

# CODE OF CONDUCT MECALBI



ELABORATED: (RFRH)

*Carla Gonçalves*

APPROVED: (GER)

*Gerard*

Mod.0139.US-B

Ref: CC.00.US-R03

Date: 04-01-2024



## INDEX

01	MESSAGE FROM CHIEF EXECUTIVE OFFICER	01
02	OBJECTIVES OF THE CODE	02
03	MECALBI'S POLICY	03
04	MISSION, VISION AND VALUES	04
05	WE GUARANTEE THE WELL-BEING OF EMPLOYEES	06
06	WE ACT WITH ETHICS AND TRANSPARENCY	09
07	WE RESPECT THE COMMUNITY AND THE ENVIRONMENT	11
08	WE ENSURE QUALITY AND SECURITY	13
09	WE COMPLY WITH LAWS AND REGULATIONS	14
10	MONITORING THE APPLICATION OF THE CODE OF CONDUCT	16
11	DISCLOSURE AND TRAINING	17

# 01 MESSAGE FROM CHIEF EXECUTIVE OFFICER



Jorge Amaral  
CEO MECALBI

Dear employees and stakeholders,

At MECALBI we perpetuate a culture guided by the values of teamwork, ethics and transparency, innovation, quality and people's well-being.

It is due to the daily effort of our employees to fulfil this commitment that MECALBI's reputation is one of its most important assets. It is our responsibility to act in favour of consolidating our image, acting ethically with all stakeholders and with social and environmental responsibility.

These are the values that we intend to transmit through this Code of Conduct and with which we are committed to act every day. By understanding and being guided by these principles, you will be contributing to MECALBI's distinction and ensuring the continuation of our mission.

May we remain committed to always be better.

# 02 OBJECTIVES OF THE CODE

We are aware that the conduct that each one of us adopts while working is reflected in the performance of the entire company. Our Code of Conduct was created with the aim of helping everyone involved with MECALBI to act ethically and in accordance with the applicable laws, in the daily responsibilities.

In this Code, the basic principles of our activity are shared, as well as the rules of an ethical and deontological nature, which must be followed and adopted by all MECALBI employees, management members, temporarily contracted workers, partners, its branches and other stakeholders.

We remain focused on the well-being of our internal and external community. We are committed to act on a daily basis based on the premises mentioned here and to fulfil exemplary and responsible work for our organization, society, our customers, partners, suppliers and employees.

It is imperative that our Code of Conduct is presented and available to all interested parties, so that it serves as a guide in situations of ethical or legal doubt. Any situation that requires additional explanations can be resolved with the respective persons in charge, with the Human Resources Department or with the Ethics Committee.

For more information, please contact the Human Resources Department via email [rh@mecalbi.net](mailto:rh@mecalbi.net)



“Today better than yesterday,  
tomorrow better than today”

# 03 MECALBI'S POLICY

## SATISFACTION OF CUSTOMERS

- + We work with a focus on the satisfaction of our customers. We make every effort to exceed expressed and implied expectations.
- + We create products and services according to our customer's needs, through solutions that guarantee quality, safety, reliability and the intended costs.

## SATISFACTION OF THE ORGANIZATION

- + We aim for sustainable growth of the organization in all the markets in which we operate. We consciously maximize the return on invested capital.

## SATISFACTION OF EMPLOYEES

- + We guarantee the well-being of employees through a healthy work environment. We provide professional and personal development through training, performance evaluations and merit recognition.

## SATISFACTION OF PARTNERS AND SUPPLIERS

- + We maintain a good relationship with partners and suppliers. We honour established commitments and provide joint sustained growth.

## SATISFACTION OF THE SOCIETY

- + We want to be socially and environmentally responsible. We comply with applicable laws and regulations and establish relationships with public and social entities in order to contribute to the creation of value in the community.
- + We guarantee legal and regulatory compliance with the requirements applicable to our activity.

# 04 MISSION, VISION AND VALUES

## MISSION

Develop and design products with technologically ambitious solutions in the area of mechatronics, through efficient processes, and that satisfy the needs and expectations of customers with a focus on quality and innovation.

## VISION

To be considered the best supplier by MECALBI's customers, within the scope of the company.

# 04 MISSION, VISION AND VALUES

## VALUES



### PEOPLE

We recognize that our merit comes from the people involved in our activity. We guarantee the well-being and development at a professional and personal level of our employees.



