

CODE OF CONDUCT



Safety and profitability through automation

Code of Conduct

Table of contents

<i>Introduction</i>	7
<i>Preamble</i>	9
1 Basic Rules of Conduct	12
1.1 COMPLYING WITH LAWS	14
1.2 RESPECTFUL CONDUCT	14
1.3 LEADERSHIP, RESPONSIBILITY, SUPERVISION, AND INTEGRITY OF THE COMPANY	15
2. Dealing with business partners	17
2.1 FAIR COMPETITION, COUNTERFEITS AND INTELLECTUAL PROPERTY	18
2.2 REASONABLE APPROACH TO GIFTS, INVITATIONS AND OTHER BENEFITS	19

2.3 TRANSPARENT RELATIONSHIPS WITH BUSINESS PARTNERS	20
2.4 MEASURES AGAINST MONEY LAUNDERING	20
2.5 COMPLIANCE WITH FOREIGN TRADE LAWS	20
3. <i>Avoiding Conflicts of Interest</i>	23
4. <i>Protecting information and Data</i>	25
5. <i>Environment, Health and Safety</i>	27
5.1 USING RESOURCES	28
5.2 HEALTH AND SAFETY AT WORK	28
6. <i>Implementation by internal Organization</i>	31
6.1 MONITORING MECHANISMS	33
6.2 TRAINING	33
6.3 INVESTIGATIONS	33
7. <i>Questions and Reports</i>	36
7.1 QUESTIONS	37

**7.2 REPORTS ON NON-COMPLIANCE WITH THE CODE OF
CONDUCT**

SOCIAL CHARTER

Table of contents

1. Goals	41
1.1 FREEDOM OF CHOICE FOR EMPLOYEES	42
1.2 NO DISCRIMINATION	42
1.3 NO CHILD LABOR	42
1.4 FREEDOM OF ASSOCIATION	43
1.5 PAYMENT	43
1.6 WORKING TIME	43
1.7 OCCUPATIONAL HEALTH SAFETY AND ENVIRONMENTAL PROTECTION	44
1.8 QUALIFICATIONS	44
2. Implementation Principles	45
2.1 COMMUNICATION	46
2.2 INVOLVING BUSINESS PARTNERS AND SUPPLIERS	46

2.3 REGULAR CONSULTATION	46
2.4 QUESTIONS AND REPORTS	46
2.5 FINAL PROVISIONS	47

Introduction

Ethics first.

Asai has a clear vision: “We help companies to be safer and more profitable through automation”. That means that helping is the key for us.

We want to continue to fulfill this responsibility in the future by consciously taking an even more positive approach.

Ethics is the main value that acts as the most solid foundation for all decisions in our company as well as our commitment to complying with applicable laws anywhere in the world. All of this is summarized in written form in the code of conduct, and our Social Charter. The Code sets a worldwide standard that unites all the members of ASAI. The Code is an example of our vision and of the way we think and act as a social and an economical actor.

The Code of Conduct summarizes and lays down the principles of behavior at ASAI. The Social Charter describes the principles of social responsibility.

The purpose of these two mandatory documents is to govern, communicate, respect and preserve the basic principles according to which people live and work together, on behalf of everyone who works for and with ASAI. For the benefit of all of us. To ensure that we have a governance system based on values. And to ensure our success, the security of our jobs, our competitiveness and, as a result, to give us a secure future and a sense of proudness.

Guidelines and commitments are only as good as the commitment behind them and must be implemented into daily work. We ask you to support us in achieving our goals. If you have

questions about our Code of Conduct, please contact the Compliance Officer, hdiaz@asai.es at any time.

On the following pages you will find all the useful and important information you need to comply with and implement the Code of Conduct and the Social Charter.

ASAI Code of Conduct

Preamble

ASAI is fully aware of its general responsibility as a company and its social and ethical obligations.

The Code of Conduct is a set of mandatory guidelines for all employees of ASAI, managers, employees, representatives of ASAI, such as consultants, agents and independent subcontractors, together with anyone who is equivalent to an employee in functional terms (for example, temporary staff).

Every employee is expected to act in accordance with these guidelines. ASAI will not tolerate breaches of these fundamental principles. If there is concrete evidence of a breach and in every case where there is any doubt, employees can contact the Compliance Officer in confidence directly by email, hdiaz@asai.es

ASAI reserves the right to amend or withdraw the Code of Conduct at any time.

