
Code of Conduct

RMDGROUP

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CAPSULES

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COIFFES
& MUSELETS

 **Inspiral**
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1. Introduction



1.1. Purpose



Ramondin's code of conduct is, within the current context of Corporate Governance and Corporate Social Responsibility (CSR), the development and the formal expression of the values and principles that should govern the conduct of all companies taking part in the Ramondin Group (RG) and those subject to it in the performance of their functions and their working relations, trade and professional, in order to consolidate a business ethics universally accepted.

The commitment of the CCR is understood without prejudicing the strict compliance with the current law and common practices. in the place where they

develop their activity. This lay establishes a standard and a necessary budget of this Code. In no case will the compliance of the CCR involve a breach of the existing legal obligations.

The affected people will:

- **Current Law**

Respect the current law of the country in which they realise their activity, taking into account the spirit and purpose of it.

- **Ethical Behavior**

Avoid conducts that, without violating the laws of the country in which they pursue their activity, they conflict with the values, principles and ethical behaviors set out in this Code of Conduct.

- **Ethical Professional Conduct**

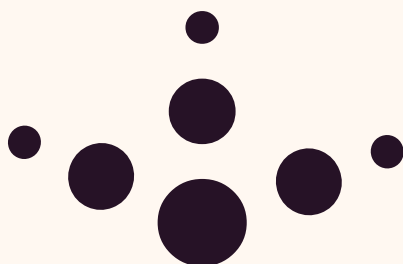
Performance of an ethical professional conduct: The affected people will assume a firm commitment to act according to their

responsibility to maintain, at any time, an optimal level of quality in all aspects of their professional activities to contribute to the profitability of the company's business and maximize therefore its value for the groups of interest.

Senior management issues this Code of Conduct, which, specific and consistent with the values of the organization, is made available for the groups of interest, defining channels for solving questions, suggestions or complaints, establishing punitive measures in case of non-compliance.

Senior management establishes the mechanisms facilitating the development, review, understanding and compliance of this code.

1.2. Subjective Scope Of Application



The Code of Conduct is intended and links:

- The members of the management board of the companies comprising the RG.
- Employees of the companies comprising Ramondin, whatever it is the type of contract to determine their links, hierarchical position or the place where they perform their provision.

1.3. Fulfillment

- The affected people (AP) are required to comply with the Code of Conduct, with respect for the values and principles contained therein and to follow the established guidelines of ethical behavior.

- Non-compliance could result in the commission of the offenses set out in the legal, corporate and labor regulations. (Paragraph 5 of this Code).

- Members of the management board, senior executives and RG executives will make their best to accomplish and make Ramondin's employees accomplish what is set out in this Code of Conduct.

- In the same way will Ramondin promote socially responsible actions among investee companies in which it doesn't exercise effective control and, through recruitment and selection processes among its customers, suppliers and definitely, organizations and corporate partners as well, according to the terms provided in this Code and its implementing provisions.

1.4. Communication and Dissemination

Ramondin will communicate and disseminate the Code of Conduct among the affected people by the deliverance of a copy of it, the company's Web site or any other means determined by the Board of Directors.

2. Principles, Mission, Vision And Values



2.1. Principle of Corporate Social Responsibility

CSR principles represent the ethical values and basic principles of Ramondin's conduct:

1. Sustainable Development

Grow social, cultural and economically respecting the environment as a whole and in a aspects, as well as ethically satisfying the needs of the present generation without romising future ones to meet their own needs ethically.

2 Respect for Human Rights and Civil Liberties

Ramondin is committed to implement the contents of the Global Compact of the United Nations which formally it joined in February 2013, with the preservation of the natural environment in which it operates

and the collaboration in the development and wellbeing of communities with which it is related.

