

## GROUP POLICY

The **MMM** Group is committed to strive in order to ensure the quality and environmental management in all processes according to ISO 9001, ISO / TS 16949 and ISO 14001 standards. Moreover our business activity and strategy integrates the responsibility criteria at our disposal and the compliance of social and legal requirements in force related to safety and health at work.

In this context, we make the following commitments:

To comply with the current legislation, as well as **all requirements endorsed by MMM** and **targets** set under the **integrated management system**.

To provide the necessary resources to develop **continuous improvement processes** and **innovation** in order to adapt and to anticipate to new trends and challenges.

To commit to develop our business and products in a **socially responsible way** while setting a **constant dialogue with our stakeholders**.

To respect the rights of individuals, their freedom of expression and to **ensure equal opportunities** without any discrimination on grounds of gender or race.

To ensure **optimal, safe and healthy working conditions**.

To prioritize the **satisfaction and loyalty of our customers**.

To preserve the conservation and **protection of the environment** by minimizing the impact caused by the activity.

To **consider environmental and efficiency aspects** into the life cycle of products and activities of **MMM** Group.

To use the **best practices and technologies available**, so that our products have the **highest level of quality** and meet the needs of our customers.

To provide a **good working environment**, which involves and motivates all staff.

To provide the **necessary training to all MMM staff** in order to ensure optimal career development allowing us to be a leader in our industry.

To prioritize **supplier relationships incorporating sustainability criteria** in its management.

To **generate wealth in our local region** and maintain a collaboration and participation relationship with Government agencies and stakeholders.

To implement, review and communicate this policy to the entire team of **MMM** and make it publicly available.



**Jordi Priu Pont**  
CEO

Molins de Rei, October 15, 2013

# CODE OF ETHICS OF GROUP MMM

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**MMM**

Excellence in  
tube systems





## CARTA DEL PRESIDENTE

MMM tiene por delante, en los próximos años, un reto importante de crecimiento y globalización. Para ello se considera esencial establecer unos valores sociales, laborales y medioambientales en las bases de las políticas del grupo para guiar y pautar este desarrollo.

En estas paginas se recogen los cimientos del crecimiento sostenible de la empresa basados en el respeto por todos los grupos de interés, el reconocimiento de los derechos humanos, la calidad y profesionalidad de nuestro servicio y nuestros productos y la preservación del medio ambiente.

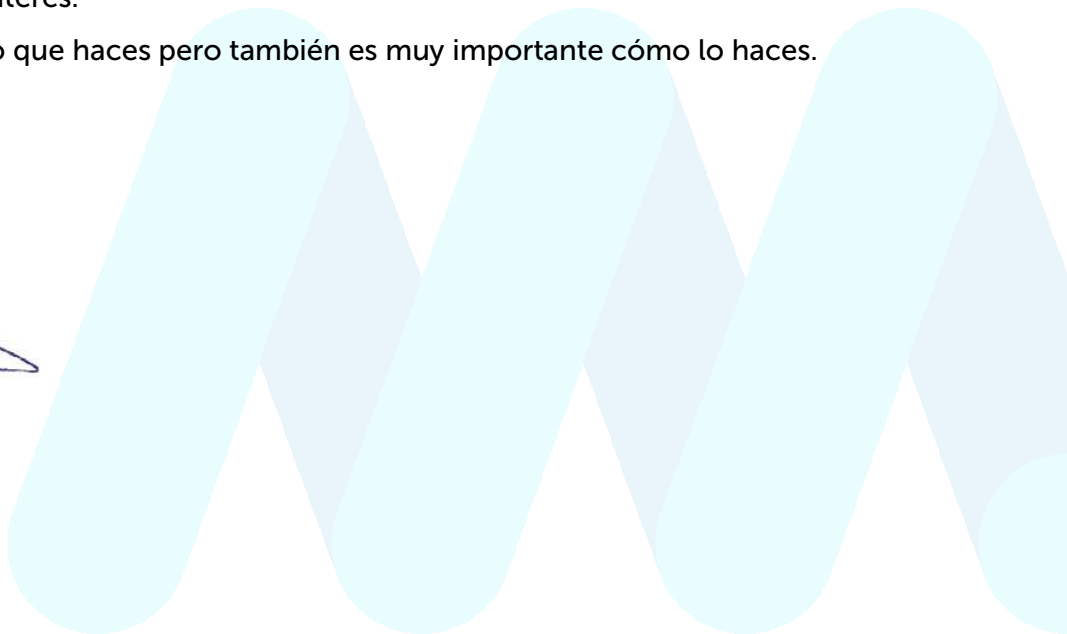
Es importante fomentar estos valores en las prácticas diarias de todos los profesionales del grupo MMM y ser conocedor de este Código. Este documento no pretende ser una lista de normas sino que el objetivo es dejar unas bases de comportamiento ético y responsable a fin de resolver problemáticas que puedan surgir con cualquier figura dentro de los grupos de interés.

