

Sant Roc, SA, is committed to the territory, society, the values of their employees and the environment. To express this commitment and establish measures to assure its compliance, Sant Roc, SA, has elaborated one programme of Compliance, that not only materialises the Corporative Principles that had always ruled over the activity of the company, but, moreover, states the Behaviour Code. With the creation of this Compliance Program, we get the achievement of two objectives: On one hand, it protects Sant Roc from the public liability and especially criminal liability, which could make in case of breaching the rules that are applicable, how it is determined from 2010 on the articles 31 bis and following from the Civil Code. On the other hand, the Compliance Program brings with it an improvement of the work conditions, which redound to the benefit of the whole company and all the people who integrates it.

### **CORPORATIVE PRINCIPLES**

Sant Roc SA activity it is base don the respect and promotion of the following Corporative Principles:

- ✓ **Human Rights on the practice of the corporate activity:** Compliance of the World agreement of the United Nations about the human rights on the work, respect of the diversity and rejection of any class of discrimination because of race, ethnic origin, nationality, religious belief, ideology, sex or age.
- ✓ **Sustainability and environment protection:** efficient use of the resources and strict compliance of the environmental regulations.
- ✓ **Transparency and no corruption:** Sant Roc refuses any economic or commercial advantage if that it was obtained by corrupt practices.
- ✓ **Health and security at work:** Optimal work conditions, in compliance with the work regulations and protection of the workers.
- ✓ **Confidentiality:** Confidential and respectful treatment both the information relative to the clients and the information relative to the competitors.
- ✓ **Leadership and personal responsibility:** Development and professional promotion on the equal opportunities, mutual respect on the practice of the work activity
- ✓ **Responsible taxation:** severe compliance of the fiscal and tax obligations from Sant Roc

## ETHICAL CODE

It contains the rules and the ethical standards, whose fulfilment is compulsory for all workers. It is based on three fundamental bases:

- ✓ **Respect at work place:** It includes the respect of diversity, the refuse of any class of harassment and the guarantee that the work place is healthy and secure. This porpoise is achieved by the company and all workers.
- ✓ **Integrity at the market:** It includes the responsible commercialisation, the respectful and equitable treatment with all clients, the commercial interactions with other agents in accordance with the basic ethical principles, the respect of applicable antitrust laws and the defence of the competency.
- ✓ **Ethics on the commercial activities:** It includes the responsible commercial decision making on a ethical way, in order to avoid conflicts of interest, the fight against corruption, subornation, fraud and money laundering, just as the responsible use of the email and other communication systems of the company.

Moreover, the Ethical Code from Sant Roc is complemented with 4 specific protocols:

1. Protocol against harassment at work
2. Protocol against money laundering.
3. Internal protocol of gifts
4. Use of new technologies protocol

Despite the resources and the effort that Sant Roc SA uses in order to prevent, and in case that something happens, acting, against the infringements of the Behaviour Code of the Company and the criminal laws, it may be the case that some illicit conduct could not be detected.

In that case, if any worker or person related with the company is aware of any illicit conduct, he/she can contact the internal reporting channel, which is managed by the Compliance Officer. The complaint must be addressed to the following email address: [canaldenunciasantrocc@gmail.com](mailto:canaldenunciasantrocc@gmail.com). In any case, confidentiality of the complainant is guaranteed.

*To fulfil the excellence that our guests deserve, Sant Roc, SA, is totally compromised with the respect of the ethical principles, the fulfilment of prevailing legislation and the creation of a work space where aptitudes and qualities of each worker are encouraged, respecting diversity in every moment diversity.*