



**WE CARE ABOUT YOU**

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**»»» CODE OF CONDUCT «««**









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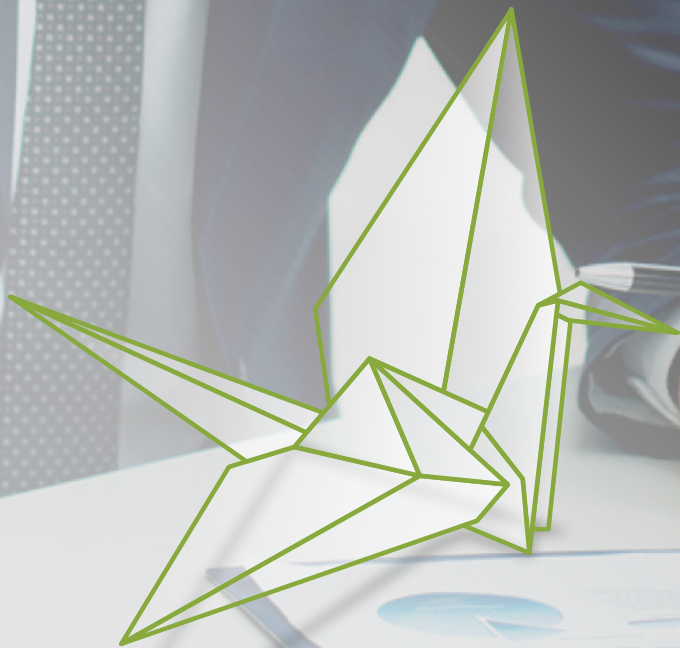
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# ➤➤➤ INTRODUCTION AND JUSTIFICATION ➤➤➤

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## INTRODUCTION



A Code of Ethics is a fundamental element, responsible for guiding and orienting the behaviour of people in the company. This code should become a guide for employees, which facilitates the development of their interpersonal relationships within the framework of respect, tolerance and coexistence.

It is the responsibility of each employee to know, internalize, disseminate, observe and enforce this code, as well as to submit to the consequences of its transgression.



## JUSTIFICATION



Alani's management, in addition to complying with the rules that guide the daily work and seeking to guide the conduct of its employees towards excellence, has designed a Code of Ethics through which behavioural parameters are established for all employees of the company, regardless of their type of contract, thus facilitating the development of interpersonal relationships within the framework of respect, tolerance and coexistence with both co-workers and users and their families.







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# »»» OUR PHILOSOPHY «««

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# OUR PHILOSOPHY



## FUNDAMENTAL PRINCIPLES:

- **Respect for human dignity:** All human beings must be valued with ethical principles and taking into account their values, duties and inalienable universal rights.
- **Integrity:** This implies taking into account the different social, economic, cultural, biological and other factors that interact in the health and illness process.
- **Efficiency:** Achieving the objectives set with the lowest possible costs without deterioration of services.
- **Quality:** To achieve the highest and best user satisfaction.
- **Equity:** With equal rights and duties to attend to users without distinction of class, creed and race.

## GUIDING VALUES:

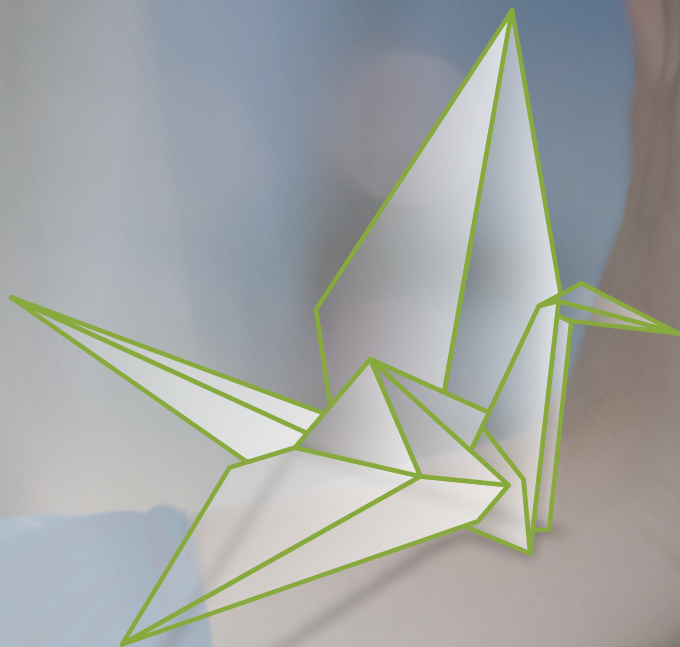
- **Tolerance:** Respecting others and understanding them as they are.
- **Respect:** Recognising others with dignity, accepting differences of thought.
- **Honesty:** Act with transparency in each of the activities we carry out.
- **Service:** To enjoy what we offer to others.
- **Responsibility:** To assume our activities in a timely manner, carrying them out efficiently and effectively.
- **Commitment:** Fulfilling our obligations