En la vida es importante lo que haces pero también es muy importante cómo lo haces.

Atentamente,

A handwritten signature in blue ink, appearing to read 'MPriu', with a horizontal line underneath.

Miquel Priu  
Presidente







# TABLE OF CONTENT

PREAMBLE .....	6
STANDARDS OF CONDUCT .....	7
RESPECT FOR HUMAN RIGHTS .....	8
PROHIBITION CHILD LABOUR .....	8
PROHIBITION OF FORCED LABOUR .....	8
DISCRIMINATION.....	9
COMPLIANCE WITH THE LAW .....	9
COMPLIANCE WITH ANTITRUST.....	9
PPREVENTING CORRUPTION.....	9
MANAGE AND ENSURE CONFIDENTIAL AND STAFF INFORMATION .....	9
PROTECTION OF INTELLECTUAL PROPIERTY .....	10
ELIMINATION OF ANTISOCIAL FORCES .....	10
RESPONSIBILITY OF THE ORIGIN OF THE MINERALS .....	10
EXPORT MANAGEMENT .....	10
PROTECTING EMPLOYEES.....	11
ENSURING HEALTH AND SAFETY IN THE WORKPLACE .....	11
ENSURING HEALTH AND SAFETY IN THE WORKPLACE .....	12
DIALOGUE AND EMPLOYEE CONSULTATION .....	12
LABOUR SCHEDULE AND REMUNERATION .....	12
PROTECTING COSTUMERS .....	13
PROVIDE PRODUCTS AND SERVICES THAT THE CUSTOMER NEEDS.....	14
COMMITMENT TO SAFETY OF OUR PRODUCTS AND SERVICES .....	14
COMMITMENT WITH THE QUALITY OF OUR PRODUCTS AND SERVICES.....	14
PROTECTING ENVIRONMENT .....	15
ESTABLISH AN ENVIRONMENTAL MANAGEMENT .....	16
REDUCE THE EMISSION OF GREENHOUSE GASES.....	16
PREVENTION OF AIR WATER AND SOILS POLLUTION .....	16
MANAGEMENT AND REDUCTION OF WASTE .....	16
MANAGEMENT OF CHEMICALS.....	17
PRESERVING THE ECOSYSTEM .....	17
DURATION.....	18
ANNEX .....	19
THE UNITED NATIONS GLOBAL COMPACT PRINCIPLES.....	19
HUMAN RIGHTS.....	19
LABOUR 19	
ENVIRONMENT .....	20
ANTI-CORRUPTION.....	20



