



GRUPO REVERTÉ

BALAÑA EGUÍA, ADVOCATS I ECONOMISTES, S.L.

DOCUMENT DETAILS

DOCUMENT: Code of Ethics.
DESCRIPTION: Outline of the Company's ethical principles
PURPOSE: To describe the nature and scope of the Company's values, as an expression of the Company's commitment to abide by the law and the ethical values derived from it.
START DATE: 14.04.2020

COMPANIES CONCERNED: S.A. REVERTÉ PRODUCTOS MINERALES; PENTA TRADING CO, SL; REVERTÉ MINERALPRODUKTE, GmbH; REGIO MARMOL, SA; REVERTE MINERALS USA, Inc.; TRANSMINER, SLU; RENCAT, AIE
OVERSIGHT: Board of Directors.
NOTIFICATION AND DELIVERY DOCUMENT: YES / NO

VERSION	DATE	AUTHOR	ACTION COMPLETED
01	14.04.2020	B&E	Document created
02	09.04.2020	B&E	Document changed based on remarks by S.A. REVERTÉ
03	27.04.2021	B&E	Updated
03	19.05.2021	SAR	Document approved
04	01.12.2023	SAR	Updated with the external Compliance platform.
04	21.12.2023	SAR	Executive Board approval

1. PURPOSE.

GRUPO REVERTÉ, which is composed of the companies S.A. REVERTÉ PRODUCTOS MINERALES; PENTA TRADING CO, SL; REVERTÉ MINERALPRODUKTE, GmbH; REGIO MARMOL, SA; REVERTE MINERALS USA, Inc.; TRANSMINER, SLU and RENCAT, AIE, recognises that it is responsible for the impacts of its decisions and operations, and therefore encourages transparent and ethical behaviour within its organisation, guided by criteria of integrity.

This Code of Ethics stems from the organisation's desire to ensure regulatory compliance, and is underpinned by the belief that ethical conduct is essential in both the operations and management of GRUPO REVERTÉ. The values set out below are essential for the harmonious operation of the whole organisation and are an integral part of the Company's identity.

This Code is a symbol of GRUPO REVERTÉ commitment to abide by the ethical values it upholds, and by any laws applicable to its operations. In turn, it sets out standards and guidelines aimed at ensuring the professional, ethical and responsible behaviour of everyone who is part of the Company. All individuals and legal entities subject to this Code of Ethics must act diligently, in good faith and in a manner that is honest, loyal, objective and aligned with the interests of the Company.

All employees, managers and directors and other individuals or legal entities subject to the Code of Ethics are responsible for complying with the Code, and for ensuring compliance by others, and for reporting any non-compliance of which they become aware.

2. SCOPE.

GRUPO REVERTÉ success must be everyone's success. Therefore, this Code of Ethics must be complied with by all members of the Company. These values should therefore guide conduct at all levels of the Company, including the Board of Directors, senior management and other staff. Finally, insofar as possible, the company's suppliers and distributors also fall within its scope and are expected to behave in accordance with these values in the course of their operations.

3. COMPANY PRINCIPLES AND VALUES.

LAW AND HUMAN RIGHTS

GRUPO REVERTÉ undertakes to comply with the legislation in force in Spain, respecting the universal principles of human rights and public freedoms, pledging to implement the policies and procedures necessary to abide by these principles, adopting ethical conduct in all its actions.

The GROUP will make every effort to prevent the commission of any criminal offences to which it is exposed in the course of its business. Furthermore, any conduct that may harm the reputation of GRUPO REVERTÉ and/or negatively affect its interests must be avoided, even if it does not break the law.

EMPLOYMENT PRACTICES

EQUALITY AND NON-DISCRIMINATION

GRUPO REVERTÉ rejects any form of physical or psychological harassment or abuse of authority, and any other conduct that may create an intimidating or hostile working environment, infringing the rights of individuals. Any such displays are considered unacceptable and will be punished and penalised, whatever form they take.

A working environment based on respect and cooperation as well as cordial, healthy and safe relationships will be fostered.

GRUPO REVERTÉ promotes the professional development of all its workers, ensuring equal opportunities in selection and promotion, through merit-based policies.

All employees must actively participate in the training plans offered by the Company, undertaking to continuously update the knowledge and skills necessary for the performance of their duties. The employment policy will be geared towards talent management and ensuring that employees are committed to the Company's project, fostering the professional development of all employees.

Moreover, GRUPO REVERTÉ attaches great importance to the overall development of individuals, which is why, insofar as possible, it will promote a working environment that is compatible with personal development, helping the members of its teams to achieve the best possible work-life balance.

