



CODE OF ETHICS AND CONDUCT FRENOS SAULEDA SA

Important Information about this Document	
Document Identification	Code of Ethics and Conduct
Territorial scope of application	National and international, aplicable to all FRENOS SAULEDA SA activities, within Spain and abroad
Subjects it applies to	Employees, executives and business partners of FRENOS SAULEDA SA
Policies it replaces	None
Policies it repeals	None
Policies related to the Code of Ethics and Conduct	All policies, processes and procedures that ensure its application
Main oversight responsibility	Ethics and Compliance Committee
Approval date	03/11/2023
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Review date	
Amendment date	



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1.- Introduction

At **FRENOS SAULEDA**, we are proud to present our Code of Ethics and Conduct, a guide that reflects our commitment to integrity and responsibility. This code is not just a set of rules but a compass that guides every one of us in the **FRENOS SAULEDA** family in our daily actions.

We want this code to reflect our way of being and doing, both in Spain, our homeland, and everywhere in the world. At **FRENOS SAULEDA**, we don't just manufacture products; we build relationships based on trust and mutual respect. This Code of Ethics and Conduct is the heart of the promise we make every day.

2.- Scope of Application

At **FRENOS SAULEDA**, we believe this Code of Ethics and Conduct is much more than a guide; it is an integral part of our identity, as essential as the materials we use to manufacture our products. It applies to all of us, every member of the **FRENOS SAULEDA S.A.** family, regardless of our role or location.

This Code applies to all our employees at our facilities in Sant Cebrià, as well as those who join us from other places. It applies to every employee, executive, and even suppliers and business partners, whenever applicable.

The Code of Ethics and Conduct is our shared promise to deliver **FRENOS SAULEDA's** quality and trust to every corner of the world where we leave our mark.

3.- Our values

At **FRENOS SAULEDA**, we firmly believe that values are the cornerstone upon which success and reputation are built and maintained, throughout our more than 100 years of history. These are the principles that guide us:

Commitment to customers:

- **Empathy:** We strive to understand and anticipate the needs of our customers, creating genuine connections with each one of them.



- **Proximity:** We remain within reach of our customers, ensuring open and effective communication.
- **Adaptability:** We adapt to changing market demands and our customers' specific needs, offering tailored solutions and innovating alongside them.

Commitment to our team

- **Respect:** We promote a work environment based on mutual respect, where everyone's contributions within **FRENOS SAULEDA** are valued.
- **Professional Growth:** We are committed to the professional and personal development of our team, offering opportunities for training, growth, and recognition.
- **Balance:** We prioritize the well-being of our employees, fostering a healthy work-life balance and providing a safe, positive workplace.

Commitment to quality

- **Innovation:** We strive for continuous improvement, constantly innovating and pursuing excellence in our products and materials.
- **Quality control and compliance:** We implement rigorous quality controls to ensure the reliability and durability of our products, while strictly adhering to applicable regulations and standards.
- **Tailored Solutions:** We listen to our customers' specific needs to provide customized solutions that meet the requirements of each project.

4.- Our Decalogue

The following Decalogue aims to provide a clear and concise framework for **FRENOS SAULEDA**'s employees, suppliers, and business partners, so they can act in alignment with our organization's values and in compliance with applicable legal and regulatory frameworks.

4.1 Integrity

Act with honesty, transparency, and responsibility in all interactions and transactions. Acting with integrity means doing what is right even when no one is watching, guided by an internal sense of ethics and morality that reflects the trust our customers, employees, and business partners place in us.

Examples of unacceptable practices:

- Exaggerating the qualities of our products.
- Hiding critical information.
- Manipulating financial information.



4.2 Respect for Regulatory Compliance

Complying with all applicable laws, regulations, and standards, both local and international, is fundamental to ensuring a safe, fair, and respectful work environment for our employees, business partners, and society at large. This commitment goes beyond mere legal compliance; it reflects our dedication to operating transparently and fairly.

Examples of unacceptable practices:

- Ignoring environmental legislation and regulations.
- Failing to meet tax obligations.
- Violating Occupational Health and Safety standards.

4.3 Quality and Excellence

We strive to achieve quality and excellence in every aspect of our work. We maintain the highest standards in our products and services, improving continually and permanently. This approach allows us to exceed customer expectations and reaffirm our commitment to market excellence.

Examples of unacceptable practices:

- Sacrificing quality commitments to meet deadlines.
- Ignoring quality control procedures.
- Altering quality test results.

4.4 Data and Intellectual Property Management

We handle all sensitive and personal information with great caution, rigorously complying with European and Spanish data protection legislation. Additionally, we respect and protect intellectual property, both internal and third-party, recognizing its critical value in innovation and development. Our commitment to privacy, data security, and intellectual property reflects our integrity and responsibility toward employees, customers, and partners.

Examples of unacceptable practices:

- Unauthorized use of confidential information.
- Violation of intellectual property rights.
- Misuse of personal data without the required authorization.



4.5 Collaboration

We value teamwork and collaboration. Therefore, it is everyone's responsibility within the organization to foster an environment of cooperation and respect, where combined efforts lead to better results.

