't understand, any concern you have, no matter how small, you must ask – you can talk with your manager, Human Resources, Legal, your Local Compliance Champion or our Group Compliance Officer, Cristina Cardona.

SAICA has a simple set of core values. Let's all live up to those values in everything we do so that we can be successful together.

Thank you.

Ramón Alejandro



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1 OUR ESSENTIAL VALUES: LEGAL COMPLIANCE AND RESPONSIBLE MANAGEMENT TO ENSURE SUSTAINABLE GROWTH

1.1 Responsible and committed management system

- (a) One of the fundamental principles firmly upheld by our company since its foundation and which infuses and governs the professional actions of our managers and executives is legally compliant and ethical behaviour as well as responsible management devoted to guarantee sustainable growth and long term profitability.
- (b) Our commitment to compliance requires that all SAICA personnel (board members, officers and employees) respect and comply with all laws, rules and regulations applicable in the countries where SAICA operates.
- (c) However, our commitment to ethical behaviour goes beyond just legal compliance and reflects our desire to uphold the highest standards of ethics and integrity in how we conduct our business. Our management system embraces these principles. As a company our objective is to obtain profits but what makes us different is the way in which we go about achieving them.

1.2 Why we have this Code

- (a) High standards of ethical, responsible behaviour and compliance with laws and regulations are essential to protecting our long term success expectations and the reputation of our business. We believe in sustainable growth on the grounds of fairness.
- (b) Each of us, through our actions and decisions, has a personal responsibility for building our reputation and living up to SAICA's values.
- (c) This Code helps us do this by setting out the ethical principles that underpin our statement of values and the way in which we conduct our business. This Code provides guidance on how to apply these principles in everything we do.

The implementation of this Code shows our commitment to ethics, honesty, and justice

Each one of us, through our actions and decisions, has a personal responsibility to build our reputation and to put Saica's values into practice

1.3 All employees of SAICA, its subsidiaries and joint ventures which SAICA controls, are required to comply with this Code

- (a) You must make time to read and understand the principles and rules set out in this Code.
- (b) If you are a leader, manager or supervisor, you have a particular responsibility to:
 - (I) lead by example and promote and display good ethical behaviour and business conduct, as well as complying with laws and regulations;
 - (II) make sure all team members have access to and understand this Code;
 - (III) make sure your people get training on ethical issues and policies related to this Code;
 - (IV) create an environment in which your team members feel confident and able to raise ethical concerns; and make sure that any ethical concerns that are raised are taken seriously and followed up.

- (c) Breaches of this Code are not acceptable and may result in criminal and civil liability as well as disciplinary action up to and including dismissal.
- (d) It is not possible for this Code to be exhaustive and set out every legal, regulatory or SAICA requirement. In certain situations, you may need to rely on common sense and good judgement to make ethical decisions based on the principles contained in this Code. If you are faced with a dilemma and you are unsure how to solve it, then you should ask for help (see Section 6 below).

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1.4 How to identify unethical behaviour or an ethical dilemma

Ask yourself the following questions:

- (I) Are these actions legal, fair and honest?
- (II) Is there anything in this Code to assist me in making a decision?
- (III) How would I feel about myself afterwards?
- (IV) How would this issue look if it was reported in the media?
- (V) Would I be comfortable explaining this in court?
- (VI) How would I feel if my family and friends knew about what I'd done?

Listen to the conversations around you. If you find yourself hearing or saying phrases like the ones below, you may well be facing an ethical dilemma:

- (I) "No one will ever know."
- (II) "It doesn't matter how it gets done provided it gets done."
- (III) "Everyone else does it, so it must be OK."
- (IV) "It's OK, it's the way we do things around here."
- (V) "I don't want to know."

2 WORKING TOGETHER

2.1 Health & Safety Policy

Within Saica we value and care about each other and it is our policy to demonstrate an exemplary commitment to the health, safety and wellbeing of everyone involved in, or impacted by, the delivery of our business objectives.

