

CODE OF CONDUCT

OUR CONDUCT, OUR SUCCESS



COSENTINO®

Silestone Quartz Scalea Natural Stone Eco recycled Sensa Granite



Each person employed by the Cosentino Group is an integral part of the story of Cosentino, one that is rewritten every year with new goals and challenges but whose essence lies in our long experience of overcoming obstacles and the search for new horizons that has made our company what it is today.

The new edition of our Code of Conduct is the fruit of our aim to reaffirm our basic values and strengthen the principles that guide our daily activity.

Cosentino Group's success is built on the foundations of personal and professional integrity. We set ourselves standards of ethical behaviour that greatly exceed minimum legal requirements. We shall never compromise these standards and we shall never request any Cosentino Group employee to do so. This is something

we owe to our customers, suppliers, shareholders and partners, and we also owe it to ourselves.

The Code of Conduct sets out general guidelines that ensure we comply with the high standards we have set and that we should carry out our business dealings in the "Cosentino Way", i.e., in the correct way and with integrity. In short, we want our employees, shareholders, customers, suppliers and partners to understand that they can believe in what we say and trust in what we do. ■

Best wishes,



Francisco Martinez-Cosentino
Chairman Cosentino Group



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■ INTRODUCTION

Our Conduct, Our Success" – our Code of Conduct - is a general set of guidelines for all Cosentino Group employees that will help us to go about our daily activities while following the letter and spirit of applicable laws and the high standards upheld by Cosentino Group.

SCOPE

This is a comprehensive code and compliance with these guidelines is required of all directors, executives and other employees, and of all other physical and legal persons acting on behalf of and remunerated by Cosentino Group, regardless of their hierarchical level and geographical or functional location.

Those signing this Code of Conduct also commit themselves to faithfully perform any activities that the company may undertake in the fields of information, training and control for Crime Prevention, in accordance with the Crime Prevention Protocols that may be implemented in accordance with the laws governing the penal responsibility of trading companies and/or their employees and agents.

COMPLAINT AND ENQUIRY HOTLINE

It is not the aim of this code to identify all situations and possible actions that may infringe ethical conduct, but to serve as a reference and, as the case may be, resolve any doubts that arise.

Therefore, in the case of any infringement of either internal regulations (whether this code or any other rule) or external regulations, or of conduct that is generally understood to be unethical, the employee who detects any such infringement is required to contact the Ethics Committee through the means and contact addresses described in APPENDIX 1 of this code.

DISSEMINATION

The senior management of Cosentino Group is required to know, comply with and enforce this code. For this purpose, the Department of Human Resources shall provide all employees with a copy of it and will record acknowledgement of its

receipt by means of submission of the duly signed document attached as APPENDIX 2 attesting to the dissemination and understanding of this code and its spirit.

This code is available on the group's intranet portal.

■ PERSONAL CONDUCT AND OUR WORK ENVIRONMENT

DIVERSITY, EQUAL OPPORTUNITIES AND RESPECT

Cosentino Group values the diversity of its workforce and is committed to the policy entitled "Plan for Equality and Diversity", which provides all employees with the same opportunities and a work environment free of any discrimination or harassment. All Cosentino Group employment-related decisions are made based on the needs of the company, the characteristics of employment and personal qualities, without consideration for race, colour, religion, nationality of origin, sex, age, physical disability, sexual preference, civil status, current or past military service or any other circumstance protected by law in the countries where we conduct our business. Cosentino Group shall not tolerate any discrimination based on any of these characteristics, or any type

of harassment of any of our employees. No Cosentino Group employee shall use, either directly or indirectly, any of the previously listed personal conditions as a means of domination or as a tool for achieving any unjustified advantage over another person. This conduct is considered illegitimate, contrary to the principle of equality and incompatible with a person's dignity.

Cosentino Group employees are required to report and discrimination, harassment, threat or any other inappropriate conduct to which they or any other person are subject.