## GENERAL BEHAVIOURAL PRINCIPLES:

1. The users and their families are our *raison d'être*, which is why we are committed to providing quality care.
2. All the behaviour of those who make up the company must be in accordance with the principles and values of the institution.
3. Each of us must have a sense of belonging, commitment and loyalty to the company.
4. We must express responsibly and cordially what we consider to be against the principles and values of the company.
5. We must give the best of ourselves in our daily activities.
6. We must be consistent and transparent in all our actions, and be willing to collaborate, share and recognise the achievements of those who deserve it.
7. All our interpersonal relationships are framed in the philosophy of good treatment.







**»»» BASIC  
BEHAVIOURAL  
GUIDELINES «««**

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# BASIC BEHAVIOURAL GUIDELINES



## With work colleagues:

- In any kind of interaction we have with another person, respect must be maintained above all else.
- We must recognise the qualities and merits of others.
- All relationships should be framed in an atmosphere of dialogue and harmony with our co-workers.
- Take care of and make rational use of the institution's assets and resources.
- Know and adopt the institutional policies.
- Strengthen teamwork as a resource for conflict resolution.
- Promote permanent spaces for dialogue and communication.
- Make appropriate use of the institution's regular channels of authority.
- Focus affective relationships on the norms of social conduct and avoid overconfidence.
- In the company's social, recreational and cultural events, adopt an acceptable social behaviour.
- Social conduct should be a testimony to your personal life, rectitude and integrity.
- Irregularities to be reported to superiors should always be reported in writing.

## With clients:

- Customers should be clearly informed of their rights and duties, as well as ensure that they are respected and complied with.
- Provide the customer with clear, timely and reliable information.
- Put yourself in the customer's shoes and treat them as you would want to be treated.
- Maintain a positive and respectful attitude when listening to customers. Do not, under any circumstances, enter into conflict with customers, even if they are upset, listen to them and engage in dialogue without raising your voice.
- Remember that a very important part of your self-control is managing your emotions.
- Be cautious with client information and privacy.







## BASIC BEHAVIOURAL GUIDELINES



### **With suppliers of goods, services and supplies and commercial agents:**

- Do not accept bribes. This includes gifts, entertainment or any kind of handouts that may compromise your independence.
  - Avoid placing yourself in situations that create a conflict between your interests and those of the company.
  - Demand timely and quality delivery of supplies and inputs from your suppliers to ensure proper business activity.
  - The contracting of suppliers should conform to the rules and not to personal and/or political interests.
  - Maintain a cordial and respectful relationship with suppliers, never be intimidating or overconfident with them.
- Remember that this is a long-term business relationship.

### **With other companies in the sector:**

- Act to the limits of your level of competence and as far as your techniques allow.
- Maintain good relations with other companies in the sector.
- Refrain from making negative comments about your institution or your colleagues to other staff.







