



ABASA SUPPLIER SUSTAINABILITY CODE OF CONDUCT

The Code of Conduct (“Code”) establishes standards to ensure that working conditions in ABASA’s supply chain are safe, that workers are treated with respect and dignity, and that business operations are conducted in an environmentally responsible and ethical manner.

To conduct business with ABASA, a supplier must declare its support for the Code and ensure its conformance to the Code and its standards. Suppliers must ensure that their management systems and other control systems align with the principles and requirements of the Code.

Suppliers must regard the Code as a total supply chain initiative. Suppliers must also require its next tier suppliers to implement and adhere to the Code. Fundamental to adopting the Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates. The Code encourages Suppliers to go beyond strict legal compliance, and to draw upon internationally recognized standards and industry best practices to advance social and environmental responsibility and business ethics.

The Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D sets out standards relating to business ethics; Section E outlines the elements of an acceptable system to manage and measure conformity to the Code.

A. LABOUR

Suppliers are required to upholding the human rights of workers, and to treat them with dignity and respect. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The Code’s labor standards are as follows:

1) Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons is strictly prohibited. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction, deception or fraud for the purpose of exploitation. All work must be voluntary and workers shall be free to terminate their employment at any time. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. All fees charged to workers in terms of obtaining employment or work must be disclosed and must be reasonable.

2) Child Labor Avoidance

Child labor is not to be used in any stage of transformation and/or manufacturing. The term “child” refers to any person under the age of 16 (or 14 where the law of the country permits), or under the age for completing

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compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is permitted. Workers under the age of 18 will not be required to perform work that is likely to jeopardize or compromise their health or safety.

3) Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Furthermore, a workweek should not be more than 60 hours per week, including overtime, except in emergency or exceptional situations. Workers must be allowed at least one day off per seven-day week.

4) Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and pay, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure are prohibited. The basis on which workers are being paid is to be periodically provided to ABASA in a timely manner via pay stub or similar documentation upon request being made by ABASA.

5) Humane Treatment

There is to be no harsh and inhumane treatment including any intimidation, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

6) Non-Discrimination

Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

7) Freedom of Association

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation, and join workers' councils in accordance with local laws shall be respected. Workers must be allowed to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

B. HEALTH and SAFETY

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Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Health and Safety were used as references in preparing the Code and may be a useful source of additional information.

The health and safety standards are as follows:

1) Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) must be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag out), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers must be provided with appropriate, well-maintained, personal protective equipment.

Workers shall not be disciplined for raising safety concerns.

2) Emergency Preparedness

Potential emergency situations and events must be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

3) Occupational Injury and Illness

Procedures and systems must be in place to prevent, manage, track and report occupational injury and illness including provisions to: (i) encourage worker reporting; (ii) classify and record injury and illness cases; (iii) provide necessary medical treatment; (iv) investigate cases and implement corrective actions to eliminate their causes; and (v) facilitate return of workers to work.

4) Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to avoid and control instances of overexposure. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

5) Physically Demanding Work

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Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be monitored, identified, evaluated and controlled.

6) Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers must be provided and properly maintained where machinery presents an injury hazard to workers.

7) Sanitation, Food, and Housing

Workers must be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by Suppliers (or its agents) must be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

C. ENVIRONMENTAL

Suppliers recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources must be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

The environmental standards are as follows:

1) Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations must be obtained, maintained and kept current, and their operational and reporting requirements must be followed.

2) Pollution Prevention and Resource Reduction

Waste of all types, including water and energy, must be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

3) Hazardous Substances

Chemicals and other materials posing a hazard if released into the environment must be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

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4) Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities must be characterized, monitored, controlled and treated as required prior to discharge or disposal.

5) Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations must be characterized, monitored, controlled and treated as required prior to discharge.