The Code of Conduct does not explicitly refer to all the guidelines and regulations that are in use within ASAI, but these will also continue to apply.

Our success key factors are:

Customer satisfaction beyond expectations

Personal and professional growth

Continuous improvement

Seeking for excellence





Code of Conduct

1 Basic Rules of Conduct

1.1 COMPLYING WITH LAWS

1.2 RESPECTFUL CONDUCT

1.3 LEADERSHIP, RESPONSIBILITY, SUPERVISION, AND INTEGRITY OF THE COMPANY

1.1 COMPLYING WITH LAWS

ASAI complies with laws, statutes and agreements and expects its business partners to do the same. All the members of the management board, all managers and all employees, are required to read and understand the contents of the Code of Conduct. In addition, they must comply with the relevant provisions of applicable laws. Breaches of the law, of contracts or of the Code of Conduct will not be tolerated and may lead to work sanctions.

1.2 RESPECTFUL CONDUCT

The success of ASAI is based on the diversity of people and a respectful attitude and approach to others. ASAI acknowledges and values the personal and individual differences of all its employees.

ASAI makes every effort to offer all its employees challenging, meaningful and satisfying opportunities for personal and professional development.

Discrimination, sexual and personal harassment, prejudice and insulting behavior will not be tolerated. All employees must treat other people with openness and honesty and with respect and responsibility. These principles apply when working with other employees and with external partners.

1.3 LEADERSHIP, RESPONSIBILITY, SUPERVISION, AND INTEGRITY OF THE COMPANY

Managers have a special responsibility. Their role is to put the success factors into practice and to encourage their employees to do the same.

Managers ensure the success of ASAI, take their special responsibility seriously and put the success factors into practice by actively raising awareness among their employees of the importance of customer focus. They work competently, assertively and consistently towards achieving objectives and successes and they inform their employees in good time and in detail about important issues. They perform tasks, exercise authority and take responsibility. They also delegate clearly and unambiguously. They work to increase employees' identification with and loyalty to the company, they encourage a trustworthy and open approach when working with others and in teams and they regularly assess their employees fairly and challenge and encourage them individually by acting as a coach.

All managers perform their organizational and supervisory tasks competently and ensure that no breaches of the law occur in their sphere of responsibility, which could have been prevented or impeded by proper supervision. This also applies when individual tasks are delegated.

Asai promotes leadership at all levels of the organization. Not everyone is a manager, but everyone is expected to be a leader.



Code of Conduct

2. Dealing with business partners

2.1 FAIR COMPETITION, COUNTERFEITS AND INTELLECTUAL PROPERTY

2.2 REASONABLE APPROACH TO GIFTS, INVITATIONS AND OTHER BENEFITS

2.3 TRANSPARENT RELATIONSHIPS WITH BUSINESS PARTNERS

2.4 MEASURES AGAINST MONEY LAUNDERING

2.5 COMPLIANCE WITH FOREIGN TRADE LAWS

2.1 FAIR COMPETITION, COUNTERFEITS AND INTELLECTUAL PROPERTY

Competition motivates us to produce our best performance. However, reliable business partnerships that benefit everyone can only be based on fair competition and strict compliance with the law. Every employee is obliged to follow and comply with national and international rules governing fair competition and not to take actions that would be in breach of antitrust law.

Sharing information with other market players is undoubtedly interesting, but always risky. Agreements with competitors covering factors that relate to competition, such as future prices, capacities and production programs or responses to invitations to tender, are not permitted. This applies to written agreements and also to the non-binding exchange of verbal information. Any exchange of sensitive information with competitors must be reported to the Corporate Compliance Officer in advance or afterward if the contact was not planned.

Asai provides tailor made solutions to industrial needs where counterfeits would make no sense or simply do not apply. The kind of problems that we solve need original solutions based on customer needs, state of the art and our own capabilities. We integrate existing solutions and we do not develop any products that could be based on existing ones. However, because of our deepest values, counterfeits would never be allowed at Asai.

The same thing applies for intellectual property.

2.2 REASONABLE APPROACH TO GIFTS, INVITATIONS AND OTHER BENEFITS

ASAI succeeds because of the price, performance, quality and suitability of the products and services it offers. We do not give or receive bribes even if this results in a business transaction not taking place. We are restrained and cautious in our approach to gifts, invitations and other benefits. We do not put our business partners in awkward situations and we do not offer them anything which could be regarded as an attempt to influence their business decisions.

