

reganosa

Code of ethics and rules of conduct

reganosa





As the Chairman of Reganosa, I am pleased to present the company's Code of Ethics and Rules of Conduct. This is a major milestone, as one of the basic commitments adopted at the moment of founding Reganosa, and still very much in effect, is the effort to develop a product for people, firmly rooted in Galicia's society and its economy, but with a national and international outlook.

This approach, which has marked our actions and the development of our operations, has allowed us to count on the presence of professionals who have helped to turn the company into a leading reference in the sector thanks to the efficiency of its production process, together with its outstanding compliance with the strictest standards and regulations that govern the sector.

Reganosa's values are known, acknowledged and respected by all its own staff and external collaborators, in order to guarantee their safety in all operations. With the aim of taking this a step further, we want to share these values with all our stakeholders, for whom we have produced this Code of Ethics and Rules of Conduct, which details the principles and values that have guided our work over the years, and which are adapted to new demands both from society and in terms of corporate governance.

The publication of this Code of Ethics and Rules of Conduct also represents an important milestone with regard to transparency with all the company's stakeholders, as well as to promote good management practices between the companies in our sector and in our supply chain. This process must help us all work towards achieving a model of respect and balanced development between the social, environmental and economic spheres which is beneficial for society as a whole.

The principles and values that underlie this Code have been developed and promoted by the Board of Directors, of which I am the Chairman. The executive team and workers of Reganosa are the cornerstones upon which these values are based, and through which they are developed, who also promote these values before our suppliers, customers and other stakeholders. The company is committed to providing the necessary resources to ensure that the Code is understood, implanted and respected by all members of the company. These values also apply to our supply chain with regard to its responsibilities, in which case Reganosa will encourage and support their comprehension and application. Safe in the knowledge that everyone associated with Reganosa will appreciate the utility of this document, and that we will strive towards ensuring constant, strict compliance with its contents, I would like to extend my very best wishes to you all.

José María Paz Goday
Chairman

A handwritten signature in black ink, which appears to read 'José María Paz Goday'. The signature is stylized and includes a long horizontal flourish at the end.

The company and
our values



Our aim is to be a company that makes efficient use of energy resources, offering optimum quality and a firm commitment to protecting the environment, which improves the well-being of individuals and society at large, as well as promoting their growth and development.

We seek to create value for our shareholders and ensure the satisfaction of our customers, whilst improving the welfare of individuals. We focus on protecting our surroundings by implementing the very latest technical advances in safety and environmental protection, with the aim of reducing our impact on the environment, especially with regard to climate change.

The values contained in this document serve as a reference and guidelines for the conduct of the executive management and workers of Reganosa, at the same time as reflecting the good faith and dedication with which we undertake all of our operations and responsibilities.

- **Integrity**, considered as a fair, balanced attitude towards the company's decision-making process, based on strict compliance with the law and the best working practices for the sector.

- **Honesty** in all its employees' activities, complying with the law, internal regulations and this Code, in addition to their operational responsibilities. All employees must guarantee that they are not subject to any type of actual or potential conflict of interest between their professional obligations and any other type of interest.

- **Transparency** in the planning and undertaking of our commitments with each group of stakeholders.

- **Respect** for and consideration of the rights of individuals and Reganosa's stakeholders, listening to and attending to their legitimate demands.

- **Personal efforts** and a commitment towards safety, innovation, ongoing improvements and efficiency in our processes, working towards achieving the best quality results through the implementation of best business and environmental practices, basing our processes on the most advanced technologies and accrediting their use.

- A **commitment** towards our business projects, focusing on teamwork and seeking solutions that improve the work of Reganosa and which benefit society as a whole.

- A **local focus** yet a global outlook. Reganosa is rooted in its environment in terms of its commitment to its shareholders and strategic importance for Galicia, contributing services, wealth and wellbeing. However, it operates on a global market, maximising the advantages offered by its location, financial solvency and know-how which can be transferred globally for the benefit of its customers and society as a whole.

