

IDENTIFICATION OF CHANGES REGARDING THE PREVIOUS REVIEW:

Adequacy to UNE-EN 9120:2018

| Issued | Revised | Approved |
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| Signature and Date  14/10/19 | Signature and Date  14/10/19 | Signature and Date  14/10/19 |
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This document reinforces the culture and ethical values of TCX MICRO SL, and it also constitutes a tool of social responsibility that guides the behavior and behavior of all the people that make up the organization as a way of reaffirming the will to maintain the best standards of honesty, integrity and transparency.

The following content follows from the Code of Ethics and Conduct:

- The ethical values that will guide our actions,
- Specific principles and expected behaviors before our significant interest groups
- Guidelines to enforce the Code and have channels to communicate concerns, doubts or deviations from it.

Therefore, the Code of Ethics and Conduct is disseminated in a way that is accessible to all significant interest groups of TCX MICRO SL: Senior Management, Management and Management Team, Employees, Property, Customers, Suppliers, Professionals and external collaborators, Administration Public and civil society in general.

1.- GUIDLING PRINCIPLES

TCX is a strategic partner for industrial and automotive manufacturers. It is a leading provider of electronic component services with more than 15 years in the market.

Today, he enjoys a solid reputation as one of the service providers with the greatest trust, professionalism and customer orientation in the industry.

Senior Management of TCX MICRO, S.L. has established as a priority the commitment to quality by allocating and providing adequate resources to achieve it and also to obtain information that facilitates the analysis of the results as a basis for decision-making that guides continuous improvement.

QUALITY COMMITMENTS

- a) Offer the customer a reliable, flexible and dynamic service.
- b) Have the latest search tools to locate the electronic components that the customer needs.
- c) Speed in the commercial response and compliance with the agreed deadlines.
- d) Excellence in customer service.
- e) Document the systematic method of work of our strategic areas, in order to use it as a consultation and learning tool for new incorporations.
- f) Use the tools that ISO 9001 puts at our disposal to continuously improve.
- g) Observe the importance of complying with the requirements agreed with the client and the legal and regulatory requirements.

Ethics and respect for current legislation: TCX MICRO S.L. It is governed by general ethical principles and respect for the law in force in each of the countries where it supplies products.

2.- ETHICAL BEHAVIOURS AND ACTION RULES

2.1.- HIGH MANAGEMENT, MANAGEMENT AND MANAGEMENT TEAM

1. Perform the exercise of his position in an ethical, responsible and professional manner.
2. It will promote the dissemination of the ethical values and principles that will guide the behavior of all its members, complying with and enforcing this Code, for that purpose it will make it known and establish the appropriate mechanisms to guarantee its application.
3. It will carry out all the necessary actions to guarantee the continuity and sustainable growth of the organization, as well as compliance with the applicable regulations, both at a general level and at a sector level.
4. Your relationships with the organization's interest groups will be based on respect as a means of generating good personal relationships.
5. Will have an attitude of support, service and trust towards its collaborators; and will act with justice and fairness in all its decisions, all with the purpose of generating and maintaining a good working environment in the organization.
6. It will put the general interest of the organization before its own, always basing its actions on honesty and transparency.
7. It will promote communication and staff participation, establishing channels that facilitate communication both ascending and descending, and will always be attentive to any suggestion, doubt, problem or claim of any person.
8. Ensure the development of working people through access to training that is necessary for the best exercise of their activities, as well as for promotion within the organization.
9. They will carry out all the necessary actions to achieve a good working environment, job satisfaction of the people who make up the organization, as well as motivation and involvement in the objectives of the company.
10. It will base the labor relations in the fulfillment of the requirements established in the regulation of current application, so much in general, sectorial or agreement, looking for the labor stability of the workers.

2.2.EMPLOEES

1. Perform the exercise of his position in an ethical, responsible and professional manner.
2. It will promote the dissemination of the ethical values and principles that will guide the behavior of all its members, complying with and enforcing this Code, for that purpose it will make it known and establish the appropriate mechanisms to guarantee its application.
3. It will carry out all the necessary actions to guarantee the continuity and sustainable growth of the organization, as well as compliance with the applicable regulations, both at a general level and at a sector level.
4. Your relationships with the organization's interest groups will be based on respect as a means of generating good personal relationships.

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10. It will base the labor relations in the fulfillment of the requirements established in the regulation of current application, so much in general, sectorial or agreement, looking for the labor stability of the workers.

2.3.- PROPERTY

1. All communications and information transmitted to the property shall be governed by the principles of clarity and transparency.
2. The commitment not to hide any relevant information on the progress of the company will be guaranteed.
3. All the topics requested by the Property will be treated following the procedures established for it and informing in a precise, reliable and sufficient manner.

