



COMPLIANCE & BUSINESS CONTINUATION POLICY

The current Compliance & business continuation policy in force reflects our organization's high commitment disposal and permanent exhibition to its activities' development showing professional ethics and legal compliance with the legislation currently in force.

While developing the current Compliance & business continuation policy, GOTEX S.A. has foresight taken into account the requirements stipulated by the regulations and laws with respect to compliance with our organization's criminal liability on its business activity.

Acknowledging the importance of the business development procedures' continuity, GOTEX S.A. has decided to introduce an integrated Penalty Crimes prevention & business continuation management system.

The government body subscribes and approves the current policy, which will be annually revised or whenever a necessary change implies to do so, having this being developed in collaboration with the Compliance Responsible. The GOTEX S.A. government body prohibits whatever behavior or performance that may imply a violation of the regulation in force, so it has provided to that effect the necessary resources for a proper compliance and crime prevention system implementation on its business activities so as to prevent, control and manage whichever possible risk related to committing penalty crimes in which the company, related parties, business partners and controlled partnerships may be exposed to.

Moreover, GOTEX S.A. stipulates the required preparations and plans a set of procedures to properly deal with an incident, from the moment in which the disaster is declared to the moment in which the order is restored. This way, its impact on the business scope, increasing our clients and related parties level of trust as well as the compliance of all legal, contractual and requirements related to our activity.

Scope of applicability, range and objectives

The current Compliance & business continuation policy applies to GOTEX S.A., with a headquarter in Ca n'Alzina Street no. 79, 08202 in Sabadell, Barcelona (Spain), and production tapes plant in Can Pobla 12, 08202 in Sabadell, Barcelona (Spain) on its business activities:

Design and manufacture of tapes and technical yarns, for technical and industrial application

The scope of applicability is extended to all personnel of GOTEX S.A. and all entities belonging to its business group, as well as all personnel employed, subcontracted, related parties, partners, collaborators, prescribers and all other authorized physical and juridical persons acting on behalf of our organization.

All appropriate juridical and physical persons under the scope must develop their activity in agreement with legal provision in force.





When it comes to the design of the Compliance & penalty crimes' prevention system, GOTEX S.A. has taken into account the compliance of the minimum requirements stipulated at both UNE 19601:2017 regulation and as indicated in no. 5 of the article 31. Bis. of the Spanish Penalty Code.

The designed and implemented compliance & penalty crimes' prevention system, which is subject to evaluations and periodical revisions, has the following main objectives:

- Diminish the exposition to penalty risks on its business activities.
- Prevent actions or behaviours that violate the legislation in force or considered as non-ethically accepted by our interest groups.
- Train and make people, professionals, shareholders, partners or similar aware of the penalty risks which their actions are exposed to as well as the adequate answer mechanisms stipulated by our organization.

The designed and implemented business continuation system, which is subject to evaluations and periodical revisions, has the following main objectives:

- Protect all resources against internal or external threats, deliberate or accidental.
- Ensure the implementation of the security measures and the Business continuity plan suggested in this policy.
- Guarantee all risks are kept under its acceptable level.
- Create a workplace where actions towards security and business continuity by all staff of the organization are recognized and appreciated.

The GOTEX S.A. government body will establish all the risk evaluation criteria so that all possible scenarios implying an unacceptable risk level would be adequately treated.

To that effect, we periodically identify and evaluate all penalty risks our business activities are exposed to, supplying documentary evidence of the results in our compliance risks matrix and we establish control plans of all evaluated risks ranked from low risk upwards in order to prevent and reduce its probability of occurrence, as well as to establish monitoring and control mechanisms.

"Everybody's Commitment"

Any employee, partner, shareholder, representative and/or anybody acting on behalf of our organization must inform and/or report whatever susceptible or suspicious action, conduct, information or evidence of infringement on our organization's Compliance & Business continuity policy and that may suppose a criminal action.

GOTEX S.A. has ordered the following means so as to everybody being able to report whatever sort of incident or suspicious conduct:

- E-mail delivery to the following e-mail address: **Compliance.gotex@coats.com**.
- Communication register through Reporting Channel arranged by our organization being either available in the company's webpage (https://www.coats.com/Industries/Wire-and-Cable) or through our link: http://bit.ly/2O6opVP

Ed. 02 September 28th 2018





GOTEX S.A. expresses its gratitude and positively appreciates the communication of whatever legality violation clue or suspicion of any employee, person or related organization connected to our company. For this reason, we appreciate to present the reported or communicated facts in more detail.

Our organization has made safety internal mechanisms/procedures available in order to guarantee the received communications/reports' confidentiality as well as to protect this people participating in our accomplishment objective through reporting and communicating from any threat or coercion.

In order to guarantee the maximum Independence, our organization has designed a specific job position in our organization chart, namely Compliance Responsible. Directly depending on the Administration board, this position is given adequate capacity, independence, and authority to ensure the correct implementation and improvement of our compliance and crime prevention system according to the defined and agreed requirements. The appointed Compliance Responsible is available to all members of the organization to advise, guide and support with respect to ethical actions and compliance. Equally, our organization will proportionately make all needed resources available in order to carry out the actions, measures, and controls planned in our Compliance Risks Control Plan.

As a result of the internal and external efficiency evaluation mechanisms of our compliance and crime prevention system as well as based on the information collected, analyzed and evaluated, some mechanisms have been established to constantly improve the efficacy of our compliance and crime prevention system, aiming at creating an authentic "live being system" capable of adapting to the changing market circumstances and to the improvements, opportunities and failures detected.

Everything defined in this policy will be gathered at SGCPSGCN (Compliance & penalty crimes' prevention system, business continuation system) regulations and procedures, which will be integrated, to the extent possible, with other organization's management systems, sharing those resources benefiting the optimization and looking for the continuous efficiency improvement and procedures' management efficacy.

The GOTEX S.A. government body is committed to the SGCPSGCN(Compliance & penalty crimes' prevention system, business continuation system) regulations establishment, maintenance and improvement, supplying it with all necessary means and sources and urging all personnel to assume that commitment. To do so, GOTEX S.A. will institute the required measures to train and make personnel aware of the penalty crimes' prevention and the continuity of the business activity.

Government body

Barcelona, September 28th 2018