



Code of conduct and responsible practices

Montaje de transportadores y sistemas industriales, S.L.

Montaje de transportadores y sistemas industriales, S.L.

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01 SUMMARY DESCRIPTIVE

This document (hereinafter the Code) establishes the criteria for action that must be observed by the company Montaje de Transportadores y Sistemas Industriales, S.L. (hereinafter MONTRA) in the performance of its professional responsibilities.

The aim of this Code is to ensure professional, ethical and responsible behaviour by MONTRA and all its employees in the development of its activities anywhere in the world, as a basic element of its corporate culture on which the training and personal and professional development of its employees is based. To this end, the principles and values that should govern MONTRA's relations with its stakeholders (employees, customers, business partners, suppliers and those companies in which it develops its business model) are defined.

To this end, the Code:

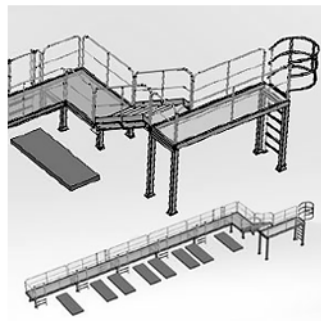
- It facilitates the knowledge and application of MONTRA's corporate culture, firmly based on compliance with human and social rights and the effective integration of the entire group of employees in the company, with respect for their diversity.
- It establishes the principle of due diligence for the prevention, detection and eradication of irregular conduct, whatever its nature, including, among others, the analysis of risks, the definition of responsibilities, the training of employees and, where appropriate, of third parties directly related to the company, and, in particular, the notification and immediate elimination of irregular conduct.
- It takes into account the principle of criminal liability of legal persons, which is enshrined in the legal system of various jurisdictions where MONTRA operates and prevents and proscribes the existence of behaviours that may determine the company's liability among its legal representatives, administrators, employees or any other person who is subject to the authority of the company's personnel.

02 SCOPE OF APPLICATION

The Code applies to all MONTRA Departments and is binding on all MONTRA staff, regardless of their position and function.

The application of the Code, in whole or in part, may be extended to any natural and/or legal person related to MONTRA, when this is appropriate for the fulfilment of its purpose and is possible due to the nature of the relationship.

The Code will be notified personally to all its Directors, who must undertake in writing to comply with it. Likewise, the obligation to comply with it will be expressly included in the documents given to the employee, who will be given a copy when he/she joins the company.



03 General principles

- 3.1 Employees
- 3.2 Clients
- 3.3 Shareholders
- 3.4 Suppliers
- 3.5 Society

The Code of Conduct is defined as an ethical commitment that includes basic principles and standards for the proper development of relations between MONTRA and its main stakeholders wherever it carries out its business activities.

The Code is based on the following principles:

- All MONTRA operations will be conducted in an ethical and responsible manner.
- The legislation in force in each country where MONTRA operates shall be complied with.
- The behaviour of MONTRA employees shall conform to the spirit and letter of this Code of Conduct and Responsible Practices.
- All natural and legal persons who have any direct or indirect employment, economic, social and/or industrial relationship with MONTRA shall be treated fairly and with dignity.
- All MONTRA activities will be carried out in the most environmentally friendly way, favouring the conservation of biodiversity and the sustainable management of natural resources.

3.1 Employees

MONTRA does not employ anyone under the age of 16.

No person employed at MONTRA shall be subject to discrimination on the basis of race, physical disability, illness, religion, sexual orientation, political opinion, age, nationality or gender.

MONTRA prohibits any form of physical, sexual, psychological or verbal harassment or abuse of its employees, as well as any other conduct that could create an intimidating, offensive or hostile work environment.

MONTRA employees have the right to organise, freedom of association and collective bargaining.

Weekly working hours and overtime shall not exceed the legal limit established by the legislation of each country. Overtime shall always be voluntary and shall be paid in accordance with the law.

MONTRA employees' salaries are commensurate with the function performed, always respecting the agreements of each sector in each country.

All MONTRA employees carry out their work in safe and healthy workplaces.

3.1.1 Equality Plan

As part of its equality policy, MONTRA respects the laws in force in Spain, which in article 45.1 and 48 of Organic Law 3/2007, of 22 March, obliges all companies to respect equal treatment and opportunities in the workplace, and is obliged to adopt an action procedure or protocol to prevent and act against sexual harassment and/or harassment for reasons of sex.