Ramondin actively promotes these commitments between the affected people, respecting the minimum international standards for the protection of the fundamental rights and freedoms of those affected by their activities and, in particular, the UN Norms on the Responsibilities of Transnational Corporations and other commercial enterprises in the field of Human Rights, the OECD Guidelines and the ILO Tripartite Declaration of Principles concerning multinational Enterprises and social Policy of the International Labour Organization, as well as avoiding complicity in the violation of human rights, adopting complementary international standards where the legal framework is not adequate.

3. Labor Rights

Ramondin will promote and materialize the right of workers to freedom of association and affiliation and the effective right to collective bargaining, also working for the elimination of forced or compulsory labor, child labor and any other form of coerced labor.

Ramondin prohibits any form of harassment or physical abuse, sexual, psychological or verbal, by or towards its employees and any other conduct that may give rise to an intimidating, offensive or hostile workplace.

The company has defined a harassment protocol to apply in order to manage a possible similar situation.



4. Corruption and Bribery

Ramondin is opposed to influence the will of the people in order to get any profit by using unethical practices. It does neither allow other people or entities to use these practices with those affected.

The affected people should not accept or make, directly or indirectly, any payment, gift or compensation of any kind which are not considered characteristic of the normal course of the business, to try to improperly influence in their commercial, professional or administrative relations.

When a situation is doubtful, those affected should inform or make inquiry through the superior responsible or Compliance Unit. Ramondin sets the appropriate procedure for the prevention, monitoring and, when appropriate, the sanction of the conduct constituting corruption and bribery through the Compliance Unit.

5. Conflicts of Interest

The affected people should avoid every situation which could turn into a conflict of interests and abstain from influencing or intervening in decisions of those situations that directly or indirectly, up to a second-degree relative in the direct line or of consanguinity (professional and / or family), could have a personal interest, see the "Protocol of Relatives' incorporation to Ramondin" in paragraph 3.2. Before any potential conflict of interest, the affected people should inform Ramondin through the superior responsible or through the Compliance Unit.

6. Safety and Health at Work

Ramondin promotes an adequate health and safety policy at work and takes preventive measures to ensure the compliance of the regulations in force in each country. It is an aim of this policy the commitment to continuous improvement in order to strengthen the observance of international standards and practices guided by a criteria of excellence.

The affected people must know and follow the rules of protection of health and safety at work and ensure, within the scope of their duties, the safety of themselves, other employees, customers, suppliers, employees and generally all people who may be affected by the developmental activities of Ramondin, in the terms established by the law.

7. Environmental care

The preservation of the environment is one of the basic principles and aims of Ramondin, guaranteed by the adoption of an appropriate environmental policy and the implementation of an environmental management system.

The affected people must, within the scope of their duties, know and accept this policy and act at all times in accordance with the sustainability criteria and that inspired respect, adopt habits and behaviors related to good environmental practices and contribute positive and effectively to the achievement of the objectives set, struggling to minimize the environmental impact derived from its activities and the use of facilities, equipment and means of work available to them, ensuring an efficient use of the former.

Ramondin supports the research of technologies which are friendly with the environment, requiring their suppliers, contractors and collaborators an environmental behavior which fits the very principles of the Corporate Social Responsibility. Ramondin encourages information and training in this environmental management to all the groups of interest of the organization.

8. Technological Heritage

Ramondin considers the information and technological knowledge as one of its main assets, which otherwise is essential for leadership, so that it should be given special protection. In this sense, Ramondin performs all actions needed in the countries where it operates, in order to protect it.

In the same way, Ramondin also performs actions opposed to applications or industrial or intellectual property rights from third parties which it considers necessary in defense of its technological or intellectual heritage.

Ramondin is responsible for the originality of their own designs and its template has forbidden the use of elements of intellectual property to third parties without the

Ramondin's record that it has the rights and / or licenses.

The affected people will protect and take care of the information and technological knowledge that is accessible, not making more use than necessary for the proper performance of their duties in a responsible, efficient and appropriate way to his business environment, respecting the current authorizing procedures for publication.

