

NAVACEL PROCESS INDUSTRIES

CODE OF CONDUCT

Erandio, 31/03/2020

1. FUNDAMENTALS:

Our code of conduct fundamentals:

- ✓ We will never compromise safety of employees or others.
- ✓ We do business with integrity ensuring that people are treated well, and that the environment is treated with respect.
- ✓ We will always act in a socially responsible manner.

2. UN PRINCIPLES:

The purpose of this document is to have a common set of guidelines and principles that explains what we think is good for business behaviour which at the same time comply with the 10 principles of the United Nations 'Global Compact in the areas of Human Rights, labour, environment and anti-corruption (www.unglobalcompact.org)

Human Rights: we respect and support the protection of internationally proclaimed human rights and make sure they are not complicit in Human rights abuses.

Labour: we uphold the freedom of association and effective recognition of the right to collective bargaining. We promote the elimination of all forms of forced and compulsory labour, and the abolition of child labour, and discrimination in respect of employment and occupation.

Environment: we support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environment friendly technologies.

Anticorruption: we work against corruption in all its forms, including extortion and bribery, within the area of influence of Navacel Process Industries we aim to ensure that all partners, suppliers, subcontractor and employees comply with the above the principles.

3. SOCIAL RESPONSABILITY:

We promote local subcontractors and providers.

We collaborative with other local companies and different associations in the promotion or I+D for removable energy on the sea.

4. FURTHER INFORMATION

NAVACEL'S POLICIES

1. D01-03-10_R4_QHSE_Policy
2. D01-03-11_R1_Anti-Corruption_and_Bribery_Policy_EN
3. D01-03-12_R2_Alcohol_and_Drugs_Policy_EN
4. D01-03-13_R3_PPE_Policy_EN
5. D01-03-14_R1_Compotence_and_Training_Policy_EN
6. D01-03-15_R1_Road_Safety_Policy_EN
7. D01-03-16_R1_Anti-Slavery_Human_Trafficking_Policy_EN
8. D01-03-17_R0_Data_Protection_Policy_EN

Please find these policies attached below (starting next page).

QUALITY, SAFETY, HEALTH AND ENVIRONMENTAL POLICY

The Navacel Group: NAVACEL PROCESS INDUSTRIES S.A and DULANTZI METALS, S.A., leader in the design and manufacture of capital goods, assumes the commitment of obtaining products that satisfy the requirements and expectations of its clients in Quality, Quantity and Opportunity, in addition to the legal and regulatory ones, by means of the employment of Efficient and Innovative practices, Safe for the workers and Respectful with the environment.

The NAVACEL Group management leads the deployment of this policy, at all levels of the organization and assumes the following basic principles to ensure consistency with the strategy and business development:

- The viability of the company requires the continuous search for efficiency and productivity improvement in order to achieve competitive presence in the market.
- Training, communication and recognition for a job well done, as well as the participation of the people in the organization in all relevant aspects of their activity and processes, are the axes to motivate the staff towards continuous improvement.
- The respect for natural resources, through an efficient Environmental Management, is part of our commitment, based on the protection of the environment, minimizing the impact, as well as optimizing resources and acting proactively to prevent pollution.
- Safety is the first sign of respect for the personnel and their work environment, providing safe and healthy working conditions for the prevention of injury and health deterioration, eliminating hazards and reducing risks to occupational safety and health with a commitment to consultation and participation of workers and workers' representatives.

The management has a firm commitment to the continuous improvement of Occupational Health and Safety performance, acting proactively to prevent damage and deterioration of people's health, and allocating sufficient resources for the development of preventive activities.

Management recognizes human talent as its most valuable resource and understands that occupational health is a necessary condition for the well-being of its workers, with positive repercussions on overall development and productivity. Therefore, it will carry out actions aimed at promoting, preserving and restoring health. Additionally, it will generate conditions with the aim of contributing to improving people's health conditions and consolidating safe work styles and healthy living habits on a permanent basis.

All employees have the responsibility and authority to interrupt and cease all types of work whenever a risk situation exists or is considered possible in which both personnel and the environment are exposed. Any work that was interrupted will not be resumed until the task of adopting a safer approach is reassessed. If there is any reasonable doubt, the worker should immediately consult with his or her supervisor to find the best way to continue the work safely.

- The Quality, Safety, Health and Environmental Management is everyone's responsibility and the leadership of it, is the responsibility of the Management; assuming the commitments of compliance with applicable legislation or others that the company subscribes.

