

# AGGREGATES EUROPE - UEPG CODE OF ETHICS





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### Message of support from the President of UEPG

Since its foundation in 1987, AGGREGATES EUROPE - UEPG has been representing and defending the legitimate interests of aggregates producers in Europe, in coordination with its Members. This was achieved by pro-actively identifying EU initiatives and policies that are likely to impact European aggregates producers, keeping Members updated on relevant policy developments and ensuring AGGREGATES EUROPE - UEPG positions are considered by EU policymakers and decision makers, through the coordination of its own associative actions and through its Member associations.

The commitment to strict compliance with the law in all actions carried out by AGGREGATES EUROPE - UEPG has been a maxim for the organization since its creation. AGGREGATES EUROPE - UEPG Core Values are to be Open, Transparent and Honest.

This Code of Ethics is elaborated to disseminate and promote these values and principles and make effective the adherence to the culture of compliance of AGGREGATES EUROPE - UEPG staff and Members, when performing duties in the framework of AGGREGATES EUROPE - UEPG

It is my intention as President of AGGREGATES EUROPE - UEPG to make clear the solid commitment of the Association, through this Code, as well as with everything it represents, in the management of ethics and values.

Compliance is configured as a sine qua non requirement for success, long-term mission of AGGREGATES EUROPE - UEPG and the aggregates sector.

For all the above, it is necessary that AGGREGATES EUROPE - UEPG's Members acknowledge, assume and apply the content of this Code, which will contribute to the growth and improvement of our organization and to the development and evolution of the aggregates sector itself.

In Brussels, 19 November 2021.

## 1.1 AGGREGATES EUROPE - UEPG MISSION, VISION AND VALUES

### 1.1.1 Mission

The AGGREGATES EUROPE - UEPG mission is to work for a sustainable aggregates industry for a sustainable Europe. To that end, the AGGREGATES EUROPE - UEPG is committed to not only identify the legislation to which it is obliged to comply with but also to measure the levels of compliance in the organisation.

### 1.1.2 Vision

The AGGREGATES EUROPE - UEPG vision is to be the Aggregates Industry Champion and a trusted Partner.

The AGGREGATES EUROPE - UEPG seeks to design and manage a sustainable and efficient associative activity, aiming to generate profitable and sustainable growth in the aggregates sector, improving their stakeholders' level of acceptance, and actively collaborating with EU Institutions.

### 1.1.3 Values

AGGREGATES EUROPE - UEPG Core Values are to be Open, Transparent and Honest.

The AGGREGATES EUROPE - UEPG considers it essential to defend the legitimate interests of its Members in accordance with the ethics and legality that must govern all its actions; transparency in decision making; dialogue and negotiation in the search for solutions to issues raised; and a solid internal democracy and voluntariness regarding their membership.

These values, endow AGGREGATES EUROPE - UEPG with legitimacy, representativeness, and independence.

To facilitate the fulfilment of this mission, vision and ethical values, the following Code of Ethics is approved.

## 1.2 CODE OBJETIVES

This AGGREGATES EUROPE - UEPG Code of Ethics establishes the values that should guide the behaviour of those who are part of the Association, as well as helping to consolidate business and personal conduct in accordance with ethical values.

This Code, together with the Compliance Policy, is the starting point of the AGGREGATES EUROPE - UEPG Compliance Plan and affects the entire activity of the Association, whose general conduct must be based on respect for fundamental values such as honesty, integrity, transparency and security, actions that must be subject to high levels of vigilance and ethical behaviour.

This Code is a key internal control tool, to guarantee that all its internal activities are carried out with the utmost integrity.

AGGREGATES EUROPE - UEPG will respect and defend the democratic principles and values enshrined in European Union such as respect of human freedom, democracy, equality, the rule of law, and respect of human rights, especially the right to freedom of expression, honour, personal and family privacy and image.

The requirements of this Code shall prevail except in cases where its provisions conflict with a specific law.