Additionally, the affected people should protect and preserve the information and technological knowledge of any inappropriate use of harm arising to Ramondin interests, communicating the violation of the intellectual or industrial property from which is owner through the responsible superior.

9. Cooperation and Collaboration

Ramondin encourages an environment of teamwork and cooperation with all the groups of interest, to take better advantage of all the capabilities and resources.

10. Right to Privacy

Ramondin guarantees the right to privacy and privacy of all the groups of interest, in the terms stipulated in the laws, protecting their personal data and agreeing not to disclose unless consent of the parties or in cases of legal obligation or compliance of judicial or administrative decisions.

Ramondin, in particular, respects the privacy in the use of information technologies and provides its employees with the means to carry out their work following the manual governing the use of computers in Ramondin. However Ramondin reserves the right to revise, without notice: email, internet sessions, the usual connection to the network of the worker, etc., to ensure that the integrity of Ramondin is not put into risk, or engage in illegal actions that violate the moral or involve the distribution of protected material by intellectual property.

Ramondin also follows the current legislation on data protection trusted by their customers,

suppliers, shareholders, candidate selection processes or others, agreeing not to disclose unless consent of the parties and except in cases of legal obligation or judicial or administrative decisions.

11. Information Processing and Confidentiality

Ramondin considers the information and knowledge as one of its main and essential assets for business management, so they should be given special protection.

Ramondin's information or entrusted to it will, in general, be considered privileged and confidential information.

12. Image and Reputation

Ramondin considers its image and corporate reputation as one of its most valuable assets to preserve the trust of its shareholders, employees, customers, suppliers, authorities, and society in general

The affected people must take the utmost care to preserve the image and reputation of the company in all its professional activities.

Public interventions and / or with the media, participation in professional conferences or seminars and any other event that may have a public release by the affected people, whenever they appear in Ramondin's representation, should follow the procedure set with this purpose.

2.2. Mission

- We are dedicated to the design, manufacture, marketing and proper application of technical products with high added value, for the sealing and image of bottles of wine, spirits, champagne, etc.
- We work on respect and transparency, with a vocational view to meet customer needs, focusing our efforts on creating value as a company.

2.3. Vision

- Having sustained growth through market development and product innovation, related to key business processes.
- Getting Ramondin be a role model for doing things right, being an absolute guarantee provider.
- Being a world reference in the sector of capsules and regional reference business model.

2.4. Corporate Values

Deep Pride of Belonging

- We are proud to work in Ramondin, our products and our customers.
- Ramondin works to build strong and enduring relationships with its groups of interest (employees, customers, suppliers, shareholders, society, etc.) and, thus, forging a sense of belonging to a great company in which they take part and a project project with which they feel involved.

Personal Commitment to the company

- Ramondin is "our company".
- We feel part of the business plan.
- We strongly protect our "know-how".
- We act with loyalty to the company. We dedicate ourselves to work.
- We act with responsibility, taking into account the impact of our actions.
- We are appreciated personally and professionally.

Customer Service

- We try to anticipate customer needs to satisfy them better.

- We are at the client service, with availability.
- We strive and we are aware of a job well done.

Teamwork

- We work with team spirit.
- We generously share knowledge, successes and goals.
- We listen

Mutual Respect and Trust

- Our actions lay on respect for human values
- We act with autonomy in decision-making
- We are honest and transparent, skills we show as well.

Constant Overcoming

- We focus on improvement at all levels
- We are keen on changing and continuously improving
- We assume mistakes, learning from them, doing the contrary with negligence.



3. General Rules of Professional Conduct



Ramondin’s code of conduct sets conduct standards to be observed by affected people in relation to the following areas:

3.1.1. Relationship with The Groups of Interest

3.1.1. Relationship among people from Ramondin

The management model and therefore Ramondin’s work processes are designed to ensure the compliance of the principles of Corporate Responsibility in this document, ensuring as well the following commitments to the people of Ramondin:

Proper Treatment

Make sure that the treatment towards people is based on respect for the dignity, polite and

respectful. Do not use mental or physical coercion, verbal abuse or maltreatment.

