

## 1.- Purpose and Scope of Application

The Code of Ethics and Laboral Conduct aims to establish the values that must guide the behavior of the people that works in DYNATEC. This Code of Conduct does not substitute national and international labor regulations. It's based on resolutions adopted in the Declaration on Fundamental Principles and Rights at Work from International Labor Organization, the Universal Declaration of Human Rights and the UN Global Compact.

This Code of Ethics is addressed to all the people that work in DYNATEC regardless their type of contract, their position or the place they use to perform their work. DYNATEC Management will put all the means at its disposal to enforce the rules contained in this Code.

The Code of Ethics come into effect the day of its publication and will be in force until further notice. It will be reviewed and updated periodically taking into consideration suggestions and proposals made by employees and DYNATEC commitments to social responsibility.

## 2.- Basic principles

### 2.1.- Respect for the law

Every employee must enforce existing laws in the countries in which they operate and observe ethical behavior in all their actions. All the workers have to know the laws that affect their work asking if necessary for accurate information through their supervisor.

Is prohibited to possess, use, sell or share illegal drugs or drug paraphernalia on the premises of the company or client. It is not allowed to perform any activity for the company under the influence of alcohol. It is not allowed to own or use firearms or ammunition on the premises of the company or clients, subject to local law.

### 2.2.- Respect for the people

DYNATEC rejects any form of physical, psychological or moral harassment, abuse of authority, or any other conduct that may create an intimidating or offensive environment



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to the rights of the people. Every DYNATEC employee should be treated with respect, fostering a pleasant, healthy and safe environment. All people working in DYNATEC are required to deal fairly and respectfully to their peers, superiors and subordinates. In the same way, relationships between DYNATEC employees and those of its customers and suppliers will be based on professional respect and mutual collaboration. DYNATEC also promotes and respects the right of freedom of association, formation of unions and collective bargaining in the workplace.

Employees must dress according to the professional context in which they are and take care of their personal appearance.

### 2.3.- Effective equality

DYNATEC promotes gender diversity as well as professional and personal development of all employees, ensuring equal opportunities through its action policies.

We do not accept any discrimination in the professional field based on age, race, color, sex, religion, political opinion, nationality, sexual orientation, social origin or disability. Also, we ensure compliance with the provisions of the International Labour Organization, especially in relation to minors, not admitting any child labor. The term "child labor" means any person employed under the minimum legal age in the jurisdiction in question. However, under no circumstances we employ any person less than sixteen years of age. Additionally, the company will not use or sponsor the use of forced labor.

The selection, promotion and compensation of employees are based on the skills and performance of their functions, as well as on the criteria of merit and capability requirements defined in the job. According to our principle of diversity, we pretend to maintain a global work environment, attract and retain people of all backgrounds and training our workforce to achieve excellence.

DYNATEC encourages the promotion and internal mobility as a way to retain talent in its organization. The company seek the stability of employees, development and motivation offering training and educational opportunities that enable all staff to be involved in their own development pledging to keep knowledge and skills updated in order to foster their professional growth and add value to our customers.

DYNATEC conducts staff performance and quality surveys annually through which they can provide accurate and honest opinions, stimulating suggestions and bidirectional analysis.

DYNATEC take measures to reconcile work and family life, enabling professional and personal development of its employees, with equal opportunities without discrimination that may be caused as a result.

#### 2.4.- Safety and health at work

DYNATEC policies promote safety and health at work and adopt the preventive measures established in the legislation of each country, providing a work environment that respects the dignity and health of employees.

All people working in DYNATEC must know and follow the rules of health protection and safety at work and ensure the safety of them, other employees, customers, suppliers, employees and, in general, of all people that could be affected by the development of its activities.

Weekly working hours and overtime shall not exceed the legal limit established by the legislation of each country. Overtime shall be voluntary and paid always in line with the law.

#### 2.5.- Use of confidential information and personal data protection

All employees must keep strictly confidential all restricted information they access as a result of their professional activity and shall refrain from using improperly benefit for themselves or others.

DYNATEC respects the privacy of individuals and collects, processes, uses and retains employee personal information only as necessary and in accordance with the laws of the countries in which it operates. Employees with access to information from other employees must respect and promote the confidentiality of this information and will make responsible and professional use of it.

The company complies with current legislation on data protection, protecting the personal data of its customers, employees, candidates in selection processes or others. We also agree to request and use only those data that are necessary to effectively manage our business.

DYNATEC provides its employees with the necessary resources to carry out their work. All employees must use these resources in a responsible and appropriate way in the vicinity of their work. They must protect and preserve them from any inappropriate use that may result in damage to the interests of the company. The hardware and software systems must have a professional use only and cannot be used to:

- Storing, distributing or visiting websites with inappropriate material that violates human rights to privacy, honor, self-image, religious freedom and the dignity of people such as racism, xenophobia, advocacy of violence or terrorism and pornography or sexist material.

- To use, enter, download, copy, transmit, reproduce, distribute or store any software, published work or invention protected by intellectual property without a license or authorization.
- Conduct or participate in mass mailings of letters, jokes, or inappropriate images.

#### 2.6.- Steps to prevent bribery and corruption

DYNATEC is contrary to influence the will of people outside the company to obtain a profit by using unethical practices. DYNATEC will not permit other people or entities to use these practices to their employees. DYNATEC staff must act according to the laws that are applicable and, in any case, they may use or tolerate bribes from third parties to the Company, its employees or vice versa.

DYNATEC employees shall not receive, offer, or give, directly or indirectly, any payment in cash, gifts, favors or compensation, to people in the service of any entity, public or private, with the intent to obtain or maintain, illegally, business or other advantages.

#### 2.7.- Respect for the environment

DYNATEC assumes the principles expressed in the Quality and Environmental Policy, acting at all times in accordance with the criteria of respect and sustainability, adopting habits and behaviors related to good environmental practices.

According to this strategy, all DYNATEC staff must know and accept this policy and strive to minimize the environmental impact of its activities and the use of facilities, equipment and means of work made available.

#### 3.- Acceptance and compliance with the code

DYNATEC will communicate and disseminate to all employees the contents of this Code of Conduct and post it on the website of the company ([www.dynatec.es](http://www.dynatec.es)). All employees who join or become part of DYNATEC must accept the values, principles and rules of conduct set forth herein.

#### 4.- Rules of conduct

DYNATEC will ensure at all times confidentiality in the handling of complaints that may arise and will not support any form of retaliation against employees who report, in good faith, alleged breaches of the code. The company will also ensure at all times the utmost respect for the rights of any person suspected of involvement in a possible breach.

The employee, supplier, customer or partner who understands or has known of the existence of misconduct or any breach or violation of the rules in the Code of Conduct should report it immediately to their superiors or DYNATEC management. This communication may be done through the following ways:

- Regular mail to: calle Bravo Murillo 297, portal 10, planta 1º derecha, 28020 Madrid.
- E-mail to: [info@dynatec.es](mailto:info@dynatec.es)
- Fax to: +34 91 571 36 65.

Any disciplinary action will depend on the circumstances of the offense. It will be considered whether the infringement was intentional or not, and the good faith demonstrated by the employee to communicate or collaborate in any investigation or remedy for the same.