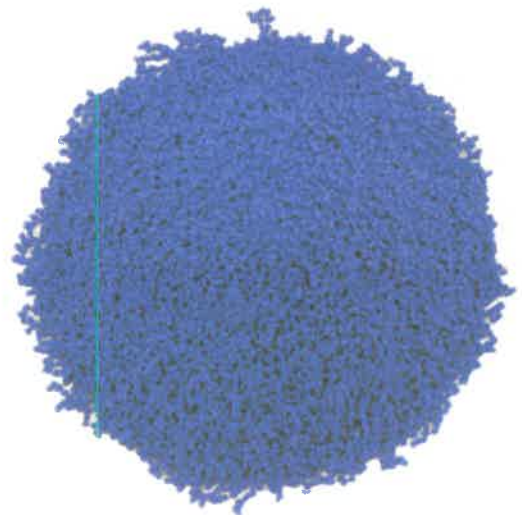


Code of Ethics





Importance of this Code of Ethics

DELTA TECNIC's Code of Ethics is the backbone of the company's ethical culture, the **basic and mandatory standard** designed to establish our Organisation's corporate principles and ethical values, so as to promote the utmost rigour in compliance with our legal obligations and undertakings in the conduct of our business.

The ethical values and principles set forth in this Code must be observed at all times and without exception by every member of the Organisation, including workers, managers and its board of directors, irrespective of where they are working, their position in the Organisation or the legal nature of their relationship with DELTA TECNIC.

DELTA TECNIC also requires its business partners such as distributors, agents and suppliers, and generally anyone dealing with **DELTA TECNIC**, to follow conduct consistent with the principles and values set out in this Code.

Ethical behaviour must be the responsibility of ALL.





Forward

DELTA TECNIC (hereinafter either “DELTA TECNIC” or “the Organisation”) is a Catalan chemical company devoted to the production of colour concentrates and their distribution to more than 50 countries around the world. Since 1982 DELTA TECNIC has been firmly committed to quality of service and technological innovation in its products, thereby safeguarding its greatest asset: its customers.



Our challenge is to keep growing while offering innovative solutions incorporating new technologies driven by the needs of the market, achieving all of our aims with honesty and commitment to the values and principles that have always prevailed and will continue to prevail in DELTA TECNIC, and which we now set out in this Code of Ethics (hereinafter also the “Code”).



DELTA TECNIC's ethical principles and values

- Respect for ethical culture and good corporate governance
- Diligence, objectivity, transparency and honesty in all of our decisions and all of our activities
- Zero tolerance of any regulatory non-compliance, with total rejection of any practices regarded as corrupt or fraudulent and total respect for the law in the territories where DELTA TECNIC operates as well as for the company's internal standards
- Fair and effective competition with all parties with which the Organisation has dealings, so as to promote true fair play in the marketplace
- Establishment of safety measures to protect our workers
- Respect and defence of human rights and civil liberties
- Sustainable growth, wholly respecting the environment
- Social responsibility and commitment
- Satisfying our customers, seeking to understand their organisations so that we may better meet their needs, with open communication and well-motivated and committed staff
- Seeking excellence in our products and services, with thorough checks to ensure that they meet the highest standards of quality
- Innovation as a driving force of our technologies, driven in turn by market needs
- Protection of proprietary and third-party confidential information and know-how
- Respect and observance of this Code and other internal and external standards applicable to the Organisation, along with professional ethics and good faith in trading relationships

Commitments

1. Commitment to ethical culture and regulatory compliance

The Organisation's commitment to ethical culture is reflected in the everyday dealings that all **DELTA TECNIC** professionals have with their professional environment, assuring compliance with the principles and values governing this Code as well as with other internal and external standards applicable to the Organisation, and with the establishment of mechanisms to ensure compliance with applicable legislation and standards wherever they may be working.

Moreover, for that aim to be achieved, business partners and third parties dealing with **DELTA TECNIC** also need to share the values and principles underlying the Organisation's business, i.e. not just being familiar with them but also acting in accordance with them.