VIOLENCE, THREATS AND WEAPONS

The safety and security of our employees is extremely important to Cosentino Group. Cosentino Group employees are forbidden from involvement in violent acts or any other type of wilful misconduct that may cause harm to other persons or their property.

Cosentino Group forbids the possession, use and transfer of firearms or any other weapons including knives or any other type of potentially dangerous instrument on its premises (including buildings, parking areas, factories and any other location where Cosentino Group carries out its activity).

These prohibitions also apply to Cosentino Group employees when dealing with matters on behalf of Cosentino Group. Exceptions to these regulations are made for both Cosentino Group security personnel and law enforcement officers, who are subject to the regulations applicable to them.

ALCOHOL AND ILLEGAL DRUGS

Employees are obliged to refrain from the consumption of alcohol and are expressly forbidden from using, possessing and distributing illegal drugs, while working or, for any reason, on Cosentino Group premises, operating Cosentino Group

property (including Cosentino Group vehicles) or while taking part in Cosentino Group activities of any kind.

CONFIDENTIALITY

During the course of its business activities, Cosentino Group gathers a significant amount of personal and confidential information, which is to be treated in accordance with the privacy laws in force in the jurisdiction where the company operates and with the best practices for the protection of privacy. For this purpose, Cosentino Group shall guarantee a high level of security in the choice and use of information technology (IT) systems destined to the processing of personal and confidential information.

Further information is available by consulting the IT security document on the group's intranet portal.

HEALTH AND SAFETY AND THE ENVIRONMENT

We have the responsibility to treat both the environment in which we work and the people we depend on with care and respect.

Cosentino Group is committed to the upkeep of the health and safety of its employees, contractors and other workers on Cosentino Group premises.

All employees are required to observe the safety regulations and to take precautions in order to prevent accidents.

The Health and Safety policy is available on the group's intranet portal.

Our operations give priority to reducing waste, recycling and implementing programmes for reuse of material and pollution prevention. We are constantly improving the environmental protection standards for our products and programmes for compliance with them, even exceeding industry standards and applicable legal requirements.

The environmental policy is available on the group's intranet portal.

PREVENTION OF MONEY LAUNDERING

Cosentino Group and its directors, senior management and other employees are required to refrain from carrying out or becoming involved in any way in activities that entail the laundering (i.e., acceptance or handling) of money from criminal activities of any kind.

Cosentino Group is required to comply with the money laundering laws in force in any competent jurisdiction.

Any employees involved in commercial

transactions must be familiar with and receive instruction in the obligations of the company and its employees in cases defined by the law, among others, regarding the current limits allowed for the acceptance of cash or negotiable instruments not requiring proof of identity.



■ INTEGRITY OF OUR FINANCIAL STATEMENTS AND COMPANY RECORDS

The integrity of Cosentino Group accounting and financial records is critical for the company's operations and is a key factor for ensuring the tranquillity and confidence of our employees, shareholders, investors, creditors, suppliers, customers and partners. We must guarantee that all operations are duly recorded, classified and summarised according to Cosentino Group accounting policies.

These policies ensure the appropriate internal controls and compliance with the Generally Accepted Accounting Principles, laws and other applicable regulations.

The incorrect reporting of the company's operating performance, and wilfully placing the integrity and veracity of its accounting and financial statements at risk is a violation of Cosentino Group policies.

No employee may include in the company's books or records any information of a financial or any other nature that is intentionally concealed, masked or that may give rise to inaccurate interpretations. **Employees must also maintain, protect and destroy company**

records in accordance with the policies for the maintenance of Cosentino Group records that are currently in force.

No Cosentino Group employee or member of senior management may report operating, commercial or financial information in such a way, by silencing or highlighting certain aspects, as to give rise deliberately to errors in the general evaluation that may be made of a function or project by entities receiving such reports.