Gifts and invitations that take the form of a friendly gesture can help the business relationship to develop. However, the threshold between permitted behavior and illegal influence is often hard to identify. Misjudgments can have negative consequences for the acting person and also for the company. If you have questions concerning an individual case, you should contact the Corporate Compliance Officer. Particular care must be taken with public officials. In these cases, you should always ask the Corporate Compliance Officer for advice.

Donations must always be transparent. This means that the recipient and the specific purpose that the donation will be used for must be transparent and documented. In the case of sponsorship, it is important to ensure that the relationship between the financial support and the service provided in return is appropriate and that the sponsorship is in line with the company's principles of Corporate Citizenship. Donations and sponsorship activities are subject to the internal ASAI approval.

2.3 TRANSPARENT RELATIONSHIPS WITH BUSINESS PARTNERS

Business partners are chosen solely on the basis of competitive considerations and of comprehensive and clearly defined agreements which guarantee appropriate payments and commission. Business partners shall be required to comply with the Code of Conduct.

2.4 MEASURES AGAINST MONEY LAUNDERING

ASAI takes all the necessary measures within its sphere of influence to prevent money laundering, i.e. the introduction of the proceeds of criminal activity into the legal financial system with the aim of concealing the true origins of the money.

2.5 COMPLIANCE WITH FOREIGN TRADE LAWS

ASAI complies with the relevant national and international foreign trade laws for all its deliveries, services and payments. Breaches of these laws will not only lead to considerable fines, but could also result in a prison sentence for those involved. In addition, the deliveries in question will be stopped and the loss of customs and export privileges could make future deliveries by ASAI more difficult.

Against this background it is important that all employees involved with the import and export of goods and technologies (including technical data), the provision of services and the payment process comply with the relevant sanctions, export and import regulations. This includes in particular following internal company guidelines and processes and consulting the relevant customs and export function within ASAI.



Code of Conduct

3. Avoiding Conflicts of Interest

Situations in which the personal or financial interests of an employee are in conflict with those of the company must be avoided.

In order to identify and avoid conflicts of this kind, employees must immediately notify the company of situations which could lead to restrictions on their personal objectivity and independence, such as second jobs or shareholdings in the companies of business partners or competitors. ASAI will investigate potential conflicts of interest. Employees are not required to report the purchase of shares traded on the stock exchange or about small-scale investments.



Code of Conduct

4. Protecting information and Data

ASAI is aware of the importance of information security and data protection to the company and to individual employees and guarantees to provide effective protection in both areas.

Trustworthy and effective cooperation is based on truthful and correct reporting as part of internal and external communications.

In order for ASAI to remain competitive, it is essential that internal company matters and sensitive information from business partners and customers are treated as confidential and protected against unauthorized access and loss. The obligation to keep the information confidential shall continue after the end of the working relationship.

It is not only the content of the information that must be protected, but also the details of who supplied it and to whom it refers. With the spread of digitization and the possibilities that this opens up, protecting personal data is becoming increasingly important. Personal data is particularly sensitive and must be processed with care and in accordance with legal requirements by the employees of ASAI. For this reason, we ensure in all our internal company processes that personal data is only processed with the consent of the data subject or on the basis of statutory law. Personal data is only used for the purpose for which it is collected.

Care must be taken to ensure that the content of the data is correct, that the data is not kept for longer than necessary and that it is stored safely and protected against unauthorized access. We also guarantee that the rights of data subjects to obtain information about their data, the right to rectification, erasure, restrict processing and the right of data portability are safeguarded.

Code of Conduct

5. Environment, Health and Safety

5.1 USING RESOURCES

5.2 HEALTH AND SAFETY AT WORK

5.1 USING RESOURCES

We give a high priority to protecting the environment and natural resources and to avoiding unnecessary waste in both our development and production processes. ASAI complies with the relevant environmental legislation. We will immediately rectify any deficits in this area. Reducing the consumption of energy is a permanent objective, for our facilities and for the products we manufacture or integrate. We carefully take into consideration any action that might influence the greenhouse phenomenon by reducing gas emissions and whenever possible using renewable energy and sustainable supply.

We do not use water, in any form or way, nor during manufacturing or installation processes. At Asai we only use technologies which do not cause gas emissions.