**»»» POLICIES THAT ENSURE  
COMPLIANCE WITH THE CODE  
OF CONDUCT <<<**

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## POLICIES THAT ENSURE COMPLIANCE WITH THE CODE OF CONDUCT



- The formal instances for settling any ethical conflict that may arise between employees of the institution, employees and users or between users themselves will be at the management level and in the spaces determined by this level.
- The regulation of the Code of Ethics and respect for it by employees and managers of the institution is a fundamental instrument for avoiding or resolving conflicts in particular situations.
- In the event of a breach of the principles of this code, any employee of the company must try to persuade his or her colleague to analyse and modify his or her unethical conduct. If this personal approach is rejected or if the offence is known to be repeated, it is the duty of the co-workers to inform the corresponding superior so that he/she can take the appropriate action, which will lead to correcting the errors committed through various sanctions, which can range from an educational role to, in serious cases, expulsion, as determined in the internal work regulations and the single disciplinary code.
- The company will have different levels which will ensure compliance with this code.

### These levels will be:

- 1- Self-control:** Each employee is responsible for compliance with the principles and concepts contained in this code.
- 2- Co-workers or users:** Orient your co-workers in a cordial and respectful manner when you consider that they are committing breaches of this code, and be willing to accept any suggestions they may make.
- 3- Your superiors:** When misconduct is considered serious or very serious, or occurs repeatedly, management will proceed with the appropriate investigations and sanctions.







## **POLICIES THAT ENSURE COMPLIANCE WITH THE CODE OF CONDUCT**



For company employees, policies for the prevention of aggressive behaviour will be those contained in the company's Code of Ethics.

For users, policies for the prevention of aggressive behaviour will be the fulfilment of their duties.

The following are the mechanisms through which compliance with these policies will be verified, and the company will respond in cases of abusive and aggressive behaviour:

### **For employees:**

Verification of their behaviour will be carried out through direct observation of their actions by users, co-workers and external persons and complaints affecting any aspect included in the Code of Ethics.

The response mechanisms in the event of abusive and aggressive behaviour will be the appropriate sanctions in each particular case depending on the seriousness of the matter.

### **For customers:**

Verification of their behaviour will be carried out through direct observation of their actions by employees, and communication of such to their superiors in the event of any type of aggression.

The response mechanisms in the event of abusive and aggressive behaviour by an external customer against an internal employee or another external employee will be handled in a polite manner and if the situation warrants it, it will be taken to higher instances such as the law.







# ETHICAL BUSINESS



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# ETHICAL BUSINESS



## Bribery and corruption

Bribery, like any other form of corruption, is harmful and illegal, and we should not engage in it in any form. Bribery means giving, offering, receiving or soliciting a corrupt or improper payment or advantage in exchange for something.

Examples of situations in which pressure to pay a bribe may arise:

- Winning or retaining a contract
- Obtaining a certificate or permit
- Securing payment of an invoice
- Avoiding a fine or penalty
- To clear goods through customs
- Gaining an advantage over a competitor

A bribe can take the form of money, gifts, access to entertainment, services, procurement, charitable donations, political contributions, preferential treatment or some other advantage. Making small extra payments to individuals for the performance of routine administrative or official tasks (also known as "facilitation" payments) are a form of bribery and are therefore also prohibited. There may be very rare exceptions, usually in emergency situations, where making such payments is necessary, for example, if the safety of an employee is at risk. If possible, seek advice before considering making such a payment, or, if not, report it immediately to an appropriate member of management.

Meals, hospitality and small gifts can be legitimate activities if done properly. However, they can be a form of bribery if they are excessive in value, inappropriate in nature, too frequent or intended to have an inappropriate influence on a business decision. All such activities must be conducted in accordance with the Gifts and Hospitality Policy and the Travel and Expenses Policy.







## ETHICAL BUSINESS



### Anti-corruption policies

*We are committed to acting lawfully, ethically and with integrity.  
The Anti-Corruption Policy establishes controls to ensure that our  
employees behave ethically and with integrity.*

ALANI HIGIENE PROFESIONAL S.L. has a zero tolerance approach to bribery, corruption and fraud. We are committed to acting professionally, fairly and with integrity in all our dealings and business relationships wherever we operate.

We are committed to implementing and enforcing effective systems to counter bribery, corruption and fraud.

This policy is established to help our employees identify which corrupt business practices are prohibited in their daily work to prevent corruption.