It is an unavoidable commitment to report any unfavourable aspects realistically, promptly and exhaustively since the proper shaping of the designs of the company's decision-making bodies depends on this.

Cosentino Group policies forbid the influencing, manipulation, coercion and deception of internal and independent auditors with respect to the company's financial statements, processes or internal control systems.

Employees of the Cosentino Group Finance Division and senior management are subject to the even greater obligation of

ensuring that the financial and accounting practices reflect the financial results and situation of Cosentino Group clearly,

completely, exactly, fairly, promptly and transparently.

■ CONFLICTS OF INTEREST AND PERSONAL INTEGRITY

Any work performed by Cosentino Group must be done so in the best interests of our shareholders and of Cosentino Group, free from any conflicts of interest or anything that may appear to be a conflict of interest.

In order to prevent conflicts of interest, we must not become involved in any activity, investment or association that may even lead to the appearance of a conflict between our personal interests and the business interests of Cosentino Group. Likewise, no participation by employees in any activity outside the company is to imply less or insufficient dedication of their time and effort to Cosentino Group.

Where any doubt arises regarding an employee's personal situation and possible conflicts of interests, the persons involved must contact the Ethics Committee, who will confirm the existence of any conflict and inform the employee of the best path to take in order to avoid a clash of interests.

In order to prevent conflicts of interests, employees are not to participate directly or through direct family members in activities that may:

- Compete with the Group's activities or business.
- Supply Cosentino Group with goods or services, or do business with Cosentino Group in any other form.
- Cosentino Group employees are forbidden from using internal information for personal gain or to assist an independent business.



PARTICIPATION ON BOARDS OF DIRECTORS AND ADVISORY COMMITTEES

Employees must obtain prior authorisation from the Ethics Committee before accepting an invitation to participate on the board of directors of another company, or to serve on any third-party advisory committee.

Cosentino Group authorisation is not required for participation of employees on the board of trustees of charity or community organisations, provided that their activity does not come into conflict or interfere with their activities as employees of Cosentino Group or reflect negatively on Cosentino Group.

If you or any other person with whom you have a significant personal or business

relationship has a financial or commercial interest in a particular company, under no account are you to attempt to influence Cosentino Group to do business with that.

THEFT AND FRAUD

Cosentino Group will not tolerate fraud of any kind and will investigate and report any person committing fraud to the competent authorities. Fraud is intentional deceit, otherwise defined as illegal conduct that is unethical, dishonest and unfair that may result in gain, use or advantage over an employee, or in damage or loss to any person or entity.

All employees are required to report any suspicion of theft or fraudulent acts committed inside Cosentino Group.

■ BUSINESS GIFTS AND OTHER COURTESIES

As a Cosentino Group employee, you must not accept or give any kind of gift that compromises your judgement, that may influence third parties inappropriately, or that may compromise the decisions of Cosentino Group.

You may accept objects that have a token value (equivalent to €30 or less). Likewise,

you may also accept meals and invitations to entertainment activities provided they are reasonable, in good taste and are not of a nature that will compromise the free options of Cosentino group to act in the market.

In case of doubt, always inform your immediate superior.

■ USE OF COMPANY RESOURCES AND ASSETS

Cosentino Group assets and resources must be applied to the achievement of Cosentino Group business objectives. All employees are required to protect and to refrain from mistreating such assets and resources. Use of any Cosentino Group assets and resources for activities infringing the law and ethics, or for personal activities is forbidden.

fixed-line telephones, among others) are property of the company and are provided to Cosentino Group employees and certain third parties in order for them to achieve the objectives of Cosentino Group.

Exceptional use of Cosentino Group resources is occasionally granted for personal purposes, but these must be kept to a minimum and always in compliance with the law and Cosentino Group policies.

COMPUTER SYSTEMS AND TECHNOLOGY

Technology and computer resources (e.g. computers, e-mail, networks, Internet, intranet, fax, mobile telephones and other wireless communication systems and

Users of Cosentino Group computer systems and technology resources must not reveal their passwords.



