COSMOS GROUP CODE OF ETHICS

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Level:	Corporate / Plant	
Owner:	Cosmos Group Management	
Affected plants:	X	01 - AISA ALCALÁ
	X	02 - AISA ÁVILA
	X	03 - AISA BARCELONA
	X	05 - EGSA
	X	06 - LOGYCA
	X	07 - NEINSA PLÁSTICO
	X	08 - NEINSA METAL
	X	09 - COSMOS INDIA
	X	10 - COSMOS BIZKAIA
	X	11 - COSMOS CZECH
	X	12 -COSMOS PFULLENDORF
	X	13 - COSMOS BRASIL

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Date:	09/01/2018
Translated by:	A. Garcia
Date of translation:	13/06/2019

Version control:

Version	Date	Modifications
01	09/01/2018	Creation
02	07/06/2019	Changed email address to report non-ethical behavior

COSMOS GROUP CODE OF ETHICS

1. COSMOS XXI GROUP CODE OF ETHICS

COSMOS XXI Group and all its Companies all over the world are firmly committed to carrying out their activity with honesty, integrity, honor and responsibility. This commitment is part of our DNA since our inception in 1995 and is the core of our Social Responsibility Plan and our Code of Business Conduct and Ethics.
We are responsible for complying with all applicable laws of the countries where we do business. This includes the anti-corruption laws that govern all over the world where the COSMOS XXI Group has commercial interests or some of its suppliers that are part of its supply chain.

Through this policy, COSMOS XXI Group expresses its commitment to fight corruption in all its forms, including extortion and bribery.

Taking into account the activities most exposed to the risk of corruption, COSMOS XXI Group regulates the following activities:

2. BRIBES

It prohibits the use of any form of illicit payment, by pecuniary or other means (1), in order to obtain any advantage in the dealings with its stakeholders. The prohibition also applies to the employees who, by virtue of their duties and the activities they perform, intend to accept or offer bribes for their own benefit or for the benefit of their relatives, associates or acquaintances.

In the event that any employee comes to know that bribes have been agreed, offered or requested, he will be obliged to inform the general management about it.

3. GIFTS, PRESENTS AND FAVORS

COSMOS XXI Group and all its Companies all over the world do not grant or allow any type of gift that can be interpreted as something that exceeds normal commercial practices, of normal courtesies, or any estimate to receive a favorable treatment in the performance of any activity in which the company can be included.

Any form of gift that may influence the independence of judgment or induce to guarantee any kind of favor is prohibited. This includes free participations or invitations, labor promises and valuable gifts customary to suppliers.

The gifts of COSMOS XXI Group and all its Companies around the world will be characterized by their purpose to promote the brand image or because they will offer a clear common benefit in business interest. All gifts offered must be managed by the advertising and marketing coordination and must be authorized by the general management.

Employees who receive gifts must inform the company about it so that the destiny of these can always be defined.

Anything that supposes an advantage for a person, of material or moral, financial or non-financial value and that is considered relevant according to the uses and customs.

4. DONATIONS TO POLITICAL PARTIES

COSMOS XXI Group and all its Companies refrain from participating in or sponsoring any event the purpose of which is political propaganda, neither unlawful pressure directly or indirectly from political parties, representatives or candidates is admitted, nor the acceptance of economic benefits or personal influences in areas of government or connections with those who exercise authority in order to obtain favors or benefits.

5. DONATIONS TO BENEFICIAL ORGANIZATIONS AND SPONSORSHIP

Within the HSEQ policy COSMOS XXI Group and all its Companies can interact with various non-profit entities with the aim of guaranteeing a reciprocal benefit for the parties involved. It is made clear that it is supported through sponsorship and specific agreements that favor vulnerable groups, referring to environmental issues, social development, arts and / or sports and scientific and technological dissemination, which guarantee quality and transparency and are part of our interest group.

In the choice of proposals COSMOS XXI Group and all its Companies will pay special attention to any conflict of interest of a business or personal nature that may arise.

6. FAVORED TREATMENT

COSMOS XXI Group and all its Companies do not authorize to make, offer or accept, directly or indirectly, any payments or benefits for any activity in order to streamline the services and processes or any advantage over and above those laid down.

The buying and selling procedures of COSMOS XXI Group and all its Companies are done correctly and transparently pursuant to the anti-corruption policy, ensuring the appropriate selection of suppliers, management and corresponding contracts.

Any worker of COSMOS XXI Group and all its Companies, who suspects that he is the protagonist of a conflict of interest, has a moral obligation to inform the organization about the situation. Failure to inform about the event will be assumed as a behavior against the anti-corruption policy and consequently will generate sanctions according to the severity of the conflict or event.

7. CODE OF ETHICS

Commitments and ethical responsibilities in the management of business and business activities undertaken by the employees of COSMOS XXI Group and all its Companies are based on the principles of Honesty, Justice and Transparency.

8. COMMUNICATION PROCESS OF UNETHICAL CONDUCT

Internal Complaints System or **“Whistleblowing”.**
By which, the employees of the Group, through email, denuncia@gcosmos.com, can report the existence of conducts contrary to the Law or to the company's internal conduct rules, on the part of the employees, company auditors, suppliers, etc.