This commitment is founded upon three health & safety objectives:

- To precisely define the expectations we place upon our business and operational leaders to drive exemplary and continuously improving health & safety management, control and performance.
- To equip those leaders and their teams with the capability and resources to meet these expectations.
- To generate a climate where everyone understands these expectations and supports their delivery through always displaying a duty of care for themselves and others.

To attain and sustain these foundational objectives we commit to:

- > Maintain and evolve a management system (the SAICA Group Health & Safety Management Framework) that defines and drives sustained and continuously improving health & safety management and control practices wherever the Saica Group operates.
- > Always comply with Health and Safety legal requirements and industry best practices.
- > Provide safe and healthy working environments free from hazards that might create injury or ill-health.
- > Recognise and evaluate all Health & Safety risks associated with our activities, facilities and equipment and to eliminate, mitigate, manage and control those risks.
- > Collaborate with employees and other stakeholders to ensure we take every opportunity to evolve and reinforce our commitment to health & safety.
- > Establish key performance indicators that provide comfort and assurance that our commitment to health & safety is delivering the results we expect and desire.
- > Each Business Leader in each country of operation demonstrating personal leadership and allocating adequate resources to meet the commitments of this Policy Statement.

Saica is committed to maintaining a safe and healthy workplace

Make sure that you know and understand the health and safety requirements of your workspace and your surrounding area

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2.2 Equality, Human Rights and Diversity Policy

Sustainability at Saica begins with our company values: we take care of the future, we value people, we contribute value and accept challenges. These values guide us in our decision-making and integrate sustainability into our culture.

Our contribution to sustainability at Saica, as part of a wider concept of "ESG" (Environmental, Social and Governance), which considers responsible management aimed at improvements made to economic performance, Environmental, Social and Good Governance aspects, sets out to create a favourable environment to ensure decent employment, equal opportunities, avoids any kind of discrimination, and fosters diversity and the inclusion of employees, set forth in a series of measures that have been formulated, based on respecting Human Rights and the labour legislation applicable to each of the countries in which we operate.

For this purpose, Saica Group commits to:

- (a) Aligning with the Sustainable Development Goals (SDG) and the United Nations 2030 Agenda, as well as with similar initiatives such as the Ethical Trading Initiative, OIT Agreements and the Modern Slavery Statement, in order to generate decent employment opportunities tailored to the market, committing to the development of people throughout their professional careers.
- (b) Fostering Diversity and Inclusion in the widest sense, involving the acceptance of and respect for individuals, in order to create a diverse and innovative environment. We believe in the integration of functional diversity and the cultural and intergenerational togetherness of our teams, in order to assemble work teams with complementary and enriching perspectives.
- (c) Ensuring Equal Opportunities and non-discrimination, in access

We want Saica to be a company in which each worker is able to reach their full potential and be recognised for it. For this reason we work as a team

to employment, training, professional promotion and working conditions, throughout employees' working life at Saica, so that they suffer no discrimination, either directly or indirectly, due to any causes related to their birth, race, colour, gender, sexual orientation, religion, opinion, age, condition or personal or social circumstances. These principles affect both the treatment of our workforce, as well as visitors, clients and suppliers of the Saica Group. Relations between them and how they are treated shall always be based on professional respect and mutual collaboration.

- (d) Continuing to work towards Gender Equality, increasing the presence of the under-represented genders in our workforce and casting aside any obstacles that thwart, either directly or indirectly, equal opportunities.
- (e) Strengthen our commitment and actions through ethical practices, implementing procedures for the communication and investigation of any practices, behaviour or actions that go against these principles and values, with the aim of eradicating them and raising awareness among the workforce by means of training actions.

In short, this task, which encompasses all levels and areas of our organisation, can only be successfully addressed through SAICA's respect and values, the principles contained in our Code of Ethics and Regulatory Compliance, as well as through Equality Plans or similar protocols introduced in different centres and countries.