Freedom of Opinion

Facilitate the right of the People to keep and freely presenting their ideas, beliefs, or opinions, and never impede their expression if they don’t disreep with the entity’s activites.

Employment

Creation and job security through the development of the company management and the investment needed for the project.

Professional Development

Professional Development, through comprehensive training in every job, continuing vocational training of all persons of Ramondin, and an equitable management of promotions.



Everyone has a value in itself

Nondiscrimination

Ensure equal opportunity and treatment regardless of race, color, sex, religion, political opinion, nationality, social origin or other distinguishing characteristics. Do not make injustices or comparative grievances when hiring, promotion, evaluation, compensation, training, information, participation, termination, dismissal or retirement.

Freedom of Religion, Politics and Civic Life

Respect the right to religious freedom, including the right of assembly and the right to keep practices of worship and observance, as well as the exercise of political and civil rights.

Fair Wage

Fair and decently paying people for their work, meeting the current legal requirements and ensuring a decent living for them and their families.

Attention

Playing host programs, integration and removal.

Reconciling Work and Family Life

Ramondin is aware of the importance of self-development, promoting family reconciliation policies that facilitate the necessary balance between professional and personal life of the affected people.

Consistency with these commitments

Information

Providing everyone with the timely, complete, clear and understandable information they need about Ramondin, the workplace and labor relations, as well as conditions, rights and duties.

Teamwork

Teamwork among people of the same or different job profiles, based on the union and empathy of the members, working in order to achieve shared goals in a cooperative and coordinated way.

3.1.2. Relationship with Shareholders

The management model and therefore Ramondin's work processes are designed to ensure the compliance of the principles of Corporate Responsibility in this document, ensuring as well the following commitments to the shareholders of Ramondin:

Social and Economic Balances

Developping and publicizing the various representatives generally from Ramondin's property, the annual social and economic question.

Representation and Government

Respect towards the rights of the shareholders, in terms of representation, voting rights,

participation in government bodies,
information, etc.

Information

Timely, complete, true and transparent about
the situation and main proceedings as well as
the operating results, social and economic.

Continuous value creation

Continuous value creation, and therefore
conserve, protect and enhance the assets,
rights and interests of the shareholders
respecting the assumed commitments.

As regards the incorporation of relatives to the com-
pany, it shall be subject to the “Protocol of Relatives’
incorporation to Ramondin” in paragraph 3.2.

3.1.3. Customer Relations

The management model and therefore Ramondin’s
work processes are designed to ensure the complian-
ce of the principles of Corporate Responsibility in
this document, ensuring as well the following com-
mitments to the customers of Ramondin:

Promotions and Advertising

Do not use in the marketing of products
or services, promotions or misleading
advertising nor any which may incite illegal,
unethical or dangerous conduct.

Information

Provide clear, understandable, truthful,
complete and detailed information for clients.

Customer Attention

Practicing an exquisite treatment with Clients,
based on education, kindness, sympathy, etc...
Collect their suggestions, complaints, claims,
returns and treat them appropriately.

Conflict

Enhance the resolution of potential conflicts
either by way of mediation, arbitration or similar.

Design and Production

Design and production of safe products.

Hiring

Ethically negotiate the terms of contracts,
with no deception or manipulation, providing
budgets of goods and services when needed,
as well as receipts or invoices of the goods or
services supplied.

Enforcing Contracts

Comply with contracts or agreements in
performance, quality, time, price, warranty,
customer service and other conditions.

Sales

Comply with whatever legitimate practice and
with no abuse of dominant positions, artificial
alteration of the features, or the price of goods
or services offered.

3.1.4. Relationship with Suppliers, Contractors and Partners

Ramondin aims to promote with its suppliers, con-
tractors and partners relationships based on trust,
transparency of information and the sharing of
knowledge, experience, skills and values.