To this end, the Management undertakes to:

- Make this policy known to all staff.
- Provide the necessary resources
- Regularly monitor the effectiveness and efficiency of your Management System
- To review annually the validity of this Policy.

Erandio, 09/03/2020

Emilio Celorio Torre – General Director



HEALTH AND SAFETY POLICY in response to the CORONAVIRUS pandemic

NAVACEL PROCESS INDUSTRIES S.A., a leading company in the design and manufacture of capital goods, in accordance with the basic principles of its integrated management policy

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Erandio, 31th of March of 2020
Emilio Celorio Torre – General Director



ANTI-CORRUPTION AND BRIBERY POLICY

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1. POLICY STATEMENT

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our relationships and business dealings wherever we operate and to implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of the Spanish Criminal Code (SCC). December 2010.

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals. We therefore take our legal responsibilities very seriously.

ANTI-CORRUPTION AND BRIBERY POLICY

We have identified that certain of our activities create particular risks for our organisation, in particular:

- Sub-contractors.
- Overseas Public tenders.

To address these risks we have taken the following steps:

- Implemented an anti-bribery and corruption policy;
- Undertaken a risk assessment exercise, which will be subject to on-going review;
- Undertaken a training programme of senior management;
- Taken steps to implement a training programme for all individuals operating in areas of the organisation that are perceived as high risk;
- Reviewed and amended policies related to this Anti-corruption and Bribery Policy, including the Public Interest Disclosure Policy; and
- Prepared standard clauses relating to Bribery Act issues for inclusion in key contractual documentation.

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2. WHO IS COVERED BY THE POLICY?

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

3. WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Examples:

Offering a bribe

You offer a potential business partner tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for NAVACEL. It may also be an offence for

ANTI-CORRUPTION AND BRIBERY POLICY

the potential client to accept your offer.

Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

You arrange for the organisation to pay an additional payment to a foreign official to speed up an administrative process, such as clearing items through customs.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

4. HOSPITALITY AND GIFTS

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties and the giving or receipt of gifts, provided that this is done in accordance with Regulations.

Normal and appropriate hospitality and gifts would include where the hospitality or gift:

- is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- complies with local law;
- is given in our name, not in your name;
- does not include cash or a cash equivalent (such as gift certificates or vouchers);
- is appropriate in the circumstances. For example, in Spain it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, is of an appropriate type and value and given at an appropriate time;
- is given openly, not secretly; and
- is not offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Compliance Manager.

ANTI-CORRUPTION AND BRIBERY POLICY

5. WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

6. FACILITATION PAYMENTS AND KICKBACKS

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official.

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Compliance Manager.

Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

7. DONATIONS

We do not make charitable donations or contributions to political parties.

8. YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

ANTI-CORRUPTION AND BRIBERY POLICY

You must notify your manager and/or the Compliance Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the Schedule.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

9. RECORD-KEEPING

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policies and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

10. HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager and/or the Compliance Manager.

11. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that you tell the Compliance Manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

12. PROTECTION

Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

ANTI-CORRUPTION AND BRIBERY POLICY

13. TRAINING AND COMMUNICATION

All existing workers operating in areas that are perceived as high risk as far as the Bribery Act is concerned will receive regular, relevant training on how to implement and adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, agents and business and other partners at the outset of our relationship with them and as appropriate thereafter.

14. WHO IS RESPONSIBLE FOR THE POLICY?

The Senior Management Team have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Compliance Manager has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

15. MONITORING AND REVIEW

The Compliance Manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Manager.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

16. SCHEDULE: POTENTIAL RISK SCENARIOS: "RED FLAGS"

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to your manager or to the Compliance Manager:

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;

ANTI-CORRUPTION AND BRIBERY POLICY

- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- a third party requests an unexpected additional fee or commission to "facilitate" a service;
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a third party requests that a payment is made to "overlook" potential legal violations;
- you receive an invoice from a third party that appears to be non-standard or customised;
- a third party insists on the use of side letters or refuses to put terms agreed in writing;
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- you are offered an unusually generous gift or offered lavish hospitality by a third party.

17. COMMUNICATION POLICY:

Sub-contractors and providers shall send to NAVACEL their anti-corruption and bribery policy.

This anti corruption and bribery policy shall be published on Navacel web- site.

This anti corruption and bribery policy shall be published on board notice at premises and offices.

Once every year this policy shall be amended.

HSE shall inform each new employee about this policy

This Policy will be reviewed annually.