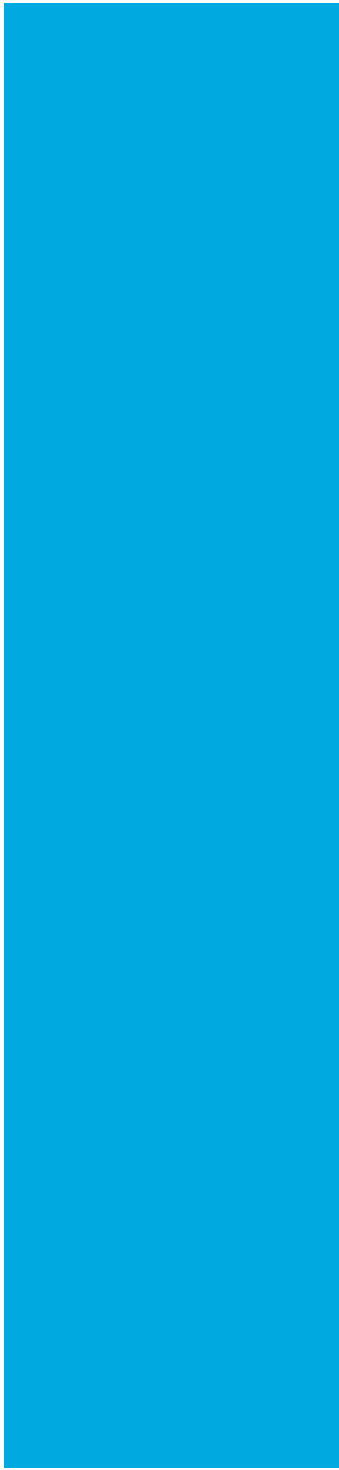
## PREAMBLE

The ethical code of MMM group is a document that pretends to give intrinsic social values in daily practices that must govern the ethical and responsible behaviour of all of its members, including its managers and employees to the relationship they keep with its stakeholders around.

This document confirms the responsible production values contained in the Global Compact of the United Nations. These values contribute to the excellence of internal and external relations of the group by developing an ethical and responsible work environment for the professional performance of our members.

This document reflects the willingness of prevention, detection and suppression of irregularities related to breaches of human rights, labour rights and the same penal code, according to the laws of each of the countries where MMM group has representation and respecting the values of their respective cultures.

The code is a set of values that, despite not being able to cover all situations, should help, thanks to judgment and sense of responsibility of each, to take the ethically right decision in each of the countries that any member of the group is located.



## STANDARDS OF CONDUCT

This section wants to give the requirements of socially responsible conduct that any member of the MMM group must follow, including management, employees and stakeholders of the group. All procedures developed in MMM are made pursuant to the group vision, values and principles that are part of the Global Compact of United Nations (annex). In addition, should not be contemplated, it can give a judgment and a social responsibility of each of the members of the company in situations not framed.







## RESPECT FOR HUMAN RIGHTS

Every person, simply by being a person, has inalienable and worldwide applicable rights. MMM group is working for mutual respect has to go hand-in-hand with the inherent dignity that any person deserves and ensure its compliance for all stakeholders of the group. In the group is fundamental the fulfillment of the existing laws of every country where activity develops to avoid harassment based on race, nationality, sex, religion, disability, age, origin, position in the company, labor situation or any other reason, though it could be included in the law.

## PROHIBITION CHILD LABOUR

The child labour is the work realized to too early age, which forbids the opportunity of the child to continue in his training or to commit an outrage against his development. MMM's labour policy has, as principle, not admission of 18-year-old minor workers as contribution to the effective abolition of the child labour in the whole group and its stakeholders, indistinctly of the country / region.

## PROHIBITION OF FORCED LABOUR

The forced labour is one of the well reflected principles in the Declaration on Fundamental Principles and Rights related to the principles and fundamental rights at work and, in the same time, is the fourth principle of the Global Compact of the United Nations. The policies of the company are directed to the freedom of employment, understanding itself as the right to the free and voluntarily incorporation without being under restriction, and to the freedom of completion of employment, where the employees have the freedom of putting end(purpose) to an employment, in conformity with the national legislation or the collective agreement.



## **DISCRIMINATION**

In MMM group is not allowed any form of discrimination based on the race, nationality, sex, religion, disability, age, origin or another reason legally prohibited in none of the aspects of occupation either in recruitment, occupation, promotion, salary, resignations, retirement, assignment of functions, disciplinary measures, among others.

## **COMPLIANCE WITH THE LAW**

The MMM group has groups of interest worldwide and the fulfilment of the regional and international regulations is basic for the good performance of all the relations of the company.

## **COMPLIANCE WITH ANTITRUST**

MMM has the commitment, for the protection of the market of the free national and international competence, to not establishing contacts with groups of interest that are related to illegal practices of the competence as well as monopolies, commercial undue transactions, peddling of political favours and illegal practices of business.

## **PPREVENTING CORRUPTION**

El grupo MMM trabaja para forjar y mantener relaciones estrechas y transparentes con los grupos de interés del grupo así como de contribuir con los compromisos tributarios, específicos por la normativa de cada país / región. La política de transparencia del grupo no se permite influir en una relación de negocio o inducir en una conducta fuera del marco ético mediante la aceptación ni el obsequio, de regalos, servicios o la hospitalidad de proveedores.

## **MANAGE AND ENSURE CONFIDENTIAL AND STAFF INFORMATION**

The appearance of the new technologies has supposed that the security of the information should greater due to the huge flow information being exchanged in the networks. The group MMM adopts policies of obtaining the information of all the stakeholders by legitimate and veracious forms. Likewise it guarantees the protection of the staff information of the group and its groups of interest that only is used for determined aims in chord with the laws of every country / region.