It describes acceptable and unacceptable behaviours to ensure that the work of ALANI HIGIENE PROFESIONAL S.L. is carried out in a socially responsible and ethical manner and in accordance with all applicable laws.

ALANI HIGIENE PROFESIONAL S.L. is committed to respecting all relevant laws to counter bribery, corruption and fraud in all jurisdictions in which we operate, including specific consideration of Spanish law and the Bribery Act 2010.

We maintain Integrity Registers where specific cases, as detailed in the policy, are recorded for transparency and monitorability.

This policy was approved by Anita Pereira, Deputy Chief Executive Officer of ALANI HIGIENE PROFESIONAL S.L. on 15 September 2019.







# ETHICAL BUSINESS



## Anti-corruption policies

### Legal framework

Bribery of natural or legal persons is regulated in Article 286-bis of the Spanish Penal Code.

### Definition of private bribery

As in the case of public bribery, the offence requires the act of offering, promising, giving, soliciting, accepting or receiving an unjustified benefit or advantage which, in this case, must be aimed at securing preferential treatment in the acquisition or sale of goods or in the contracting of professional services, in breach of the recipient's obligations.

### Consequences of private bribery

Article 286-bis of the Penal Code punishes this conduct with the following penalties: December 2010, fulfilling the mandate contained in Framework Decision 2003/568 /JHA to prevent acts intended to corrupt the management of the company in a manner similar to bribery.

#### A- For individuals

- Imprisonment (from six months to four years)
- A fine ranging from the value of the illicit benefit or advantage up to three times that value.
- Disqualification from the right to engage in industrial or commercial activity (from one year to six years).







# ETHICAL BUSINESS



## Anti-corruption policies

B- For legal entities

- Daily fine of up to five years (see first bullet point in Section 1.4 (b)).
- Publication of the court decision in the relevant official gazettes and, if requested by the victims, in general newspapers.
- Dissolution of the legal person
- Suspension of the activity of the legal person for up to five years
- Closure of the legal person's premises for up to five years
- Temporary (up to 15 years) or indefinite prohibition to carry out the activities that have made the commission of the offence possible.
- Prohibition for up to 15 years to benefit from public aid, to enter into contracts with the public sector or to benefit from tax and social security incentives or benefits.
- Unlimited judicial intervention of all or part of the legal person's activities to protect the interest of the public in general and of the legal person's employees in particular

## Limitation applicable to hospitality expenses (gifts, travel, meals, entertainment, etc.)

The Criminal Code does not establish quantitative or qualitative limitations on hospitality expenses. Case law has established two criteria to determine whether a hospitality payment could be considered a private bribe:

- The hospitality offered or received is not "socially acceptable".
- The hospitality offered or received could affect the recipient's judgement. Whether a hospitality expense could be considered a bribe should be determined on a case-by-case basis, taking into account all the facts and circumstances surrounding the case and applying the two criteria mentioned above.







# ETHICAL BUSINESS



## Competition and antitrust

It is critical to our success to compete and win new contracts. However, Alani expects all of its businesses to compete in the marketplace in a manner that is legal and ethical and allows for healthy competition. Most countries have laws prohibiting anti-competitive behaviour, which regulate dealings between competitors, customers, suppliers and distributors. Generally, this means that we cannot engage in behaviour that may restrict competition and/or distort the market, such as price fixing, market sharing and bid rigging with competitors.

If your business is a market leader or has a large market share, it may be considered to have a dominant market position in which case even stricter provisions would likely apply to prevent your business from abusing its position, such as aggressively trying to drive competitors out of the market.

These laws vary from country to country and in some countries, such as the US and the EU, they may apply even when the situation occurs outside the relevant territory. Penalties for violation of competition law can be severe and could expose Alani, and even employees, to:

- Significant civil and criminal penalties, including heavy fines and prison sentences.
- Investigations and legal proceedings.
- Reputational damage and loss of business.







## ETHICAL BUSINESS



### **Communications, accounts and reliable records**

This applies to all information relevant to our business, including our annual report, monthly management accounts, sales figures, contracts and personal expense claims, as well as non-financial information such as health and safety reports and supplier audits.