In addition, protection measures have been developed and procedures have been established to prevent it and to deal with any complaints or claims that may be made by those who have been subjected to it.

- Drawing up an Equality Plan
- Preparation of an annual pay gap report.
- Creation of a protocol against harassment at work.
- Creation of a complaints channel.

3.2 Clients

MONTRA is committed to offering all its customers a high standard of excellence, quality, health and safety in its products and services, and to communicating with them in a clear and transparent manner. These products will be produced in an ethical and responsible manner.

3.3 Shareholders

MONTRA carries out its activity in accordance with the social interest, understood as the viability and maximisation of the value of the company in the long term in the common interest of all shareholders.

3.4 Suppliers

MONTRA's suppliers of goods and services are obliged to comply with this Code, insofar as it applies to them.

They must also allow any review by MONTRA or authorised third parties to verify compliance.

3.5 Society

MONTRA is committed to working with the local, national or inter-national communities in which it does business.

04 Behavioural commitments and responsible practices

4.1 Compliance with applicable
legislation and internal regulations

4.2 Compliance with agreements
and conventions

4.3 Employee relations

4.4 Customer relations

4.5 Market practices

4.6 Supplier relations

4.7 Relations with authorities
and officials

4.8 Conflicts of interest

4.9 Exercise of other activities

4.10 Use of company goods
and services

4.11 Confidentiality of information
and personal data protection

4.12 Protection of intellectual
and industrial property

4.13 Register of operations

4.1 Compliance with applicable legislation and internal regulations

Compliance is a necessary prerequisite of this Code.

All MONTRA employees must comply with the laws in force in each of the countries in which it carries out its activities in the supply of goods or services. The application of the Code shall in no case imply non-compliance with the legal provisions in force in the countries where MONTRA operates.

All MONTRA employees must comply with the company's rules and procedures, as well as any instructions that may be adopted in their development.

MONTRA undertakes to provide the necessary means for its employees to know and understand the internal and external regulations necessary for the exercise of their responsibilities.

4.2 Compliance with agreements and agreements

MONTRA assumes, as part of its internal regulations, the content of the agreements and conventions, whether national or international, to which it has adhered, committing itself to their promotion and compliance.

A list of the main agreements and conventions is annexed to this Code as Anex I,

which shall be kept permanently updated.

4.3 Relations with employees

MONTRA considers people as a key business factor, defends and promotes compliance with human and labour rights and is committed to the application of standards and good practices in terms of employment conditions, health and safety in the workplace.

Company personnel shall cooperate in strict compliance with applicable labour standards and in the prevention, detection and eradication of irregularities in this area. All employees are obliged to act, in their working relations with other employees, in accordance with criteria of respect, dignity and justice, taking into account the different cultural sensitivity of each person and not allowing any form of violence, harassment or abuse at work, or discrimination on grounds of race, religion, age, nationality, gender or any other personal or social condition unrelated to their conditions of merit and ability, with special consideration for the care and integration of people with disabilities or handicaps at work.

All employees are responsible for strict compliance with occupational health and safety standards, and for ensuring their own safety and the safety of those affected by their activities.

The consumption of substances which could affect the proper performance of professional duties.

4.4 Relations with clients

All employees are obliged to act, in their relations with customers, in accordance with criteria of consideration, respect and dignity, taking into account the different cultural sensitivity of each person and not allowing discrimination in treatment on the grounds of race, religion, age, nationality, gender or any other personal or social condition prohibited by law, with special consideration for the care of people with disabilities or handicaps.

MONTRA protects its customers by establishing and implementing mandatory health and product safety standards for all suppliers, guaranteeing that all the articles it sells do not involve risks to their health and/or safety in use.

MONTRA employees shall ensure that the above standards, as well as all other established rules and procedures, are complied with.

In carrying out their business activities, MONTRA employees shall promote the company's products on the basis of objective standards, without misrepresenting their conditions or characteristics. The company's promotional activities shall be conducted in a clear manner so as not to provide false, misleading or deceptive information or which could mislead customers or third parties.

All staff are obliged to ensure the security of

billing and collection procedures, the protection of customer data and the prevention of fraud.

4.5 Internships at market

MONTRA competes fairly in the marketplace and does not under any circumstances condone misleading, fraudulent or malicious conduct.

