



# Code of Ethics

DACSA GROUP is committed to ensuring ethical principles and respect to people, society and the environment, within their area of influence, extending to all interest groups.

In DACSA group we are aware of the importance of creating and maintaining a work environment in which the fundamental principles of human rights and workers' rights are guaranteed, corruption and bribery are not permitted, and one in which the work aims to guarantee environmental sustainability, as well as the health and safety of all of those involved.

DACSA group is committed to establishing and respecting guidelines aimed at fulfilling these principles that the company consider to be basic based on various international agreements such as: the Universal Declaration of Human Rights, the International ILO Conventions and the ten principles of the United Nations Global Compact.

The following principles are applied to all company activities, regardless of their nature and the place in which they are carried out.

## HUMAN RIGHTS AND WORKERS' RIGHTS:

### 1. FREE CHOICE OF EMPLOYMENT

- 1.1 The company does not approve of forced labour or that which is coerced, both in the companies that form the Group directly and indirectly through providers or subcontracted companies.
- 1.2 Staff at DACSA do not have to leave "deposits" or identity documentation and they are free to leave the company after giving the required legal notice.

### 2. FAIR PAY

- 2.1 Salaries and benefits are paid on time, in line with the national legal regulations, industry benchmark standards, or whichever is higher. In any case, the salary should always be enough to cover basic needs and allow for discretionary income.
- 2.2 Clear information regarding salary and working conditions will be given in writing to all members of staff at Dacsa, before accepting the job and during each income period.
- 2.3 Deductions cannot be made from the salary, which are not covered by the applicable regulations, as a disciplinary measure.
- 2.4 Salaries are paid to members of staff by the company directly.
- 2.5 The company keeps records of all of those that are hired and the payments to them.

### 3. FAIR WORKING HOURS

- 3.1 Working hours are in accordance with national legislation and benchmark industry standards, or that which offers the greatest protection.
- 3.2 Those employed at Dacsa do not work more than 40 hours a week on a regular basis and they have at least one day off every seven days on average.
- 3.3 Overtime is voluntary (it cannot be done by those under eighteen years of age).
- 3.4 Adequate rest is given to staff at Dacsa, with rest breaks and holidays in accordance with national legislation and the applicable international conventions.

#### **4. REGULAR WORK**

- 4.1 In all aspects, the work carried out is based on recognised labour relations, established through the national legislation.
- 4.2 Staff obligations, subject to labour law or social security and the regulations that derive from regular labour relations, will not be evaded through the use of labour only contracts, subcontracts or remote contracts, or via practical programmes in which there is no intention of imparting skills or providing employment.

#### **5. CHILD LABOUR**

- 5.1 Those under the age of 16 are not employed (or those below the minimum age to work according to ILO labour standards).
- 5.2 Those under the age of 18 are not employed for night time work or that which is considered particularly risky.

#### **6. NO DISCRIMINATION**

- 6.1 It is ensured that there is to be no discrimination in employment practices due to race, colour, age, gender, sexual orientation, civil status, pregnancy, parental state, religion, ideology, nationality, social condition, illness, functional diversity, belonging to a union, or any other reason.
- 6.2 Staff at Dacsa do not carry out tasks that are not compatible with their abilities.
- 6.3 Those who work for the company on a temporary contract have the same rights as those on a permanent one.
- 6.4 The hiring process for new staff is based purely and exclusively on the ability of the person to carry out the work based on their qualifications, skills and/ or experience, without exclusion or distinction based on other factors.

#### **7. FAIR TREATMENT**

- Abuse of any nature will not be tolerated, whether physical or psychological, as well as any form of intimidation such as sexual harassment, verbal assault, threats, or other forms of psychological harassment.
- 7.2 The human rights of any of the company staff, as well as external personnel working for the company, cannot be violated under any circumstances.
- 7.3 All disciplinary measures should be well communicated to the affected staff member, as well as their legal representative. A written procedure should be established as required by legal or conventional regulations.

#### **8. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING**

- 8.1 Those working at DACSA, without distinction of any kind, have the right to join or build unions of their choosing, as well as collectively bargain.
- 8.2 The company has an open attitude towards union activities.
- 8.3 Staff representatives are not discriminated against and have access to develop their representation roles in their place of work.
- 8.4 Where the law restricts the right to freedom of association and collective bargaining, the company would facilitate the development of parallel means for independent and free association and bargaining.