Principles and rules of conduct

We attach importance to our Code:

- By creating an Ethics Committee to promote our principles and ensure that they are observed.

We have acquired personal and corporate responsibility:

- We comply strictly with all legal obligations in relation to employment, taxation, environmental and economic matters, adopting the necessary measures to ensure their effective compliance.
- We uphold, follow and respect all the aspects indicated in the code.
- We promote it amongst our stakeholders.

In our workplace

Safety first. We operate in a safe, reliable and responsible manner, with a firm commitment from company employees towards safe practices.

We work as a team, and select the best professionals in order to achieve this.

We respect human rights, rejecting all types of discrimination, harassment or abuse.

We protect the confidentiality of the company's information and personal privacy, using computer systems in a responsible way.

We protect our assets and use them responsibly.

A commitment to our environment and community

We operate in a safe manner and instil confidence.

We protect the environment.

We participate in the socioeconomic development of the region.

We comply with our financial obligations.

We run our business in an ethical manner.

With our contractors

We comply with our ethical standards.

We promote compliance among our contractors.

With our customers

We comply with our ethical standards.

We promote our Code.

With our shareholders

We report information in a transparent manner.

We undertake to comply with applicable legislation.

We protect the company's reputation.

We attach importance to our Code by:

Creating an Ethics Committee to promote our principles and ensure that they are observed.

Integrating a Corporate Social Responsibility and the Ethics Committee into the company structure in order to prevent any potential infringements of this Code.

Promoting awareness of the Code and helping with its interpretation and application.

Overseeing compliance in cooperation with department supervisors.

Providing support for employees, guaranteeing full confidentiality of potential complaints and helping them to solve any problems related to compliance with the Code.

Carrying out independent investigations into matters related to ethical issues and regulatory compliance when necessary, ensuring that all investigations are carried out in accordance with the law.

Responding to requests for information in relation to the Code and producing any reports and evaluations required.

Providing the necessary resources to facilitate the application and fulfilment of this Code, defining systems for evaluating and penalising misconduct, ensuring the protection of employees who report any potential infringements.

We take on a personal responsibility:

We strictly comply with all legal, employment, tax, environmental and financial obligations, taking the necessary measures to ensure this compliance.

We apply and respect all the stipulations of the Code.

We set an example and promote the values expressed in the Code amongst our employees and stakeholders, reporting any concerns we may have in relation to situations that may infringe it.

*Principles and rules
of conduct in our
workplace*

*“We respect human rights
and reject all types of
discrimination, harassment
and abuse.*

*We work as a team, and
select the best professionals
in order to achieve this.”*

Safety first

The company's commitment towards safety and the protection of the environment and individuals applies to all of its employees, including its executive management.

Our Health, Safety, Environment and Quality Policy structures the management of this key principle, through which Reganosa will measure and intervene in the most significant parameters in order to minimise and prevent all types of industrial or workplace accidents.

Safety is the priority in all our operations, including the protection of individuals and the environment. Ensuring a rigorous approach towards procedures, implementing suitable technologies and training allow us to carry out operations under the maximum safety conditions, in accordance with international standards.

Safety is everyone's responsibility. Reganosa's employees must act to ensure that all tasks and operations are carried out with maximum safety, complying with all the established procedures and standards.

None of Reganosa's employees or any external personnel under its responsibility may bring alcohol, prohibited substances, weapons or unauthorised persons onto the company's premises.

All employees are obliged to notify their supervisors of any type of unusual behaviour or situations.

We respect human rights

The company will ensure that human rights are respected.

Reganosa fully endorses the United Nations Global Compact, adopting all the resulting obligations.

Employees may not be discriminated against because of their sex, race, religion, beliefs, sexual orientation or disability. This principle also applies to the recruitment, hiring and careers of employees, as well as their salaries and other payments. Promotion within the company will be based on merits, skills and performance.

The diversity of employees will be respected, and no form of illegal discrimination will be tolerated.