The search for commercial or market information by MONTRA employees shall always be carried out without infringing any rules that may protect it. Employees shall reject information about competitors obtained improperly or in breach of the confidentiality under which it is held by its rightful owners. In particular, special care will be taken not to violate company secrets in the case of professionals joining MONTRA from other companies in the sector.

Company employees shall also avoid spreading malicious or false information about the company's competitors.

In their relations with third parties, MONTRA employees shall generally avoid payments in cash, and those made in currencies other than those previously agreed. In any case, payments shall be made in accordance with the policies defined by the MONTRA Department Financial Management.

They shall also be subject to special control and supervision unforeseen payments made to

or by third parties not mentioned in the relevant contracts, payments made to accounts which are not the usual ones in relations with a given organisation or person, payments made to or by persons, companies, entities or to accounts opened in territories qualified as tax havens and payments made to organisations where it is not possible to identify the ultimate partner, owner or beneficiary.

4.6 Relations with suppliers

MONTRA employees shall deal with their suppliers of goods and services in a lawful, ethical and respectful manner.

The selection of suppliers shall be governed by criteria of objectivity and transparency, combining the company's interest in obtaining the best conditions with the desirability of maintaining stable relations with ethical and responsible suppliers.

All suppliers working with MONTRA must commit to respect the human and labour rights of all contracted employees, as well as to involve and convey these principles to their business partners. Violation of any of these principles will in no case be accepted by MONTRA.

Purchasing and procurement activities shall be carried out in strict compliance with the rules and procedures in force in the company. All decisions taken in this area must

be substantiated, in the sense that they must be justifiable, verifiable and verifiable in the event of review by third parties or MONTRA's own supervisory bodies. MONTRA personnel are obliged to protect commercially sensitive information relating to the conditions established by the company in relation to its supply chain.

MONTRA employees shall not solicit suppliers or accept information regarding terms and conditions from other companies that compete with MONTRA.

No MONTRA employee may offer, grant, solicit or accept, directly or indirectly, gifts or gratuities, favours or compensation, in cash or in kind, of any nature whatsoever, that may influence the decision-making process related to the performance of the functions derived from his or her position.

Any gift or donation received in violation of this Code must be returned immediately and the Ethics Committee must be informed of this circumstance. If it is not reasonably possible to return the gift or donation, it shall be handed over to the Administration Department, which, after issuing the corresponding receipt, shall allocate it for purposes of social interest.

In particular, no MONTRA employee may offer, grant, solicit or accept gifts or gratuities to or from any natural or legal person with whom MONTRA has dealings of any kind which, in isolation or aggregated over a period of one year, have a value of more than EUR 200 or its

equivalent in local currency. Gifts of cash are expressly prohibited.

4.7 Relations with authorities and officials

MONTRA employees shall deal with public authorities and institutions in the countries in which it operates in a lawful, ethical and respectful manner, in line with international provisions for the prevention of corruption and bribery. Employees who have a relationship with representatives of public administrations must be specifically authorised by the company.

Personnel who have dealings with public administrations should document the decisions taken and accredit compliance with the internal and external rules applied, in order to facilitate the review of compliance with regulations in this area by third parties and the company's supervisory bodies.

As a general rule, no employee of MONTRA may offer, grant, solicit or accepting, directly or indirectly, gifts or gratuities, favours or compensation, of whatever nature, to/from any authorities or officials.

Exceptions to the above rule are only gifts and hospitality of small value that are proportionate and reasonable according to local practice, transparent, given for legitimate, socially acceptable interests, and sporadic, so that their content or regularity would not lead

an independent third party to doubt the good faith of the employee or the company. Gifts of cash are expressly prohibited.

It is the responsibility of each employee to know and properly assess local practices, taking into account the interest and good reputation of the company. In case of doubt, the Company's management should be consulted. In any case, standard practices on gifts and hospitality should be properly monitored, evaluated and recorded by the company.

MONTRA employees shall refrain from making facilitation or expediting payments, consisting of the giving of money or other things of value, regardless of their amount, in exchange for securing or expediting the course of a proceeding or action of any nature before any judicial body, public administration or official body. Employees shall avoid obtaining undue advantage in tax matters for MONTRA and shall be careful not to use any other means to obtain any undue advantage for MONTRA ensure that the information declared in this respect to the authorities is truthful and reflects the company's actual situation.

They shall also ensure that the aid requested or received from public administrations is used appropriately and that their application is transparent, avoiding falsifying the conditions for obtaining it or using it for purposes other than those for which it was granted.