## **PROTECTION OF INTELLECTUAL PROPIERTY**

In our sector, the innovation and the development as well as the investigation are key elements for the future of the company. MMM protects the intellectual property rights belonging to the group and do not obtains information of intellectual property of third parts by undue forms nor does an misuse of the above mentioned information.

## **ELIMINATION OF ANTISOCIAL FORCES**

Our activities and global relations carry the affectation of problematic political and social, worldwide, that could manage to have relation with the activity of the group. For this reason, directive and the employees of the group MMM have the commitment to exclude from the groups of interest any organization associated with criminal activities, terrorism, breach of the human rights and any organization that commits an outrage on the common well-being of the society. This exclusion prevents to the group MMM from anticipating and not supporting any relation or business with these organizations.

## **RESPONSIBILITY OF THE ORIGIN OF THE MINERALS**

The globalisation of the companies has allowed that the economy should look, of inherent form, for the most productive ways of obtaining the resources in any country. This fact does not imply that could damaged human rights and other values described in this document. The MMM group, to preserve the ethical values along the production of the product, needs to all suppliers a declaration of origin for products with content in minerals. This declaration asks to the supplier to indicate the origin of the minerals of his product. In case of suspicions or evidences of a troubled origin of the products, actions will be implemented to provide materials with alternative sources or substitute of the minerals.

## **EXPORT MANAGEMENT**

The MMM group carries out procedures and pertinent negotiations of the export of technology and goods restricted by the laws and regulations of all countries / regions where are from our groups of interest.



## PROTECTING EMPLOYEES

One of the most important assets for a company are his members and the group MMM supports this position keeping over their health and protection, by the application of safety systems in the (places of performance and healthy environments of work.



## **ENSURING HEALTH AND SAFETY IN THE WORKPLACE**

The MMM group makes sure that the environment of every person who has a labour relation with the company is sure and healthy by the implantation of prevention of accidents system to be able to develop his professional capacity with complete certainty and integrity.

## **DIALOGUE AND EMPLOYEE CONSULTATION**

The employees are the vertebral column of any company and of the quality of its products. This one is a clear principle inside the group MMM that adopts policies of approximation to the employees on his labour performance and, as it is defined in the third principle of the World Agreement of the United Nations, recognise the right of businessmen and workers to constitute associations and unions depending on his needs. The businessmen must neither interfere in the decision of an employee on his right of affiliation nor discriminate against it for affiliating, as to a representative of the above mentioned employee.

## **LABOUR SCHEDULE AND REMUNERATION**

The group MMM has a commitment with his employees in relation with the fulfilment of the labour laws stipulated in each country and a compensation for his professional performance.

In relation to working hours of the employees, is respected the maximum hours of labour performance marked in the labour laws (included overtime), the concession of programmed days off and the wage coverage of annual vacations.

Likewise, is respected the minimum wages, overtime, wage discounts, I pay depending on the performance(yield) and other remunerations.



## PROTECTING COSTUMERS

The automotive sector carries an inherent responsibility with the product and ITS quality associated with the use of pieces for safety. To it, the group MMM has a commitment with the quality of his products, understanding the needs of the customer and making controls in all the products and services, putting emphasis in safety products.



## **PROVIDE PRODUCTS AND SERVICES THAT THE CUSTOMER NEEDS**

The commitment with the quality of MMM group depends from the customer support to identify the needs and, in consequence, to develop and to provide socially effective products and services. It is trying to avoid the waste of material, energy and impacts on the environment due to not fulfilment of the needs of the client.

## **COMMITMENT TO SAFETY OF OUR PRODUCTS AND SERVICES**

One kind of products of MMM are systems of conduction of fluids for the automotive sector. These products take part of the safety system of vehicles. These systems have a special care and severe controls are realized to be equal or to exceed with the fulfilment of the regulation and / or of the needs of our costumers.

## **COMMITMENT WITH THE QUALITY OF OUR PRODUCTS AND SERVICES**

The products of the group MMM subject to controls and rigorous processes quality to give the major confidence to our costumers. On same way, our suppliers have our collaboration to be able to assure the quality along the whole production line.



