

## **CORPORATE SOCIAL RESPONSIBILITY (CSR) CODE OF CONDUCT**

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## **1. INTRODUCTION**

### **1.1 PURPOSE**

By means of this Code, and in accordance with the principles of transparency, SETGA, S.L.U. (hereinafter SETGA) wishes to develop and publicly disseminate the guidelines, principles and values that shape the company's conduct in relation to all the stakeholders in the organisation's activities and achievements.

This Code of Conduct falls within the sphere of the company's good governance and corporate social responsibility measures and develops and formally sets out the values and principles that must guide the professional conduct not only of SETGA as a company, but also of its employees, representatives and agents, all for the purpose of establishing a universally accepted code of corporate ethics.

The principles and values set out in this Code go above and beyond the company's commitment to comply with local, regional, national and international laws and regulations. They place a duty on the company and its members to observe ethical behaviour in the performance of their activities and to strive for continuous improvement to achieve sustainable development that will satisfy present needs without jeopardising the ability of future generations to meet their own needs.

The Code will be placed at the permanent disposal of all stakeholders on the organisation's website and notice board. It is binding for the company, the company's management and its personnel, whatever their geographical location, level of responsibility or work, and whatever their contractual relationship or sectoral agreement with the company.

The senior management is responsible for implementing and supervising the social responsibility principles within its decision-making processes, while also encouraging personnel to practice and integrate these principles within the corporate culture.

## **2. STAKEHOLDERS**

All stakeholders, both groups and individuals (workers, suppliers and clients, as well as the Government and society at large) are affected to a greater or lesser degree by SETGA's social conduct. As such, SETGA shall consider the interests of these stakeholders and act accordingly, while also ensuring the right to privacy of all the parties involved in its activity.

### **2.1. COMMUNICATION, DATA PROTECTION AND CONFIDENTIALITY POLICY**

For the purposes of protection, storage, safekeeping and non-disclosure of personal data and work documents and data, SETGA's data protection policy adheres to the provisions of the regulations in force regarding confidentiality and the storage and safekeeping of data, in order to protect the confidential information of clients and suppliers, keeping it secure, limiting access and avoiding public disclosure of such data, including after the completion of the commercial relationship, while at all times respecting trade secrets and other information owned exclusively by third parties, except when the interested parties have given their express consent, when obliged to do so by law, or in compliance with court or administrative rulings.

## 2.2. COMPANY PERSONNEL

SETGA has created internal communication processes to provide its personnel with accessible information and to ensure they receive all information of interest, as well as communication channels open to all personnel from the moment they join the company, all of which are updated to reflect changes to practical and legislative requirements, guaranteeing the flow of information at all times.

In this regard, SETGA has a system for receiving complaints, consisting of a 'contact' section on its website, which covers all interests, needs and complaints from all of its stakeholders. It also has a physical complaints/suggestions box for use by SETGA personnel for internal matters, with measures in place to protect the anonymity of anyone who reports breaches of this Code of Conduct.

All complaints and suggestions are forwarded to the parties responsible and to the management in meetings held on a periodic basis, and all of them are analysed and responded to.

There are also information boards in the entrance and the meeting rooms for posting relevant information, notifications and details of upcoming training sessions, as a way of ensuring direct communication with personnel.

## 2.3. CLIENTS

For the purpose of ensuring continuous improvement, SETGA has established the following priorities in relation to its clients:

- ✓ Ongoing efforts to attain the highest levels of product and service quality.
- ✓ Ongoing innovation and adaptation of products to different needs.
- ✓ Strengthening of the company's dialogue with, and service to, clients and society, based on their requirements, and work to analyse and resolve incidents.
- ✓ Strict respect for the rights of its clients in all areas, including data security and confidentiality, with SETGA undertaking to observe strict compliance with legislation related to personal data protection, information society services and other applicable legislation.

SETGA personnel are obliged not to disclose any confidential data to which they may have access as part of their work.