The management model and therefore Ramondin’s
work processes are designed to ensure the complian-
ce of the principles of Corporate Responsibility in
this document, ensuring as well the following com-
mitments to the suppliers of Ramondin:

Conduct

Encourage and, as far as possible, ensure the
establishment of an accountability system for
their suppliers.

Approval

Purchase products and services from solvent
suppliers, approved or accepted on the basis



of established criteria, according to those set forth herein.

Information

Provide clear, understandable, accurate, and detailed information.

Agreements

Formalize agreements of the parties through contracts or agreements, written documents.

Conflict

Enhance the resolution of potential conflicts to be resolved by ways of mediation, arbitration or similar.

Hiring

Ethically negotiate the terms of contracts or agreements, with no deception or manipulation, requesting budgets of goods or services when needed. Relations between Ramondin and their suppliers should be mutually beneficial, free and respectful at all times, without exercising or enforcing dominant actions.

Enforcing contracts

Strictly comply with all the conditions agreed in the contracts or orders.

Payments

Making payments on time, without imposing deferrals or delays, exerting dominance, which would impose an implicit funding of Ramondin against the Providers.

3.1.5. Relationship with Competitors

The management model and therefore Ramondin's work processes are designed to ensure the compliance of the principles of Corporate Responsibility in this document, ensuring as well the following commitments to the competitors of Ramondin:

Truth

Do not spread false information, manipulated or biased about competitors, seeking his discredit.

Respect

Respect towards the competitors recognizing their rights, merits and efforts for fighting for their competitiveness, survival and development.

Information

Get information of competitors only through lawful ways.

Cleaning

No abusive conduct of unfair competition. Ramondin agrees to compete fairly, encouraging free competition, with full respect of current regulations and avoiding any conduct which constitutes collusion, abuse or restriction of it.

3.1.6. Relationship with Public Authorities

The management model and therefore Ramondin's work processes are designed to ensure the compliance of the principles of Corporate Responsibility in this document, ensuring as well the following commitments to the public authorities:

Relations

Keeping with the various organs of government relations based on transparency and cooperation, taking into account the level of development and needs of the countries, regions and localities affected by our activities.

Collaboration

Collaborate with the various organs of government ethical and economic development of the communities affected by our activities and continuous improvement through appropriate building actions: information, participation, etc.

Tax Obligations

Meet our debt and social security obligations ethically, in all the territories in which we conduct our activities.

Respect

Respect towards the various organs of the government fulfilling its laws, standards, requirements, etc.

Information

Keep informed the various government bodies related to our activities, our ethical commitments, our development of action

plans, risks, and, in general, of all that may be of interest.

Non-interference

Refrain from any undue interference as Ramondin in political activities, establishing clear and transparent conditions so that managers and employees are able to participate in these activities exercising their own individual rights.

There will be no connection, membership or collaboration with political parties, institutions, foundations and associations exceeding Ramondin's ones. Any contribution to the same should be done in such a way that your personal interests are clearly shown, without involving the company in any way and its political neutrality.

3.1.7. Community Relations

Ramondin proclaims its willingness to contribute to the improvement of the quality of life and wealth creation, both through the activity of the company, and the drive and the launch of new businesses, as well as through the promotion of economic development social-business through informal channels.

The management model and therefore Ramondin work processes are designed to ensure the compliance with the principles of the Corporate Responsibility in this document, and should provide the following commitments to the community:

Sensitivity to Social Changes

Sensitivity to changes in society to better understand the changing needs of society and thus to anticipate future environmental demands.

Information

Systematic, fluid and accurate information about their activities, so as to create a climate of trust and credibility, considering the company as a referent itself.

Environmentally Friendly

Environmentally friendly complying with the current legislation and assisting in its preservation and improvement.

Job Creation

Job creation leading new competitive developmental businesses.

Disadvantaged Groups

Supporting the development of disadvantaged areas and groups.