Our financial and accounting records are relied upon by our management team, senior management, investors and society to make informed decisions about our business and may also be provided to regulatory and governmental authorities. We must comply with all applicable laws, regulations and accounting standards and ensure that the financial information we issue provides a true and fair view of our business and is not in any way misleading. Revenue and profit figures must be accurate and recognised in the correct period.

All contracts with customers and suppliers must be properly documented and correctly recorded in the relevant contract management system.

All business expenses must be accurately recorded and documented. If an employee is unsure whether an expense is legitimate, he or she should report it to his or her manager.





»» PEOPLE CARE «««

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# PEOPLE CARE



## Health and Safety

Our employees, their families and customers rely on this commitment. Health and safety will always be our top priority and cannot be compromised in any way.

Our health and safety policy requires all activities to implement an effective management system to protect the health and safety of our employees, our customers and anyone else who may be affected by our work activities. We are committed to ensuring that:

- Our management provides visible leadership in this area and engages with employees to promote safe behaviours, creating a strong safety culture.
- Employees have the training and tools to enable them to do their jobs safely and are empowered to make the right decisions about their safety, the first time and every time.
- All health and safety risks are understood, assessed and controlled by adopting best practice in all our work procedures.
- Health and safety performance is regularly monitored, reviewed and publicly communicated.
- We act on what we learn to continually improve our health and safety performance.

Accidents are inevitable and we are committed to preventing them. To this end, operational management encompasses a full range of measures to protect people, the most significant of which are our Golden Rules for Health and Safety. These rules cover the main areas where we are putting ourselves most at risk and spell out clearly what we all need to know and do to keep our employees, our customers and ourselves safe.

Health and safety is everyone's responsibility! Therefore, all employees must take responsibility for their own health and safety and that of others affected by their work and the decisions they make, follow safe work practices and cooperate fully with their superiors on any health and safety matters.







## PEOPLE CARE



### Equality and Equity

Alani is committed to treating employees and all individuals with dignity and respect, and to complying with all applicable labour laws and regulations, ensuring a discrimination-free environment for all. The company's values promote a culture in which mutual respect and individual growth are key ingredients of our success.

It is illegal and always contrary to this Code to treat unfavourably or engage in any conduct that adversely affects another employee (such as disciplinary action, denial of promotion, influencing pay or working conditions) or harassment on the basis of gender, age, race, skin colour, ethnic or national origin, trade union membership, marital status, pregnancy, disability, religion, sexual orientation or any other discrimination as defined by applicable law.

Alani will not tolerate attitudes that may be considered threatening, hostile or verbally or physically offensive and will take appropriate disciplinary action if they occur.

#### Examples of harassment may include:

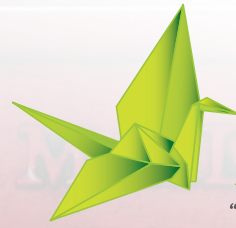
- Use of offensive nicknames, language or gestures.
- Unwanted and inappropriate jokes, taunts or teasing
- Dissemination of e-mails, or images with offensive content
- Threatening or physically intimidating someone
- Excluding others from conversations or social events

#### Examples of sexual harassment may include:

- Unwanted advances, propositions or flirting
- Unwanted physical contact or looks
- Inappropriate comments about a person's appearance, including their dress or physique.
- Indecent or suggestive remarks, questions, gestures, language, stories or jokes
- Sharing inappropriate images or videos







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**ANONYMOUS BOX**







## ANONYMOUS BOX



### *Complaints procedure.*

Alani makes available to workers, clients, suppliers and the community in general, two ways so that people can make their complaints safely or reliably.

1. Via email: [info@alani.es](mailto:info@alani.es)
2. Through the website in the "contact us" section

In these 2 ways, all internal and external people will be able to make any complaint, report or observation confidentially.





»»» ENVIRONMENTAL POLICY «««

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## ENVIRONMENTAL POLICY



The safety of its employees, the environment and the communities in which the company operates is ALANI SL's first priority. The company will provide a safe and healthy working environment for all employees, and operates its facilities in a manner that protects the safety of its neighbours.