### TEAMWORK

We ensure success and grow day after day with our teamwork. We foster trust and respect through the culture of cooperation that exists in our company.



### ETHICS AND TRANSPARENCY

We act ethically and maintain transparent and accurate communication with everyone involved in our activity.



### INNOVATION

We are aware that our market position depends on the innovation and technology we use. We innovate in order to continuously improve and foster business growth.



### QUALITY

We create excellence products that follow market trends. It is our priority to offer the highest quality and ensure our customers' satisfaction.

# 05 WE GUARANTEE THE WELL-BEING OF EMPLOYEES

### FORCED LABOUR

The use of any forced, slavery or involuntary labour is prohibited. Employees will not be obliged to do forced labour and are free to end the contract, when the legal requirements are fulfilled.

### NON-DISCRIMINATION

We respect the diversity of our employees and offer equal job opportunities to all of them.

We do not discriminate in hiring, wage, access to training, promotion, rescission or retirement based on age, race, religion, political beliefs, disability, gender, sexual orientation, pregnancy or marriage status.

### HARASSMENT

We respect the principles and values of national and international legislation on Human and Social Rights. We do not tolerate any type of harassment, or discriminatory or intimidating behaviour.

We promote equal opportunity and ensure integrity and dignity in the workplace.

### WORK SCHEDULE

We ensure that working hours comply with applicable mandatory requirements and collective bargaining agreements.

### FAIR REMUNERATION

We comply with all national regulations and industry standards regarding wages and benefits.

All employees have access to detailed information about their working conditions and salary, before starting the contract.

### FAIR WORKING CONDITIONS

We provide fair working conditions to all our employees.

We comply with applicable labour laws and regulations, including in terms of wages, working hours and other benefits that are implemented at MECALBI.



# 05

## WE GUARANTEE THE WELL-BEING OF EMPLOYEES

### FREEDOM OF ASSOCIATION

We recognize the different forms of freedom of association of our employees, namely those of a professional, recreational and socio-cultural nature.

We see freedom of association as the expression of principles that are part of human nature, source of development, identity and cultural affirmation. The principles of responsibility, solidarity, shared/common objectives, community spirit and mutual help are included.

### PERSONAL DEVELOPMENT AND PROFESSIONAL PROGRESSION

We value the professional and personal development of our employees. We promote constant training, to acquire new skills, which are an element that enhances better performance and greater motivation.

The selection, remuneration and professional progression policies adopted are based on merit criteria and benchmark practices in the market.

### RESPECT FOR THE EMPLOYEE'S PRIVATE LIFE

We guarantee the right of reservation and confidentiality regarding information of a personal nature, non-professional nature and also clinical data.

### SAFE AND HEALTHY WORKPLACE

Our main priority is to ensure a safe and healthy work environment for our employees.

We never put the health and safety of our employees at risk. We comply with all applicable occupational health and safety regulations and use the necessary safety equipment.

Any risk to health or safety is immediately communicated to the Occupational Hygiene and Safety Service (OHSS), in order to optimize the process and prevent further accidents. In case of emergency, actions are taken to prioritize the protection of the lives of employees.

Our policy ensures compliance with RoHS legislation – Directive 2011/65/EU on the restriction of the use of certain dangerous substances in electrical and electronic equipment – and the REACH regulation – Regulation (EC) n° 1907/2006 on registration, evaluation, authorization and restriction of chemical substances.

### DRUGS AND ALCOHOL

Working under the influence of alcohol or drugs is not permitted. The production, request or distribution of any type of substance in the workplace is strictly prohibited.

# 05

## WE GUARANTEE THE WELL-BEING OF EMPLOYEES

### SAFETY ON WORK TRAVELS

In situations of work travels, all the necessary information is provided to avoid exposure to safety risks as much as possible. We take the necessary security measures accordingly with the recommendations issued by management.

In the event of a safety incident related to trips of this type, we take charge to immediately inform the Occupational Hygiene and Safety Service and activate insurances for this purpose.

### LEARN FROM MISTAKES

We promote a culture where we handle mistakes openly and transparently.

We encourage good communication inside the company, especially in this type of situation, and ensure that mistakes are handled fairly with employees. All the decisions that turn out to be wrong must be recognized, discussed and corrected in order to prevent it happens again.