The General Management at SAICA Group fully accepts and shares the content of this Policy.

Everyone who is part of Saica, and those that work with us, should respect diversity, inclusion and non-discrimination

2.3 Performance and reward

- (a) SAICA fosters a work environment that encourages employees to develop their talents and careers, exercise creativity and achieve superior performance.
- (b) SAICA respects its employees' right to union and other representation according to local laws.
- (c) Wages and salaries will be paid on time and pursuant to all agreements.

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2.4 Human Rights

Respect for Human Rights is the backbone of our relationship

SAICA commits to fully comply and respect the United Nations Human Rights in the development of its corporate purpose.

3 PROTECTING OUR BUSINESS

3.1 Safeguarding our assets

As a Saica employee it is important that you help protect the Company, and with it, its future

Each and every one of us must help protect the assets, not only physical assets but also technology, sensitive information about products and processes, know how, and industrial and intellectual property

- (a) SAICA has a wide range of physical assets, technologies, proprietary/commercially sensitive information and intellectual property, which are vital to SAICA's business and which SAICA will protect from unauthorised use or disclosure.
- (b) Each SAICA employee is responsible for protecting confidential information relating to SAICA, its products and operations, including financial information, business and marketing strategies, business plans, business processes, technology and systems.
- (c) Unless specifically authorised by management, you must not disclose any SAICA confidential information to other parties (e.g. suppliers, customers or other partners) without confirming that there is an appropriate agreement in place to protect the information from unauthorised disclosure.
- (d) SAICA personnel must not make improper use of SAICA's assets or permit others to do so.
- (e) SAICA's communications system and infrastructure may only be used for legitimate business purposes or as authorised by management. SAICA does not tolerate the use of its business information systems to access, copy, store or transmit any information or data considered to be offensive, obscene or inappropriate.
- (f) In order to promote safety, prevent possible security violations and manage the communications system, SAICA has the right to monitor, in accordance with applicable law, its communications system and infrastructure.

We must protect the data and Privacy of our employees' information; and we must also protect the company's reputation in the media and any outside communication

3.2 Data protection/Privacy of employee information

- (a) SAICA respects the personal privacy of its personnel in line with applicable laws and company policies.
- (b) SAICA may periodically review and monitor messages and call records for security and other business purposes, as permitted by applicable law.

3.3 Reputation: Media and communications

- (a) SAICA aims to be transparent and open in its communications with all of its stakeholders, while avoiding disclosing any sensitive information that could damage SAICA's interests.
- (b) Comments about SAICA's financial performance and prospects to external parties may only be made by an official SAICA spokesperson.
- (c) SAICA has appropriate internal controls and processes to ensure that accounting and financial reporting complies with legal and regulatory requirements.

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4 CONDUCTING OUR BUSINESS

4.1 Anti-bribery and corruption

- (a) SAICA does not tolerate bribery or corruption in any form. SAICA complies with all applicable anti-bribery and anti-corruption laws and regulations wherever it conducts business. All employees are expected to follow the SAICA Anti-Bribery and Corruption Policy.
- (b) Payments to distributors, advisers, consultants, suppliers and other parties must be based exclusively on the products/services contracted and not on anything that could be interpreted to be a bribe.
- (c) SAICA employees, and anyone else conducting business on SAICA's behalf (such as agents) must not offer, give or receive gifts, gratuities, entertainment or other benefits that could reasonably be believed to influence public or business decisions or to induce an improper performance of a public or business activity.
- (d) Entertainment and gifts must be reasonable and lawful in the country in which they are being provided / received" and accurately recorded by SAICA. SAICA's Anti-Bribery and Corruption Policy provides guidance on this respect.
- (e) Report bribery, or any suspicions or allegations of bribery. Always seek advice if you are unsure how to proceed or need more guidance. See Section 6 below.