Under no circumstances will the company permit any type of sexual harassment, abuse of authority, insults or other kinds of actions that result in intimidating behaviour or create a hostile environment.

These policies will extend to the company's international relationships, particularly with regard to maritime traffic in our Terminal.

Within its sphere of influence, Reganosa will encourage the observance of Human Rights and the other principles contained in this Code.

We work as a team, and protect our privacy

Reganosa supports ongoing improvement by creating multi-department workgroups, with its employees playing an essential role in creating a working environment that encourages the achievement of these objectives, promoting values such as transparency and respect as the cornerstones of success.

The process of selecting collaborators for developing projects has to be carried out carefully and in an objective manner. Reganosa fosters alliances with universities and other academic institutions as a source of talent and a way of contributing value to our projects.

Computer systems play a key role in achieving our business goals. They are strictly for professional use, with employees being obliged to comply with our Policy on Information Security and the Use of Computer Systems.

Reganosa respects the privacy of its employees, as a result of which it will only use personal information for professional purposes, in accordance with applicable legislation.

We protect our assets and avoid conflicts of interest

All the company's employees are committed to protecting Reganosa's assets and using them in a respectful way, including process equipment, installations and buildings, as well as replacement parts and raw materials, waste materials and vehicles.

All intangible assets must also be used in a responsible way, such as the amount of time dedicated to the company, computer systems, patents and records. Employees are committed to using these for legitimate purposes, protecting them against any potential damage.

All employees responsible for producing quotations must follow the defined procedures, making sure that approved amounts are used for the purposes indicated by Reganosa's executive management.

Conflicts of interest appear when employees use the company for their private, personal, financial, political or social benefit in a way that can harm the company's image.

Reganosa's employees are responsible for preventing any type of situation that may result in conflicts of interest between them and the company.

Unless expressly authorised in writing by the Ethics Committee, no relationships of any kind are allowed with contractors, customers, users, competitors or Reganosa employees, through companies or affiliations in which the employee has shares, holds a post or acts as an independent consultant.

*Principles and rules of
conduct with
our environment and
community*

*“We protect the environment,
participate in the
socioeconomic development
of the region and meet
our financial obligations.”*

We protect the environment and participate in socioeconomic development

All Reganosa's employees are committed to defending and ensuring compliance with the company's Environmental Policy.

Every effort will be made to prevent and minimise any negative environmental impact, with a special emphasis on the marine environment.

To this end, we shall promote and respect biodiversity, promote the efficient use of energy and natural resources, and uphold and act in accordance with the key environmental management guidelines, beyond the legally required minimums.

We are committed to transparency in our relationship with the community, providing information on any issues that help to preserve all the commitments acquired by the company.

We shall promote the creation of energy infrastructures as a strategic factor for development of the social and commercial fabric of our milieu.

We shall promote the use of natural gas, as a readily available and clean fossil fuel, for the welfare of society and the progress of business.

We shall encourage the development of local enterprises by sharing Reganosa's know-how and experience as far as possible. In this sense, Reganosa is committed to providing transparent information regarding its activities and impact on its website (www.reganosa.com).

We comply with our financial obligations, running the business in an ethical manner

Reganosa will declare its revenue and expenditure as required by law, in a completely transparent manner, audit its accounts and present them to the Commercial Register. It will also comply with all of its tax obligations.

It will comply with all laws for the prevention of money laundering or financing for unlawful purposes.

Employees must ensure that all business relationships are carried out with legitimate financing and objectives, checking for warning signs such as payments to tax havens, in cash or with no associated documentation.

Any employees detecting undeclared payments or suspected cases of money laundering are required to inform Ethics Committee.

We will act in a loyal, honest way in our business relationships.

In our relations with the authorities, we will avoid any type of situation that may involve dishonest activities, and will be particularly strict in matters of bribery and corruption. We shall take the necessary steps to prevent any type of illegal activity.

*Principles and rules
of conduct with our
contractors*

*“We ensure that our contractors
are aware of and accept
the stipulations of the
procurement code.”*

We promote and comply with our ethical standards

In all our procedures involving contractors, we must comply with the standards included in Reganosa's Code of Ethics for Procurement.

