



CODE OF ETHICS

Asociación de Investigación Metalúrgica del Noroeste

Code of Ethics AIMEN v1
Approved by AIMEN's Board of Directors
December 18, 2019

TABLE OF CONTENTS

INTRODUCTION.....	2
CODE OF ETHICS AND CONDUCT.....	3
SCOPE OF THE CODE OF ETHICS AND CONDUCT	3
COMPLIANCE COMMITMENT.....	4
OBJECTIVES OF THE COMPLIANCE POLICY.....	5
RESPECTING HUMAN RIGHTS AND HUMAN INTEGRITY:	6
PRIVACY AND INTIMACY	7
RESPECTING PROPERTY	7
RESPECTING SOCIO-ECONOMIC INTERESTS.....	8
RESPECTING HEALTH AND THE ENVIRONMENT	10
RESPECTING AN HONEST AND TRANSPARENT MANAGEMENT OF OUR ECONOMIC INTERESTS	10
RESPECTING OUR CONTRACT OBLIGATIONS	11
RESPECTING WORKERS' RIGHTS	11
QUALITY AND EXCELLENCE: OUR METHOD AND TARGET.....	12
COMPLIANCE WITH THE OBJECTIVES DESCRIBED IS OUR ORGANIZATION'S TOP PRIORITY	12
AIMEN SHALL REACT IN CASE OF ANY BREACH OF THE PRINCIPLES OF THIS CODE OF ETHICS AND CONDUCT	13
SCOPE AND VALIDITY	14

INTRODUCTION



“A CONDUCT BASED ON A STRONG ETHICAL CULTURE, AND, THEREFORE, ON REGULATORY COMPLIANCE, IS THE FOUNDATION FOR OUR ASSOCIATION'S PRESENT AND FUTURE”

The **Asociación de Investigación Metalúrgica del Noroeste** (Metallurgical Research Association of the Northwest - AIMEN) is a private non-profit organization, incorporated in Vigo in 1967 by a group of Galician businesspeople with the aim of promoting Research, Technology Development and Innovation in the Industry.

AIMEN is the leading Center in the field of materials in the Autonomous Community of Galicia, and it was recognized and registered as an Innovation and Technology Center under number 38 in the Registry of the Spanish Interministerial Commission of Science and Technology (CICYT) on May 21, 1998. Nowadays, the entity has more than one hundred associated companies and provides services to more than seven hundred organizations devoted to both industrial and commercial activities.

Given the transversal nature of the technologies and services developed by the Center, the sectors serviced by AIMEN are very diverse: automotive, naval, aeronautics, metal mechanics, wood, construction and energy, textile or biotechnology, among others.

Throughout more than fifty years of activity, AIMEN's main objective has been to contribute to the development and reinforcement of the competitive capacity of technology and innovation companies. AIMEN renders technological services, scientific-technical assistance and R&D activities in fields such as metallurgy, forming processes, welding, laser technologies, industrial design and engineering, environment, materials characterization and failure analysis, non-destructive tests, calibrations, industrial organization, quality management, environmental management, occupational risk prevention and technological training.

In the last few years, the Technology Center has been experiencing an intense transformation process, aimed at successfully facing the challenge of internationalization, new technologies and the so-called Fourth Industrial Revolution, in order to enter an increasingly globalized world that offers a horizon full of possibilities for growth.

Keeping in line with its past and in order to face the challenges of the future, AIMEN must continue to strengthen the perception of the Technology Center among its associates, the industrial sector, customers and suppliers, public administrations and the general community, as an Institution of solid prestige and international reputation, led by the principle of excellence.

To this end, AIMEN does its utmost to promote a Business Culture guided by ethical principles and respect for the law, which is required to govern the conduct of all its members, and is expected to become a guide for the conduct of its business partners in their commercial relations.

CODE OF ETHICS AND CONDUCT

SCOPE OF THE CODE OF ETHICS AND CONDUCT

This Code of Ethics and Conduct, as well as AIMEN's Compliance Policy, must be observed by all members of the Association (governing bodies, managers, employees, contributors, interns, volunteers, temporary agency employees, and, in general, by any person linked to AIMEN by professional or similar relationships). AIMEN expects its members to respect it and to adapt their conduct to the ethical principles it develops, without territorial or temporal limitation.

For this reason, this Code and, in general, the Association's Compliance policies must necessarily be known and accepted by all its members. For this purpose, AIMEN's Managers shall ensure its full dissemination and proper explanation.