Each one of us must comply with the Saica Anti-Fraud and Anti-Corruption Directive

If you become aware of any bribery or suspicion of bribery, you must report it

We must avoid any situation that may create conflicts, actual or potential, between Saica's interests and each one's interests

Avoid any situations that may compromise our principles of competition and if in doubt about the legality of your action, ask before you act

4.2 Conflicts of interest

- (a) Each SAICA employee owes his/her professional loyalty to SAICA and all business-related decisions must be made based on SAICA's best interests, rather than on personal or other considerations/relationships.
- (b) Every SAICA employee is expected to avoid any situation that could create actual/potential conflicts between SAICA's interests and the interests of the employee. If you are uncertain about whether a specific transaction, activity or relationship can create a conflict of interest, you should seek guidance (see Section 6 below).

4.3 Competition/antitrust

- (c) SAICA believes in open and fair competition and is committed to complying with all applicable competition and antitrust laws wherever it does business. All employees must avoid situations that can lead to unlawful and anticompetitive behaviour, including dealings with competitors, customers, suppliers and other partners.
- (d) You must:
 - (i) never make or enter into formal or informal agreements (whether written or verbal) or even discuss with any competitor as regards:
 - the prices at which SAICA sells its products to its customers;
 - the terms of supply offered to or agreed with customers;
 - which customers are targeted or sold to or which territories are targeted or sold into;

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We are committed to a fair and competitive market that rewards innovation and efficiency. Saica is an innovative and efficient group. This is thanks to everyone's daily efforts and only a scenario of free competition will reward this effort

- SAICA's responses to requests for proposals or invitations to tender from customers and/or SAICA's participation in procurement processes; or
 - the volumes of product which SAICA intends to produce or supply on the market;
- (II) not disclose to any competitor SAICA's competitively sensitive information, including information relating to SAICA's prices, ongoing bids, terms and conditions of sales, market share, costs or profit margins, strategic plans/initiatives;
- (III) not allow any competitor to disclose its competitively sensitive information to SAICA. If an unsolicited disclosure is made, you must immediately object and you should seek guidance (see Section 6 below);
- (IV) be careful before you agree to any restrictions on customers, joint venture partners, suppliers or other partners as to who they can sell to or buy from and on what terms;
- (V) report any suspicions or allegations of anti-competitive behaviour. Always seek advice if you are unsure how to proceed or need more guidance. See Section 6 below. SAICA's Group Competition Compliance Program provides further guidance.

4.4 Working with customers, suppliers and partners

At Saica we are committed to dealing with all our clients, suppliers, and other partners fairly and with integrity

- (a) SAICA aims to treat all its customers, suppliers and other partners with fairness and integrity.
- (b) SAICA aims to be a preferred supplier to all of its customers by offering superior products and service levels and through fair and honest competition.
- (c) SAICA respects the confidentiality of commercially sensitive information provided to us, only uses information which has been obtained legitimately and only for legitimate business purposes and respects any contractual or legal confidentiality obligations.
- (d) In its advertising and marketing practices, SAICA complies with the prevailing ethical and legal standards.
- (e) In selecting suppliers and partners, SAICA aims to choose parties whose core values and commitment to lawful and ethical business conduct matches SAICA's.
- (f) SAICA expects the customers, suppliers and partner to adhere in full to the values and principles of legal compliance and ethical behaviour set forth in this code.
- (g) SAICA will be entitled to audit customers, suppliers and partners' performance as regards legal and ethical compliance.
- (h) In case of evidence of failure in compliance, the customer, supplier or partner will be required to take the steps necessary to correct the shortcoming and to prevent its reoccurrence. In case of repeated and consistent non-compliance with a major commitment and in the absence of effective remedial plan of action, the business relationship shall be reconsidered and SAICA shall be entitled to terminate it as the case may be.



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Saica acts with integrity and protects confidential or proprietary information it has in its possession and which belongs to third parties

4.5 Respecting the confidential and proprietary information of others

- (a) SAICA will act with integrity and protect information in our possession which is confidential or proprietary to other parties, including customers, suppliers, joint ventures and other partners.
- (b) SAICA does not obtain competitive intelligence by illegal or unethical means, nor does SAICA solicit or use proprietary information of other parties that we know to be proprietary and restricted from disclosure.