Our employees are the key to success

# 06

## WE ACT WITH ETHICS AND TRANSPARENCY

### PROHIBITION OF BRIBERIES

We do not accept or give bribes. It is not allowed to offer or receive benefits, goods or any kind of value in order to influence or obtain commercial advantage.

It is up to each employee not to contribute to any type of activity that is understood as bribery and that violates laws.

### RECEIVE AND GIVE GIFTS OR INVITATIONS

We understand that in certain countries, exchanging gifts or invitations is culturally important for developing and maintaining business relationships. However, we only accept and offer gifts or invitations in accordance with applicable laws and/or internal regulations.

Drinks and meals are included at appropriate prices in the context of business meetings. We also accept or offer promotional materials identified with the company's logo.

### CONFLICTS OF INTEREST

We avoid any type of conflict of interest that may arise, and we only make business decisions that are in MECALBI's interest.

We are responsible for avoiding situations that may arise out of personal interest and that cause conflicts of interest with the company.

There must be no financial or business relationships with customers, partners, suppliers or competitors that affect decisions and actions taken in the best interest of our company. None of our decisions should be based on personal relationships, benefits to family members, or other private interests.

Employees and management receive specific training in order to ensure adequate knowledge of the policy and the development of a culture of ethical integrity and respect for compliance with the principles of ethics and transparency.

MECALBI maintains a system of internal control and monitoring of the operations carried out, which should be adjusted to the specific risks of corruption and conflicts of interest of the activity developed.

# 06

## WE ACT WITH ETHICS AND TRANSPARENCY

### FAIR AND FREE COMPETITION

We comply with all applicable competition laws and are committed to act fairly. We are committed to a good relationship with the competition and a proper functioning of the market, fundamental aspects for growth, innovation and the practice of fair prices.

We do not engage in illegal exchanges of information regarding products, prices, strategies, or sensitive information with competitors. We intend to distinguish ourselves through our products, technology, reliability and quality of service, maintaining a conduct that protects everyone involved with MECALBI's activity from administrative procedures, criminal investigations, sanctions and damage to reputation.

### LEAD BY EXAMPLE

Our managers and leaders promote a culture of integrity based on ethical decisions.

Managers and leaders must be examples to follow for our teams. These must be oriented to act ethically, honestly and in compliance with all applicable laws and/or internal rules, in all types of situations.

### FORGERY POLICY

We recognize that forgery of components is a serious problem that has a negative impact on the world economy and puts the safety of individuals at risk. As such, MECALBI is committed to prevent the introduction of any forged components into the supply chain.

▶ All employees and stakeholders are responsible for ensuring that these types of situations do not arise and, if they do occur, they must be reported and managed appropriately.

To comply with the principles of ethics and transparency, MECALBI has a channel for complaints on the website, which may be used by employees, business partners or other interested party to report any event likely to contradict its

# 07 WE RESPECT THE COMMUNITY AND THE ENVIRONMENT

## CONTRIBUTION TO LOCAL COMMUNITIES

We contribute to local communities and respect their cultures and practices.

We support and engage with local communities through active participation in local events and other activities, with the aim of building trust and contributing to their development. We count on the partnership with local entities to promote social and cultural matters related to education, art, science, sports and environmental protection.

## INDEPENDENCE

We have a posture of independence from public institutions and political parties, without prejudice of professional relationships. We do not fund or use any company resources, under any circumstances, to promote political parties or organizations whose mission is essentially political.

## COOPERATION

The MECALBI Group has a cooperative attitude with public authorities and local communities, guided by rules of transparency and independence, with full availability and openness to improve the legal environment of its businesses.

## CHILD LABOR

The recruitment of child labour is strictly prohibited and it is mandatory to comply with the provisions of the relevant standards of the International Labour Organization (ILO). In addition, we have programs that allow the transition of any child who is performing child labour in the supply chain.



# 07 WE RESPECT THE COMMUNITY AND THE ENVIRONMENT

## ENVIRONMENTAL SUSTAINABILITY

We are aware of the impact that our activity can have on the planet and, consequently, on society. We act with the aim of being environmentally responsible and minimizing any impact that results from our actions, not compromising profitability and increasing the longevity of our company.

We motivate and ensure the efficient use of natural resources and energy, to reduce consumption with a carbon footprint. We adopt sustainable behaviours, which involve reducing waste, reducing the consumption of water, electricity and consumable materials, thus contributing to an environmentally conscious performance.