In countries where there are requirements and restrictions on international trade, MONTRA employees will scrupulously comply with the regulations in force and will submit the required information on their activities to the authorities upon request.

4.8 Conflicts of interest

MONTRA employees must avoid situations that may involve a conflict between their personal interests and those of the company. They must also refrain from representing the company and from intervening in or influencing the taking of decisions in which, directly or indirectly, they or a third party related to them have a personal interest. They may not use their position in the company to obtain personal or proprietary sales or business opportunities of their own.

No MONTRA employee may provide services as a consultant, director, officer, employee or advisor to another competing company, with the exception of services that may be provided at the request of MONTRA or with the authorisation of the Company's management.

MONTRA respects the private life of its staff and consequently the private sphere of their decisions. Within the framework of this policy of respect, employees are urged to inform the Company's management of any conflicts of personal interest or those of their family environment that may compromise the

necessary objectivity or professionalism of their role at MONTRA, so that, with respect for the confidentiality and privacy of individuals, the appropriate measures can be taken for the benefit of both the company and the individuals concerned.

Specifically, the following are potential situations of conflict and must be reported to Company Management:

- The performance by the employee or by persons related to him/her, directly or indirectly, by him/herself or through a company or institution, of activities that constitute the same, similar or complementary type of activity as that carried out by MONTRA.
- The performance by the employee or by persons related to him/her, directly or indirectly, by him/herself or through a company or institution, of activities that generate the exchange of goods and/or services with MONTRA, whatever the agreed remuneration regime.

4.9 Exercise of other activities

MONTRA employees may only carry out work and professional activities unrelated to those carried out at MONTRA, provided that they do not impair the efficiency expected in the performance of their duties.

Any outside work or professional activity

that may affect the company's working day must be authorised in advance by the company's management.

MONTRA develops its business model without interfering politically in the communities where it carries out its service provision, manufacturing, distribution and/or marketing activities.

Any relationship of MONTRA with governments, authorities, institutions and political parties shall be based on the principles of legality and neutrality.

Any contributions made by the company, in cash and/or in kind, to political parties, institutions and public authorities shall always be made in accordance with current legislation and guaranteeing their transparency, to which end they must be preceded by a report from the Legal Department accrediting their full legality.

The right of employees to participate in legally recognised political activities is the company's employees are responsible for the proper performance of their work at the company and are carried out outside working hours and outside any MONTRA facility in such a way that they cannot be attributed to the company.

4.10 Use of goods and services of the company

MONTRA employees shall make efficient use of the company's goods and services and shall not use them for personal gain.

In this regard, under no circumstances shall MONTRA employees use the equipment that MONTRA makes available to them to install or download programmes, applications or content whose use is illegal, which contravene the company's rules or which may damage its reputation. Neither shall they use company funds or cards to pay for activities that are not part of their professional activity.

recognised, as long as these do not interfere with the employees should be aware that documents and data contained in MONTRA's information technology systems and equipment may be subject to review by the competent units of the company, or by third parties designated by the company, when deemed necessary and permitted by the regulations in force.

4.11 Confidentiality of information and personal data protection

MONTRA staff are obliged to the information and knowledge generated within the organisation, owned or guarded by the organisation must be protected.

Employees shall refrain from using for their own benefit any data, information or document obtained in the course of their professional activity. Nor shall they communicate information to third parties, except in compliance

with applicable regulations, company rules or when expressly authorised to do so. Likewise, they shall not use confidential data, information or documents from a third company without their written authorisation.

MONTRA personnel undertake to maintain confidentiality and to use any data, information or document obtained during the exercise of their responsibilities in the company in accordance with internal regulations on the matter. In general, and unless they are instructed otherwise, the information to which they have access must be considered confidential and may only be used for the purpose for which it was obtained.

Likewise, they shall not duplicate, reproduce or make any use of the information other than that necessary for the performance of their tasks and shall not store it in information systems that are not owned by MONTRA, except in the cases and for the purposes expressly authorised.

The obligation of confidentiality perma-
The obligation to return any material related to the company shall be required after the employee shall be entitled to a share in the company's assets at the time of termination of his or her relationship with the company.

MONTRA staff shall respect the personal and family privacy of all persons, whether employees or others, to whose data they have access. Authorisations to use data must be in response to specific and justified requests.