## HEALTH AND SAFETY:

### 9. WORK HEALTH AND SAFETY

- 9.1 A safe, healthy and hygienic work environment is provided, in accordance with current legislation, offering protection to those who work at Dacsa, visitors, contractors, clients and the workplace in general, against any risk, of any nature, that the activity entails.
- 9.2 Necessary checks are carried out in order to avoid accidents and damage to health that can occur whilst working, and measures are taken to reduce the causes of the inherent dangers in the workplace.
- 9.3 Drinking water, sanitation facilities and rest areas will be provided.
- 9.4 The company supplies protective equipment free of charge to those who need it in order to do their job.
- 9.5 Those who work at Dacsa receive regular training regarding health and hygiene, as soon as they are employed.
- 9.6 A senior management representative is responsible for health and safety.
- 9.7 The company has insurance that covers all of its members in case of injury in the workplace.

## ENVIRONMENTAL SUSTAINABILITY

### 10. ENVIRONMENTAL REQUIREMENTS

- 10.1 The company respects the environment whilst carrying out its activities, meeting the appropriate legal requirements, other requirements related to the environment and sustainability, as well as environmental policy, ensuring that the necessary permits, licenses and records are up to date.
- 10.2 In terms of the environment, the company's focus is that of prevention and continual improvement, promoting environmentally responsible measures and favouring the development of sustainable agricultural production systems and technology that is respectful of the environment.
- 10.3 The company evaluates and analyses its environmental management periodically, as well as any measures adopted in order to minimize the environmental impact of its activities.
- 10.4 Action plans are implemented to reduce the inefficient use of resources, such as raw materials, energy and water.
- 10.5 In order to minimize waste, necessary measures are adopted, ensuring that they are managed safely and responsibly.
- 10.6 Air pollution is controlled, aiming to reduce all types of emissions.

## COMPANY INTEGRITY AND ETHICS

### 11. LEGAL REQUIREMENTS

- 11.1 DACSA GROUP is committed to adhering to both applicable national and international legislation and regulations in every country in which they operate, avoiding working with suppliers that violate those laws and regulations.
- 11.2 The company adheres to and respects all internal management policies including those pertaining to the Compliance Program and provides regular training to all members of staff with the aim of eliminating any risks that may occur when not complying with the rules.

- 11.3 The company ensures that, before the contract begins, the person to be hired has all legal requisites needed in order to work. When an employment agency is used, the company must ensure that all staff provided comply with current legislation.

## 12. ANTI-CORRUPTION

- 12.1 No form of corruption, including extortion and bribery, is tolerated in business or personal transactions within the company.
- 12.2 The company has a protocol of "Acceptance and Offering gifts and hospitality" to regulate any possible doubts in commercial relationships and agreements.

## 13. CONFLICTS OF INTEREST

- 13.1 The DACSA GROUP Code of Conduct includes the principles actions related to the conflict of interest to avoid situations in which, directly or indirectly, the interested Person could interfere with those of the company in decision making.

## ETHICAL CHANNEL:

All professionals at DACSA GROUP and subcontracted companies will be familiar with this Code of Ethics, which they should accept and adhere to during their time with the company, or whilst carrying out tasks for them.

Anyone who has doubts regarding the application of the Code of Ethics, or who is aware of any violation to one of the principles within it (by a staff member of the Group, a supplier or a subcontractor, a collaborator or anyone who represents the company), should contact the company's Ethical Channel, which is responsible for evaluating and processing queries and complaints that may arise.

The company guarantees the appropriate treatment of personal data and confidentiality in the management of queries and complaints that are processed, and is committed to protecting those who make formal complaints, in good faith, or that have participated in an investigation procedure, from any form of reprisal.

DACSA GROUP provides the Ethical Channel, through which any queries, questionable behaviour or reports of violation can be communicated, through the following means:



[ethical.channel@dacsa.com](mailto:ethical.channel@dacsa.com)



Mailbox available in each branch of Dacsa Group (red mailbox)

PRESIDENT



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