## 2.4. RELATIONSHIP WITH SUPPLIERS, CONTRACTORS AND COLLABORATORS

Relationships with the company's suppliers and/or service providers should always be conducted in accordance with good ethical conduct and ensure correct exchange of services, mutual satisfaction and minimal risk. In this regard, **the following aspects** shall be taken into consideration:

- ✓ Value for money/cost effectiveness.
- ✓ Compliance with legal and contractual obligations and mutual respect between the supplier and the client.
- ✓ Adherence to and compliance with the SOCIAL RESPONSIBILITY CODE OF CONDUCT FOR SUPPLIERS. Any breaches or suspected breaches of the same, whether on the part

of an employee or a subcontracted worker, must be reported, keeping the information confidential at all times in order to protect the person who reports the incident.

- ✓ Compliance with employment and health and safety regulations.
- ✓ The environmental impact of the product and/or service as well as the company's regular activities.

## 2.5. Society

SETGA has the following commitments to society:

- ✓ To adapt its products and services to the needs of society.
- ✓ To contribute towards energy efficiency and sustainability, as well as the sustainable economic development of the area where it carried out its activities.
- ✓ To guarantee clear and accurate information on the company, its organisation and activities, for the purpose of generating trust.
- ✓ To comply with the applicable health and safety and environmental legislation in order to ensure better protection of workers and the environment and to avoid environmental damage.
- ✓ In line with the principles and values of this Code and with its activity, SETGA contributes to several CSR and environmental initiatives outside of the company through its sponsorship of sporting organisations and help in encouraging the social integration of groups at risk of exclusion, with employment initiatives for people aged over 45, people in long-term unemployment, people with special needs, etc.

## 2.6. GOVERNMENT

In its relations with the various Administrations, SETGA observes the following principles:

- ✓ Compliance with the applicable laws and regulations in force.
- ✓ Collaboration and transparency in any auditing activities that fall under the competency of the Administration, as well as submission of information and documents for the public monitoring of sponsorships and/or collaboration programmes.
- ✓ Adherence to the principles of coherent personal conduct set out in this Code of Conduct, avoiding any conflict with regulations or, if this does occur, reporting it, where applicable.

## 3. SOCIAL RESPONSIBILITY POLICY AND PRINCIPLES

As part of its quality, health and safety, environment, and energy saving management system, SETGA has in place a policy that includes aspects of SOCIAL RESPONSIBILITY, which is disseminated and published in the present Code of Conduct, and which is based on the following basic principles:

- **Accountability and transparency:** SETGA, S.L.U. is committed to responding to the impacts that its decisions and activities have on the environment, the economy and society in general, especially any significantly negative impacts, and also undertakes to implement whatever measures are required to prevent a recurrence of such unexpected and involuntary negative impacts. Furthermore, in adherence to the principle of transparency it is committed to reporting clear, precise and complete information, to the extent that is reasonable and sufficient, on its policies, decisions and activities, including their known or probable impacts on society and the environment.
- **Ethical conduct:** SETGA, S.L.U. is committed to ensuring its conduct is at all times ethical and based on the values of honesty, fairness and integrity, and to promote these

principles which involve a concern for other people, for animals and the environment, also reflecting a strong will to ensure the impact of our activities and decisions are aligned with the interests of our stakeholders.

- **Respect for human rights and basic freedoms:** SETGA, S.L.U. is committed to respecting the rule of law, human rights and public freedoms, avoiding complicity in any action or omission that could constitute an infringement of any such rights or freedoms.
- **Cooperation with the community:** the company fosters collaboration with all the communities in which it carries out its business activities for the purpose of balancing these activities with social expectations. To this end, it offers sponsorships for activities that drive social participation.
- **Health, safety and the environment:** as well and guaranteeing measures to protect the health and safety of its personnel, the company promotes good practices in the area of health, safety and the environment, with a focus on prevention.

