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1 / Purpose

This document aims to set out the standards of ethical behaviour of the Cupa Group as a company and those of all its employees.

The Code contains the ethical guidelines accepted by everyone forming part of the Cupa Group. The guidelines are binding and govern relationships within the Group and the Group’s relationship with all its stakeholders.

2 / Who this code applies to

The Code of Ethics is designed to guide the behaviour and actions both of the Group itself and those of the people work within it.

In this way, it governs the Cupa Group’s two-way relationship with all the people who in different ways and from different spheres are connected to the Group.

3 / Values

Cupa Group values reflect its way of understanding the business and its relationship with all its stakeholders, and are the following:

1 / Honesty  2 / Effort  3 / Economical  4 / Leadership vocation  5 / Commitment
4 / Commitments derived from those values

Principles of action

4.1. / The Cupa Group to its employees

a. Professional development and growth

The Cupa Group considers that people are a key factor in its business success and the enhancement of their personal and professional development is therefore a major objective. This shared goal is based on general teamwork practices and a respectful working environment that enables people to develop professionally in accordance with their merits and abilities.

The Group shall promote the means that contribute to people’s learning, training and updating their knowledge and skills, focusing on specific goals, helping to improve their performance in the workplace, and giving them the skills and expertise required for their professional development as the company grows.

b. Goal of achievement and equal opportunities

Through its talent management process the Cupa Group ensures that effort and personal achievement is acknowledged and believes that the promotion and exchange of know-
personnel selection programmes on strictly objective criteria by taking into account solely the academic, personal and professional merits of candidates, as well as the Group’s needs.

A reply is given to all candidates taking part in selection processes, and they are kept informed at all times of the state of the process.

The information requested from candidates will only be used to verify aspects related to candidates’ professional profile or suitability.

The Group will evaluate its employees rigorously and objectively by observing their individual and collective professional development.

d. Recruitment

Personnel are hired through a legal employment contract and no form of illegal employment is admitted. On commencing the employment relationship each employee receives precise information regarding the characteristics of the job and the tasks to be carried out, details of the remuneration and labour regulations set out in the collective
bargaining agreement, the company’s internal rules and procedures, as well as preventive and security information associated with their post.

e. Personal management

In the personnel management field, the Cupa Group takes a keen interest in the professional development of its employees and is committed to internal promotion and development programmes. The Group favours a flexible, dynamic and horizontal work organisation where people can carry out their tasks while interacting and communicating easily and fluently with their colleagues.

f. Diversity

The Cupa Group seeks to fully integrate the diverse and complex components of its human resources while at the same time ensuring equal opportunity among all its employees and staff.

Respect for diversity, an active attitude in favour of integration, and the promotion of a solid corporate identity are expected of all Group members.

g. Working environment

The Cupa Group strives to promote a working environment characterised by trust, respect for human dignity, cordiality and team work. The Cupa Group expressly prohibits any abuse of power in the workplace and any other conduct that might create an intimidating, offensive and hostile working environment.

Every member of the Group shall contribute to generating a positive, pleasant, rewarding and safe working environment that encourages people to give the best of themselves.

h. Health and safety at work

The Cupa Group promotes the adoption of health and safety at work policies to ensure all employees a safe and stable environment, keeping occupational hazard preventive measures up to date and scrupulously respecting the applicable regulations wherever its corporate activity is performed.

4.2. Employees to the Cupa Group

a. Commitment

The Cupa Group staff and personnel must show their allegiance to the Group by strictly observing the legislation in force where they carry out their activity, in compliance with the spirit and aim of the regulations and by complying with the provisions set out in this Code.
of Ethics and with the basic procedures regulating the Group’s activity. They shall also fully respect the obligations and commitments assumed by the Group in its contractual relations with third parties.

The directors of the Group must be fully conversant with the external and internal laws and regulations affecting their respective business area, and must ensure that the personnel under their charge receive adequate information and training that will enable them to understand and comply with the obligations applicable to their employment and professional duties.

b. **Internal conduct**

All employees shall comply with the principles and requirements contained in this Code of Ethics and in the Cupa Group’s White Paper, as well as with any further rules that may be added to them and must seek to ensure that other individuals or entities performing activities on behalf of the Cupa Group also do so.