5.2 HEALTH AND SAFETY AT WORK

We also give high priority to health and safety throughout our organization. ASAI is aware of its responsibility for its employees and guarantees to take precautions against accidents. Employees are also responsible for ensuring that their everyday working environment is safe and healthy. Our internal processes guarantee that we comply with legal regulations and provide healthy workplaces. Any potential deficits in this area will be rectified immediately.

We raise awareness permanently on the importance of using all the available equipment for personal protection.

All of our personnel receive health and safety training on a regular basis, always taking into account the specific requirements of any given position within the company. In any case, all personnel are trained for emergencies, accident and incident management, handling the workplace economy, and in the use of fire protection equipment.

On a yearly basis, all personnel are invited to attend a medical examination to make sure any possible conditions, related or not to working conditions and environment, are detected as soon as possible and can be treated. Special care is taken to provide all workers with, and advice on, ergonomically adequate working environment to prevent any possible problems.

All equipment and machinery used by the workers carry the relevant CE certificate and undergo periodical maintenance and, in case required, official certification procedures, to make sure we work with top condition equipment and, therefore prevent any possible accidents due to the equipment's condition.

Any machinery and/or installation produced by Asai undergoes a complete risk analysis and assessment and is CE certified, thus complying with the most strict security requirements.



Code of Conduct

6. Implementation by internal Organization

6.1 MONITORING MECHANISMS

6.2 TRAINING

6.3 INVESTIGATIONS



6.1 MONITORING MECHANISMS

The application of the dual-control rule, the separation of incompatible activities (separation of functions) and strict regulations on full and complete documentation are aspects of the internal organization of ASAI that help to prevent irregularities, in particular in the order and shipping processes.

Alternative quotations will be obtained wherever this is appropriate and reasonable. Financial, accounting and other reports and records are properly drawn up and reflect the company's transactions and financial relationships, in accordance with generally accepted accounting principles and those of ASAI. No secret accounts and/or ledgers are created that are not recorded in the accounting system.

6.2 TRAINING

The employees receive regular information and training about the content, meaning and purpose of the Code of Conduct. In addition, special training courses are held regularly on selected subjects.

6.3 INVESTIGATIONS

Compliance with the Code of Conduct is, first and foremost, the individual responsibility of each employee. All members of the management board and the supervisory board, all managers and all employees are personally responsible for reading and understanding the Code of Conduct and other ASAI guidelines relating to their work. Managers and employees

who do not fulfill their responsibilities in this area or who break the rules in the Code of Conduct will be subject to disciplinary measures and, where appropriate, to legal consequences.

Experience shows that organizational principles are only successful if they are accompanied by appropriate monitoring measures. These include the use of suitable monitoring and plausibility checks by the internal audit department. The internal audit department is required to ensure that employees comply with the Code of Conduct and to use appropriate auditing criteria.



Code of Conduct

7. Questions and Reports

7.1 QUESTIONS

7.2 REPORTS ON NON-COMPLIANCE WITH THE CODE OF CONDUCT

7.1 QUESTIONS

In the case of questions regarding the Code of Conduct or uncertainty as to its interpretation, employees can contact the Corporate Compliance Officer at any time, hdiaz@asai.es

7.2 REPORTS ON NON-COMPLIANCE WITH THE CODE OF CONDUCT

If there is concrete evidence for non-compliance and in all cases where there is any doubt, employees should contact the Corporate Compliance Officer in confidence directly by email, hdiaz@asai.es



Social Charter

Preamble

The increasing globalization of the markets for goods and capital has enabled transnational companies to establish global production and sales networks. These worldwide networks are accompanied by a social responsibility to act in accordance with the basic principles that govern how people live and work together.

Managers and workers commit to fulfilling the social and societal responsibility of ASAI as a globally acting company.

On the basis of a company governance system based on values, the ASAI will exploit opportunities for business success and the creation of jobs and will keep potential risks to a minimum.

Ultimately, this is important for the international competitiveness of ASAI and will help to safeguard its future and that of its employees.

The management and the workers have established the following objectives and implementation principles for the global business activities of ASAI. These will be achieved while taking into consideration the legislation in force in the various countries and locations and while acknowledging the different cultures in those countries.



Social Charter

1. Goals

The following fundamental goals and implementation principles are based on the principles of the International Labor Organization (ILO) and take into consideration national laws and, in particular, the ILO conventions 29, 87, 98, 100, 105, 111, 138 and 182.