For these reasons, **DELTA TECNIC** provides its professionals with training as a vital part of the need for them to be aware of ethical culture, so as to instruct them regarding instruments for preventing, detecting and managing compliance risks liable to cause financial, legal or reputational harm to **DELTA TECNIC**.

The commitment to ethical culture and regulatory compliance depends not only on **DELTA TECNIC**'s board of directors and top management, whose task it is to promote and spearhead it, but also on each and every employee acting on behalf of the Organisation in the professional decisions that they make.



3. Management of conflicts of interest

When taking any decisions in the course of our professional activities, private interests may cause us to cease to act legally, objectively, transparently and fairly vis-à-vis **DELTA TECNIC**, allowing personal interests to come into conflict with those of the Organisation.

At **DELTA TECNIC** we believe it is essential to avoid conflict-of-interest situations, as such situations may entail a loss of objectivity in decision-making with the resulting risk of corrupt or fraudulent practices.

For this reason, the principle to follow in the event of a conflict of interest, before any decision is taken, is that the situation should be immediately reported to **DELTA TECNIC**, and the person concerned should refrain from taking any steps in relation to the matter involved.



On deciding upon the selection of a new supplier, where there is a family relationship or friendship, this must be reported and the person concerned must take no part in the decision. Our processes follow objective and technical criteria based on merit.




2. Zero tolerance of corruption

Corrupt practices, whether in the public or the private sector, are detrimental to free competition and market development, increase the cost of goods, introduce uncertainty into trade transactions and reduce the quality of products and services, spoiling trust in the proper and efficient working of markets, among other things.

For all these reasons, and the adverse consequences of any corrupt act committed within the Organisation, **DELTA TECNIC** undertakes at all times to act according to the principle of zero tolerance of illegality and corruption, rejecting and expressly condemning all kinds of bribes or trading in influence, along with any other practices regarded as corrupt or fraudulent.

The Organisation accordingly undertakes to comply with the highest ethical standards as well as with any laws and regulations applicable to its business, irrespective of where it is conducted.

DELTA TECNIC expressly forbids any conduct consisting of offering, promising, delivering, requesting, receiving and/or accepting, for the benefit of the Organisation or that of third parties, cash payments, gifts, commissions or any other undue benefits or rewards with a view to bribing public officials or authorities, or to unduly favouring another party in the purchase or sale of goods, procurement of services or trading relationships, as regards natural or legal persons, whether public or private.



Offering to hire an unemployed family member of a supplier in exchange for getting better terms for DELTA TECNIC from that supplier is an example of private-to-private corruption



5. Dealings with our business partners

Our track record shows that we are a company that has promoted respect, professional responsibility, transparency and honesty in our dealings with our business partners.

Our information is transparent and objective, avoiding ambiguous or equivocal expressions, so as to advertise and promote our products truthfully and accurately, and we do not tolerate fraudulent practices such as misleading advertising.

We are committed to applying internal procedures for selection, approval and quality monitoring of suppliers based on criteria of quality, capacity, sustainability and regulatory compliance. We act according to the principles of impartiality, objectivity, transparency and equal treatment, and all company decisions must be taken free of conflicts of interest.

6. Respect for our professionals

One of DELTA TECNIC's main assets is its professionals; we are concerned about their working environment, their social security and, above all, their rights.

In its relationships with professionals, DELTA TECNIC encourages diversity and decent treatment; we do not tolerate differing or discriminatory treatment on grounds of age, sex, ideology, race or religion, or any discourse with connotations of harassment or abuse of authority.

We encourage equal opportunities and personal and professional development with criteria of merit, aptitude and ability in staff recruitment and promotion processes, with the utmost transparency and objectivity.

We are committed to work-life balance and comply with workplace health and safety regulations, training our professionals and adopting the legally required health and safety measures.