2.4.- CUSTOMERS

1. Customers will be informed about the Code of Ethics and Conduct implemented, its repercussions and benefits, trying to involve the client in socially responsible behavior in their organization.
2. A product and service will be offered to the client that seeks to meet their needs and expectations, following safety, sustainability and quality criteria.
3. The relationship with the client will be based on respect, honesty and transparency as a means to achieve a satisfactory and long-lasting relationship. Based on this principle of action, the transmission to the client of all the necessary information of the product / service offered and without hiding any important data will be guaranteed.
4. All agreements agreed in the contractual relationship will be fulfilled, demonstrating that honesty and seriousness is the basis on which TCX MICRO S.L. It supports your business relationships.
5. Customer complaints will be answered as quickly as possible, encouraging dialogue and always seeking a fair resolution for all parties involved.
6. No attempt will be made to win the favor of customers through the use of gifts or attentions that go beyond what is considered normal in a business environment.
7. Every worker who maintains contact with the client, represents and is the image of TCX MICRO S.L. Therefore, before a client, he must maintain a faithful behavior to the culture and values of the organization.
8. The confidentiality of the data, information, industrial and / or intellectual property provided by the client will be guaranteed.

2.5. SUPPLIERS

1. They will be informed about the Code of Ethics and Conduct implemented, its repercussions and benefits, trying to involve the provider in socially responsible behavior in your organization.
2. The ethical and socially responsible behavior of the supplier companies in the selection and evaluation processes will be assessed.
3. The relationship with the supplier companies will be based on respect, honesty and transparency as a means to achieve a satisfactory relationship for both parties.
4. All agreements agreed in the contractual relationship will be fulfilled, demonstrating that honesty and seriousness is the basis on which TCX MICRO S.L. It supports your business relationships.
5. Dialogue will be encouraged as a way of resolving conflicts that arise in the relationship with supplier companies.
6. The relations with the suppliers, in no case will be based on the gifts or attention that we can receive from them. Gifts or attentions that go beyond those considered normal in business relationships will not be accepted.

2.6. PROFESSIONALS OR EXTERNAL COLLABORATORS

1. All professionals or external collaborators will have a spirit of service and support towards employees and will act in a fair and respectful manner.
2. It shall be ensured that no external professional or collaborator is subject to or maintains vexatious or intimidating treatment by a manager or employee.
3. Transparency and clarity in information will prevail by establishing channels that foster communication in every possible way.
4. The professionals and external collaborators will respect at all times the confidentiality of the information to which they have access during the provision of their services.

2.7. PUBLIC ADMINISTRATIONS

1. TCX MICRO S.L. undertakes to satisfy all legal requirements in relation to Public Administration.
2. It is established as an anti-corruption policy in dealing with the Public Administration, zero tolerance for bribery and extortion practices, committing to your complaint in the event that these practices are detected.

2.8 COMPETITION

1. TCX MICRO S.L. It undertakes to compete loyally with other companies cooperating to achieve a free market based on mutual respect between competitors and refraining from unfair practices.
2. You will not use unethical methods to attract customers from other competitors.

2.9. ENVIRONMENT

1. TCX MICRO S.L. It is committed to protecting the environment and carrying out its activities in a responsible manner, preventing pollution and reducing the impact of the processes and activities carried out to improve its environmental performance.
2. In this sense, TCX MICRO S.L. has established environmental and sustainability policies and practices from which:

- a. It has established a plan to evaluate, prevent and manage environmental risks associated with processes and activities (such as waste management, ...), and thus mitigate the organization's impacts on the environment.
- b. It seeks the optimization of consumption and natural resources, as well as the improvement in energy savings.
- c. It ensures that employees know and assume these policies and act at all times in accordance with the criteria of respect and sustainability, adopt habits and behaviors related to good environmental practices and contribute positively and effectively to achieving the objectives established in this matter by organization.

2.10.-COMMERCIAL PRACTICES

1. TCX MICRO S.L. will properly manage, protect and conserve resources and will not use them for activities not allowed by the organization or by the applicable legislation and / or regulations.
2. Despite the intense competition of the markets, all commercial practices will be carried out in accordance with the laws and regulations in force and any illegal conduct is strictly prohibited.
3. No secret agreements between two or more parties with fraudulent, illegal or dishonest purposes such as influencing, setting or controlling prices, terms or conditions will be carried out.
4. To distinguish ourselves from our competitors, we must serve the quality of our products and service, as well as our reputation, therefore, we must not, directly or indirectly, offer, promote, grant or authorize the delivery of anything of value that its purpose is to influence or obtain an undue advantage at the commercial level with a customer, supplier or through a third party. Therefore, the criteria of reasonableness and proportionality should be used to assess whether it is responsible and ethical to accept gifts or compensation that are intended to influence commercial, professional or administrative relationships, both with public and private entities, without being subject to this code. set or determine what minimum and maximum quantities should be observed in the commercial attention.

Conflict of interests

5. Personal relationships and activities can lead to real or apparent conflicts of interest. All persons related to the commercial activities of TCX MICRO S.L. they must be able to identify situations in which direct or indirect interests could conflict and in the case of minimal doubt they should consult with Management.
6. TCX MICRO S.L. considers that the relationship with its employees must be based on loyalty that stems from common interests. In this sense, it respects the participation of its employees in other business or financial activities provided they are legal and do not enter into unfair competition or collision with their responsibilities as employees. Likewise, employees must inform the company in the event that they or their close relatives participate or will participate in the governing bodies of other companies that may collide with the interests of TCX MICRO S.L.