#### 4. GENERAL RULES OF CONDUCT

SETGA, S.L.U. always carries out its activities in compliance with the following:

- ✓ Human rights, as established by the United Nations Universal Declaration of Human Rights.
- ✓ The International Covenant on Economic, Social and Cultural Rights.
- ✓ The International Covenant on Civil and Political Rights.
- ✓ The United Nations Convention on the Rights of the Child.
- ✓ The United Nations Convention on the Elimination of all Forms of Discrimination against Women.
- ✓ The United Nations International Convention on the Elimination of all Forms of Racial Discrimination.
- ✓ The principles of the Conventions and Recommendations of the International Labour Organisation (ILO), as regards its activities and treatment of its personnel.
  - Convention 1 of the ILO on hours of work (industry) and Recommendation 116 (reduction of hours of work).
  - Conventions 29 and 105 (forced work and slavery)
  - Convention 89 (freedom of association)
  - Convention 98 (right to collective bargaining)
  - Conventions 100 and 111 (equal remuneration for men and women workers for work of equal value, and discrimination)
  - Convention 102 (social security – minimum standards)
  - Convention 131 (minimum wage fixing convention)
  - Convention 135 (workers' representatives)
  - Convention 138 and Recommendation 146 (minimum age)
  - Convention 155 and Recommendation 164 (health and safety at work)
  - Convention 159 (vocational rehabilitation and employment of disabled persons)
  - Convention 169 (indigenous and tribal peoples)
  - Convention 177 (home work)
  - Convention 182 (worst forms of child labour)
  - Convention 182 (maternity protection)

#### 4.1. COMPLIANCE WITH LEGAL REQUIREMENTS

The activities and services of SETGA, S.L.U. shall be conducted in compliance with the provisions of the regulations in force, strictly adhering to the national legislation of the country in which it operates or in which its services are contracted that applies to the company's area of activity, including legislation related to work, immigration, health, safety and environment, and any other applicable fundamental right established in international codes.

It shall also act in compliance with the obligations it has voluntarily undertaken and with the provisions of standard SA 8000.

As regards national legislation and other applicable rights, as well as the obligations undertaken by the company, the applicable regulation shall always be the strictest one.

All the commercial activities of SETGA comply with all the laws and regulations in force in the countries and jurisdictions where it operates, both where it produces its goods and where it provides any of its services, as well as the places where such goods are incorporated into the value chain.

SETGA keeps accurate and transparent records and accounts to prove compliance with all applicable laws and regulations.

#### 4.2. ANTICORRUPTION

SETGA shall not be involved in any type of bribery, tipping, corruption, extortion or embezzlement. It shall not carry out any action that infringes, or causes its clients or suppliers to infringe, any current anticorruption law or regulation.

#### 4.3. CONTRACTING, WORKERS' RIGHTS AND EMPLOYMENT CONDITIONS

When hiring permanent and temporary staff, SETGA, S.L.U. shall only hire employees who are legally authorised to work at the plant where it carries out its production activities, and in the geographical area where its services are provided.

Prior to contracting an employee, it shall precisely ascertain their age and their legal entitlement to work in the country, as well as all the other details provided on their CV. Records shall always be kept of these checks (copy of the person's national ID card or other ID document that proves their age, or photograph that relates the person to the details provided, and any other documents that may be required to confirm the authenticity of the data).

- All personnel shall be **legally contracted**. Foreign personnel must be legal residents in the country where they carry out their work and have a **valid work permit** for the period of their contract.
- Workers shall be treated with **dignity and respect**. The abuse of workers by any person shall not be tolerated.
- The company **acknowledges and respects the right of workers to associate with, or become a member, or decline to become a member, of any** [missing text] as permitted by and pursuant to the laws and regulations in force, as well as the **right to collective bargaining**.
- The company acknowledges the **right of workers to create, join and run trade unions** in accordance with the law, and prohibits any kind of reprisal for supporting the freedom of association or collective bargaining.

- Workers and their representatives **shall not be discriminated against** due to their membership of a legal trade union. The company guarantees that the workers' representatives shall not be discriminated against, and that such representatives shall have access to the workers in the workplace.
- **SETGA shall not use or support the use of child labour** and shall ensure that child labour has not been used in the production or provision of its goods and services.

**The employment conditions** and the terms and conditions of the employment **contracts** shall comply with the applicable laws and shall be provided to workers using clear language. Contracted personnel shall be provided with written details of their work in clear language.