TRAVELLING AND ENTERTAINMENT

All Cosentino Group employees must ensure that all business travel is undertaken in order to achieve Cosentino Group commercial objectives. **Travelling expenses must be reasonable, prudent and in accordance with the applicable corporate policies.**

POLITICAL DONATIONS AND ACTIVITIES

The law in many of the locations where Cosentino Group carries out its activities limit the ability of companies to make political donations or to become involved in political activities. Cosentino Group adheres to these laws strictly. Cosentino Group employees must not become involved in political activities on behalf of Cosentino Group, or make contributions of any kind to political organisations, except when this is done in compliance with applicable local laws or regional policies, and always in accordance with Cosentino Group values, mission, vision, policies and procedures.

Donations to charitable works on behalf of Cosentino Group can only be made with prior authorisation from the Chairman's Office.

CONFIDENTIAL INFORMATION

Cosentino Group employees have a duty to protect the confidential information

of Cosentino Group, and the confidential nature of relations between the company and its customers, suppliers and shareholders. Employees are bound by the provisions of the law and of their employment contract to keep this information confidential, even upon termination of their employment with company.

Use of any confidential information obtained during employment with Cosentino Group for personal benefit is an infringement of Cosentino Group policies.

Where employees or senior management are required by an authority unavoidably and under legal obligation to reveal information, they must inform their immediate superior of this circumstance, save where this communication is expressly forbidden by a competent authority.

Confidential information must only be disclosed and discussed with Cosentino Group employees, and only when there are business reasons to justify this action.

Cosentino Group employees are expected to take the necessary measures to ensure the physical security of confidential information and of facilities.



THIRD-PARTY DEALINGS

Cosentino Group employees are required to act responsibly, honestly and with integrity in dealings with suppliers, customers, partners, shareholders, government agencies and competitors.

regulations in those places where they carry out their business, that apply high ethical standards and treat their employees fairly and with dignity and respect.

HUMAN RIGHTS

Cosentino Group is committed to working only with socially responsible companies that comply with the applicable laws and

Likewise, all Cosentino Group members are required to adhere to the laws governing the privacy and image rights of individuals.

THIRD-PARTY CONTRACTING

Our contractual relations with suppliers and customers are key elements for our success. Supplier selection and procurement decisions must be made objectively and in the best interests of Cosentino Group, always being based on the evaluation of prices, satisfaction of needs, delivery, quality and other relevant factors.

Likewise, relations with customers must be conducted professionally and using the necessary Cosentino Group resources in order to establish a good sales rapport with each customer. Employees must not come to any verbal or other type of agreements that include or appear to include commercial or accounting practices that may be questionable. Cosentino Group requires all suppliers to comply with all applicable laws when fulfilling their contractual obligations with Cosentino Group.

SALES AND MARKETING

Cosentino Group gains customers and builds long-term relations with its customers as a result of offering quality products and services and of demonstrating honesty and integrity in all its relations. Our sales and marketing material and any other statements we make to our current and potential customers must be accurate, true and in

strict compliance with applicable laws.

SPEAKING ON BEHALF OF COSENTINO GROUP

For this reason, Cosentino Group shall always show scrupulous respect in the appointment of spokespersons according to the different subjects. Employees are forbidden from making statement on behalf of Cosentino Group in media or public events, unless expressly authorised to do so.

DEALINGS WITH COMPETITORS

No employee is permitted to reach agreement on or to discuss the setting of prices with any competitor or to agree to limit the availability of goods or services in the market.

In order to prevent even the appearance of conduct of this type, employees must refrain from discussing the following subjects with a competitor: prices and discounts; sales terms including credits, earnings, profit margins or costs; distribution or assignation of customers or markets; boycotts; customers; suppliers; market share; distribution practices; offers or bids, or decisions regarding participation in calls for tenders; sales areas or countries; selection, classification, rejection or termination of relations with customers; or any other information regarding competition.

