

# SurTel ELECTRÓNICA, S.L.

## QUALITY AND ENVIRONMENTAL MANAGEMENT POLICY

SurTel is committed to:

- Protect the environment, prevent pollution and use resources in a sustainable way (optimizing the consumption of natural resources, energy and raw materials necessary for the realization of our products).
- To the extent of its possibilities, it is committed to reduce the effects of climate change and protect biodiversity and ecosystems.
- Comply with the applicable requirements (including legal and regulatory requirements) and continuously improve the efficiency of the quality and environmental management system.
- Apply the necessary means to ensure that the goods and services offered to our customers are free of errors.
- The ultimate goal of all surtel activities is to ensure that the results of our work exceed the expectations of customers and other interested parties

This Policy is understood, applied and maintained up to date at all levels of the organization. It is communicated to suppliers and is public on our website. SurTel has an integrated Management System that guarantees compliance with this Policy. The frame of reference for the establishment of the objectives and goals is formed by the general objectives, specified annually in the management system review meetings by management, among others:

- Continuous decrease in the claims of our clients.
- Decrease in the area of resources and improvement of energy efficiency.
- Involve all the staff of the organization and the collaborators in the maintenance of the management system and especially in the detection and notification of incidents.
- Improvement of the training level of our collaborators for the responsible participation in the conservation of the environment.
- Continuous improvement in the results of inspections to our suppliers and the results of our production processes.
- Improved information management available to the entire organization.
- Control and recycle the waste produced in our productive activity

## CORPORATE SOCIAL RESPONSIBILITY POLICY

SurTel is committed to:

- Enforce information security.
- Promote and ensure that all activities are carried out in an ethical and responsible manner.
- That all persons who directly or indirectly maintain an employment, social or industrial relationship with SurTel receive a fair and respectful treatment.
- Respect health and safety rights at work. The workers will have adequate light, ventilation, fire protection, potable water and will have adequate measures for the prevention of work accidents.
- Respect human rights. Suppliers do not use any form of forced labor or child labor, and prevent the use of strategic minerals from countries in conflict.

- Adequately train employees in matters of health and safety at work.
- Pay in amount and term to its employees, the stipulated salaries.
- Require collaborators to follow the same requirements of SurTel.

## ANTI-BRIBERY AND PROFESSIONAL ETHICS POLICY

The people of SurTel commit to:

- Not receive any personal or financial benefit from a supplier, customer, competition or third parties, which conflicts with the interests of the organization.
- The gratuities and the presents received or offered must be lawful, coherent and authorized, and those that have the purpose of generating a good climate, such as greeting cards, merchandising, etc., are allowed.
- The presents and bonuses received or offered will not be in cash or if it is in kind its equivalent monetary value will not exceed € 100.
- It is allowed, for hospitality, meals and presents, when the nature and frequency is coherent and authorized. And, in addition, comply with the guidelines of SurTel's policies and code of conduct.
- Avoid presents or gratuities to public employees, as they may go against current legislation.
- Avoid conflicts of interest, between personal and those of the organization, such as:
  - Perform activities that compete with the interests of the organization.
  - Influenced by personal interests, family or any other type of link.
  - Use information or resources of the organization for the personal or third-party benefit.
- Any conflict of interest that may arise should be communicated to the person directly responsible for its evaluation. It is allowed to have a conflict of interest as long as it does not harm the interests of the organization and is communicated and authorized.
- Corruption, whether bribery or extortion, with customers, suppliers, competitors or third parties, constitutes a violation of the organization's anti-bribery policy. Any indication of corruption should be communicated to the organization.

## INFORMATION SECURITY MANAGEMENT POLICY

SURTEL Management, aware of the requirements of interested parties and after analyzing their context in the field of new technologies, is committed to developing, implementing, maintaining and continuously improving, as part of its Management System (MG), a Information Security Management System (hereinafter "IS").

Information Security (SI) is characterized as the preservation of:

- The confidentiality of information, ensuring that only those who are authorized can access it;
- The integrity of the information, ensuring that the information and its process methods are accurate and complete;
- The availability of information, ensuring that authorized users have access to information and their associated assets when required.

The management of SURTEL recognizes the importance of identifying and protecting its information assets, avoiding the destruction, disclosure, modification and unauthorized use thereof.

This Policy applies to:

- All information printed or written on paper, stored electronically, transmitted by mail or using electronic media, displayed or spoken in a conversation.

- Any system that is running on a computer or device that is connected to the Surtel networks and to all the information systems provided by Surtel.
- All external parties that provide services to Surtel information processing
- All information related to customers, suppliers, employees, prices and figures of business, databases, strategy, management and other documents of the organization.

As part of the information security policy of SURTEL:

- An identification, analysis and evaluation of the risks associated with the IS is carried out.
- A risk treatment plan is established and implemented
- Objectives are established in relation to the IS.
- The necessary controls are established to deal with the risks identified and the objectives of IS that must be achieved with these controls.
- The business, legal or regulatory requirements and the contractual obligations of the IS are complied with.
- All personnel are provided with the necessary information, awareness and training regarding IS.
- Every employee will be responsible for preserving the confidentiality, integrity and availability of the information assets, as well as for communicating the violations to the IS, confirmed or suspected.
- Any violation of this IS policy will be prosecuted and sanctioned as a very serious fault.
- The SURTEL IS Responsible is directly responsible for the maintenance of this policy, as well as to investigate any violation of this policy communicated by the staff.



**La Carolina 19 de Septiembre de 2017**

**Apolinar Soriano Mora**  
*Director Gerente*