The company's workers are covered by the current version of the **Pontevedra Metal Industry collective bargaining agreement**, which shall be made available to all personnel for consultation.

A copy of said agreement shall be provided to anyone who so requests. Workers shall also be provided with an up-to-date copy of the **salary tables**.

Any **disciplinary measures** applied shall be those set out in the applicable collective bargaining agreement and must be recorded in the personnel file by means of a document detailing the measure.

**Child labour:** a child is considered to be any person under the legal age of employment pursuant to the laws of the country where the facilities are located, or in the absence of such laws, under the legal age for completing compulsory education. SETGA's suppliers shall not employ anyone under the age of 16, regardless of the minimum legal age of employment of the country where the supplier is located. Furthermore, any worker under the age of 18 shall be considered a young worker and shall be allowed to complete any compulsory education required by local laws. Nobody under the age of 18 shall be allowed to carry out hazardous work, understood as work which, due to its nature or the conditions in which it is performed, involves a high risk of damage to the health or safety of the worker in the absence of suitable protection.

SETGA shall not use or support the use of **any type of forced labour**, nor shall it require its personnel to hand over "deposits", identity documents or other documents such as passports or permits as a condition of employment when they start working for the company.

All work must be voluntary and no type of slave labour shall be accepted, including labour in conditions of servitude, labour to pay off debts or involuntary prison labour.

SETGA shall not be involved in human trade, trafficking or exploitation, or with imported merchandise generated through slavery or human trade.

SETGA shall not apply or approve **any type of discrimination** based on race, caste, place of origin, religion, ancestry, disability, gender, sexual orientation, civil status, membership of trade unions, political affiliation or age as regards, hiring, training, promoting, dismissing or retiring its personnel, or as regards any other condition throughout its selection, training, remuneration and promotion processes.

SETGA shall not tolerate any type of sexual, psychological or verbal harassment or abuse.

In accordance with applicable legislation, SETGA fosters and maintains a workplace that is free from discrimination and shall deal with its employees at all times in a respectful, fair and dignified manner. As such, it shall not permit any behaviour, including gestures, language or physical contact, that is sexually coercive, threatening, abusive or exploitative. Furthermore, it

shall not use or support the use of physical punishment, physical or psychological coercion, or verbal abuse.

The personnel's **reproductive rights** shall not be restricted or limited.

The workplace environment requirements that protect the health and safety of pregnant women, women who have recently given birth, and breastfeeding women shall be respected.

Female candidates shall not be questioned regarding whether they are pregnant, unless this is necessary for health and safety reasons, for example if the job involves exposure to chemicals.

SETGA guarantees that the **work timetables** of its personnel comply with applicable legislation and collective bargaining agreements and ensure a **sufficient amount of rest time**. It also guarantees all the legally established leave, holidays and benefits.

For the purpose of dealing with an irregular workload, and to avoid as far as possible the adoption of measures that affect the stability of employment, redundancy schemes, and the need for overtime, SETGA may impose an irregular distribution of the annual work timetable amounting to 10%, while respecting the maximum working year.

Employees shall be given at least one and a half days off every seven days, and overtime shall only be worked when required due to force majeure, production peaks or unforeseen circumstances, and always on a voluntary basis, as provided for in the collective bargaining agreement. All overtime shall be remunerated, although under no circumstances may it exceed 12 hours per employee per week. If permitted by local legislation, employees may voluntarily work overtime during their days off, as long as they have at least one day off within the following seven days. Employees must never work more than 21 days consecutively without one day off. All the **hours worked shall be recorded** using a data recording system. Regular reports shall be created on the overtime hours worked in each section and the cause. Workers shall be provided with a copy of the overtime summary and the related remuneration.

Employees shall be paid a **legal wage** that includes overtime, social security payments and equal pay for equal work, with no discrimination. Disciplinary measures shall not involve deductions from wages. SETGA guarantees that workers shall be provided with a clear breakdown of their salary and benefits and that only the legally allowed deductions shall be applied.