Individuals in managerial or senior positions must set an example to the workers under their supervision, at all times and at all professional levels, promoting relationships that are based on respect for the dignity of others, participation, fairness and mutual support, providing a respectful working environment and a positive working climate, and providing the resources necessary to achieve the objectives established for the purpose of complying with this Code.

The employees and managers of GRUPO REVERTÉ, must protect and enhance the good image and corporate reputation of the GROUP, by exercising their duties in a professional, ethical and responsible way.

All members of GRUPO REVERTÉ are obliged to use the computer systems and resources made available to them in a proper, efficient, rational and lawful way.

GRUPO REVERTÉ recognises and respects the right to freedom of association and the effective exercise of the right to collective bargaining through trade union representatives.

OCCUPATIONAL HEALTH AND SAFETY

GRUPO REVERTÉ conducts its business in a manner that ensures the highest level of safety for people and facilities, promoting the adoption of health and safety policies at work, fostering a safe and stable working environment, and adopting the preventive measures established in the current legislation, committing itself to update them continuously and ensuring that they are complied with by all its workers and by the partner companies or suppliers with which it operates.

The members of GRUPO REVERTÉ will carry out their work in a safe environment and in accordance with the regulations on occupational health and safety, maintaining a policy that avoids and minimises any actions that may endanger people or cause damage to property and safeguarding their safety and that of third parties. For this reason, workers should be aware of the hazards to which they are exposed through their jobs, and of the measures required to manage and minimise these hazards. Additionally, those who work with explosive substances are strictly required to comply with the safety measures established for this type of product.

Employees and managers are responsible for complying with and enforcing health and safety regulations, using the equipment and resources assigned to them responsibly.



ENVIRONMENT

GRUPO REVERTÉ has a strict environmental policy which must be complied with, and it operates in a manner that fully respects the environment, complying with and surpassing the standards established in the environmental regulations.

The GROUP undertakes to actively and responsibly promote environmental conservation, complying with legal requirements and conducting its business in such a way as to minimise environmental impacts, with the aim of reducing the environmental impact of its activities.

GRUPO REVERTÉ will operate in such a way as to minimise any environmental impact that may be generated. To this end, it will implement restoration plans for the quarries it operates, help to reduce waste, and minimise energy consumption and the use of fuel, water and materials.

GRUPO REVERTÉ carries out strict quality controls to minimise its impact on the environment, continuously monitoring these controls. Furthermore, the GROUP will seek to reduce pollution from its activities, focusing its actions on reducing emissions and discharges, and on reducing any waste that may be generated so that it can be managed more appropriately.

The GROUP requires all its employees to abide by all behavioural guidelines aimed at minimising the generation of waste that is harmful to the environment and preserving natural resources. Therefore, workers must act at all times in an environmentally-friendly and sustainable way, following the instructions they receive from GRUPO REVERTÉ, ensuring that they are followed, and relaying these principles to the external companies with which they work.



MARKET

ZERO TOLERANCE FOR CORRUPTION

GRUPO REVERTÉ supports zero tolerance for corruption and bribery.

Any manager, director, employee or partner of the Company is forbidden to receive, request, accept, promise, offer or grant to equivalent individuals from other commercial enterprises, an unjustified benefit or advantage of any kind whatsoever, for themselves or for a third party, as consideration for receiving favourable treatment for themselves or for a third party over others, or to favour them (e.g. in the purchase or sale of goods, in the procurement of services or in business dealings).

In this sense, it is forbidden to offer gifts or presents of any kind or amount, directly or indirectly, to persons, in consideration of their position or public function. Relations with public officials must be confined to the strictly legal/official sphere.

INTEGRITY

Employees, managers and directors must behave with integrity at all times, carrying out their work in an honest, proper and responsible manner, abiding by the law and disclosing information in accordance with the law.

Employees will demonstrate the highest level of professional objectivity when performing the tasks entrusted to them in the exercise of their duties, without being unduly influenced by their own personal interests or the interests of third parties, and it is forbidden to accept or offer any kind of advantages or gifts for financial or commercial gain.

INNOVATION AND QUALITY

With the aim of meeting the changing needs of its customers at all times and in the most efficient way, GRUPO REVERTÉ continuously strives for innovation in all areas in which the Company operates, from extraction and processing to the marketing of its products.

For this reason, GRUPO REVERTÉ has its own quality control laboratories, equipped with the most state-of-the-art technical equipment for testing, measuring and controlling the parameters that guarantee the quality of both the extracted mineral and the finished products.

Research, development and innovation in processes and products are the cornerstones of the company's expansion strategy.

Employees and managers must make a positive contribution to the innovation and improvement processes in their respective areas.

CONFLICT OF INTEREST

Employees, managers, directors and partners of GRUPO REVERTÉ will put the interests of the GROUP and its customers before their own interests, those of their family members or those of other individuals related to them, thus avoiding any conflict of interest between their personal interests and those of the GROUP, and they must report any situation that may entail such a conflict of interest.