Examples of unacceptable practices:

- Favoritism in the workplace.
- Hindering collaboration.
- Hoarding information.

4.6 Fairness and Respect

We treat everyone with dignity, avoiding any form of discrimination. This value reflects our commitment to equality, fairness, and diversity, promoting an inclusive and respectful environment for everyone in our organization.

Examples of unacceptable practices:

- Discrimination based on gender, age, ethnicity, personal beliefs, or any other reason.
- Verbal, physical, or psychological harassment in the workplace.
- Unequal opportunities for professional development.

4.7 Sustainability and Environmental Responsibility

We are committed to sustainability and environmental responsibility in all our projects. We strive to minimize our environmental impact and promote sustainable practices.

Examples of unacceptable practices:

- Inefficient waste of resources.
- Non-compliance with environmental regulations.
- Deliberate use of unsustainable materials when similar, less impactful alternatives are available.

4.8 Innovation and Adaptability

We aim to stay at the forefront, adopting new technologies and practices aligned with industry standards and legislation. This balance allows us to offer creative and effective solutions while ensuring compliance with current laws and regulations.



Examples of unacceptable practices:

- Launching new projects or using new materials without prior legal risk evaluation.
- Employing advanced technologies not approved by legislation.
- Modifying processes without reviewing their regulatory impact.

4.9 Effective communication

We commit to maintaining clear and effective communication with our stakeholders, especially regarding technical and safety information about our products. This includes accurately conveying data, specifications, and warnings to comply with all applicable norms and standards.

Examples of unacceptable practices:

- Misleading advertising.
- Concealing relevant technical information or risks.
- Creating incomplete or confusing technical documentation.

4.10 Management of Non-Compliance

We establish procedures to address any irregularities or deviations from our policies or legal regulations. This includes implementing a channel within our **Internal Information System** to enable employees to report incidents, ensuring proper investigation and corrective actions when necessary.

Examples of unacceptable practices:

- Ignoring reports of non-compliance.
- Retaliating against those who report irregularities.
- Failing to take effective corrective actions.

5.- Commitment to Ethical Business Practices

At **FRENOS SAULEDA**, we take pride in working ethically with our business partners. This commitment is fundamental to our organization's success and sustainability, as well as to building trusting relationships with our customers, suppliers, and the community.

In all our dealings with third parties, we maintain clear and honest communication, strictly comply with applicable laws and regulations wherever we operate, and responsibly address any potential conflicts of interest. Additionally, we reject any practices considered corrupt, such as



payments to public officials or inappropriate gifts, and we commit to taking action against such behavior if it comes to our attention.

This commitment to ethical business practices is expected of all companies with which **FRENOS SAULEDA** maintains a commercial relationship.

6.- FRENOS SAULEDA Compliance System

FRENOS SAULEDA, as part of its commitment to integrity and compliance, has established a Compliance System to ensure adherence to regulations and maintain the organization's standards.

The Compliance System, managed by the Compliance Committee, will oversee compliance with this Code of Ethics, the Compliance System Policy, the Internal Information System Policy, and any other relevant norms.

FRENOS SAULEDA will promote training and awareness actions that contribute to proper regulatory compliance within the organization. Additionally, it will provide the means and channels to monitor risk management, the implementation of policies, and the timely reporting of non-compliance.

7.-Communication of the Code of Ethics and Conduct.

FRENOS SAULEDA is committed to making the content of this Code of Ethics and Conduct available to its staff and any interested parties. This ensures that all individuals to whom it applies can reasonably understand its content and related policies, guiding their business decision-making.

Regular training and awareness activities will also be conducted to reinforce the content of this Code.

8.- Disciplinary Measures

Violations of this Code of Ethics and Conduct or related regulations pose significant risks to **FRENOS SAULEDA** and may result in legal actions. Any breaches will be addressed promptly and in accordance with applicable law.



Responses to such violations will be proportional to the severity of the incident and applied equitably, regardless of the position or rank of those involved, including employees, executives, or business partners.

9.- Communications received through the Internal Communication System

Any member of **FRENOS SAULEDA** with questions, requiring additional information, or wishing to report any situation believed to violate this Code of Ethics and Conduct may contact the Ethics and Compliance Committee through the following means:

- **Email:** compliance@frenossauleda.com
- **Phone:** (+34 937631120)
- **Internal Communication System:** <https://www.frenossauleda.com/compliance/ethical-channel>

FRENOS SAULEDA will respond to inquiries or requests for advice related to this Code and will review, investigate, and address any reported instances of potential violations. If an infringement is confirmed, appropriate measures will be taken in compliance with applicable legislation.

10.- Validity

The Code of Ethics and Conduct will come into effect on December 1, 2023, and will be made available to employees and business partners through **FRENOS SAULEDA**'s website and any other relevant means.

The Code will be reviewed and updated at least once every three years or whenever required by law and will remain in effect until a new version is approved.

11.- Approval

This Code of Ethics and Conduct was reviewed and approved by the Board of Directors of **FRENOS SAULEDA** on November 3, 2023. Its adoption reflects our commitment to ethics, integrity, and compliance in all aspects of our business operations.

In Sant Cebrià de Vallalta, December 1, 2023.