Employees must understand and correctly apply Cupa Group policies, procedures and other requirements applicable to the exercise of their functions, and assume all the
commitments required of ethical professional conduct, and shall therefore fully focus their efforts on:

- Acting diligently, responsibly and efficiently at all times.
- Acting loyally, honestly and in good faith, always in line with the Group’s interests and the principles and values expressed in its rules.
- Defending and protecting the company’s reputation.
- Showing professional loyalty in their everyday behaviour, especially regarding the correct use of internal information.
- Taking advantage of the development and training opportunities the company offers them.
- Using the company’s property and assets appropriately and with due care.
- Handling the company’s internal information provided during the performance of their work activities appropriately and with due care, especially when it is of a sensitive, strategic or confidential nature.
- Respecting all colleagues and associates and avoiding conflicts or abuse of power.
- Respecting and complying with health and safety regulations, and rejecting the use of illegal substances in the workplace.

The Cupa Group undertakes to provide the appropriate means for its employees to be aware of and understand the internal and external regulations applicable to performance of their duties and responsibilities.

C. Information security and confidentiality

The information and know-how belonging to the Cupa Group shall, in all cases, be considered classified and confidential information, and shall be subject to professional secrecy, its contents not being disclosable to third parties except with the Group management’s express authorization.

Cupa Group employees shall be responsible for protecting the information and knowledge generated within the Group and for adopting sufficient security measures to safeguard all the information and documentation, whether stored on a physical or electronic medium. In their relations with third parties Group employees must maintain confidentiality regarding the content of their work.
The use of the computer equipment, systems and software that the Group puts at the disposal of employees for carrying out their work, including internet access, must comply with security and efficiency standards and must not include any computer use, action or function that is unlawful or contrary to the Group’s rules or instructions.

The Group’s employees must not use, reproduce, replicate or share the Group’s computer systems and applications for purposes other than their professional duties. Nor shall they install or use programmes or applications that are illegal or that may damage the systems or jeopardise the image or interests of the Group, customers or third parties on the computer equipment provided by the Group.

In the event of termination of the employment or professional relationship, the sensitive and confidential information shall be returned by the employee to the Group, including documents and storage media or devices, as well as the information stored on their computer terminals. The duty of confidentiality shall remain in force at all times.

Personal data processing shall be carried out ensuring individuals’ right to privacy, and subject to personal data regulations. All Cupa Group employees must accept to be bound by the company’s confidentiality commitment.

d. Dedication in the workplace

Cupa Group employees shall carry out their work and professional obligations with diligence, and utmost commitment and dedication, in compliance with the instructions given by the Group management. This commitment and dedication imply a firm undertaking by each Cupa Group employee to make constant efforts towards the Group’s continuous improvement.
4.3. / Employees to other employees

a. Collaboration and relationships with other employees

Cupa Group personnel shall strictly comply with applicable labour and health and safety requirements, and must, in their work relationships with other employees, treat them with due respect, dignity and fair play. They must not allow any form of violence, harassment or abuse in the workplace, or any discrimination on the grounds of race, religion, age, nationality, gender or any other personal or social condition other than their merits and abilities.

b. Mutual cooperation

The Group favours the communication and exchange of information and knowledge among the different departments and with associated external entities, in order to stimulate cooperation and the flow of ideas that lead to personal and professional fulfilment for people, and continuous improvement for the Group.
4.4. / Directors to the Cupa Group

The directors of the Cupa Group must be a benchmark for the Group’s principles and values. Their loyalty and commitment to the Cupa Group must be shown in all their actions. Consequently, directors are required to perform their functions in compliance with the following principles:

a. **Compliance with the Group’s values and regulations**

Directors must both comply with and enforce the Code of Ethics, ensure awareness of it, and establish the appropriate mechanisms to ensure it is fully implemented.

b. **Setting a standard for their team and collaborators**

They must set a constant example of the implementation of the Code of Ethics values and principles.

c. **Being committed to keeping Senior Management informed**

Senior management shall inform Director of any conflict of interests that might arise in the performance of their functions.

d. **Providing truthful, authentic and accurate company information**

Senior management shall inform Director in a timely manner and accurately about the company’s real situation and future prospects. They shall also comply at all times with the general accounting rules so that accounting reports reflect the true situation of the company. They shall promote and favour external audit tasks and set up appropriate internal and external control and management systems.
4.5. / The Cupa Group to its customers

The Cupa Group bases its relationship with customers on trust and respect in a framework of collaboration that enables the achievement of mutual goals.

