

# THIRD-PARTY CODE OF CONDUCT

Last update: June 2022



## CONTENTS

- 01** About Hebron
- 02** Introduction
- 03** Our values
- 04** Our guidelines of conduct
- 05** Speak-up

# ABOUT HEBRON

Since its foundation in 1959, Hebron has been engaged in the design, manufacture and marketing of raw materials, pharmaceutical intermediates, additives and speciality chemicals for industry.

In 1989, it became part of the Japanese group Otsuka Chemical Co. Ltd, contributing to its expansion in the European market. Since the 1980s, Hebron has gone from selling 95% of its turnover in the Spanish market to exporting more than 80% of its total sales.



## Mission

To create solutions with advanced, high quality and environmentally friendly materials, offering a personalised service to ensure the success of our customers.

## Vision

To become a partner of reference for our customers, while strengthening our international presence in new markets.

# INTRODUCTION



This Code defines the standards and guidelines of behaviour that should govern the actions of both Hebron members and our business partners.

Since the creation of our company in 1961, the values framed in our corporate philosophy have inspired our daily activities. We want to maximise not only our economic performance and the needs of our customers, but also the interest of our stakeholders. We strive to do business responsibly, forging lasting business relationships and contributing to the long-term sustainability of our organisation.

As a responsible company, we only work with third parties who actively support these same principles. We have adopted this Code to ensure that our suppliers, customers, distributors and agents understand our expectations. Commitment to our Code will be an important factor in Hebron's decision to award or continue business.

**This Code is the backbone of our ethical culture and, as a fundamental rule of our system, it must be complied with by everyone who do business with Hebron.**

# OUR VALUES

Our company focuses on 7 core values that guide our daily practice and inspire our corporate objectives, as well as the strategy set to achieve them:

## **N.º 01 – Corporate governance**

We ensure the truthfulness and accuracy of the information we share, guaranteeing the maximum transparency with our stakeholders and representing a true and accurate picture of our financial and accounting situation.

## **N.º 02 – Fair competition**

We are committed to compete with other agents, respecting the principles of free competition and avoiding any conduct that would abuse or restrict it.

## **N.º 03 – Sustainable growth**

We conduct our activities with the utmost respect for the environment, contributing to sustainable development and minimising or eliminating any negative impact.

## **N.º 04 – Social responsibility**

We are committed with corporate social responsibility (CSR), supporting social, sporting, cultural and artistic initiatives in the community where we are located.

## **N.º 05 – Professional ethics**

We ensure the utmost integrity and honesty in our engagements, as well as professional conduct guided by ethics and good faith.

## **N.º 06 – Compliance with the law**

We respect not only the legislation and internal regulations that apply to us, but also the legal systems of the territory in which we operate.

## **N.º 07 – Human rights**

We are firmly committed to the Universal Declaration of Human Rights and the 10 Principles of the United Nations Global Compact. We support and respect these principles and we make sure not to be complicit in human rights abuses.



# BUSINESS CONDUCT AND ETHICS

At Hebron, honesty and integrity are our guiding principles and we want to work with business partners who share the same.

## **N.º 01 – Free competition**

We prohibit agreements on prices, the sharing of markets, territories or clients or any other conduct that restricts competition.

## **N.º 02 – Confidentiality and privacy**

We condemn infringements of intellectual property rights and the use and disclosure of confidential information. Our partners must also respect the regulations on data protection, guaranteeing the rights by data subjects.

## **N.º 03 – Gifts and invitations**

Gifts or invitations that could compromise our objectivity and impartiality are prohibited. In particular: cash, gift cards, invitations to travel/hotels outside the work environment, socially unacceptable, unethical or indecent gifts, and all those that involve a *quid pro quo* obligation or a business advantage.

## **N.º 04 – Conflict of interest**

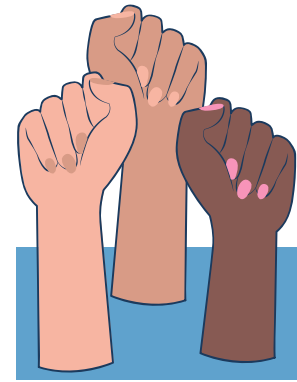
We strive to ensure that contracts are awarded on the basis of commercial factors such as price, quality or service offered. Our partners must inform us of any case where an Hebron employee could have an activity, interest or personal relationship that may interfere with their objectivity.

## **N.º 05 – Bribery and corruption**

We condemn the offer or receipt of bribes or kickbacks by our business partners, and we urge you to inform us of any case where an Hebron employee has engaged in any such conducts.

