

# Code of conduct

EUROFIRMS GROUP SLU

## MEANING AND DESCRIPTION

1. EUROFIRMS is a nationally established group of companies. It also has international presence in Portugal, Italy, Holland and Chile. Its member companies are mainly dedicated to the provision of professional services related to HUMAN CAPITAL, understood as personnel management in different areas and modalities.

All EUROFIRMS' actions are aimed at providing optimal solutions to the different needs of our clients in terms of personnel, such as the provision of personnel selection services, training, provision of personnel through temporary employment agencies and outsourcing of various activities, without neglecting the social commitment carried out through Eurofirms Private Foundation.

The companies belonging to the EUROFIRMS group and its members must abide by this Code of Conduct, without prejudice to the fact that each business entity may develop its own Code of Conduct and complementary documentation on policies and procedures according to the speciality of its activity, always under the premises of this document.

2. The team of people that make up EUROFIRMS is committed to the ongoing improvement of our actions, and we share a code of values that we apply to our daily activities: [Transparency](#), [Responsibility](#) and [Respect](#).

In order for these three values to form the basis of our management, EUROFIRMS acquires an ethical commitment that goes beyond regulatory compliance, forming the inherent features of our "personality", so that compliance with this Code of Conduct and other complementary documentation is observed in all areas of our organisation and by all its members.

Being aware that our field of business activity is dominated by constant interaction with other parties, the Code of Conduct has an additional objective, which is to govern the principles and values that should regulate the relations of EUROFIRMS with its stakeholders, making them participants in our idiosyncrasy, and also preventing our commitment from being counteracted or undermined by the actions of third parties.

3. The Code of Conduct establishes the criteria for action that must be observed by all members of the organisation in the performance of their responsibilities and functions, striving for professional, ethical and responsible behaviour, as a basic element of our corporate culture.

The purpose of the Code of Conduct is not only its mandatory observance, but its natural compliance, so that all members of the organisation are aware of the values of EUROFIRMS in their training and in their personal and professional development.

No employee may ask other employees to contravene the provisions of this Code, nor shall conduct contrary to this Code be deemed justified based on an employee's compliance with an order from a superior.

Any breaches of this Code of Conduct that may occur will be analysed and penalised in accordance with the applicable internal procedures, agreements, and legal regulations.

EUROFIRMS goes one step beyond regulatory compliance. Nowadays, for any business organisation seeking to earn the respect of society and the success of its activity, compliance with the applicable regulations should be a matter of course and should not require any doubts in this respect. However, we reaffirm our commitment to this compliance and we also imbue our activity with respect for people and socially recognised ethical values, such as honesty, humility, companionship, generosity, effort and dedication.

## OUR CLAIM: LIVING PEOPLE FIRST

*Living People First* is about helping to improve people's lives, seeking their best version in a sustainable business activity, with a will to contribute to their happiness and thus have a positive impact on our society.

To improve people's lives, we create sustainable companies, where we can contribute to their development and that of leaders with values that stimulate our project.

By helping people to achieve the best version of themselves and to develop their leadership skills, we contribute to the greater well-being of the team and its environment.

Our leadership style is helping and serving:

- We lead by values: transparency, accountability and respect.
- We aspire to be inspiring, exemplary, proactive and consistent people who see the best in everyone and celebrate it.
- We practise leadership with humility and simplicity, common sense, always pursuing excellence.

Committed people do our jobs with hope and motivation, achieving a happier team of people, loyal customers and the involvement of candidates and employees.

## PEOPLE

Promoting a culture of compliance, both regulatory and ethical, is a necessary element for the dissemination and implementation of this Code of Conduct, to which EUROFIRMS' Senior Management and Governing Body are fully committed. In this way, we can affirm that we are faced with what the doctrine on the subject has called "The Tone from the Top".

All activities developed in the environment of what is traditionally called "human resources" are closely related to PEOPLE, which should lead us to seek their well-being in the development of the organisation's activity and to consider them as HUMAN CAPITAL.

The decision reflected in this Code of Conduct comes from the Senior Management and Governing Body of EUROFIRMS, and is the result of a consolidated business and personal history, formally transferred to the exercise of good corporate governance, resulting in compliance with laws, regulations and commitments out of conviction, as obligations and rules are imposed internally that go beyond legal or regulatory obligations.

In addition, EUROFIRMS exercises a leadership that seeks to correctly adjust the commercial purposes pursued with the means used in relations with our customers, suppliers, competitors, regulators and employees, in order to position it as an ethical and highly valued company in the market in which it operates, which leads us to the need to use the necessary diligence in assessing the degree of adherence to ethical and regulatory principles held by all those with whom we interact.

## **POLICIES and PROCEDURES**

EUROFIRMS has established a series of policies and procedures that apply to the entire organisation, which must be known and respected by all its members, as they are the necessary complement to this Code of Conduct and the appropriate means of positioning ourselves correctly in our environment, both externally and internally.

### **Quality**

EUROFIRMS' goal is for all its services to have the best quality standards, and to that end we have gathered a team that will monitor the Quality of everything we have to offer.

Compliance with UNE/ISO standards is one of the keys to ensuring the best way of carrying out our activity, which is why we advocate obtaining the certifications that most involve us.

We have a Quality Management Manual, which is designed to monitor compliance with all legal and contractual obligations acquired, subject to the corresponding technical documents.

### **Information**

We treat the information of all those with whom we interact with the utmost confidentiality, without sharing it with third parties or using it for any other interests than those agreed. Personal data is also respected. We have a team that will guarantee that, which includes the Data Protection Delegate.

### **Third parties**

We understand our stakeholders to be all those people or entities affected to a greater or lesser extent by the decisions and activities that we carry out and which, in turn, allow us to function fully.