Support for Research

Support for research in order to contribute to the raising of the scientific and technological level of our environment and promoting the use of technologies and operating methods that respect the environment.

Institutions

Collaboration with institutions acting as a platform for the improvement and development of the Community.

3.2. Relatives' Incorporation to Ramondin

The employment of relatives in Ramondin is a critical issue, as it is in all family-owned companies of certain size and longevity. It is important to define rules for incorporation and internal promotion that should be included in the Code of Conduct.

1. Relatives' access to a job in ramondin

For the purpose of these Rules, "family members" means solely shareholders, directors and executives, and their descendants by consanguinity or affinity up to second-degree. Therefore, any mention of relative and/or family in the context of these rules should be construed, strictly and exclusively, in such a way.

The Rules governing relatives' access to a job in the company should strictly respect the following principles:

- The status of relative itself does not give any right to take a job in Ramondin.

- In order to incorporate a "family member" to Ramondin, there should be a real need for filling a vacancy, approved by the Management Committee.

- The "family members" seeking access to a job in Ramondin should meet the following requirements:

1st.- In the event of aspiring to the performance of an executive position, i.e. CEO, Subsidiary Director, Area Director (Sales, Financial, Human Resources, Technical or Operations), functional Directors of subsidiaries or similar positions, it is mandatory to hold an official higher university degree (bachelor's degree) in a subject relevant to the position to be performed and, at least, the previous experience needed for that position in companies other than Ramondin in jobs with similar or like responsibilities to that to be taken.

2nd.- Being approved by the Board of Directors (on the motion of the Appointment Committee) and the CEO.

3rd.- In the event of a vacancy, it should be considered whether the relative meets the necessary requirements for filling that vacancy (training and previous experience). If these conditions are met, the same process as for any other employee in Ramondin should be followed.

2. Promotion

The promotion by "family members" to positions of greater responsibility should be structured in several stages, evolving from one stage to another according to the recognition and merit of every employee in discharging his/her current personal and professional responsibilities, by following the relevant management procedures in Ramondin.

3. Remuneration

The employee's wage development, with equal merits, should be the same as for other employees with the same category, with no privileges for the mere fact of being partner or relative, by following Ramondin's usual procedures.

4. Obligations

The behaviors and performances of any "family member" should be subject to same regulation and discipline as other workers, without any privilege for his/her status as "relative." Except for the CEO position, Ramondin's shareholders and employees should not combine the job with the position of Manager or Director of the Company.

5. Incorporation for Professional Development

Ramondin should facilitate access to the labor market for "family members" through completion of the following types of internships:

- Undergraduate Internships:
While developing their academic activity, with a view to achieving that the new generations have contact with the company and know its activities, "family members" may undertake internships over their holidays. These internships should be singular per person and should not exceed 4 months. They should take place in the last year of university studies to obtain a Degree. The General Management should decide which duties every applicant should perform, ensuring their remuneration is in line with other interns in the organization. There should not be more than three interns at the same time.

- Professional Development/Intern:
In order to facilitate that "family members" improve their professional development and be able to find a job in other companies, when they finish their studies, those under 27 years old may do training in the Company in positions relating to their academic background. It is essential that the behavior and qualities of the candidates do not harm in any way the smooth running of the Company

or disrupt the harmony of its organizational chart. The training should not exceed one year per applicant and should be done in one or two parts. The General Management, at the request of the interested party, should decide on the job and its remuneration. Economic conditions should be similar to other trainee contracts in the company. In these cases, the corresponding training employment contract should be executed in accordance with labor legislation in force from time to time. There should be no more than three interns at any time, whether they are relatives or not.

6. Amendment of the incorporation rules

These Rules are intended to be a living document which should be adapted to changes that may occur in the future in Ramondin. For this reason, its content may be amended, extended and/or corrected, at any time, by the Board of Directors, always led by the principles of equality and impartiality and, consequently, apart from any arbitrariness or subjectivism.