Our professionals have all the tangible and intangible items required for the performance of their work at their disposal, and are expected to use them professionally, lawfully and responsibly, and are forbidden to use those items for any fraudulent or unlawful behaviour.



4. Competition on the marketplace

As a tangible example of integrity and ethics, in order to promote true fair play on the marketplace, **DELTA TECNIC** regards effective, fair and honest competition in all of its trading relationships with third parties, and in its interaction with the market generally, as one of its key values.

Consequently it rejects any unlawful conduct that may be contrary to fair competition or to good faith and that is liable to involve any restriction of free competition by persons linked to the Organisation in their dealings with third parties.

Any infringement of antitrust laws, such as agreements to fix prices or allocate markets, territories or customers made with competitors, among other restrictive practices, may cause serious harm to the Organisation and to the market generally, and spoil our corporate reputation.



An agreement with a competitor by any representative of the Organisation within a sectoral association as to respective price strategies or cost structures is a restrictive practice

7. Human rights and civil liberties

In order to ensure ethical conduct in its business, **DELTA TECNIC** undertakes to abide by the **Ten Principles of the United Nations Global Compact**, being responsible, on one hand, for supporting and protecting internationally enshrined human rights and, on the other, for taking measures to ensure that it is not complicit in any breach of those rights.

8. Respect for the environment

DELTA TECNIC carries on its business within a commitment to the environment, rigorously adhering to environmental protection, conservation and improvement, with the aim of passing a sustainable planet on to future generations.

For all these reasons, **DELTA TECNIC**:

- ❖ Implements protective measures helping to meet this aim by means, for example, of the adoption of an environmental management system in accordance with international standards
- ❖ Promotes initiatives favouring greater environmental responsibility
- ❖ Encourages the development and dissemination of environmentally friendly technologies

All of **DELTA TECNIC**'s business complies at all times with applicable environmental regulations.



9. Protection of confidential information

Confidential information and **know-how** constitute one of the main assets of any organisation. Accordingly **DELTA TECNIC** is firmly committed to the confidential processing of information, whether its own or that of third parties.

Confidential information is taken to mean information that is not in the public domain, i.e. to which access is restricted to a certain number of people and has a competitive or market value and over which **DELTA TECNIC** has adopted suitable protective measures to prevent any unauthorised access, distribution or disclosure.

It is essential for anyone who has access to **DELTA TECNIC**'s information to observe a strict duty of confidentiality in respect of such information, as its dissemination or use could involve irreversible damage to the Organisation, harming the corporate interests.

Our business involves the processing of the personal data of customers, suppliers, professionals and others. In this processing we comply with applicable regulations on personal data protection. We have a privacy and personal data protection policy on the basis of which we undertake to safeguard data subjects' rights and entitlements.



Examples of confidential information, belonging to DELTA TECNIC or a third party, are strategies, innovation and development plans or working procedures and methods



Whistleblowing and query channel

In order to encourage a culture of compliance in the Organisation, **DELTA TECNIC** provides a communication channel so that either members of the Organisation or third parties may escalate any queries, conflicts, signs of irregularity, infringements or offences or non-compliance or risk of non-compliance with the this Code of Ethics and/or any internal standards implementing or supplementing it.

Any communications made via this channel will be received and handled diligently and respectfully by the regulatory compliance panel, acting at all times in keeping with the internal procedure provided for the purpose and with the relevant internal and external standards.

DELTA TECNIC strictly guarantees the confidentiality of communications made in good faith on the basis of prima facie proof, and forbids any kind of reprisal, as well as requiring respect for data protection regulations.

DELTA TECNIC's default communication channels are:



<https://DELTA TECNICtecnic.ethics-fortunylegal.com>



Rec Molí de les Planes, s / n, (08740), Sant Celoni, Barcelona, Spain

The regulatory compliance panel may also be contacted by phone, at face-to-face meetings or by any other means of communication authorised for the purpose.





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Handwritten signature



info@delatecnic.com



DELTATECNIC

The regulatory compliance panel may also be contacted by phone at 902 10 10 10