Erandio, May 2018
Emilio Celorio Torre – General Manager



ALCOHOL AND DRUGS POLICY

Purpose

Being under the influence of alcohol or drugs can seriously impair an individual's judgement and reactions leading to an increased risk of accidents and injuries occurring.

The aim of this policy is to ensure the safety of all employees, workers, and visitors by having clear rules in place regarding use and possession of alcohol and drugs, and to support those who have reported a problem with alcohol or drug dependence.

Principles

The rules on alcohol and drugs will be strictly enforced.

Those who admit to having a problem with alcohol or drugs shall be fully supported by their line manager.

All matters concerning alcohol and drugs shall be treated as confidential.

Scope

The Company's alcohol and drugs policy applies to all employees and subcontractors.

Misconduct in relation to alcohol and drugs will be dealt with in relation to the disciplinary policy.

Rules

The Company's policy is that during working hours and at all times whilst on work premises employees must be free from the influence of drugs or alcohol. This will help to ensure the health and safety of employees and others with whom they come into contact, to maintain the efficient and effective operation of the business, and to ensure customers receive the service they require.

Working under consumption of medications with legal drugs (counter or prescription drugs) could also be harmful to the safety of workers and a safe working environment.

It is the responsibility of the employee to consult with a medical specialist to ensure that the use of a authorized prescription drug during the workday does not involve a violation of this Policy. In case of the consumption of the drug could cause adverse effects posing a risk to employees or those who work with him, facilities or property and / or work performance, the supervisor must be informed.

Contravention of these rules is gross misconduct and the Company will take disciplinary action for any breach of these rules, which may include summary dismissal.

When there is reasonable belief that an individual is under the influence of alcohol or drugs on reporting for work or during the course of work, they must be sent home immediately.

This Policy will be reviewed annually.

Erandio, May 2018

Emilio Celorio Torre – General Manager



Safety is the first sign of respect for staff and their work environment, preventing any potential risks that could affect people. Personal protective equipment is equipment designed to protect against occupational hazards and should be used when risks cannot be sufficiently controlled by technical means of collective protection or by work organization procedures.

Therefore, the NAVACEL management, leads the deployment of this policy, at all levels of the organization and determines the mandatory individual protection equipment to use:



- Indirect Personnel:

Logo 1: Hard hat, safety glasses, ear plugs; Logo 2: Steel toe safety shoes; Logo 3: Proper clothes (torso and upper and lower limbs covered); Logo 4: High visibility reflective safety vest.



- Direct Personnel:

Logo 1: Hard hat, safety glasses, ear plugs; Logo 2: steel toe safety boots; Logo 3: proper clothes (torso and upper and lower limbs covered); Logo 4: safety gloves.



Works in height: harness always and anchored to a fixed point



Work in confined spaces: with autonomous mask

**** Exceptions **** → Whenever you are in a narrow and confined space it is understood that the helmet will not be indispensable, as well as in the cabin of shot and paint.

When welding with the semiautonomous welding screen, we will not use the helmet.

This Policy will be reviewed annually.



Erandio, August 2018

Emilio Celorio Torre – General Manager



COMPETENCE AND TRAINING POLICY

Purpose

Search current and future training needs of Navacel Process Industries S.A. personnel.

The aim of this analysis is to identify the skill gaps identified through analysis of existing problems and projects in the company. It also tries to identify future trends of development that can generate new needs, and define and prioritize the resulting training activities.

Sistematic

- ❶ *Knowledge of the current situation of the center.*
- ❷ *Identifying processes of change, technological, organizational or other level, could generate necessary to correct training deficiencies in the near future.*
- ❸ *Analysis of projects in the short, medium and long term.*
- ❹ *Analysis of problems and malfunctions, employment trends and cultural changes that lead to training needs.*

Navacel Process Industries S.A. has obtained all those certifications for working efficiently providing a guarantee of quality to its customers, which are ISO 9001: 2008, ISO 14001: 2004, OHSAS 18001: 2007 and ISO 3834-2. It also has the U, U2 and S certificates by ASME.

It has also been recorded and verified on platforms like FPAL and Repro.

This Policy will be reviewed annually.

Erandio, May 2018

Emilio Celorio Torre – General Manager



ROAD SAFETY POLICY

Purpose

Navacel Process Industries S.A. (NAVACEL) has as its aim the integration of Road Safety at Work within the Policy Management Safety and Health at Work, allocating the necessary resources and planning them properly in order to reduce traffic accidents.