The Consultative Committee should be responsible for maintaining the document alive and suggesting changes to the Board.

3.3. Gifts and Hospitality Policy

In the complex world of social relationships, the gift may be the most complicated issue, since behind a gift, whether a family, sympathy or professional gift, a noble intent is always hidden: to please, to thank, to congratulate, to open up doors, etc. Properly given, the gift constitutes a good way to form good social relationships. By contrast, an error may become a step backward. There are many doubts that arise when choosing the appropriate gift.

Gifts for work reasons, like other gifts, must be given and received applying common sense and thinking how others will perceive it.

We are not allowed to accept or give gifts of any type which put, or give the appearance of putting, our decision-making process of current or future negotiations in an awkward position.

However, we can accept gifts when the following circumstances concur:

1. Have a fair value. This includes a value whose amount should be less than €100 or its equivalent in the relevant currency. For the purpose of calculating the amount, all gifts and hospitality received from the same provider or costumer over one year should be taken into account.
2. Be proportionate to the circumstances. Those gifts that, due to a coincidence in time or other reasons, may be deemed as given with the aim of influencing professional decisions, should not be accepted.
3. Not being requested.

Gifts given by any member of Ramondin must always fulfill the following requirements:

1. Never give gifts in cash.
2. When we start a commercial relationship, we must inform about the gift policy and learn about the policy of our costumer or supplier with regard to these issues. This may help to avoid any misunderstanding.
3. We must ensure that all offered gifts and invitations are appropriate and agree with ramondin's values.
4. Any sign of consideration that, exceptionally and justifiably, you want to have with somebody over €100 should be authorized by the CEO and documented before the Regulatory Compliance Unit (Human Resources Management).

It may be hard to know whether the gift that we are about to give or receive is appropriate, mostly when the practices and cultures are different depending on the place. Here are some examples of acceptable and unacceptable gifts.

For example, in the event of tickets for a concert or any type of event, someone in Ramondin should be present and be able to carry out activities with the customer as part of any such outing. The same rule should apply in accepting invitations from a supplier. Only invitations that are reasonable, common and ordinary for the commercial relationship, and if the

supplier is present, should be accepted.

In the case of personal discounts offered by a supplier, these should not be accepted, unless they can be offered to all the Ramondin's collaborators.

Regarding other type of gifts and invitations, only those with a symbolic value should be accepted. For example, products with the logo of the supplier's company (merchandising) or a box of chocolates are acceptable gifts, on an individual basis. If this is not the case, the generosity of the customer or supplier should be thanked, but his/her gift should be refused politely. If you think that refusing the gift could adversely affect the relationship, please ask for advice from your manager to find an appropriate way to handle the gift.

The company should create a gift bank with all gifts received by Ramondin staff from suppliers of products and services in the performance of their duties in the company. These gifts should be raffled among the members of the company, once or twice a year, depending on the number of gifts available from time to time. Personal gifts should be respected.

Finally, a gift that, in the event of being publicly known, is deemed as inappropriate or unprofessional should never be accepted. In case of doubts, always consult with the Human Resources Management and ask for advice in exceptional cases.

3.4. Presence on Social Media

When posting information or an opinion as Ramondin's employee, you must respect the internal behavioral rules on social media:

1. Act with respect, using good judgment and common sense and taking care about the information you share.
2. Do not post, in any case, confidential information of Ramondin, its customers or employees, or opinions that could be attributed to the company.
3. When posting information or an opinion on your own behalf, do not use the employment

status or any other reference that could attribute the posted content to Ramondin.

Always implement these recommendations about your behavior in social media.

3.5. Commitment to Political Neutrality

In Ramondin, we develop our business activity respecting the political pluralism of the societies in which we have any presence.

Ramondin does not contribute to election campaigns or give donations to political parties.

If you use your legal right to participate in political activities, you must do it in your personal capacity, without using resources of the company and outside of your working hours. By avoiding any reference to Ramondin and without affecting in any way the commitment to political neutrality of the company.