We are responsible in the use, maintenance and conservation of our assets and resources.

We expect our suppliers to meet our environmental sustainability goals and comply with all applicable environmental laws, rules and regulations, not neglecting the conscious use of resources. Suppliers are expected to act on our commitments and implement aspects such as:

- Reduction of CO2 emissions;
- Energy efficiency;
- Quality and reduction of water consumption;
- Improved air quality;
- Recycling and waste reduction;
- Control of dangerous materials and chemicals;
- Protection of biodiversity;
- Training of employees and suppliers.

7 On average tonnes of valued residues from the productive activity



# 08

## WE ENSURE QUALITY AND SECURITY

### PRODUCT QUALITY AND SECURITY

We value our customers' opinion and make every effort to respond to their needs and expectations. We work to improve and develop innovative, high quality and safe products and services.

### PRODUCT COMPLIANCE

We ensure the conformity of our products, in accordance with applicable laws and internal standards, such as the CE Marking.

We follow up and report any conformity defects of our products to the Quality Department, even if there are only indications of such defects.

- All the employees have the responsibility to report cases of non-compliance to the Quality Department, so that they can be analyzed and resolved.



It is the quality of our products that sets us apart.

# 09

## WE COMPLY WITH LAWS AND REGULATIONS

### DATA PROTECTION AND PRIVACY

We ensure the correct use and protection of personal data, respecting the privacy of all those involved. We collect and process personal data only for legitimate purposes and with due responsibility. We protect personal data against loss, modification and unauthorized use.

In the event of a breach of personal data, we immediately inform our Data Protection Department. In case of doubt about the correct collection and processing of data, help is requested from the Data Protection Officer (DPO).

### INTELLECTUAL PROPERTY

We guarantee that there is no undue sharing of the intellectual property of those involved with our company. We keep and protect all types of information as intellectual property, from technologies to projects or designs.

Just as we protect our intellectual property, we also respect the intellectual property of others that is protected by patents, trademarks or copyrights.

### FINANCIAL RECORDS

We comply with all accounting and tax legislation in effect. We keep records detailing our entire commercial and financial situation.

It is our responsibility to comply with accounting obligations and organize these records in accordance with applicable laws and rules.

We know that the reliability of our reports is important to building and maintaining the trust of business partners, the general public and public authorities. In order to ensure compliance with the application of the rules in force, external audits are carried out twice a year.

### COMPLAINTS POLICY

MECALBI's Complaints Policy ensures that any individual who works for or with the company is able to report any irregularity. The policy includes employees directly or indirectly employed by MECALBI, business partners, customers, shareholders and other stakeholders, so MECALBI provides a channel for denunciation on its website.

# 09

## WE COMPLY WITH LAWS AND REGULATIONS

### INTERNATIONAL SANCTIONS

We are responsible for ensuring compliance with all international sanctions that are in force and that restrict freedom of action for a State or its citizens. These sanctions can take the form of restrictions on business, financial transactions and travels.

Regular checks are made on MECALBI's customer and supplier records. These checks are always taken into account before signing new agreements, in order to guarantee compliance with the imposed restrictions.

# 10

## MONITORING THE APPLICATION OF THE CODE OF CONDUCT

In order to ensure the monitoring and observance of this code, the management designated an Ethics Committee, which monitors, impartially and independently, the disclosure and compliance with the Code of Conduct.

With this measure, we guarantee that all ethical standards and practices are present throughout our value chain, and that they are the base of all the decisions and actions taken by our employees and the company itself.



“Ethical standards and practices are present throughout our value chain”

# 11

## DISCLOSURE AND TRAINING

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The Code of Conduct is accessible to all our employees and everyone involved in our activity.

When formalizing the employment contract, it is up to employees to sign a declaration confirming their knowledge of this Code, as well as their individual commitment to comply with it.

In order to remind and raise awareness of the adoption of the Code's measures, training is provided to employees, throughout the period in which the contract is in force. We insist that these training courses focus on core topics, such as business ethics, health and safety at work and other matters that are considered relevant.

In addition to internal disclosure, the Code is available on MECALBI digital platforms.

▶ We thank you for your commitment and dedication to the principles of this Code and to act ethically on behalf of MECALBI.