The Group’s business policy is implemented following principles of free competition, respect and optimisation of its activity through the following patterns of behaviour:

a. Responsible Marketing

The publicity and marketing of our products is done honestly and ethically and does not carry out any misleading advertising.

b. Commitment to commercial agreements made with customers

The Group respects commercial agreements made with customers. We believe that our service and commitment to them are the best way of proving our good work.

c. Transparency in the management of claims, complaints or suggestions

Customer satisfaction is a priority for the Group, and therefore all customer claims, complaints or suggestions undergo a procedure that ensures they are studied, replied to and acted on through an objective process.

d. Protection of data and information provided by customers

The Cupa Group treats information provided by customers confidentially and scrupulously adheres to the due methods for it to be managed in an organised manner.

e. Prohibition to offer gifts or hospitality

No gifts, hospitality or services or any kind of favour that exceed symbolic value may be offered to customers. The Cupa Group believes that offering this type of gifts may negatively influence commercial relationships.

4.6. / The Cupa Group to its suppliers

The Cupa Group bases its relationships with suppliers on mutual benefit and trust.

The selection of suppliers is made according to objective business criteria, based on quality, efficiency and service standards.
The Cupa Group’s commitment to suppliers entails the following principles:

a. No accepting gifts from Suppliers

No gift or invitation exceeding symbolic value is to be accepted from the Group’s suppliers. We believe that such gifts can lead to the objectivity of business relationships becoming affected.

b. Adhering to commercial agreements

Complying with agreements in time, form and content. Full adherence to commercial agreements with Suppliers builds solid relationships based on mutual trust.

c. Choosing suppliers whose practices respect human dignity

The Cupa Group firmly believes in the integrity of its business, and consequently only enters into contract with suppliers whose practices respect human dignity and do not jeopardise the company’s reputation. The Group values suppliers’ respect for Cupa Group principles and seeks to promote those principles throughout the company’s value chain.

d. Objectivity at the supplier pre-selection stage

The Cupa Group guarantees that it will be objective when pre-selecting suppliers and give any company the chance to offer its products, and that it will always reply to price offers submitted.
4.7. / The Cupa Group to the environment

The Cupa Group is well aware that its resources are a product of the natural environment and that preservation and care of the environment are key for the sustainability of the business and for its economic and social development, which is why the Cupa Group is firmly committed to the environment through:

a. **Environmental awareness**

    The Group is aware of its relationship with the environment that surrounds it and allows it to prosper and therefore respects the origin of its raw materials as something unique and of great value. The result is an environmentally-friendly policy that reduces any impact on the environment to a minimum.

b. **Responsible use of resources**

    The Cupa Group carries out its activity in an environmentally-friendly way and minimises the environmental impact of its activity through:

    - The responsible use of the resources offered by nature, and at all times seeking an equitable balance between economic activity and environmental preservation.
    - Improving the workplaces and their surroundings and keeping the impact of the Group’s activities on the environment to a minimum.
    - Making business investment in a sustainable manner, based on respect for the communities close to its work centres, and by at all times applying the principle of prudence in all its actions.
    - The conservation and rehabilitation of the areas and towns where the production activities are located and by supporting social and cultural initiatives that lead to improvements for such communities.

c. **Employee commitment**

    The Group undertakes to adopt communication and awareness mechanisms with all employees in order to promote environmentally-friendly policies, and will value any contribution made by employees to achieving this goal.

d. **Commitment to sustainable improvement and innovation**

    The Cupa Group undertakes to respect and comply with applicable environmental legislation. It has in place a strict policy on waste management and generation, is firmly
committed to scientific progress, and carries out investments in Research, Development and Innovation (RDI) to achieve efficient and sustainable resource management.