4.6 Quality Policy

We define quality as the agile fulfilment of the needs, requirements and expectations of our customers and other stakeholders.

This policy, applicable to Saica's centres, services and operations, is defined by the vision and values that govern our activities. It represents a commitment understood and adopted by all employees.

Our commitments are leading the way towards excellence:

- (a) Knowing who our stakeholders are and understanding their needs and expectations through open communication.
- (b) Strictly complying with legal and regulatory requirements, as well as with our own ethical and sustainable development commitments.
- (c) Manufacturing products and providing safe services for end users and consumers, giving priority to prevention, identifying and evaluating potential risks and impacts and controlling them through best practices.
- (d) Continuously improving our processes, through monitoring and analysis, using the best available techniques and innovation.
- (e) Building loyalty among our employees, contributing to their development and involving them in the definition of our goals and

Saica expects its clients, suppliers, and partners to fully adhere to the values and principles of compliance with the law and ethical behaviour set out in this Code

Saica is committed to manufacturing products and providing quality and safe services by prioritising prevention, using the best available techniques and practices, training our employees, involving them in the Group's goals and objectives, and creating a climate of participation, communication, and safe work

objectives, fostering a climate of participation and teamwork.

- (f) Selecting suppliers that share our culture of quality, collaborating with them to add value throughout the life cycle of our products and services.

By following these principles, all Saica employees contribute to customer satisfaction and, consequently, to the company's leadership in the packaging and waste management sector.

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5 OUR PLACE IN THE WORLD

5.1 Environment Policy

The company's values underpin sustainability at Saica: we care about the future, we contribute value and we accept the challenges. These values guide us in our decision-making and integrate sustainability into our culture.

We do business as sustainably and innovatively as possible, right from the product and service design phase through to the end of the useful life of these products and services, promoting change to a sustainable model based on the Circular Economy.

Our commitments are leading the way towards responsible management. These are:

- (a) To respect the current environmental legislation in the countries in which we operate and, insofar as possible, to anticipate the application of new standards.
- (b) To promote the transition of waste to resources, facilitating recycling and energy recovery, following the principles of the Circular Economy.
- (c) To reduce to a minimum our impact on the environment. Projects aimed at Zero Waste sent to landfill and the decarbonisation of our factories will enable us to significantly reduce the environmental footprint of our products and services.

We are aware that the availability of natural resources – water, for example – is essential for us to do business. We have to respect the planet and protect it, reducing our impact as much as possible and promoting rational and efficient use of the planet's resources.
- (d) To identify and assess the risks of our activities and facilities from an environmental point of view, continually updating the systems designed to mitigate or eliminate these risks, anticipating their occurrence.
- (e) To always adopt an attitude of cooperation and open communication with our stakeholders, providing transparent information about our activities and successes in terms of environmental management and promoting a climate of involvement with our employees.

Saica's goal is to improve the efficiency of processes and the recovery of waste for use, promoting recycling within the circular economy and as part of a Zero Landfill goal

In our surrounding environment, we are committed to using the best available techniques in process design to optimise the consumption of natural resources, reduce emissions, and reduce waste generation and energy consumption

Working on the continuous updating and improvement of our management system gives us the best tools to achieve our objectives and to contribute towards present and future generations enjoying everything our planet has to offer..

5.2 Energy Policy

Sustainability at Saica starts with the company's values: we care for the future, we provide value and we accept challenges. These values guide us through the decision-making process and integrate sustainability within our culture. Reducing greenhouse gas emissions is part of Saica's values.

Our production activities require an important level of energy consumption and, therefore, we carry them in the most sustainable manner possible.

We promote the utmost efficiency in our production processes, the use of sources of energy with the lowest environmental impact, the progressive use of renewable energy sources and energy recovery.

