



ACP - Aragonesa de Componentes Pasivos, S. A.

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Code of Conduct

This code summarizes the principles under which ACP's employees work, both internally and in relation with business partners and other parties.

1) Laws and Regulations

As employees of ACP, we comply with all laws, regulations and company policies that govern our activities around the World. We act with integrity and honesty in all matters, and we are accountable for our actions.

No matter where we operate in the World, we must live by our ACP values, be aware of, and abide by, the legal standards and regulatory requirements applicable to our business function.

2) Business Partners

In relation to suppliers, ACP maintains ethical and licit relationships with suppliers of goods and services. In addition, ACP selects suppliers on the basis of the appropriateness of their product or services, their prices, delivery conditions, quality, as well as for the application of principles similar to ours.

3) Compulsory Labor / Child Labor

ACP disapproves of any form of child and compulsory labor or involuntary labor as well as any other forms of enforced labor, not only in its own enterprise but also with its business partners.

4) Our Employees

In ACP, we respect human rights and encourage their observance.

At our workplace, no form of violence or abuse is permitted. We do not discriminate against employees on the grounds of race, religion, age, sex or any other personal or social condition different from the conditions of merit and qualification.

We will protect private employee personal information and use it only for legitimate business purposes, in accordance with all relevant laws.

Moreover, ACP declares that its employees receive an appropriate remuneration. The legally defined national minimum wage is assured.



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5) Conflicts of Interest

Employees are expected to perform their duties in a way that does not conflict with the best interests of ACP. In the case that such a conflict were to arise, staff members are to report this immediately to their superiors.

6) Competition / Corruption

We compete in good faith with other companies. We believe in a free market based on mutual respect between competitors. ACP will not tolerate any corrupt practices by its staff or on the part of its business partners.

7) Report irregularities, Escalation policy

ACP staff must take measures they deem necessary to prevent the breach of the code of conduct. ACP staff must identify and consider potential situations before they will turn into a real problem

The Escalation policy and this code define a time frame to ensure that any code breach will be reported to the adequate levels, as, area manager, department manager, management and committee.

If an ACP worker has any question regarding to the best action to follow on an specific situation, or if the worker is aware of any kind of breach of the law, regulation or code of conduct, he/she must immediately report to his/her area (department) manager. Reporting situations or questions to the area (department) managers is normally the most effective way to promote a positive work environment. If you cannot inform of problems or complaints to the area (department) manager, or it is not advisable for any reason, or this action will not solve the issue, the worker must contact directly with higher levels, depending of where the root cause is.

8) Health, safety and environment

Our health, safety and environment goals are: no accidents, no harm to people and no damage to the environment.

The Management

Tarazona, October 2017