Principles

The following principles that comprehensively improve security in all modes of transport and road safety are included in the Preventive Policy, reducing the risk of accidents both mission and in itinere.:

- Minimize the risk of accidents on missions and in itinere through the introduction of technical and organizational measures.
- Include Road Mobility within the integration of prevention in the organization of the company, will be developed so that any worker who assume or to be entrusted with a task command over others, is obliged to comply, enforce and require the safety and health standards set by the company.
- Awareness of staff in relation to the prevention of accidents and respect the rules of traffic, taking pro-active behaviors against the importance of safe driving.

Scope

Compliance with this policy is the responsibility of all personnel of *Navacel Process Industries S.A.*

Responsibilities

To carry out the implementation of this policy the company management shall:

- Communicate this policy to all staff
- Provide the necessary resources
- Ensure that staff complies with having their current license and are insured.
- Train staff on safe driving mode.
- Review this policy to adapt to the new objectives of the organization in line with our goal of continuous improvement.

The company personnel will:

- Have the appropriate driving license for the type of vehicle and the country where it is used.
- Plan the trip and be insured
- Maintain a professional level behavior circulation.
- Do not bring unauthorized activities of the company passengers.
- Report any impact or accident the person responsible for security.

This Policy will be reviewed annually

Erandio, May 2018

Emilio Celorio Torre – General Manager



ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Responsibilities

General Management has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Compliance

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Everyone is required to avoid any activity that might lead to, or suggest, a breach of this policy.

This Policy will be reviewed annually.

Erandio, May 2018

Emilio Celorio Torre – General Manager



DATA PROTECTION POLICY

NAVACEL Process Industries S.A., a leader in design and manufacturing of capital equipment undertakes to obtain products that meet the needs and expectations of customers in quality, quantity and timeliness, as well as statutory and regulatory requirements by efficient, innovative and safe practices for employees, environmentally friendly and respectful with our employees, clients and suppliers data privacy.

The management of NAVACEL Process Industries S.A leads the deployment of this policy at all levels of the organization and assume the following basic principles to ensure consistency with the strategy and business development:

- This policy applies to all personal data processed and administrated by NAVACEL Process Industries S.A.
- This policy has to be distributed and communicated to every interested stakeholder in the management, procurement and reception chain.
- The sole purpose for the gathering of data by the Company is related to the Company's main activity and no other. The main objective of gathering data is to offer a better service quality, a greater added value to our produced goods, improving our client's and supplier's experience and our employee's daily tasks.
- It is each person responsibility to be fully aware of their data protection rights. Every user is entitled to the following:
 - ✓ The right to access. Every person involved has the right to request NAVACEL Process Industries S.A. copies of their personal data. (In case of any cost, the company may charge the individual with that cost)
 - ✓ The right to rectification. The person involved has the right to request NAVACEL Process Industries S.A. to correct any information they believe is inaccurate. They also have the right to request the Company to complete information believed to be incomplete.
 - ✓ The right to erasure. The person involved has the right to request NAVACEL Process Industries S.A. to erase their personal data from our data bases, under certain conditions.
 - ✓ The right to restrict processing. The person involved has the right to request NAVACEL Process Industries S.A. to restrict the processing of their personal data, under certain conditions.
 - ✓ The right to data portability. The person involved has the right to request NAVACEL Process Industries S.A. to transfer the data that we have collected to another organization, or directly to them, under certain conditions.

The company undertakes to make an accelerated treatment of the requests of the interested parties regarding their personal data with an objective of response around 1 month of receipt and confirmed receipt of the request.

The company and the Board recognize that transparency is a primary value for human and commercial relations, so it makes available appropriate channels of contact so that those interested can send their requests and concerns as quickly, directly and efficiently as possible.

All employees of the company have the responsibility to ensure the correct use of the personal data of third parties and their own and have the authority to communicate any irregularities found in this regard by requesting the initiation of a corresponding investigation or making a complaint through the line transparent.

All personal data belonging to our collaborators, such as persons and companies outside NAVACEL Process Industries S.A. will be stored in computerized and registered drives with restricted access to the different collaborators of the company according to their role, in which their responsibilities regarding data management are identified.

DATA PROTECTION POLICY

We strongly believe in privacy and it is the responsibility of all the members of the company to create or propose the strictest rules to apply in the protection of data and the use of them in a fair manner, complying with current legislation and in a transparent way.

Erandio, May / 2019

Emilio Celorio Torre – General Manager