Our commitments lead the way to responsible management:

- (a) Complying with the legal requirements related to energy efficiency, use and consumption and adapting insofar as possible to the new commitments that are being added in the fight against climate change.
- (b) Promoting production processes with less impact, including energy performance to specification, design and acquisition activities.

We promote increasing the use of renewable energy sources and energy recovery.
- (c) Our activities have an intensive energy consumption.

We must keep continuously improving our energy performance in order to achieve our targets.

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To do so, we support adding equipment and services that improve our energy efficiency and reduce energy consumption. We are aware of the importance of the human factor in the operation of our factories and their impact in energy consumption continuously improving their skills.

- (d) Identifying and assessing the impact of our activities and facilities from an energy management perspective, continuously updating the mechanisms designed to mitigate or remove them, preventing them from happening.
- (e) Maintaining our commitment with stakeholders so they have transparent information on our activities and achievements in terms of energy efficiency and driving the participation of our employees.

Promoting energy efficiency culture that may have an impact inside and outside our factories.

Improving our management systems and energy performance has a direct impact on the attainment of our goals, mitigating climate change and contributing to present and future generations enjoying what our planet has to offer.

5.3 Chain of custody

SAICA is committed to implementing and maintaining the Chain of Custody requirements to promote the consumption of paper from responsible sources as well as promoting the sustainable use of resources, thereby helping to reduce the intensive exploitation of forests. Thus, SAICA identifies the origin of recovered materials used and works with certified suppliers.

SAICA is also committed to the control of the sources of wood fiber, and publicly states that SAICA is not involved directly or indirectly in:

SAICA is committed to implementing and maintaining the Chain of Custody requirements to promote the consumption of paper from responsible sources as well as promoting the sustainable use of resources, thereby helping to reduce the intensive exploitation of forests.

- (a) The illegal trade in timber or timber products,
- (b) The violation of human rights or traditional rights in forestry,
- (c) The destruction of high conservation values,
- (d) The conversion of natural forests to plantations or other uses,
- (e) The introduction of genetically modified organisms in forest management,
- (f) The violation of the Conventions of the ILO and of the social and occupational health and safety requirements that this organisation promotes:

SAICA shall inform any interested party about the SAICA certified products we offer, the scope of our Multi-site Chain of Custody and the procedure for handling any claims related to it.

5.4 Society wellbeing

Saica acts with integrity and protects information that is confidential or subject to industrial or intellectual rights that it is the holder of and which belongs to third parties

- (a) SAICA aims to contribute to the development and wellbeing of the communities in which we operate, by profitably and efficiently offering our products/services, by promoting attractive job opportunities and by investing in our personnel via training and support.

6 HOW TO REPORT A CONCERN OR SEEK GUIDANCE

Our Code is built on principles where there is no room for fear of reprisals for reporting a breach in good faith

- 6.1 SAICA is committed to complying with all applicable laws and regulations as well as achieving the ethical standards set out in this Code.
- 6.2 SAICA is equally committed to maintaining a work environment where everyone feels able to ask questions and raise concerns about compliance and business ethics without fear of retaliation.
- 6.3 If you feel unsure about the requirements of this Code or any other SAICA Group compliance/ethics policies, you should in the first instance raise the issue with your immediate supervisor or with one of the SAICA compliance team: either the Compliance Champion allocated to your business, one of the Compliance Core Team members and/or SAICA's Group Compliance Officer (Cristina Cardona).
- 6.4 Do not hesitate to seek help: it is better to ask a question or raise a concern at an early stage than to ignore an ethical or legal issue that could have more serious consequences in the longer term.
- 6.5 If you have experienced or witnessed unethical behaviour in the workplace, including something illegal, or if you have any concerns that the requirements of this Code or any other SAICA Group compliance/ethics policies are not being complied with, you must report it (in person, by telephone or by mail/email) promptly.
- 6.6 SAICA has a strict policy that any employee who in good faith reports a concern will not be disciplined or censured in any way.

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