SETGA shall ensure the application of the measures envisaged in the relevant labour regulations and shall foster measures that have an impact on its workers' daily lives, favouring work-life balance through agreements that make it possible **to combine professional and family commitments** and ensuring that its workers are provided with information on time off and leave as set out in the relevant regulations.

#### 4.4. OCCUPATIONAL HEALTH AND SAFETY

The company has specific measures in place for managing health and safety matters, with a UNE-EN ISO 18001-certified occupational risk management system.

SETGA's occupational health and safety policy is integrated with other areas and is published on its website, so that the necessary preventive and supervisory measures are taken to guarantee compliance with legislation both on the part of the company and its personnel and clients.



SETGA has a system to prevent, detect and respond to potential risks to the health, safety or protection of its employees. A member of SETGA's management has been appointed as health and safety officer for the entire workforce, with this person being responsible for implementing the provisions regarding health and safety in the workplace.

An Occupational Health and Safety Plan is in place, managed through an External Health and Safety Service Provider, which covers workplace health and safety, industrial hygiene, applied ergonomics and psychosociology, and health surveillance, and which includes the following activities:

- Analysis of health and safety management and advice and support in relation to health and safety
- Health and safety plan
- Risk assessment
- Planning of health and safety measures
- Emergency measures
- Advice on information and training for workers regarding the risks involved in their job and how to prevent them
- Investigations regarding accidents
- Health surveillance.

SETGA's EVACUATION AND EMERGENCY PLAN makes it possible to manage all possible emergency situations. It sets out the most probable cases and the measures to be taken, considering aspects such as awareness of the plan on the part of personnel, any corrections that need to be made and related procedures.

Possible emergency situations that may arise in SETGA and which are covered by the plan include: fire in the facilities, power cuts, uncontained spills, explosions, leaks of harmful gases, flooding, burst pipes, etc. There are suitable **emergency exits** and **evacuation routes** that are free from obstacles and duly **signposted**.

The facilities can be accessed by fire engines and other emergency vehicles (such as ambulances). The first aid kits are located in a clearly visible, accessible place and will be restocked as necessary. SETGA personnel carry out emergency evacuation drills on a regular basis.

SETGA's health and safety rules must be applied to all its facilities, including the manufacturing plant, offices and worksites, thus providing all personnel with a **healthy** and **safe work environment**. Measures shall be taken that are aimed at reducing risks to workers arising from the specific hazards or risks of the activity carried out. All hazardous, flammable or combustible materials shall be stored in suitable storage containers and/or areas.

There is a preventive and corrective maintenance procedure in place for the manufacturing plant's machinery and installations, as well as an electrical maintenance programme.

The facilities must have up-to-date fire prevention certificates as required by the relevant regulations.

The company has active fire protection equipment that is appropriate for the risk level of the operations carried out at the facilities and which undergoes suitable inspection and maintenance. SETGA's facilities are also equipped with a fire alarm system.

Suitable **personal protective equipment (PPE)** shall be supplied to protect all personnel against the specific hazards to which they are exposed through their work, with a record kept of all PPE handed over.

In accordance with the applicable regulations, SETGA ensures that all its workers undergo **regular health surveillance**, in the form of medical check-ups adapted to the inherent risks of their job, while always respecting the right to workers' privacy and dignity and the confidentiality of all their health data.

#### 4.5. TRAINING

As part of its quality system, SETGA regularly designs training for all its personnel, including new staff and those that have transferred from other workplaces. It also keeps records and informs its personnel of the training available. All SETGA personnel receive standard training in relation to health and safety, safe work practices, emergency systems and the evacuation plan, as well as environmental awareness, social responsibility and the requirements of the SA 8000 standard. The mandatory health and safety training must reasonably cover all the risks to which workers are exposed through their work.

#### 4.6. RESPECT FOR THE ENVIRONMENT

SETGA has implemented specific environmental management measures through its UNE-EN ISO 14001-certified environmental management system.

SETGA has an integrated environmental policy, published on its website, and carries out measures aimed at the prevention of pollution and ongoing improvement of its environmental impact. These include the use of materials that are ever more respectful to the environment, responsible consumption of resources, responsible use of hazardous substances, promotion of recycling practices, and monitoring of changes to environmental regulations and laws in order to maintain a trend of ongoing improvement.