Furthermore, AIMEN shall promote the acceptance of this Code's guidelines by all its customers and suppliers, and, broadly speaking, by its business partners, who shall assume them as their own or have similar standards that comply with the Code's

principles, thus adapting their market conduct and, specifically, their relations with the Technology Center.

The scope of the Code is also determined by the compliance with the law and other regulations and, particularly, with regard to the conducts defined in the Criminal Code that give rise to the liability of legal entities.

The ultimate purpose is, therefore, the immersion of the entire Organization in a culture of ethics and regulatory compliance.

COMPLIANCE COMMITMENT

The **Asociación de Investigación Metalúrgica del Noroeste** is firmly committed to comply with the law when conducting any of its activities, regardless of the territory in which they are performed, as well as to respect and enforce compliance with the obligations or commitments assumed with its partners, employees and third parties involved.

Thus, the entire Board of Directors, as the highest representative of the Association, pledges its firm commitment to prevent any unlawful act or behavior, whether by the members of the Board or by any individual or legal entity authorized to make decisions on its behalf or being subject to its control or authority, using all the human and material resources available, punishing any breaches of this commitment and assessing any conduct that might promote or favor them.

“AIMEN's Governing Bodies shall ensure at all times an honest and ethical business culture within the Organization. The compliance with the rules binds all the members of the Association.”

The effectiveness of this Code of Ethics and Conduct would not be possible if it were not observed and applied by all the members of the Association, starting with the Board of Directors and down to the employee with the least seniority in the Association. Therefore, its compliance is mandatory, with no exceptions.

The principles and rules contained herein must guide the Association's actions when conducting its activities and shall be observed by all its members. Their promotion and compliance must be encouraged, even among its business partners and any other persons and entities with which it is related, whether in the national territory or outside it.

Compliance with these principles shall be a significant criterion when choosing our customers and suppliers. Their breach may be a reason for termination of the established relationship.

OBJECTIVES OF THE COMPLIANCE POLICY

The objective of the Compliance Policy is to ensure that our organization complies with the Rules at all times, especially with the values and legal assets protected by Criminal Law, preventing, detecting and eradicating any person, practice or attitude that involves a compliance risk for AIMEN.

"Our objective shall always be to comply with the rules affecting the daily activity of the Association"

Thus, AIMEN's **strategic objectives** are:

- To comply with the law in all its aspects and particularly zero tolerance to crime.
- To keep integrity and transparency in business management.
- To base the development of its daily activity on ethical principles, sustainability, respect for people, the environment and labor rights and health at work; all of the above under the premises of impartiality and rejection of influences derived from conflicts of interest, as well as the protection of the confidential processing of information and compliance with market rules.
- To maintain the Association's status as a national and international referent in R&D&I, combining its own processes with a culture of ethical compliance and

reporting its achievements for the benefit of the business fabric and, ultimately, the general community.

- To ensure transparency and democracy in the operation of its governing bodies, rejecting any actions influenced by private interests that may go against those principles, as well as any arbitrary behavior.
- To constantly promote within the Organization and in its external relations an ethical culture of compliance with the applicable regulations, with special attention to international mandates and agreements concerning people's rights, the environment, occupational health, markets and sustainability, among others.
- To promote continuous training as a key element for the development of its values and the immersion of these values in its social base, with special attention to those training activities that enhance the culture of regulatory compliance and ethical behavior.
- To comply with its contractual obligations and maintain a loyal relationship with its stakeholders.
- To maintain a fluid, loyal and transparent relationship with the different public administrations and their officials.

RESPECTING HUMAN RIGHTS AND HUMAN INTEGRITY:

The **Universal Declaration of Human Rights of the United Nations** continues to be subject to constant and repeated non-compliance throughout the world.

AIMEN will not tolerate any situation or business relationship that could lead to a breach of these rights.

“Contributing, or simply allowing, under any circumstances, that our Association is directly or indirectly benefited by the exploitation or suffering of others, and most specially of the weakest segments of the population - minors, women and immigrants- is absolutely inadmissible.”

In accordance with all of the above, AIMEN and its members strongly refuse any discriminatory conduct based on sex, ideology, religion or race.

Any irregularity or real suspicion of non-compliance must be reported immediately via the channels provided by AIMEN, so that the Compliance Department, the Governing Body and the Management of AIMEN can take the pertinent decisions, there being no commercial justification whatsoever for the allowance of these types of conducts.

PRIVACY AND INTIMACY

Privacy and intimacy are fundamental rights of all persons; therefore, AIMEN puts all the means available to ensure their protection.