TRANSPARENCY

To all entitled recipients, GRUPO REVERTÉ is committed to providing truthful, complete and proportionate financial information, ensuring that the information it has to disclose, both internally and externally, is truthful in financial and accounting matters, in accordance with the legislation in force.

All individuals who are part of GRUPO REVERTÉ are required to abide by this principle, in particular anyone whose duties and responsibilities consist, directly or indirectly, in generating or reporting such information.

All professionals are obliged not to disclose, transfer or circulate confidential and sensitive information unless it is necessary for the performance of their work duties. Similarly, if they have confidential information concerning third parties, they will refrain from using it for the benefit of the GROUP.

GRUPO REVERTÉ promotes free, fair and honest competition. It is strictly forbidden to attempt to change the prices that would result from free competition for any products, goods, services or any other movable or immovable property which are the subject of a contract.

PREVENTION AND MONEY LAUNDERING

GRUPO REVERTÉ is firmly committed to complying with the legislation on the prevention of money laundering, adopting policies to prevent and avoid, in the course of its activity and operations, irregular payments or the laundering of money obtained from illegal or criminal activities.

The GROUP condemns any act that involves acquiring, possessing, using, converting, or transferring assets, while knowing that these have originated from criminal activity, committed by the same or any third party, or any other act to conceal or cover up their illegal origin, or to aid the person (natural or legal) who has been party to the offence or offences to evade the legal consequences of their actions. It is also expressly forbidden to conceal or cover up the true nature, source, location, destination, movement or rights to / ownership of property, while knowing that it is derived from criminal activity or from an act of participation in such activity. GRUPO REVERTÉ will exercise the utmost diligence in its dealings with third parties.

Special care will be taken to ensure that the company's financial statements and, generally, the GROUP's financial information, accounts, contracts and related documentation provide a true and fair view of all financial transactions in a clear and accurate manner, and the directors, employees and managers undertake to ensure that any information that they help to prepare is complete, truthful and reliable.



SUPPLIERS

In its dealings with suppliers, GRUPO REVERTÉ will work with them in a transparent manner, enabling and facilitating the attainment of shared objectives, always endeavouring to ensure that there is full cooperation, loyalty and mutual trust, and abiding by and enforcing the agreements entered into, always in accordance with the current legislation.



GROUP

GRUPO REVERTÉ will provide the necessary resources to ensure that its members are familiar with the regulations that apply to them and will establish the necessary internal control model to ensure compliance with the law, the internal rules and the ethical principles and values that are the cornerstone of its identity and business. Therefore, any non-compliance must be reported through the Whistleblowing Channel (Ethics Channel). This confidential channel is also available to contractors, suppliers and external partners of the GROUP.

GRUPO REVERTÉ has a Regulatory Compliance Manual that sets out the values of this Code according to principles and guidelines of conduct, with the aim of averting any risks associated with non-compliance with the Code.

4. ACCEPTANCE OF THE CODE OF ETHICS.

It is a prerequisite for any person joining the GROUP's organisational structure to accept the Code of Ethics prior to joining it. For this purpose, a copy of this Code will be provided in a language with which the individual is sufficiently familiar to understand the content hereof.

When the circumstances so warrant, GRUPO REVERTÉ may require suppliers, distributors, external professionals and representatives of the GROUP to agree to adopt and comply with the provisions of this Code.

If any conflict arises between this Code of Ethics and that of the supplier, specific rules will be established by mutual agreement.

5. UPDATING THE CODE OF ETHICS.

The Code of Ethics will be reviewed and updated regularly, taking into account any suggestions and proposals by members of GRUPO REVERTÉ which may have been received through the Ethics Channel or any other channel provided by the company for this purpose.

Any changes to this and all other implementing policies will be reported to the organisation's staff, partners, and any person associated with the GROUP who has adopted the Code of Ethics.

6. WHISTLEBLOWING CHANNEL / ETHICS CHANNEL.

All employees, managers, directors and other individuals or legal entities subject to the Code of Ethics are responsible for complying with the Code, as well as for ensuring compliance by others, and for reporting any irregularity and non-compliance of which they become aware.

With this goal in mind, GRUPO REVERTÉ has implemented an online tool to enhance communication and transparency, emphasizing our ongoing commitment to transparency, integrity, and responsibility. This tool provides reports, information, or concerns regarding non-compliance or suspicious situations.

<https://sociedadanonimareverteproductosminerales.integrityline.com>

7. NON-COMPLIANCE AND DISCIPLINARY MEASURES.

Failure to comply with the provisions of this Code of Ethics will be considered a very serious violation, which will be subject to the corresponding penalty.