## PROTECTING ENVIRONMENT

The group MMM agrees that the preservation and protection of the environment is an interest by minimizing the impact of the productive activity and contemplating the environmental and efficiency aspects in the own life cycle of the products and activities of the group, in order to contribute with the sustainable development of the group.







## **ESTABLISH AN ENVIRONMENTAL MANAGEMENT**

The group MMM, continuing with his environmental commitment, compliances with all the laws that are of application in the countries / regions where activity is realized, by realizing annually declarations to the administration of the environmental parameters that could carry a relevant impact in the environment. Likewise, the effort to continue improving and reducing the environmental impact of our activity is reflected in the certificate EN-ISO-14.001.

## **REDUCE THE EMISSION OF GREENHOUSE GASES**

Our production worldwide holds us directly with the environmental impacts to global scale, being the climate change one of the most relevant. The commitment of the group MMM is make sure, in all the places of production for the reduction of the direct emission of greenhouse gases, promoting the use of Technical Available Improvements, and indirect emission fruit of the energetic consumption, promoting the energy efficiency. In addition the group has come to agreements and commitments for the reduction of the greenhouse gases with the administration.

## **PREVENTION OF AIR WATER AND SOILS POLLUTION**

The concern about the environment is clear in the policy of the group. From MMM is working to accomplish and anticipated, as far as possible, the whole regulation for water, air and soils pollution, that could be affected as result of the activity of the group. The assumed commitments lead us to doing a routine measurement of the impacts that take place to the environment in order to have a control on the environmental impacts.

## **MANAGEMENT AND REDUCTION OF WASTE**

MMM awareness, to all his groups of interest, about the importance of the waste management under the philosophy of the reduction, recycling, re-utilization and recovery. Is working to implicate of all the parts related with the process of production to giving value to the major possible quantity of misestimate materials. In addition, is working with suppliers to promote the use of reusable or biodegradable packing in order to minimize the environmental impact generated along the production line.



## MANAGEMENT OF CHEMICALS

The group MMM has aware about the importance of the correct management of chemical products that are use in the activity of the group because of its impact, that can cause, on the environment and our groups of interest. To expire and to be anticipated, as far as possible, to changes and trends in the regulations of every country or region where activity is done, it is a priority in the group. For it, as far as possible, MMM is working to eliminate, of the chain of the product, elements that contain chemical substances. In case of not being able to eliminate the above mentioned substances, will be registering and informed to the competent authorities about the quantities of the chemical substances according to the regulation of every country / region.

## PRESERVING THE ECOSYSTEM

The MMM group considers the conservation of the environment has to be a task that must be respected during the whole course of the manufacture of the products. For it, we are working for the utilization raw materials free of chemical pollutant products and looking for suppliers respectful with the environment in his chain of suppliers.



## DURATION

The code of ethic takes affect the same day of its publication to all the employees and will remain in affect until its cancellation. Will be checked and updated from time to time by the Committee of the Code of ethic in order to take in mind the offers of the employees and commitments that MMM acquires in terms of social responsibility and good government. The areas integrate this Committee are: Human Resources, Financial, Quality, Industrial Direction(Address) and Direction(Address) to have the major vision of the needs of all the groups of interest of the group.

## ANNEX

### THE UNITED NATIONS GLOBAL COMPACT PRINCIPLES



The UN Global Compact's Ten Principles are derived from:

- Universal Declaration of Human Rights.
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development.
- United Nations Convention Against Corruption.

#### HUMAN RIGHTS

PRINCIPLE 1.- Businesses should support and respect the protection of internationally proclaimed human rights.

PRINCIPLE 2.- Make sure that they are not complicit in human rights abuses.

#### LABOUR

PRINCIPLE 3.- Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

PRINCIPLE 4.- The elimination of all forms of forced and compulsory labour.

PRINCIPLE 5.- The effective abolition of child labour.

PRINCIPLE 6.- The elimination of discrimination in respect of employment and occupation.



## **ENVIRONMENT**

**PRINCIPLE 7.-** Businesses should support a precautionary approach to environmental challenges.

**PRINCIPLE 8.-** Undertake initiatives to promote greater environmental responsibility.

**PRINCIPLE 9.-** Encourage the development and diffusion of environmentally friendly technologies.

## **ANTI-CORRUPTION**

**PRINCIPLE 10.-** Businesses should work against corruption in all its forms, including extortion and bribery.