Environmental protection is the responsibility of all ALANI SL employees.

The company works to effectively control the environmental impact of its operations, and strives to continuously improve its environmental performance and practice of sustainable growth.

ALANI SL works to make its products safe for customers, consumers and employees and to effectively control its environmental impact. The company works with its suppliers and customers to address environmental issues of mutual concern.

ALANI SL conducts its activities in accordance with the highest standards of corporate best practice and in full compliance with all applicable regulatory requirements.

ALANI SL is committed to the sustainable development of its business, taking all economic, environmental and social issues into consideration.

ALANI SL is committed to transparency and open communication about its environmental and social practices. It seeks dialogue with stakeholders in order to contribute to the development of global best practices.

ALANI SL requires the same commitment to transparency and open communication from its suppliers and subcontractors.

ALANI SL continually reviews and questions its objectives and targets in order to reduce its overall impact on the environment.







**»»» CORPORATE SOCIAL  
RESPONSIBILITY «««**

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# CORPORATE SOCIAL RESPONSIBILITY



## Sustainability

We are committed to continually improving our performance to minimise the environmental impact of our operations. Protecting the environment, conserving resources and preventing harmful impacts such as pollution is fundamental to the success of our business and, specifically, to delivering operational excellence and excellent customer service.

We will provide leadership, direction and support to ensure that:  
The environmental impact of all our activities is identified, assessed and controlled by adopting best practice in all our work procedures.  
Colleagues have the tools and training to meet our environmental commitments.

Environmental performance targets related to greenhouse gas emissions, water use reduction and waste production are set, measured and publicly reported where they are significant in our operations.

As we develop products and services and improve existing ones, we will seek to further limit their environmental impact.

We are committed to establishing consistent environmental management procedures throughout the organisation with common key performance indicators and effective management systems. All companies are required to communicate to colleagues their own environmental policy statement reflecting this group policy and describing the arrangements and organisation in place to ensure compliance with applicable environmental legislation, group environmental management requirements and the environmental requirements of our customers.

We will support our colleagues to take ownership of the environmental impact of their work, listen to their feedback and act on what they tell us.







# CORPORATE SOCIAL RESPONSIBILITY



## Integrity

In all our business operations we recognise that trust and integrity are essential qualities. We strive not only to build this with our customers and suppliers as a company, but also at all levels of our daily interaction as individuals.

The most effective way to earn and maintain people's trust is the way Alani does it! Comply with our own policies and standards and conduct ourselves in accordance with our own Code of Conduct. Provide a level of service to our customers that continually exceeds their expectations. Doing business with integrity and valuing our customers and suppliers alike.

Integrity, for ALANI, means fulfilling our responsibilities in accordance with the values embodied in the ALANI Way. It means that we are accountable for our actions as individuals and the effect we have on our customers, our suppliers, our colleagues and ALANI as an organisation.

- **The Law:** We comply fully with all laws and regulations that relate to our activities in all countries in which we operate. Having high levels of integrity in business has implications in a number of different areas.
- **Confidentiality:** All information is considered confidential unless it is freely and publicly available.
- **Deliberate intent to mislead:** Without exception, we do not engage in or assist in any activity that is fraudulent or designed to mislead.







# CORPORATE SOCIAL RESPONSIBILITY



## Equality

ALANI is about the individual and never imposes any restrictions on people's ability to develop their full potential or contribute to the success of the company. This is a fundamental core value.

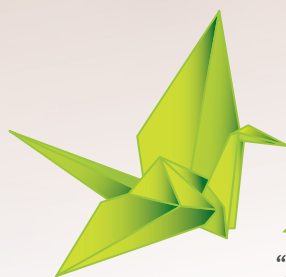
## Anti-corruption and bribery

Our policy is to conduct all our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery.

As part of our approach, we do not make or receive contributions of any kind for the purpose of gaining any business advantage or provide gifts or hospitality with the intention of persuading anyone to act improperly.







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