Compliance with personal data protection regulations is one of the Association's priorities. Thus, all the necessary compliance protocols and policies have been established, not tolerating any kind of action that undermines them. AIMEN, as a proof of its commitment, has appointed a Data Protection Delegate, even if it is not legally required.

We are therefore extremely careful when dealing with **personal information** as a result of our daily activity, observing at all times the rules and instructions we receive in order to comply with the RGPD 679/2016 and the LOPDGDD.

We also pay special attention when safeguarding the information, taking care of its integrity, confidentiality and preservation, by establishing the necessary controls and defenses against unlawful intrusions.

The privacy and integrity of AIMEN's staff and those with whom it interacts is ensured.

RESPECTING PROPERTY

“AIMEN's maxim of conduct is the respect for property, both tangible and intangible, with special attention to intellectual property and business secrets.”

AIMEN's daily activity is based on the establishment and respect of **confidentiality** good practices, as well as on complying with the intellectual property rights of our customers, suppliers and business partners.

The organization rejects any illegitimate use of intellectual property, enforcing such policy in accordance with the applicable legislation and its own Compliance Policy. Therefore, it also rejects the collaboration in any activity involving industrial or corporate espionage.

All AIMEN's employees, managers and representatives must consider, as an essential obligation in their daily work, the respect for each other's property, covered by law or contract, restricting their actions to those licenses or authorizations of use legitimately acquired.

For this reason, all the members of the organization shall comply with and respect the law and the policies implemented in the Association in order to guarantee these rights, both of third parties and of the Technology Center itself.

AIMEN also expects its business partners to implement similar policies.

RESPECTING SOCIO-ECONOMIC INTERESTS

In order to comply with the law, AIMEN shall respect in all its activities the common economic and social interests of the whole community.

Accordingly:

AIMEN shall be especially cautious in its commercial relations and will avoid serving as protection or as instrument for unlawful conducts intended to prevent third parties from complying with their obligations, contributing to their fraudulent insolvency.

AIMEN rejects money laundering from criminal activities. For that purpose, it shall monitor the flow of funds in which it takes part, paying special attention to its obligations, as a non-profit Association, arising from Law 10/2010 on the prevention of money laundering and terrorist financing, as well as its developing regulation.

Therefore, and in order to ensure that any business proposal that seems strange or anomalous will be rejected, our relationships will always be established only with registered and solvent companies.

Tax and Social Security fraud: Our financial management shall be transparent and shall be based on reliable and complete information. It shall never be modified or manipulated.

Tax and social security regulations shall be complied with in all cases.

The control and use of public funds from grants and subsidies, whether they come directly or derived from the multiple projects in which AIMEN takes part as a leader, consortium member, partner or subcontractor, require special attention. The procedures and controls regarding the suitability and legality of requests for financing, expenditure control, application and justification of funds with regard to the obligations taken constitute an essential and unwaivable element.

Compliance with the abovementioned principles shall determine the selection of business partners, who will be required to comply with the legal obligations, as well as to have an ethical and transparent conduct.

Job recruitment bases shall be established using the same method, in order to ensure their transparency and compliance with the law. These will be established following interpretative criteria based on the principle of contribution to social charges and not circumvention, eliminating any risky or fraudulent acts that may lead to liabilities for the Association.

RESPECTING HEALTH AND THE ENVIRONMENT

Social awareness regarding this matter has become clear and it is constantly increasing due to the strong awareness campaigns and the use of social networks as a reporting system.

AIMEN implements an Environmental Management System based on the highest international standards in order to mitigate environmental hazards. This system operates through strict monitoring and compliance with ISO Standards (ISO 14001) implemented by the Association. In addition, it has the official Certification proving their implementation in accordance with the Standard.

“Our objective is to ensure a non-polluting management and safe transport in order to avoid any environmental and human hazard.”

RESPECTING AN HONEST AND TRANSPARENT MANAGEMENT OF OUR ECONOMIC INTERESTS

Corruption is one of the scourges of the 21st century, and the strong social rejection it provokes has led to many severe reforms of our criminal law intended to eradicate the different forms of corruption within the scope of Public and Private Management: Corruption between individuals, influence peddling and bribery, and corruption of state or foreign public officials are all forms of the same phenomenon that we shall avoid in our commercial activity.

AIMEN's commitment of absolute rejection to crime requires the company to maintain and demand, both internally and externally, preventive and reactive actions against corrupt practices or proposals, regarding private entities as well as public administrations and their officials.

Thus, we firmly reject making or receiving any types of promises, favors, retributions or benefits of any nature whatsoever aimed at corrupt or unethical behaviors, persecuting such behaviors, whether coming from our employees or by our business partners.

