

CODE OF CONDUCT



Nekicesa places the highest value on the integrity of our company and each of its directors, officers, employees and representatives.

Directors, officers, employees and all representatives, including agents, consultants, independent contractors and suppliers are responsible for complying with all applicable laws and regulations in each country in which the Company does business and for knowing and complying with this Code of Business Conduct and other policies of the Company.

Violations of law or this Code or other policies of the Company are subject to discipline, which may include termination.

COMMITMENTS

Inside the company

With our customers

With our suppliers

A handwritten signature in blue ink, appearing to read "Kerman Elordi Izcoa".

28/11/16

Kerman Elordi Izcoa

General Manager

To be a trusted company year by year we need to work to a consistent and higher set of standards and follow them in everything we do

INSIDE THE COMPANY

- ◆ **We respect the individual and diversity,** recognizing the dignity of each individual, respecting each employee, promoting self-development through training that broadens work-related skills and different perspectives and ideas, without regard to gender, race, ethnicity, sexual orientation, physical or mental disability, age, pregnancy, religion, veteran status, national origin or any other legally protected status.
- ◆ **We experience our values:** we will carry out our tasks following the principles set forth in our vision and in compliance with this Code of Business Conduct and our corporate policies.
- ◆ **We avoid conflicts of interest:** we should avoid any situation that may create a conflict between our personal interests and the interests of the Company.
- ◆ **We work in a positive environment:** Nekicesa endeavors to provide all employees an environment that is conducive to conducting business and allows individuals to be creative, take initiatives, seek new ways to solve problems, generate opportunities and be accountable for their actions. Nekicesa also encourages teamwork in order to leverage expertise through effective collaboration and cooperation. In the case that the usual communication channels are not sufficient or appropriate, Nekicesa Packaging employees have a mail address (recursoshumanos@nekicesa.com) to contact freely with the company Board to transmit needs or special situations.
- ◆ **We do not employ child forced labor and provide a safe workplace:** Nekicesa does not and will not employ child labor. To help safeguard ourselves and others, as well as our facilities, Nekicesa will conduct and support research on the effects of materials and products it handles or sells, conduct preventive safety and loss prevention and occupational health programs, and require that equipment and operating practices meet all applicable regulatory requirements.
- ◆ **We respect each other's privacy:** Nekicesa respects our privacy and therefore maintains only those employee personnel and medical data necessary for business, legal or contractual purposes. Access to those records and the information contained therein shall be limited to those with a need to know for a legitimate business purpose.
- ◆ **We safeguard company property and information:** Safeguarding Nekicesa assets is the responsibility of all directors, officers and employees and representatives. We must use and maintain such assets with care and respect while guarding against waste and abuse. We will protect from disclosure or misuse all non-public information pertaining to Nekicesa, including business and financial information, acquisition and divestiture plans, proprietary technical data, competitive position, strategies, customers data and product costs.
- ◆ **We protect the environment:** Nekicesa will utilize management systems to apply a global standard that provides protection of human health and the environment, including compliance with applicable laws and regulations.
- ◆ **We maintain accurate books and reports results with integrity:** Nekicesa's financial, accounting and other reports will accurately and fairly reflect the transactions and financial condition of the Company in accordance with generally accepted and Company-approved accounting principles, practices and procedures and applicable reactions.



WITH OUR CUSTOMERS

- ◆ **We provide quality products and services:** we strive to provide products and services that meet or exceed our customers' expectations for quality, reliability and value, and to satisfy their requirements with on-time and In full- deliveries.
- ◆ **We seek business openly and honestly:** Nekicesa strictly prohibits bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of a government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action. Nekicesa has also strictly prohibited to any employee making payments to any person. Therefore, company gifts offered by Nekicesa only can have a testimonial attention character and can never exceed 100€.
- ◆ **We follow accurate billing procedures:** It is our obligation to reflect accurately on all invoices to customers the sale price and other terms of sales for products sold or services rendered. Every employee has the responsibility to maintain accurate and complete records. No false, misleading or artificial entries may be made on Nekicesa's books and records.
- ◆ **We safeguard the property of others:** Nekicesa safeguards the tangible and intellectual property of its customers which may be used in fulfilling work assignments, and we will comply with all regulations or contractual requirements governing the use of such property.

WITH OUR SUPPLIERS

- ◆ **We seek long-term relationship:** we will strive to build long-term relationships with our suppliers and award business based on their ability to meet our needs and commitments, their reputations for service, integrity and compliance, their high standards for quality and delivery and their prices.
- ◆ **We will not be influenced by gifts:** Nekicesa prohibits employees accepting bribes, commissions or any other form of undue payment, directly or indirectly, by part of our current and potential suppliers or anyone else, in order to obtain a contract or any other commercial benefits. For all this, the received gifts only can have a testimonial attention character and can never exceed of 100€.



*We firmly believe
that operating in a
responsible and
ethical way is
essential for the
success of our
business*



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