

Code of Ethics

CUPAGROUP
Since 1892



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Message from the CEO



Dear colleagues and collaborators:

Cupa Group's values and principles have always been the basis of our company and the thing that defines us as a company.

At Cupa Group we are proud to conduct our activity prioritizing care for the social, cultural and environmental setting.

With that in mind, I am pleased to share with you Cupa Group's Code of Ethics which aims to compile and disseminate our values, principles and commitments guiding the conduct of Cupa Group directors, employees and collaborators.

Only by adhering to these values, principles and commitments will we be able to perform our activity in line with the highest ethical standards.

Kind regards,

A stylized, handwritten signature in black ink, consisting of several fluid, connected strokes.

Javier Fernández



1 / Purpose

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

The Code contains the ethical guidelines accepted by everyone forming part of 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 who work within it.

In this way, it governs 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. / Cupa Group to its employees

a. Professional development and growth

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 Cupa Group ensures that effort and personal achievement is acknowledged and believes that the promotion and exchange of know-how throughout all areas of the company is key to attaining such personal achievement.

At the same time, the Group is committed to an effective equal opportunities policy, and undertakes to provide the means to help all employees in their personal and professional development.

c. Selection and evaluation

Cupa Group's commitment to equal opportunities and non-discrimination extends to its staff recruitment processes. The requirements for the posts to be covered are defined on the basis of knowledge, experience and ability which are measured 100% objectively and never based on personal criteria or circumstances like gender, age, race, ethnicity, religion, marital status or sexual orientation. The information candidates are requested to supply is at all times related to the requirements of the post and is only used to assess their suitability for the job.

All candidates for a position with Cupa Group will be considered within the recruitment process and will never be discarded on the basis of criteria that are not strictly professional or related to their knowledge and experience. In addition, the Human Resources department will ensure that the relevant measures are taken to facilitate participation in our recruitment processes of candidates with limitations (on mobility, reading, writing, hearing...).

d. Recruitment

Personnel are hired through a legal employment contract and no form of illegal employment is permitted. 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, 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

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

Cupa Group strives to promote a working environment characterised by trust, respect for human dignity, cordiality and teamwork. 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 work in 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 Cupa Group

a. Commitment

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.

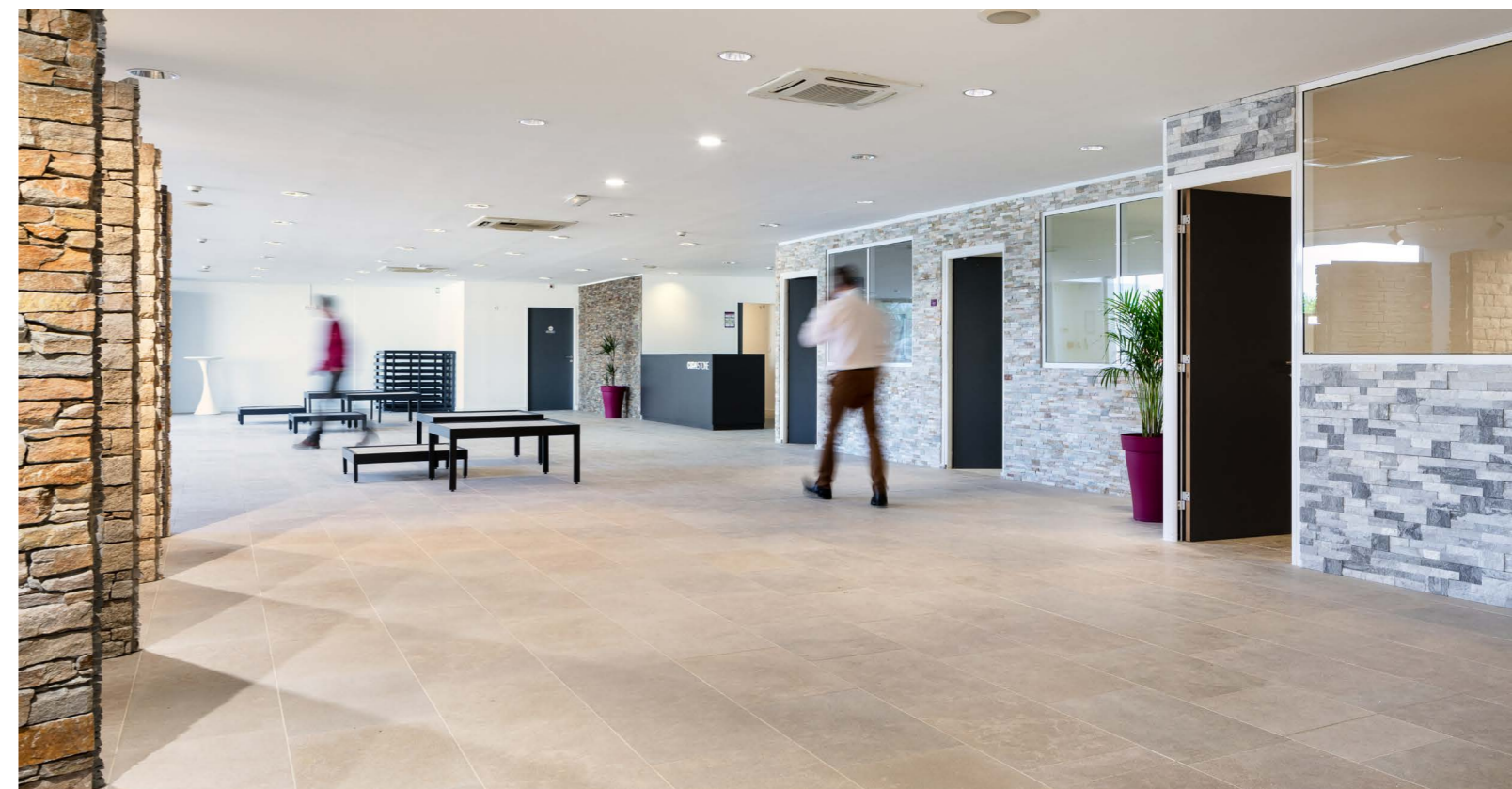
The directors of the Group must be fully conversant with the external and internal laws and regulations affecting their respective business area, and must ensure that the personnel under their charge receive adequate information and training that will enable them to understand and comply with the obligations 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 Cupa Group also do so. In addition, the Group's office employees shall (re)certify their adherence to this Code of Ethics as well as to the Ethics Policy on an annual basis.