4.8. / The Cupa Group to the community

The Cupa Group is aware of the importance its activity has for the environment and of the responsibility this entails; it therefore seeks to generate prosperity and promote the development of those communities where it operates. Hence, its commitments are the following:

a. Social Awareness

To contribute to the development of the communities where the Cupa Group carries out its activities by adopting a strong commitment to the creation of employment thereby bringing wealth to those communities and enabling them to prosper and develop.

To fully respect the culture and traditions of the towns and areas where the Group operates, in particular by making a real contribution to the improvement of the traditional architecture of the towns.

b. Complying with regulations

The Cupa Group strictly complies both with applicable legislation and with this Code of Ethics, resulting in:

- Implementation of a cooperation and transparency policy in the Group’s relationship with the Public Administration.

- Commitment to any interested parties and collectives that require Cupa Group’s collaboration.
c. **Relationship with competitors**

The Cupa Group establishes respectful relationships with its competitors. It has a firm commitment to sector associations and is a member of several associations that seek to ensure the continued existence of the various business sectors and that strive to achieve goals that are of common interest.

d. **Relations with institutions, political parties and trade union organizations**

The Cupa Group does not finance institutions, organizations, political parties or trade unions or their representatives or candidates, or sponsor events or activities whose objectives are political or trade union propaganda. However, the Cupa Group collaborates and cooperates with various entities and organizations that have objectives related to the company’s purpose and that provide transparency as to the destination of the resources provided.

e. **Aid and sponsorship**

The Cupa Group has created the “Cupa Foundation” with the aim of promoting economic and technological development, essentially in the natural stone sector, as well as social
development in rural areas and in those with particularly disadvantaged populations by promoting cooperation and sponsorship activities. The choice of actions and proposals to be carried out by the Foundation will be characterised by the absence of any conflict of interests of a personal or business nature in order to guarantee transparency and appropriate management of the aid and sponsorships.

5 / Implementation of the Code

The Code of Ethics was approved by the Cupa Group Board of Directors before being put into effect and communicated to all Group employees.

The Code is available on the intranet, where it may be viewed and read whenever required. Each work centre will always have paper copies available for those employees preferring this format.

Any customer and/or supplier, and, in general, anyone interested in reading the Code of Ethics can also find it published on our website www.cupagroup.com.

Any update or amendment to the Code will be communicated in a timely manner.
Monitoring and compliance with the Code of Ethics

The Cupa Group has created an Ethics Committee to deal with any queries or complaints regarding the implementation of the Code of Ethics. The Ethics Committee will monitor compliance with the Code and will promote any actions required to give prominence to it and encourage its implementation, updating and improvement.

For these purposes, the Ethics Committee has made an email address and a phone number available so that anyone may contact it to make enquiries, complaints and ask any questions.

The email address is: codigoetico@cupagroup.com, or you can write to the following address: La Medua, s/n, 32330 Sobradelo de Valdeorras, Ourense (Spain) c/o “Ethics Committee”.

Aim of the Ethics Committee

The aim of the Ethics Committee is to ensure compliance with and implementation of the Code of Ethics in order that the Group can carry out its activities in a manner consistent with the provisions of this document.

Composition of the Ethics Committee

The Ethics Committee shall consist permanently of the HR Manager, the Head of the Legal Department, and, on a rotating basis, 2 Corporate Staff Managers and 2 Business Unit Managers.

The rotating positions shall be for the term of 1 year and chosen from highest to lowest seniority in the Cupa Group.

Control procedure

In the event of any complaint, which shall always be dealt with without disclosing names, regarding behaviour or conduct contrary to the provisions of the Code of Ethics, the Committee will meet and make a study of the incident and then follow it up.

If the complaint is upheld the Ethics Committee will take the actions required to address the situation in accordance with the particular case and circumstances.
Principles of action

CÓDIGO ÉTICO

Commitment
- Honesty
- Effort
- Austerity
- Leadership

Environment
- Society
- Employees
- Directors
- Customers
- Suppliers

Professional development
- Objectivity
- Loyalty

Quality and Solid relationships
- Equal opportunities
- Social awareness
- Responsible use of resources

Responsible Marketing
- Mutual trust
- Transparency

Recognition
- Decision-making

Leadership
- Innovation
- Nature preservation
- Integrity
- Daily effort

Sustainable improvement
- Solid relationship
- Quality and efficiency

Health and safety
- Recognition
- Professional development

Innovation