4. Compliance Unit



The CCR, because of its nature, cannot and should not cover all possible situations, but must be limited to the establishing of the criteria to guide the behavior of the affected people and, if necessary, resolve any questions that could arise. To this end, the Compliment Unit Standards is established, which shall consist of two directors and the Director of HR. Its functions in relation to Ramondin’s Code of Conduct are:

Update

Propose to the Board of Directors to review and update the Code of Conduct periodically, taking the suggestions made by all groups of interest.

Dissemination

Promote the dissemination, awareness and enforcement of the CCR.

Doubts

Resolve any doubt that may arise concerning the interpretation and/or application of the Code of Conduct.

Complaints

Receive any doubts or complaints of any performances breaking the ethics, integrity or violating the principles of the Code of Conduct, giving the direction to proceed in accordance with the procedure set out in this Code of Conduct.

Suggestions

Receive any suggestions, questions or doubts related to the Code of Conduct.

Compliance

Assess and report annually on the degree of compliance of the Code of Conduct.

Information for the Board

Inform periodically the Board of Directors on Compliance, complaints, questions, suggestions and defaults related to the Code of Conduct, once analyzed.

All communications received by the Compliance Unit will be treated confidentially.

To facilitate the proper internal control of allegations involving the CCR, they will all be traceable from the point of view of compliance, so that the adequacy of decisions to internal and external standards is justifiable and verifiable in the case of revision, from the part of competent third parties or from the company itself.



5. Breaches and Violations



A violation of the Code of Conduct by the affected people may lead to the sanctions exposed in the legal, corporate and labor standards. The affected people should not, regardless of their position, request, require or direct actions or behaviors that violate the provisions of the Code of Conduct. At the same time, the affected people mustn't meet requests, requirements or orders contrary to the Code of Conduct, nor rely on those as justification for illegal behavior.

In case that an affected person has knowledge or reasonable doubt of illegal performances or contrary to it is required to report the failure through any of the following channels:

Human Resources

- a) Through oral or written complaint to the Director of HR of Ramondin, who should transfer it to the Regulatory Compliance Unit.

Regulatory Compliance Unit

- b) By means of a written complaint addressed to the Regulatory Compliance Unit, via ordinary mail and/or e-mail: ucn@ramondin.es

The identity of the complainant will be considered confidential, so any disciplinary action should be taken, directly or indirectly, because of the fact of the complaint, with no prejudice to the rights that apply, under current regulations, to the accused.

The Compliance Unit may request prior to the decision on the complaint process an accurate information to its previous assessment. In case that the termination was unrelated to violations of the Code of Conduct it should be forwarded to the Department by reason of the facts reported, giving account to the complainant.

In case that there is evidence of violation of the code of Conduct, a confidential record will be instructed, which may require the cooperation of all those affected, they obliged to provide it coming within the terms of the applicable law.

The result of the file processed will be communicated to those interested and, when appropriate, to the General and / or Board of Directors, if it is detected any labor violation or, if appropriate, to the judicial or administrative authorities.

6. Term and Acceptance



The Code of Conduct will come into force, in general, from the day of its approval. However, the Board of Directors may determine progressive communication and implementation of the Code of Conduct to the Affected people caring each circumstance as well as the temporary or permanent withdrawal of the application of the rule to the same, should the circumstances advice it.

Ramondin's Affected people specifically accept the entire contents of the Code of Conduct. The future affected people incorporating or becoming part of Ramondin will deliberately accept it. The Code of Conduct will be attached to the employment contract.

DATE, REVISION AND APPROVAL
OF THIS CODE OF CONDUCT

Laguardia (Spain). January, 2018

Signature:

RAMONDIN S.A.

JOSÉ MIGUEL MUNILLA
Consejero Delegado,

January 2019

RMDGROUP

ramondin
CAPSULES

ramondin
COIFFES
& MUSELETS

 **Inspiral**
Screw caps