#### 4.7. INNOVATION

SETGA is an international company defined by innovation and high technological value. It has extensive experience in the areas of design, lighting technology and electronics. It considers innovation to be an essential asset and one of the driving forces that make it ever more competitive within its sector. SETGA brings about improvements by focusing on three main areas: the creation of new lighting technologies, the use of ever more environmentally respectful materials, and the development of intelligent control systems underpinned by efficiency.

SETGA's developments include:

- The "Prudenza" system: Technology designed to protect pedestrians on pedestrian crossings.
- "Circadionic": Technology based on intelligent lighting which adapts to people's circadian rhythms.
- "CANDELA" project: Project for the intelligent design of street lighting, using a series of solutions that make it possible to measure, model, optimise and act in real time on a city's entire network of streetlights. The project includes the development of a smart lighting system with the ability to measure current status (consumption, health, etc.), the ability to adapt the city's lighting with much more granularity, and the ability to communicate with a control centre as part of the smart city paradigm. Furthermore, the use of mobile scanners makes it possible to automate the inventory of public lighting networks, with the exportation of positioning data and light fixture metadata.

The CANDELA consortium is made up of 4 Galician companies. It is subsidised by the Galician Innovation Agency and supported by the regional Ministry of Economy, Employment and Industry, with co-funding from the European Development Fund, with the objective to "promote technological development, innovation and quality research" (EDF OP for Galicia 2014-2020).

- First projects with "Made in Spain" RGBW lighting technology.
- Pioneering thermal dissipation system for LED lights.
- "Argon Pressurised System" (APS) technology.
- "LeavingGuard" anti-glare system.
- Adaptation of 3D printing technologies to the design cycles of new LED public lighting models.

#### **4.8. QUALITY STANDARDS. RESPONSIBLE MARKETING AND ADVERTISING. COOPERATION, COLLABORATION, IMAGE AND FAIR COMPETITION.**

SETGA meets quality standards and has an ISO 9001-certified quality system. Furthermore, to communicate its integrated policy and measures in the area of Corporate Social Responsibility, it uses "responsible advertising", designed in accordance with current Spanish advertising legislation.

If any of its advertising should breach said legislation, it shall immediately be modified, amended or fully or partially withdrawn, while accepting any complaints and, if necessary, publishing an erratum notice.

In SETGA, the different members of the workforce work together as a team.

Everyone who works for and/or collaborates with SETGA must undertake to protect the company's good image and reputation.

The management works to foster collaboration between the different members of the team.

In relation to its competitors, SETGA shall adhere to the following principles:

- ✓ It shall not use illegitimate means of gaining information.
- ✓ It shall not carry out activities that constitute unfair competition.
- ✓ It shall not disseminate false or biased information.

In relation to society, SETGA collaborates with the Spanish Red Cross in the workplace and social integration of people who take part in the Employment Plan. It provides different sponsorships to sports organisations, including its collaboration with ANEDIA in sports events for children with diabetes. It also collaborates with the Galician San Francisco Association, an NGO that works to improve the quality of life of people with intellectual disabilities and their families throughout their lives, through activities such as the association's printing workshop.

## **5. CODE OF CONDUCT, INTERPRETATION, COMPLIANCE, PERIOD OF VALIDITY AND UPDATES**

The rules of conduct set out in this Code shall guide the behaviour of all SETGA personnel when interacting with stakeholders.

As regards SETGA's social responsibility efforts, the company has a committee made up of workers' social representatives and a Management representative. This team shall be responsible for periodically reviewing and updating this Code of Conduct based on the contributions, requirements and needs that arise in the company's relationship with stakeholders, on the request of and after the approval of the company Management.

In the event of failure to comply with the provisions of this Code of Conduct, the management shall adopt the appropriate disciplinary measures as provided for by the applicable collective bargaining agreement.

This Code of Conduct shall enter into force on 30 September 2019. Everyone who joins the company after this date shall receive a copy of this Code together with the other orientation documents.