## 1.3 CODE SCOPE

This Code will be applicable to all the AGGREGATES EUROPE - UEPG staff and AGGREGATES EUROPE - UEPG Members in the framework of the duties performed for AGGREGATES EUROPE - UEPG and in accordance with their respective national obligations., regardless of position, responsibility, or occupation within.

Those persons who hold a representative position in the AGGREGATES EUROPE - UEPG, and those dedicated to the management and direction of the Association, are obliged to comply with the guidelines established in this Code, while performing duties in the framework of AGGREGATES EUROPE - UEPG.

Regarding employees, understood as those persons who, without being suppliers, provide services to the AGGREGATES EUROPE - UEPG, they must always comply with the professional behaviour guidelines established in this Code and applicable labour regulations.

As for the AGGREGATES EUROPE - UEPG Members working in the purview of AGGREGATES EUROPE - UEPG, they are obliged to comply with the provisions of this Code in the exclusive scope of their relations with the organisation and to maintain among themselves, within AGGREGATES EUROPE - UEPG, with the institutions, political organisations, interest groups and society in general, relationships based on good faith, courtesy, moral integrity, business ethics and respect for the honour and prestige of all members. This without prejudice to the priority application of other national or European regulations.

All those affected by this Code must avoid any conduct that, even without violating the law, could damage the reputation of AGGREGATES EUROPE - UEPG and negatively affect its interests. None of them will consciously collaborate with third parties in the violation of laws, nor will they participate in actions that compromise respect for the legal system.

Likewise, they undertake in their actions to maintain the common interest of the aggregates producers as a primary objective.

#### **1.4 ETHICAL PRINCIPLES**

Based on the SEAP Code of Conduct and in the AGGREGATES EUROPE - UEPG Bylaws (articles 4, 25 and 26):

- **Transparency:** AGGREGATES EUROPE - UEPG will act with transparency in the management of the entity, reporting its objectives, strategies, and activities to its members and to society in general. The relations with institutions, stakeholders, and society will be pursued under the principles of cooperation and transparency.
- **Democratic decision-making:** AGGREGATES EUROPE - UEPG bodies will operate in accordance with democratic principles. In addition, active participation of all those organizations, agents or stakeholders who may have a direct or indirect interest in the activities and procedures developed by AGGREGATES EUROPE - UEPG will be encouraged prior to the adoption of final decisions.
- **Independence:** in defence of the interests entrusted, AGGREGATES EUROPE - UEPG will act with full independence from any public entity, institution, political interest or economic or social agent. The governing bodies of the association will base their decisions and agreements, solely and exclusively, in the general business interests whose defence they are entrusted with.
- **Institutional collaboration:** institutional collaboration is compatible with the independence of action with respect to the public powers and other economic and social agents. In accordance with the foregoing, AGGREGATES EUROPE - UEPG will maintain effective collaboration with as many institutions, bodies and administrations as are necessary to achieve its objectives.
- **Defence of aggregates industry:** priority will be given to representation and defence of common interests. No Member Association or group of associates will receive discriminatory treatment.
- **Defence of free competition:** AGGREGATES EUROPE - UEPG will act with full respect for free competition without, in any case, using the Association to carry out collusive practices.
- **Anticorruption and ant bribery:** AGGREGATES EUROPE - UEPG is against influencing the will of people to obtain any benefit using unethical practices. All AGGREGATES EUROPE – UEPG Policy Officer, Member associations and employees must act in accordance with the law and, in no case, may they carry out or tolerate bribes from or to third parties, for the purpose of unlawfully obtaining or maintaining business or advantages.
- **Protection and respect for the environment:** AGGREGATES EUROPE - UEPG assumes the need for protection and respect for the environment in accordance with sustainability criteria and

protection of biodiversity.