6) Product Content Restrictions

Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal. Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

D. ETHICS

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are required to uphold the highest standards of ethics including the following:

1) Business Integrity

The highest standards of integrity must be upheld in all business interactions. Participants shall have a zero tolerance policy to, and prohibit any and all forms of bribery, corruption, extortion and embezzlement (which extends to promising, offering, giving or accepting any bribes). All business dealings must be transparently performed and accurately reflected on Suppliers' business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

2) No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

3) Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4) Intellectual Property

Intellectual property rights must be respected; transfer of technology and know-how is to be done in a **ACEITES ABASA S.A.U.**

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manner that protects intellectual property rights.

5) Fair Business, Advertising and Competition

Standards of fair business, advertising and competition must be implemented, maintained and enforced. Appropriate means to safeguard customer information must be implemented.

6) Protection of Identity

Programs that ensure the confidentiality and protection of supplier and employee whistleblower must be maintained.

7) Responsible Sourcing of Minerals

Suppliers must have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in countries like Democratic Republic of the Congo or an adjoining country. Suppliers must exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

8) Privacy

Suppliers must protect the personal information of everyone they do business with, including suppliers, customers, consumers and employees, as well as their reasonable expectation of privacy. Suppliers must comply with privacy and data protection laws and regulatory requirements when personal information is collected, stored, processed, transmitted, shared and destroyed.

9) Non-Retaliation

Suppliers must have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

E. MANAGEMENT SYSTEM

Suppliers are expected to adopt or establish a management system that reflect and align with the content of this Code. More specifically, the management system must be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products; (b) conformance with this Code; and (c) identification and mitigation of situations of non-compliance with this Code. It should also facilitate continual self-assessment and improvement.

The management system should contain the following elements:

1) Company Commitment

A corporate social and environmental responsibility policy statements affirming Supplier's commitment to ACEITES ABASA S.A.U.

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compliance with the ideals and requirements of the Plan, and providing for and supporting continual improvement within the organization. Such policy needs to be clearly and prominently endorsed by Supplier's executive management.

2) Management Accountability and Responsibility

The Supplier must clearly identify company representatives responsible for ensuring implementation of the management systems and associated programs. Senior management must periodically review the status of the management system to ensure continued compliance and alignment with the Code.

3) Legal and Customer Requirements

A process must be implemented by Suppliers to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

4) Risk Assessment and Risk Management

A process must be implemented by Suppliers to identify the environmental, health and safety and labor practice and ethics risks associated with their operations. Suppliers must determine the relative significance for each risk, and implement appropriate procedural and physical measures to monitor and control identified risks and ensure regulatory compliance as well as compliance with the Code.

5) Improvement Objectives

Suppliers must establish and implement written performance objectives, targets and implementation plans to improve their social and environmental performance. Suppliers must also implement periodic assessments of their success and challenges in terms of achieving those objectives.

6) Training

Suppliers must establish and implement training and informational programs and materials for managers and workers to allow them to implement Suppliers' respective policies, procedures and improvement objectives, and to comply with applicable legal and regulatory requirements.

7) Communication

Suppliers must establish a process for communicating to workers, suppliers and customers clear and accurate information about their policies, practices, expectations and performance.

8) Worker Feedback and Participation

Suppliers must establish ongoing processes to assess employees' understanding of requirements of this Code as well as practices and policies that arise in terms of the implementation of the Code. Suppliers must create effective systems to obtain employee feedback in terms of the foregoing and to assist in the continuous improvement of said practices and policies.

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9) Audits and Assessments

Suppliers must establish periodic self-evaluations of their operations, practices and policies to ensure conformity with legal and regulatory requirements, the Code, and contractual requirements related to social and environmental responsibility.

10) Corrective Action Process

Suppliers must establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

11) Documentation and Records

Suppliers must create and maintain documents and records to ensure regulatory compliance and conformity with organizational requirements along with proper document management and retention systems and practices to ensure compliance with confidentiality and privacy obligations.

12) Supplier Responsibility

Suppliers must establish a process to communicate Code requirements to their own suppliers and to monitor their suppliers' compliance to the Code.

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