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 perform their duties and responsibilities.



c. Information security and confidentiality

The information and know-how belonging to 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 Cupa Group

The directors of Cupa Group must be a benchmark for the Group's principles and values. Their loyalty and commitment to 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

The directors, as well as any Cupa Group employee or involved party, shall inform the Senior Management 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. / Cupa Group to its customers

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

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. Cupa Group believes that offering this type of gifts may negatively influence commercial relationships.

4.6. / Cupa Group to its suppliers

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.

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

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

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. / Cupa Group to the environment

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 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

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

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. / Cupa Group to the community

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. Regulatory compliance

Cupa Group complies rigorously with the current applicable legislation and with the present Code of Ethics which means:

- Applying a policy of collaboration and transparency in the Group's relations with public authorities.
- Commitment to stakeholders and social groups that need Cupa Group's collaboration.
- Rigorous, responsible communications through a variety of information channels.
- Cupa Group is entirely committed to preventing any act of fraud or corruption.
- Express prohibition on engaging in any activity or behavior that may constitute influence trafficking.
- Cupa Group is fully committed to preventing money laundering and the financing of terrorism anywhere in the world. For that reason, this policy establishes that one of its priorities is to cooperate with the competent authorities on the issue as appropriate.



c. Relationship with competitors

Cupa Group builds respectful relationships with its competitors. It is firmly committed to supporting sector associations and is a member of various associations that seek to maintain various sectors of activity and work to achieve common objectives.

Cupa Group is committed to working to encourage a competitive environment, a culture of effort and a free market. It rejects any type of agreement designed to limit free competition in the marketplace. For that purpose, appropriate specific measures will be agreed to fulfill these objectives and comply with the principles of fair competition that Cupa Group defends.

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

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, 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

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 Board of Directors of Cupa Group 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. Employees who do not have access to a computer due to their work position may request a copy from their superiors or the Compliance Committee via e-mail: cumplimiento@cupagroup.com.

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.

6 / Monitoring and compliance with the Code of Ethics

Cupa Group has created a Compliance Committee to provide support with any queries, complaints and/or consultations in relation to the operation of the Code of Ethics. The Compliance Committee will ensure compliance with the Code and promote all actions required to highlight and encourage application, updating and improvement of the Code.

For these purposes, a whistleblower channel has been set up for queries, complaints, claims, and suggestions from any interested party, which can be anonymous if they so wish. The whistleblower channel is accessible by any of the following means:

1. Through the space provided for this purpose on the Cupa Group website located at the following address: www.cupagroup.com
2. Through a free telephone line, operating 24 hours a day, 365 days a year and available in local language. This telephone line is managed by an external operator, so that the anonymity of the whistleblower is guaranteed.



Principles of action

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