# Ethical Trading Policy Statement



At Senerca we are committed to trading in a fair manner with all our customers and suppliers.

We take our legal and moral obligations very seriously in working to prevent acts of bribery, anti-competitive behaviour, modern slavery, and illegal trading.

## CODE OF CONDUCT

At Senerca, our employees are trained in and bound by the company Code of Conduct, which covers.

### Fair and Honest Dealing

- With colleagues, shareholders, customers, suppliers, and competitors.

#### Compliance with Laws, Rules & Regulations

- Including antitrust laws, environmental laws, discrimination laws, political process, relations with government official, integrity of records and compliance with accounting principles.
- Conflicts of Interest
  - Avoiding any relationship, activity, or ownership that might create a conflict between personal interests and the interests of the company.
- Corporate Opportunities
  - Not taking any business opportunity discovered as a result of employment with the company for personal benefit.



- Protection & Proper Use of Assets & Resources
  - Preserving and protecting the company assets and resources and to ensuring their efficient use, and only using them for legitimate business purposes.

## Confidential Information

 Protecting all confidential information from unauthorised disclosure, including customer, supplier, business partner and employee data.

The Company also has a Code of Conduct for suppliers, agents and distributors which stipulates the standards of ethical behaviour that it expects from its key business partners

## The Executive Team

# SENERCA SP S.L.

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