Handling information that is harmful to the competition: Employees must refrain from obtaining information that may be harmful to the competition in manner that is unethical or illegal, for example, by means of industrial espionage or inappropriate or unauthorised access to confidential information.

Respect shall be given to all third-party intellectual and industrial property rights in operational and commercial actions.

If you have any questions in this regard, please contact the Legal Department.



■ ETHICS COMMITTEE

An Ethics Committee has been created with the basic function of monitoring compliance with this Code of Conduct.

Where compliance with this code or any other matter or action related to it affects a senior manager, the Chairman's Office shall be the only competent body to be acquainted with and resolve the matter.

The Ethics Committee is comprised of the Corporate Human Resources Management, the Legal Department Management and the Internal Auditing Department Management.

The Internal Auditing Department Management shall act as coordinator of the committee for the purpose of recording information.

The committee shall receive, deal with,

respond to and act on any consultation, complaint, claim or report based on this code. All consultations and communications made by the committee are to receive a response within ten days.

Once the committee becomes aware of the existence of an event that may be an infringement of this code, it shall adopt the measures to investigate that it deems opportune. Once the facts have been analysed, it shall issue a report of conclusions proposing the actions it considers opportune to the Company Chairman's Office, which shall pass judgement.

The Ethics Committee has full independence for the exercising of its functions and reports directly to the Chairman's Office.

APPENDIX 1

HOTLINE: CHANNEL FOR COMPLAINTS AND ENQUIRIES

Concerns and Infringements Report

Cosentino Group has a commitment to achieve its objectives with integrity. If you suspect any infringement of the law, this Code of Conduct or any of the policies of Cosentino Group, or that any inappropriate action is being undertaken in Cosentino Group, it is your responsibility to report your concerns to the Ethics Committee.

The Ethics Committee guarantees confidentiality and the anonymous nature of and consultation or reporting received.

All employees shall be treated with dignity and respect and shall not be subject to reprisals, threats or harassment for reporting concerns or infringements.

Anonymous reports for the sole purpose of defamation or slander shall not be accepted or processed. Where such action is proven, the false complaint shall result in a sanction to the greatest extent permitted by the regulations.

The following complaint channels are available:

E-Mail:
comite.etica@cosentinogroup.net

Telephone:
(+0034) 683 651 069

Postal Address:
Grupo Cosentino.
Dirección de Auditoría Interna
Autovía A-334, salida 60 / 04850 Cantoria
Almería / España



APPENDIX 2

with National Identity Card No.

employee of Cosentino in the position of

STATES

That he/she is responsible for understanding and complying with the Cosentino Group Code of Conduct, submitted as an appendix documentation in the Employee Information Starter Pack, together with all applicable policies. Infringement of the Code of Conduct and the applicable policies may result in disciplinary measures including termination of employment with Cosentino Group.

CLAUSES

I. If there is any conflict between this Code and Cosentino Group policies and local laws or regulations, that containing the highest ethical standards shall prevail, except in cases where to do so would imply infringement of a local law.

II. The Audit Committee of the Cosentino Group Board of Directors must approve any modification to the provisions of the Cosentino Group Code of Conduct before they come into force.

In witness whereof and for all pertinent purposes, I affix my signature

In, dated of 20

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THE ORIGINAL



RECYCLED SURFACES



SEMI-PROTECTION



COSENTINO CENTRAL:

Ctra. Baza - Huércal Overa, Km. 59 / 04850 Cantoria / Almería / España

Tel: +34 950 444 175 / Fax: +34 950 444 226

info@cosentinogroup.net

www.cosentinogroup.net / www.silestone.com

www.scalea.es / www.ecobyconsentino.com / www.sensabyconsentino.com

HOTLINE FOR QUESTIONS AND REPORT

E-Mail: comite.etica@cosentinogroup.net / Tel: (+0034) 683 651 069