Their satisfaction is key to the survival and success of any business activity, by virtue of which we must be aware that if our services are not received positively and successfully in the market, it will end up having a negative impact on other stakeholders, such as candidates, workers or our suppliers, without ruling out the same effect in reverse.

Each stakeholder group has certain expectations that they assume will be fulfilled when they interact with EUROFIRMS. For this reason, it is important to maintain communication with them, either through personal dialogue or other tools that allow us to know their opinions regarding the company's activity, finding their points of disagreement and working to resolve them.

Given the diversity of stakeholders with whom EUROFIRMS has relations, ranging from company ownership, business partners, clients, candidates, employees,

employees on secondment or in the provision of services, structural employees, suppliers and regulatory bodies (Tax Agency, Social Security, State Public Employment Service), we must seek, as a major challenge, common interests among all of them, with the aim of not interfering with each other's expectations, and the first step for this is: CARING AND LISTENING TO PEOPLE.

### **Collaboration**

All EUROFIRMS members must take responsibility for complying with and enforcing the Code of Conduct, avoiding practices that might facilitate the justification or covering up of actions that are prohibited by the organisation.

In this respect, EUROFIRMS places the Ethics Channel at the disposal of all members of the organisation.

Specifically, Executives and Employees and other members of the stakeholders, in the event that they become aware of any irregularity or weakness, or if they personally suffer the consequences thereof, undertake to inform the Compliance Committee about it through the Ethics Channel <https://canaletico.es/es/eurofirmsgroup>. For its part, EUROFIRMS guarantees the possibility of making anonymous complaints, a strictly confidential treatment of the situation, guaranteeing, without prejudgement, the protection of the victim and the immediate cessation of these actions, bringing the matter to the attention of the authorities if necessary. The protection of the whistle-blower will also be guaranteed, and any possible retaliation against them will be punished.

Our ethical channel works through an external web platform that meets the highest standards of information security. This platform, in compliance with the criteria established by the Attorney General's Office, is open to all members of the stakeholders with whom EUROFIRMS has relations and is managed by an external company that undertakes to receive complaints and guarantee the highest levels of confidentiality in reporting to the compliance body for subsequent investigation. This external company will also be responsible for recusing, if necessary, those members of the Compliance Committee who are in a situation of conflict of interest.

In this respect, EUROFIRMS places the Ethics Committee and the Whistleblowing Channel at the disposal of all members of the organisation.

EUROFIRMS makes its principles of action and values known on a regular and updated basis, in order to transmit and "infect" the whole organisation with the spirit of this Code of Conduct. However, the attitude of the members must be proactive, collaborative and participative in the field, taking advantage of the training and information opportunities that EUROFIRMS makes available.

## **Equality**

We treat all those with whom we interact with equality, in strict accordance with the scope of art. 14 of the Spanish Constitution, we advocate that no personal factor may be taken into consideration by us in a discriminatory manner.

We firmly believe in the equal treatment of men and women. At EUROFIRMS there is no premise or slogan that could be discriminatory on the basis of gender, both internally and externally.

We offer equal opportunities and equal treatment to all people, both within our organisation and in the practice of our activity.

Furthermore, the integration of people with disabilities, especially in the labour market, is an important part of our business activity.

## **Non-Financial Information**

We see it as an instrument that helps to collect, measure and disseminate data on environmental, social and governance issues in our organisation.

It is a further sign of transparency in order to build trust with third parties and to strengthen our credibility and the trust that others place in EUROFIRMS, to which we must all contribute from our position in the organisation.

It is another factor that adds value to our company and fosters our differentiation in the market. We must publicise who we are, what we do and how we do it in order to attract talent and business opportunities.

## **Respect for human rights**

This Code of Conduct expressly includes our commitment to the human rights recognised in national and international legislation, committing us to identify the potential impacts that the operations and activities carried out, directly or through a third party, may generate in this aspect, assuming the obligation to respect them, disclose their content, monitor their observance, as well as comply with and enforce compliance with all the regulations that are necessary for their protection.



## **Anti-bribery and anti-corruption**

Both concepts must be contained in this Code of Conduct in a particular way, due to their relevance in today's economic society, and we expressly and clearly adhere to all national and international legal regulations on the subject.

It is prohibited in our organisation to pay, offer to pay or authorise the payment, directly or indirectly, of anything of value to any government official, political party or candidate, or to anyone acting on behalf of a public organisation for the purpose of obtaining or securing business or for obtaining an improper business advantage. We should also be aware that an offer, scheme or promise to pay or give anything of value may constitute a violation of this Code of Conduct and applicable law.

On the other hand, it should not be forgotten that "anything of value" is a very broad concept and includes, by way of illustration but not limitation, items such as money, gifts, offers of employment, undue discounts, payment of expenses, debt forgiveness or personal favours.

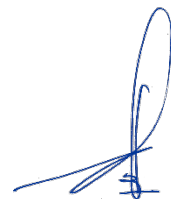
## CONTROL

The corporate reputation of our company will depend on the stakeholders' view of us, and the organisation is convinced that it will only achieve excellence through the positive impact we can have on society at all levels.

EUROFIRMS is aware that it is necessary to monitor compliance with the legally binding rules and ethical rules that the organisation has voluntarily adopted.

Senior Management and the Governing Body are responsible for implementing, communicating and promoting a culture of compliance, and to ensure that it is being adopted and applied, they will develop surveillance and monitoring systems to this end, thus safeguarding the policies, procedures and regulations developed on the basis of the compliance culture adopted.

In Cassà de la Selva, on 31 December 2021



Signed Eurofirms Group SLU Governing Body