ASAI respects internationally recognized human rights.

1.1 FREEDOM OF CHOICE FOR EMPLOYEES, 1.2 NO DISCRIMINATION, 1.3 NO CHILD LABOR, 1.4 FREEDOM OF ASSOCIATION, 1.5 PAYMENT, 1.6 WORKING TIME, 1.7 OCCUPATIONAL HEALTH SAFETY AND ENVIRONMENTAL PROTECTION, 1.8 QUALIFICATIONS

1.1 FREEDOM OF CHOICE FOR EMPLOYEES

Jobs in the ASAI Group are freely chosen. We are totally opposed to forced and compulsory labor (including debt bondage and involuntary prison labor) in accordance with the definitions in ILO conventions 29 and 105.

1.2 NO DISCRIMINATION

In ASAI, we guarantee equal opportunities and equal treatment regardless of ethnicity, skin color, gender, religion, nationality, sexual orientation, social background or political views, provided that these are based on democratic principles and tolerance of people with different opinions.

Employees are not given preference or put at a disadvantage because of their membership of a company employee organization.

1.3 NO CHILD LABOR

Under the terms of ILO conventions 138 and 182, children's development must not be inhibited, their dignity must be respected, their safety must not be put at risk and their health must not be harmed.

ASAI complies with the general regulations concerning the minimum age of employment.

1.4 FREEDOM OF ASSOCIATION

ASAI recognizes the right of all employees to establish collective employee organizations and to take part in collective bargaining to determine working conditions.

1.5 PAYMENT

Payment in ASAI is based on the legally guaranteed minimum wage, the minimum standards of the relevant national sectors of industry and the current situation on the labor market, regardless of gender.

1.6 WORKING TIME

ASAI complies with the relevant national regulations and agreements on working hours and on regular paid vacations.

1.7 OCCUPATIONAL HEALTH SAFETY AND ENVIRONMENTAL PROTECTION

Health and safety at work and the protection of the environment are given a high priority in the ASAI Group. The ASAI Group guarantees that standards of safety and health in the workplace comply with national regulations as a minimum.

Health and safety in the workplace and the creation of working conditions that meet people's needs are an important element of our company policy. The company recognizes the right of the national employee organizations to make proposals regarding health and safety and environmental issues.

1.8 QUALIFICATIONS

ASAI finds, hires and promotes its employees on the basis of their qualifications, which are relevant to their function, and their abilities. The company supports the targeted, ongoing, needs-based training of employees in order to achieve high levels of performance and high-quality work.

Social Charter

2. Implementation Principles

In the same way as the guidelines laid down in the Code of Conduct, they are part of the corporate culture and are an expression of the self-image of ASAI as a company. They form the basis for the internal and external activities of the company and its employees.

2.1 COMMUNICATION, 2.2 INVOLVING BUSINESS PARTNERS AND SUPPLIERS, 2.3 REGULAR CONSULTATION, 2.4 QUESTIONS AND REPORTS, 2.5 FINAL PROVISIONS

2.1 COMMUNICATION

The content of this joint declaration is communicated within ASAI in a suitable form in the relevant national language. The local employee organizations are consulted to determine the type of information on the basis of the overall communication strategy of the company.

2.2 INVOLVING BUSINESS PARTNERS AND SUPPLIERS

ASAI supports its business partners and suppliers and encourages them to introduce and implement similar principles in their companies and to incorporate them into their company policy. ASAI expects its business partners and suppliers to apply these principles as the basis for mutual relationships and regards them as an appropriate criterion for long-term business relationships.

2.3 REGULAR CONSULTATION

Once a year, a consultation process takes place concerning compliance with the objectives and the implementation principles in this joint declaration. The Metalworkers' Federation and others are our sources for such consults.

2.4 QUESTIONS AND REPORTS

If you have questions regarding the Social Charter or information about a possible breach of the regulations in this joint declaration, you can speak directly to your manager, your local employee organization or the external ombudsmen appointed by ASAI, who will treat the matter as confidential. Employees who report a possible breach of the law or of this joint declaration in good faith must not be concerned about discrimination.

2.5 FINAL PROVISIONS

This declaration comes into effect on the day it is signed. Individual claims or claims by third parties cannot be made on the basis of the declaration.

Pinseque, September 2020