Employees must refuse any type of gifts or offers from contractors. Any situation of this kind must be reported to the employee's supervisor.

As an exception, gifts with a symbolic value may be accepted as a part of the usual working relationship with suppliers, providing these are purely for the sake of courtesy and do not influence the decision making processes and impartiality of Reganosa.

It is expressly forbidden to provide suppliers with personal telephone numbers, addresses or details.

When planning to attend events accompanied by contractors when meals, entertainment, accommodation or other types of activities will be offered that involve economic costs, this must be reported to the employee's direct supervisor for their approval and in order to adopt the necessary measures.

If the employee detects any type of attempt by the contractor to influence our professional decisions, they must immediately inform their direct supervisor.

When choosing, assessing and approving a supplier, it will be necessary to comply with all the requirements indicated in Reganosa's procedures in the processes of selection, tendering, negotiation, procurement and monitoring of suppliers, encouraging them to comply with the social responsibility standards.

Reganosa will apply corporate responsibility criteria in awarding major contracts, committing itself to applying a process of monitoring and ongoing improvement with regard to the responsible conduct of its suppliers.

We will ensure that our contractors are aware of and accept the company's Code of Ethics for Procurement.

*Principles and rules
of conduct with our
customers*

“We comply with our ethical standards and inform our customers about our Code.”

We comply with ethical standards

Reganosa's employees may not accept gifts or offers from customers that may influence or be interpreted as an attempt to influence any decision-making process. Any situation of this kind must be reported to the employee's immediate supervisor.

Occasional contacts with customers as a part of ongoing business relationships with Reganosa are acceptable, which must be reported to the employee's direct supervisor, having complied with the internal approval procedures. Contacts of this kind must be within reasonable limits and in proportion to the intended result.

Employees will provide customers with a copy of the Code of Ethics for their information, answering any questions in relation to it, and shall be obliged to act in accordance with the values and Rules of Conduct it contains.

*Principles and rules
of conduct with
shareholders*

“We report information in a transparent, reliable, consistent and auditable manner, committing ourselves to complying with currently applicable legislation and protecting the company’s good name.”

We report information in a transparent manner

At Reganosa, we consider it essential to keep information transparent, reliable, consistent and auditable, disclosing it to our shareholders, Board of Directors, Executive Committee and Management Committee.

All employees must act in a responsible manner when obtaining and keeping records and data on any area of Reganosa's activity. Employees are obliged to act with rigour when reporting information required by law, as well as the information required by our executive and operational departments.

All records and accounts pertaining to Reganosa must fully and accurately reflect the company's transactions, complying with all necessary accountancy practices and regulations, as well as the respective internal requirements.

Financial and other types of information which has to be transmitted to stakeholders and society at large will be reported in an accurate, verifiable and transparent manner.

Existing legislation in this area will be enforced, fully respecting all contractual obligations.

Reganosa's employees will also respect the obligations and commitments of the company, and shall refrain from undertaking or collaborating in actions which despite being legal may affect the principle of legality or damage their good name and that of the company.

All employees must act loyally towards the company, respecting the confidentiality of the information to which they have access in their professional undertakings and based on their responsibilities.

Employees may not disclose any type of information regarding business conditions, with the exception of those the company is obliged to communicate by law.

Employees will protect the professional image and good name of Reganosa, and collaborate towards ensuring the control and responsible use of the same by suppliers, contractors and other collaborators. Any public declaration and intervention made by employees must be previously notified to their superiors and respect the image of the company, avoiding anything that may harm or damage its image and good name and acting in a loyal manner with regard to the mission, vision and values of Reganosa.

Employees shall be obliged to report any situations that may damage this good name and that may represent an infringement of this Code.

The company is obliged to produce a monitoring report for shareholders detailing the implementation of the Corporate Social Responsibility model and the company's initiatives in this area, in accordance with the highest international standards.