- **Accurate information:** The governing bodies will guarantee the rights of the member associations, especially their right to information. Any member, before entering the AGGREGATES EUROPE - UEPG, will receive detailed and transparent information of their rights and obligations, as well as information on the organisation's bylaws, policies in force and this Code of Ethics. The AGGREGATES EUROPE - UEPG will promote the continuity of Its members through an effective defence of their interests.
- **Non-discrimination and equal opportunities:** AGGREGATES EUROPE - UEPG promotes the professional and personal development of all its employees, ensuring equal opportunities. No type of discrimination is accepted in the professional sphere, among others, for sex, sexual orientation and identity, age, religion, political opinion, nationality, social origin, or disability. The promotion and selection of employees is based on their skills and performance, as well as on merit and ability criteria defined in the job requirements. People who hold management or command positions must act as facilitators of the professional development of their collaborators. **A Gender Equality Plan** would be developed within the AGGREGATES EUROPE - UEPG to ensure the gender balance and equal opportunities within the organization.
- **Healthy and safe work environment:** AGGREGATES EUROPE - UEPG will promote the adoption of health and safety measures at work and will adopt the necessary preventive measures, promoting a work environment that respects the health and dignity of employees. For these purposes, the "AGGREGATES EUROPE - UEPG Harassment Protocol", to combat sexual, moral, and labour harassment, will be developed.
- **Family and work life:** The AGGREGATES EUROPE - UEPG will promote flexibility of working hours and the use of remote communication and teleworking elements to allow a better conciliation of personal and family life with work.
- **Compliance with intellectual property policies:** AGGREGATES EUROPE - UEPG Employees and Members have the duty to use AGGREGATES EUROPE - UEPG resources appropriately and responsibly. These resources must be protected and preserved from any misuse that could result in harm to employees and the Association.
- **Accurate financial information:** those in charge of the direction and management of AGGREGATES EUROPE - UEPG, have the obligation to maintain the accounting records with accuracy and honesty, reflecting their true image. They must comply with the rules on transparency in the use of funds and provide all the documentation required by the competent authorities. Member Associations must be up to date with their payment obligations towards AGGREGATES EUROPE - UEPG.

## 1.5 ETHICAL DUTIES OF AGGREGATES EUROPE - UEPG MEMBERS OF MANAGEMENT AND GOVERNING BODIES

Based on the SEAP Code of Conduct and in the AGGREGATES EUROPE - UEPG Bylaws (article 4) without prejudice of priority application of other national or European regulations:

- **Confidentiality:** All members of the governing bodies will keep secret the content of the deliberations that take place during their meetings and will refrain from revealing the information to which they have had access. The obligation to keep secrecy is permanent, so it will remain in force even after the termination occurs.
- **Conflicts of interest:** members of AGGREGATES EUROPE - UEPG governing bodies will always act prioritizing the interests of the Association over their own, those of their relatives or those of other linked people, both in the relationships they maintain with the Association itself, as in those

that they maintain with member associates, suppliers or any other third party. None of them may make a particular use of the AGGREGATES EUROPE - UEPG's assets, beyond that to which they are entitled, or make use of their position in the organisation to obtain a financial advantage.

- **Transparency:** members of the governing bodies must report the positions, functions or activities carried out in entities other than the AGGREGATES EUROPE - UEPG of a similar nature and, in general, any situation that may be relevant to the Association. All members of the governing bodies should notify the Board the opening of any judicial procedure, making their position available to the Board until the matter is solved. The Board may agree by simple majority of its members, following a report from the Compliance Officer, after hearing the Secretary General, to suspend or remove the person from their position.

## 1.6 AGGREGATES EUROPE - UEPG'S ETHICAL DUTIES TOWARDS STAFF

Based on the SEAP Code of Conduct and in the AGGREGATES EUROPE - UEPG Bylaws (article 4), without prejudice of priority application of other national or European regulations:

- **Selection, promotion, and training of personnel:** AGGREGATES EUROPE - UEPG promotes the professional and personal development of all its employees, ensuring equal opportunities, without any discrimination for race, sex, sexual orientation and identity, religion, opinion or any other personal or social circumstances. The selection and promotion of employees is based on the competences, merit, capacity, and performance of their functions. AGGREGATES EUROPE - UEPG will always ensure the interest of the organisation, promoting access to women to management and responsibility positions. Employee's training will be incentivized to promote their professional progression and add value to the Association, committing to keep updated the knowledge and skills necessary for the most effective performance of the responsibilities entrusted to them.
- **Work and family life:** AGGREGATES EUROPE - UEPG formalizes the commitment of the organization's management to equality between women and men and the conciliation of work, family and personal life will be encouraged. A monitoring and evaluation process will be implemented to review the measures and an update over time, so that they are effective and maintain their adaptation to the needs of the personal.
- **Healthy and safe work environment:** AGGREGATES EUROPE - UEPG will drive the adoption of safety and health measures at work and will adopt the necessary preventive measures, providing a work environment that respects the health and dignity of employees. All employees should comply with safety and hygiene standards at work. The Association will carry out risk assessments evaluating the factors of this nature that could occur at work, especially behaviours that involve labour, sexual or gender harassment. All those measures will be completed with the training of workers and the dissemination of this Code of Ethics as well as other documents that can lead to greater healthy and safe work environment.
- **Use of assets, and resources:** AGGREGATES EUROPE - UEPG makes available to its employees, associates, and collaborators the necessary resources for the development of their functions. All of them should use the resources in a responsible and appropriate way, protecting and preserving them from any use inadequate.

## 1.7 ETHICAL DUTIES OF MEMBER ASSOCIATIONS

Based on AGGREGATES EUROPE - UEPG Bylaws (art. 4 and 8) and according to the Society of European Affairs Professionals (SEAP\*) Code of Conduct every Member Association is obliged to comply with the following ethical

duties, as members of the AGGREGATES EUROPE - UEPG, and without prejudice of priority application of other national or European regulations.

- Fulfil the agreements validly adopted by the AGGREGATES EUROPE - UEPG.
- Do not violate the functional and territorial competencies of the rest of the associations, adopting decisions or behaviours that may lead to confusion about the true interest represented by AGGREGATES EUROPE - UEPG.
- Express their positions about AGGREGATES EUROPE - UEPG actions and procedures in the appropriate bodies at the time of internal debate, always protecting the image and objectives of the Association.
- Make a reserved use of any confidential information received because of their position in the Association.
- Adapt their behaviour to the AGGREGATES EUROPE - UEPG mission, vision, values, and principles, complying with this Code of Ethics, when working under the purview of AGGREGATES EUROPE - UEPG.
- Communicate possible conflicts of interest to the Compliance Officer.
- Submit the interest of the Association and the defence of the interests of the sector to any personal or professional circumstance that may damage the image of the AGGREGATES EUROPE - UEPG.
- Make proper use of the Association's resources, allocating them to the fulfilment of its objectives in defence of the sector.
- Make their membership and/or position available to the Board when it is not possible for them to comply with this Code and the rest of the AGGREGATES EUROPE - UEPG Compliance Policy.

### 1.8 AGGREGATES EUROPE - UEPG'S STAFF ETHICAL DUTIES

Based on AGGREGATES EUROPE - UEPG Bylaws (art. 4) and according to the Society of European Affairs Professionals (SEAP\*) Code of Conduct without prejudice of priority application of other national or European regulations:

- **Loyalty to the Association and preservation of AGGREGATES EUROPE - UEPG image:** workers must behave loyally towards the Association, even once the employment relationship has ended. Situations like unfair competition, information leakage, or disclosure of false news about the management positions or about the Association, are clear signs of disloyalty that, in no case, should occur among AGGREGATES EUROPE - UEPG employees.

Those bound by this Code must have the necessary authorization to intervene on behalf of AGGREGATES EUROPE - UEPG, in front of the media, in conferences, seminars or other public events. On these occasions, they will communicate the opinion of the Association or clarify that they are expressing their own.

An employee shall not knowingly do, permit, or order to make materially false or misleading communications about AGGREGATES EUROPE - UEPG, nor sign or allow others to sign a document containing information materially false or misleading. Every employee undertakes to notify the Compliance Officer of the opening of any procedure criminal court. The Secretary General may agree, after a report from the Compliance Officer to suspend the person from his position or propose to the Board the removal of his/her position.