Bribery, corruption and illegal commissions

7. Any practice of corruption, bribery or payment in all its active and passive forms is prohibited, either through acts, omissions or through the creation or maintenance of favor or irregular situations.
8. They will not be carried out on behalf of TCX MICRO S.L. monetary contributions or in any other way to administrations, governments or entities to obtain a position of advantage or influence.
9. Donations, grants or loans to political parties will not be made in a non-transparent manner.

Business practices with customers

10. All employees must act seeking excellence in their relationships with customers, with the objective of achieving the highest levels of quality and excellence in products and services for the long-term development of relationships based on trust and mutual respect.

Business practices with suppliers

11. The goods or services provided by the suppliers or collaborating companies will be monitored, evaluating them in an objective manner in relation to the terms contemplated in the offer document, contract and / or order.

12. It will be promoted among suppliers and external collaborators, without prejudice to the fulfillment of the contractual conditions and under the premise of respect for the faculty of management, practices in accordance with the guidelines of conduct included in this ethical code. In this sense, sustainable / social purchase will be promoted, that is, the acquisition of products or services in which environmental and social considerations are valued together with the usual criteria of quality, safety, price or efficiency.

2.11.- CONFIDENTIALITY

The personal data to which TCX MICRO S.L. has access. They will be treated in accordance with current legislation on the Protection of Personal Data and with the Security Manual implemented in the organization.

During relations with the organization, some people may be in contact with confidential information and that consequently is not known by third parties. None of these persons may use or disclose this confidential information belonging to the organization or to third parties with whom they have business relations even after their contractual relationship with TCX MICRO SL has ended, in accordance with the commitment of confidentiality signed by all employees (duty of secret).

The employees of TCX MICRO S.L. they must immediately notify any anomaly that they have detected and may involve a violation of the security and confidentiality of sensitive information (disappearance of documents, anomalous request for information, indications that allow the manipulation of computer systems, etc.)

3.- ACCEPTANCE AND COMPLIANCE WITH THE ETHICAL CODE

This code of ethics is mandatory for all employees of TCX MICRO S.L. and nobody, regardless of their level or position, is authorized to contravene the provisions of this code.

Breaches or violations of this code of ethics and conduct jeopardize the prestige and good image of TCX MICRO S.L. Therefore, all persons have the obligation to immediately report any breach or bad practice that they may observe in the performance of their professional activities.

Non-compliance will be analyzed in accordance with internal procedures and current regulations and conventions.

Any questions that may arise regarding the interpretation or application of this code should be consulted with Management.

4.- NOTIFICATION OF CONCERNS, SUGGESTIONS AND / OR COMPLAINTS

We all have the duty and responsibility to report in good faith any violation of this Code that is known or suspected, including any breach of laws, regulations, regulations or policies that apply to TCX MICRO S.L.

4.1.- CONFIDENTIALITY OF THE PERSON COMMUNICATING AN FACT

All communications and inquiries will be treated confidentially. The person may choose to maintain his anonymity, although in some cases this may make it difficult to investigate, monitor or resolve the reported event.

No reprisal or punishment shall be taken against persons who report in good faith of suspected illegal or unethical conduct of another person.

4.2.- CHANNELS TO COMMUNICATE CONCERNS, SUGGESTIONS AND / OR COMPLAINTS

The workers of the organization may communicate any concerns, suggestions and / or complaints to their direct manager or to Management, identifying themselves or anonymously.

Any person in the organization that receives information about a reportable act must act diligently and responsibly on the matter of which they are informed, redirecting the communication to the person responsible.

The attached form will preferably be used for communication and will be sent in a sealed envelope or by email to:

Cory Taylor
General Manager
TCX MICRO S.L.
Carrer Arno Jager, 20, 08390 Montgat, Barcelona
e.mail: cory@tcxmicro.com

The external persons of the organization can also present concerns, suggestions and / or complaints in relation to this code of ethics and conduct. To do this they will direct their communications using the same channels described.

4.3.- COMMUNICATIONS TREATMENT

Management will assign a registration number to the communication received together with any other evidence provided, then proceed to its analysis and verification for resolution, with the support it deems appropriate.



TCX MICRO, S.L
CODE OF ETHICS AND CONDUCT

Date : 14/10/19

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**DOCUMENT OF COMMUNICATION OF CONCERNS, SUGGESTIONS OR COMPLAINTS IN
RELATION TO COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT.**

Identification data

All communications and inquiries will be treated in a completely confidential manner. The person may choose to maintain his anonymity, although in some cases this may make it difficult to investigate, monitor and / or resolve the reported event.

Name:

Address:

Company:

Department:

e-mail:

Teléfono:

Description of the concern, suggestion or complaint

Cory Taylor
General Manager
TCX MICRO S.L.
Carrer Arno Jager, 20, 08390 Montgat, Barcelona
e.mail: cory@tcxmicro.com

Nº:1

Date:14/10/19