RESPECTING OUR CONTRACT OBLIGATIONS

The Technology Center has strongly based its national and international prestige on the compliance with its contract obligations -an essential element to be present in the market-, which demand trust and reliability in all business relationships.

All the members of the Association are bound by legal compliance, but also by contractual compliance (*pacta sunt servanda*), so they must duly observe the aforementioned obligations, being subject to the processes established in the organization with regard to its production activity, and informing their superiors, or the Compliance Department, when applicable, of any irregularities or deficiencies they may identify.

RESPECTING WORKERS' RIGHTS

There is absolutely no doubt that people are the most important asset for AIMEN. Thanks to their high qualifications and involvement in the Technology Center's project, it has evolved to reach excellency levels of wide renown.

Thus, and for the purpose of their constant dignifying, AIMEN preserves:

- **Their health protection and occupational hazard prevention.** AIMEN implements and has duly certified the OSHAS 18001 Standard, with an active Occupational Hazards Prevention Committee. Likewise, it has health and occupational hazard prevention services delivered from first-level bodies.
- **Nondiscrimination.** Firmly rejecting all and any types of discrimination on the basis of race, sex, religion or ideology, and promoting its reporting and the immediate denunciation of any conduct contrary to this principle.
- **Rejecting all types of harassment at work.**
- **Promoting continuous education,** covering training addressed at their professional promotion as part of the Association's ethical culture.

QUALITY AND EXCELLENCE: OUR METHOD AND TARGET

As a Technology Center “of excellence”, quality services and the highest and best acquaintance with the latest technological and research advances have been a priority for AIMEN. This is proven by accreditations and acknowledgments (ISO 9001, UNE 166002, UNE-EN in 9100, Certificates IQNET, official endorsements, ISO 14001, OSHAS 18001).

But the Association and its Governing Bodies are convinced that said advocated quality and excellence can only be guaranteed by an ethical culture and the compliance with the regulations; and this is what they wish to transmit to the entire Organization and its Business Partners. Thus, everybody (starting by the highest ranks) is expected and demanded to comply with AIMEN’s Codes of Conduct, turning them into the company's strategic means and target.

COMPLIANCE WITH THE OBJECTIVES DESCRIBED IS OUR ORGANIZATION'S TOP PRIORITY

“The objectives contained in this CODE OF ETHICS AND CONDUCT must be applied by absolutely all the employees of AIMEN, within their scope of action, above any order they receive from their superiors, or any internal regulation that may contravene them. They shall no longer be applicable only in case of existence of a legal imperative rule of higher degree. In such case, the latter shall be preferably applied. AIMEN shall influence its business partners to adopt the principles contained in this Code, outweighing the selection of their customers and suppliers by virtue of their assumption of such principles as their own.”

AIMEN SHALL REACT IN CASE OF ANY BREACH OF THE PRINCIPLES OF THIS CODE OF ETHICS AND CONDUCT

A non-tolerance policy shall be implemented at all times in case of any risk of failure to comply with the Association's ethical values. All and any situation or proposal (whether internal or external) that could jeopardize the principles set forth in this Code of Ethics and Conduct must be rejected.

We will encourage the commitment and adaptation of the conducts of the Association's members and business partners addressed at complying with the law, applying, by virtue of the regulations in force and the contractual clauses agreed, the applicable disciplinary regime (which shall in all cases be governed by the principle of proportionality).

As a consideration, all and any behaviors promoting and guaranteeing the ethical culture of Compliance requested by AIMEN shall be acknowledged and valued.

All and any breach or irregularity with regard to this Code of Ethics and Conduct must be immediately reported, so AIMEN can remedy the situation. For this purpose, any communication channel enabled by the Association may be used.

INVESTIGATION PROCEDURES: AIMEN must investigate all and any events that may involve an incident or possible breach, especially any information that shows signs of criminally prosecutable behaviors.

When performing such investigations, fundamental rights and the strict observance of the presumption of innocence principle must be complied with at all times, guaranteeing that the privacy and integrity of people shall be preserved, being subject to all and any applicable regulations.

SCOPE AND VALIDITY

This Code of Ethics shall be updated from time to time according to any changes in AIMEN's internal or external context and to any legal amendments that may affect it.

This Code of Ethics and Conduct was approved by AIMEN's Board of Directors at the meeting held on 18 December 2019 and it faithfully reflects the values that govern our Association.

It shall enter into force at its date of approval and it shall be valid until it is replaced or modified according to the procedures set by AIMEN.