## **N.º 06 – Money laundering**

For avoiding being involved in such activities, we apply a "KYC" policy, identifying the account holders of our financial transactions. We expect from our partners a firm commitment in the fight against these crimes and their cooperation.



## HUMAN & LABOUR RIGHTS

At Hebron, we treat each other with respect and dignity and expect our business partners to comply with all applicable laws regarding employment, wages and labour rights.

### **N.º 01 – Discrimination**

We support the creation of a pleasant working environment governed by a proper, respectful and dignified treatment. Therefore, we have zero tolerance for any form of discrimination and harassment, both within our organisation and by our business partners.

### **N.º 02 – Forced & child labour**

Our suppliers must provide a workplace free from all forms of human trafficking, forced and child labour in their operations. Suppliers must ensure that workers' contracts clearly convey the terms and conditions of employment in a language that workers understand.

### **N.º 03 – Labour conditions**

Our partners must comply with all applicable labour regulations, particularly with regard to working hours, rest and holiday time, wages, benefits and employee compensation.

### **N.º 04 – Freedom of association & collective bargaining**

Hebron recognises and respects the right of association of its employees and allows them to exercise it freely, as well as freedom of association and the right to collective bargaining, and we expect our partners to do the same, ensuring that there is no interference, harassment or retaliation.



## SAFETY, HEALTH & WELL-BEING

At Hebron, the health, safety and well-being of employees are fundamental to our success. We only engage with business partners who implement effective practices to ensure the health and safety of their employees.

### **N.º 01 – Health and safety**

At Hebron, we engage with business partners who provide a working environment that ensures the health and safety of their employees. This includes the implementation of safety procedures and the provision of appropriate personal protective equipment (PPE) to minimise the risk of accidents or injuries.

### **N.º 02 – Safety training**

We expect our partners to provide their employees with the necessary occupational health and safety training and to put in place processes to prevent catastrophic events. Employees have to be capable of identifying potential emergency situations and should receive health and safety information related to hazardous materials.

### **N.º 03 – Incident Management**

Our partners are expected to have systems in place for employees to report health and safety incidents and to manage and track incident reports. Such incidents should have corrective action plans to mitigate potential risks and should provide necessary medical treatment and facilitate the return to work of workers.

### **N.º 04 – Licensing & permits**

Our partners must comply with all applicable laws and regulations regarding employee health and safety, as well as have all necessary permits and licences to operate.



# SUSTAINABILITY AND ENVIRONMENT

At Hebron, we are committed to protecting the environment, guaranteeing maximum respect for it throughout our supply chain and minimising any negative impact that our activity may cause.

## N.º 01 – Respect for the environment

Our partners must comply with all applicable environmental laws, regulations and directives regarding waste, air emissions, hazardous materials and wastewater discharge, both in the manufacture of their products and in their transport, storage and disposal.

## N.º 02 – Sustainable consumption

Our partners are expected to use natural resources efficiently and responsibly, developing sustainable practices and activities, in order to minimise or eliminate negative environmental impacts.

## N.º 03 – Product quality and safety

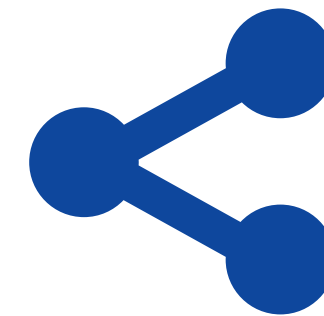
Suppliers shall ensure that products supplied to Hebron are manufactured and distributed in accordance with applicable laws, and that they comply with all applicable quality and safety standards.

## N.º 04 – Continuous Improvement

Our partners are expected to implement appropriate environmental management policies that seek to reduce the environmental impact of operations, continuously improving their own organisations' policies and promoting sustainability throughout their value chain.

# SPEAK-UP

To avoid breaches of this Code, please take the following actions:



Share this Code with your company's employees who have contact with Hebron members or work on Hebron's premises.



If you have any questions or queries about this Code, please contact us by sending an email to:

[consultas.compliance@hebronsa.es](mailto:consultas.compliance@hebronsa.es)



In the event of a potential breach:

- Notify Hebron immediately if it involves its goods or services.
- Take prompt action to remedy and avoid or mitigate its effects.

Hebron reserves the right to terminate the business relationship in the event of a breach of this Code (including failure to notify and remedy). Hebron also could seek any damages incurred as a result of the breach. In addition, Hebron reserves the right to conduct audits to confirm such a violation.