- **Conflicts of interest:** A conflict of interest arises when the private interest of an employee or family member interferes or appears to interfere with the interests of AGGREGATES EUROPE - UEPG. It

also arises when an employee because of his position, or a member of his family, receives improper personal benefits, including loans or guarantees, in operations involving the Association, its members or suppliers. Any employee who has knowledge of an actual or potential conflict or have questions about whether there is such conflict must be brought to the attention of the Compliance Officer or of the Secretary General.

- **Respect for people:** AGGREGATES EUROPE - UEPG rejects any manifestation of physical, psychological, moral harassment or abuse of authority, as well as any other conduct that may generate an environment that is harmful or intimidating towards AGGREGATES EUROPE - UEPG employees, AGGREGATES EUROPE - UEPG Members, or other members of the governing bodies.

Workers will treat with due respect and consideration both their superiors and their inferiors and equals at work. For these purposes, workers will receive up-to-date and sufficient training on conflict management and on those behaviours that could constitute harassment, to facilitate their identification, detection, eradication, and reporting, where appropriate from the Compliance Officer.

- **Duty of secrecy:** Employee must keep the corresponding secrecy regarding confidential information, exclusive and lawful content accessed because of their position or function.
- **Duty to report:** Each employee will adopt the appropriate measures to stop any known violation of the Code of Ethics by another employee or member of the Association. To do this, he or she will proceed to report the conduct before Compliance Officer, either verbally, or through the "ethical mailbox" on the website, or directly to the Secretary General, if the conduct involves the Compliance Officer.

## 1.9 CODE ENFORCEMENT

### 1.9.1 Compliance Officer appointment

AGGREGATES EUROPE - UEPG acquires the ethical commitment, by approving this Code of Ethics, to disseminate its content and demand its full compliance.

For these purposes, the figure of the Compliance Officer is created, who will be the person in charge of controlling, detecting, and preventing practices contrary to ethical principles, set out in this Code. He is responsible to implementing and promoting an ethical culture that should be implicit in all the activities of the Association.

### 1.9.2 Compliance Officer duties

- To examine and ensure compliance with this Code of Ethics.
- To make proposals for improvement in good governance, issuing the reports it deems appropriate, both ex officio and at the request of the Board.
- To receive complaints from associates or employees about any conduct contrary to what is stated in this Code, Bylaws, policies and other regulations.
- To advise the governing bodies of AGGREGATES EUROPE - UEPG on compliance matters, issuing for this purpose the reports that are required or established in the applicable regulations.
- Any other competence that in terms of good governance has not been expressly attributed by this Code or by the AGGREGATES EUROPE - UEPG Bylaws to any other governing body or to the General Secretariat.

### 1.9.3 Annual Compliance Report

The Compliance Officer will present to the Board an Annual Compliance Report, which will include the measurement, disclosure, and accountability with respect to the objectives established in this Code of Ethics and in the applicable policies.

In addition, it may include proposals for measures to improve compliance with these ethical standards.

#### **1.9.4 Processing of complaints and records**

Complaints will be sent to the Compliance Officer via internal complaints channel, regarding behaviours that may be contrary to the AGGREGATES EUROPE - UEPG's principles and values which could have been committed by any of its Members, employers, associates, or members of the governing bodies.

The channel will be made available to associates and employees on the corporate website under the tab "ethical mailbox".

The Compliance Officer will keep permanently updated a record of all complaints filed and the result of the files processed. A follow-up on the complaints received will be part of the Annual Compliance Report.

### **1.10 WHISTLEBLOWER PROTECTION**

The Compliance Officer must keep the due secrecy regarding the identity of eventual Whistleblowers. The identity of the Whistleblowers may be kept secret at his request through selecting the option "anonymous report" in the report form, so that his/her identity can only be known by the Compliance Officer.

The identity of the person will remain hidden behind an alphanumeric Code that only the Compliance officer will handle.

