

# DOGA GROUP CODE OF CONDUCT

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## Introduction

The companies which are part of DOGA (hereinafter referred to as DOGA) have, and have had since its foundation in 1958, an excellent reputation all over the world for corporate honesty. Integrity as a basis for business management, compliance with rules and laws, as well as our corporate values and commitment to sustainable development have been, are and will be the guidelines to be followed in decision-making processes and action taking.

## Scope of the Code of Conduct

DOGA's Code of Conduct has been laid down to formulate the principles by which the Group establishes its relations with employees, suppliers, partners and other participating parties. It is applicable to all the members of the organisation, from the Board of Directors to every single employee.

DOGA encourages its suppliers, customers and other related parties to adhere to these principles.

The principles in this document will be applied to the evaluation of present and potential suppliers.

## Business Principles

### Compliance with current legislation

DOGA complies with the local rules and legislation in all the countries where it is present.

In situations in which there is no specific legislation, DOGA applies its own rules based on its corporate values and corporate culture.

If the law and the principles established in this code come into conflict, the law will prevail.

### Relations with customers and suppliers

The transactions between DOGA and its customers and suppliers are characterized by fairness.

DOGA will on no account offer any rewards or any advantage to those customers, potential customers or any of its representatives for breaking the applicable law or challenging the reasonable, ethical and generally accepted business practices.

DOGA employees should under no circumstances accept payments, presents or any other type of reward by a third party which could affect or appear to affect their objectivity in their decision making.

## **Financial information**

All DOGA financial transactions must be reported according to the generally accepted accounting practices. The accounting records must show the nature of all transactions correctly and should never lead to error or deceit.

DOGA will provide open, truthful, relevant and comprehensible information on time to those who require such information, if DOGA is under obligation to do so

## **Conflicts of interest**

DOGA employees and the members of the Board of Directors will develop their private and other external activities, such as their own financial interests, in a way in which they do not come into conflict, or seem to do so, with the interests of DOGA. Should any conflict of interest arise, it must be immediately reported to the Human Resources department by the person subject to the conflict.

## **Political involvement**

DOGA observes neutrality with respect to political parties. Neither DOGA names nor DOGA assets should ever be used to promote the interests of political parties or any of their candidates.

## **Environmental Principles**

### **Resources efficacy**

DOGA designs its products and processes in such a way that the energy and raw materials are used efficiently and the waste and residual products are reduced to the minimum during the life cycle of products.

### **Preventive Principle**

DOGA supports the preventive principle by avoiding materials and processes which could be environmentally risky and could put health at risk whenever alternative procedures are available.

### **Environmental performance**

DOGA audits periodically its own plants and its suppliers' plants, keeps a record of and reports their environmental action, emphasising the evaluation of potential risks for the products.

## Human Rights and Work Practices

### Human Rights

Within its scope of influence, DOGA supports and respects the protection of the human rights internationally proclaimed.

### Non discrimination

DOGA employs and deals with its employees, customers, suppliers and other participating parties following a policy of no gender, race, religion, age, disability, sexual orientation, nationality, political opinion, affiliations, social or ethnic origin discrimination. Diversity is promoted at all levels.

### Labour

No form of hard labour, child or compulsory labour will be tolerated. No one will be employed unless they have reached the age required to finish the compulsory secondary school. Freedom of association, the right to collective negotiation and the right to agreements will be protected in all DOGA workplaces.

### Working atmosphere

All DOGA employees will be guaranteed the optimal conditions for a healthy and safe working atmosphere.

## The responsibilities of Managers and Employees

It is DOGA Managers' responsibility to communicate and inform about both the content and the spirit of this document within the organisation, and encourage the employees to report any behaviour which violates the principles established in this document. The explicit or implicit acceptance of questionable actions will not be tolerated.

Reports on no compliance with this code can be sent anonymously and confidentially to DOGA General Management. A communication channel is established through the e-mail address [dpd@dogo.es](mailto:dpd@dogo.es), which is received by the HR Director and the data protection delegate. Those who communicate violations in good faith, will not be subjected to punishment.

The application of this code will be accurate and coherent. The no compliance with its statements can lead to disciplinary actions.

## Adherence to the United Nations Global Compact

DOGA joined the United Nations Global Compact on March 10th, 2015, therefore voluntarily acquiring a commitment to comply with the 10 Principles that are established in said Global Compact and taking up the obligation to prepare and share annual progress reports through the Global Compact web platform ([www.pactomundial.org](http://www.pactomundial.org)).

The Code of Conduct has been adopted by the Board of Directors of DOGA on June 27, 2007; first revision on March 24, 2015 on the occasion of the company's adherence to the UN Global Compact; second revision on April 1, 2019 on the occasion of the incorporation of the communication channel with Management; third revision on March 1, 2023 on the occasion of the acquisition of the DOGA companies by the new owners.

Any change will be published promptly.