The Compliance Officer may be relieved of the duty of secrecy by the written consent of the Whistleblower or in the event that the falsehood of the complaint is evidenced.

Notwithstanding the foregoing, the data of the associates who carry out the Communication may be provided to both the administrative or judicial authorities, insofar as the Compliance Officer is required by such authorities as consequence of any procedure derived from the object of the complaint.

The person who knowingly filed a false report, in order to harm the reputation of the accused or for other spurious reasons, will incur in a serious or very serious infringement of this Code of Ethics depending on the nature and seriousness of the alleged acts, with disciplinary consequences.

### **1.11 PROCESSING OF COMPLAINTS AND SANCTIONING REGIME**

The Compliance Officer, acting in coordination with the Secretary General, will propose to the Board the list of situations that imply the violation of the due diligence required in accordance with this Code of Ethics.

In case of violation of the duties and obligations established in the regulations, bylaws and in this Code by the members of the Association, the representatives of its governing bodies, management positions, staff or Member Associations, the Compliance Officer will be in charge of instructing the matter, without prejudice to the requirement of criminal, civil, labour or any other kind of liability that may proceed, and submit to the Secretary General its conclusions together with its proposal of sanction.

In the process of handling complaints, the rights of both the complainant and the reported person shall be protected.

In the event of the involvement of the Secretary General, the Compliance Officer will raise the conclusions of his/her investigation to the President of the AGGREGATES EUROPE - UEPG, together with his proposal for sanction.

In the event of the involvement of the Compliance Officer, the Secretary General of the AGGREGATES EUROPE - UEPG who will raise the conclusions of his/her investigation to the President, together with his/her proposal for sanction.

If the denounced events are considered as minor infractions, the Secretary General, or the President, will communicate the sanction to be imposed to the Compliance Officer who will draft the resolution, and will communicate it both verbally and in writing to the person or persons involved in the events.

If the denounced events were considered as serious or very serious offenses, the Secretary General, or the President, will raise the proposal of sanction to the Board who will decide by simple majority.

The resolution must be communicated to the Compliance Officer, Secretary or President who will draft the resolution, and communicate it both verbally and in writing to the person or persons involved.

The investigation and resolution phase must end in the maximum period of three months from the reception of the complaint by the Compliance Officer, unless for complexity reasons a longer period is necessary, so it may be extended for another 30 days.

#### **1.12 INTERPRETATION**

This Code of Ethics will be interpreted in accordance with the applicable legal and statutory regulations.

#### **1.13 MODIFICATION**

This Code of Ethics will be modified, when previously agreed by the Board, requiring for its validity an agreement adopted by the same majority that is required for the modification of the Bylaws.

The Board will promote the modification of this Code in accordance with social demands changes on the legislation and new ethical needs in the business environment, at the proposal of the Compliance Officer.

#### **1.14 TRAINING**

AGGREGATES EUROPE - UEPG will include the necessary actions in its training plans to prevent conducts contrary to the principles and values set forth in the present Code.

Seminars, webinars, publications, and other communication strategies will be held specifically aimed at workers, managers and associates implementing a culture of regulatory compliance in the Association, encouraging the early detection of these unethical or illegal behaviours and their reporting.

#### **1.15 DIFFUSION**

AGGREGATES EUROPE - UEPG Members have an obligation to know, comply with and enforce this Code, whatever their position or responsibility in the Association, when working in the purview of AGGREGATES EUROPE - UEPG.

To this end, the AGGREGATES EUROPE - UEPG General Secretariat will provide all of them with a copy of this Code.

Each new incorporation to the Association will imply the delivery of the “welcome package”, in which it will contain, among other documents, this Code of Ethics.

The AGGREGATES EUROPE - UEPG Code of Ethics will be published in a visible place on the Association's website.

#### **1.16 ENTRY INTO FORCE**

This Code of Ethics comes into effect from the agreement reached at the AGGREGATES EUROPE - UEPG Board meeting held on 19 November 2021.

**AGGREGATES EUROPE - UEPG aisbl - General Secretariat**

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