MONTRA employees must strictly comply with the internal and external rules established to ensure the proper handling of information and data provided to the company by third parties.

termination of the activity in MONTRA and shall include the obligation to return any material related to the company. In the collection of personal data from customers, employees, contractors or any person or entity with whom a contractual or other relationship is maintained, all MONTRA personnel obtain consents, where required, and undertake to use the data in accordance with the purpose authorised by the consent giver. Furthermore, MONTRA staff must be aware of and respect all internal procedures implemented with respect to the storage, custody and access to data and which are intended to ensure the different levels of security required according to the nature of the data.

Employees shall report to the relevant department or area any incidents they detect relating to the confidentiality of information or the protection of personal data.

4.12 Protection of intellectual and industrial property

MONTRA is committed to the protection of its own and others' intellectual and industrial property. This includes, among others, copyrights, patents, trademarks, trade names, copying rights, design rights, database extraction

rights and rights to specialised know-how.

MONTRA is responsible for the originality of its own designs and will ensure that its suppliers guarantee the originality of the designs they make available to the company.

MONTRA personnel are expressly prohibited from using works, creations or distinctive signs of intellectual or industrial property of third parties without proof that the company has the corresponding rights and/or licences.

MONTRA personnel shall take the necessary measures to protect intellectual and industrial property by ensuring that processes and decisions in this area are traceable, in the sense of being documented, justifiable and verifiable, especially through the titles of the works, creations or distinctive signs themselves and the application of contractual clauses that guarantee the origin and peaceful use of those of third parties.

Intellectual and industrial property resulting from the work of employees during their tenure with the company, and which relates to the MONTRA's present and future business, shall be the property of the company.

Only those brands, images and texts duly authorised by the Marketing and Business Development Department will be used in marketing and advertising.

4.13 Registration of operations

All material transactions carried out by the company shall be clearly and accurately recorded in proper accounting records which give a true and fair view of the transactions and shall be available to internal and external auditors.

MONTRA employees shall enter the financial information in the company's systems in a complete, clear and accurate manner, so that it reflects, at the corresponding date, their rights and obligations in accordance with the applicable regulations. In addition, they shall ensure the rigour and integrity of the financial information that, in accordance with the regulations in force, must be communicated to the relevant authorities.

MONTRA undertakes to implement and maintain an adequate system of internal control over the preparation of financial information, ensuring regular monitoring of its effectiveness. The accounting records shall at all times be available to internal and external auditors. To this end, MONTRA shall ensure that the accounting records are available to internal and external auditors at all times. The company undertakes to provide its employees with the necessary training to ensure that they know, understand and comply with the company's internal control over financial reporting commitments.

4.14 Social commitment and environmental

MONTRA's Corporate Responsibility, understood as its social and environmental commitment in the development of its activities and for the benefit of all its stakeholders, forms an inseparable part of its business model.

MONTRA's social commitment takes the form of sponsorship, patronage and social action activities, carried out by the organisation or channelled through collaboration with social organisations.

Likewise, MONTRA will encourage and promote the collaboration of its employees with organisations of social interest in those places where it operates, through, among others, corporate volunteer programmes.

The Company's management, in accordance with MONTRA's internal regulations, is the body authorised to approve any contribution to sponsorship, patronage or social investment programmes.

MONTRA is committed to minimise the environmental impact throughout the entire life cycle of its products until their final disposal, developing, at each stage of the process of design, manufacture, distribution, sale and end of use, measures to reduce and compensate for this impact.

MONTRA employees will carry out

their activities by promoting the social and environmental sustainability of the company, as a way of responsibly creating value for all its stakeholders.

05 Compliance with the Code
and Ethics Committee

05 Code Compliance and Ethics Committee

In order to ensure compliance with this Code, there is a Monitoring Committee composed of:

- Management of the company

The Monitoring Committee may act on its own initiative or at the request of any MONTRA employee, manufacturer, supplier or any third party with a direct relationship and a legitimate commercial or professional interest, upon a complaint made in good faith.

To this end, communications made under this Code, whether they contain complaints of non-compliance or queries regarding its interpretation or application, may be sent to the company by any of the following means:

- Ordinary mail to MONTRA's address.
- Email to the MONTRA employee's mailbox: buzondelepleado@montra.es

The Management of the Company reports to the Governing Body and has the following basic functions:

- a) Monitoring compliance with and internal dissemination of the Code to all MONTRA staff.
- b) The receipt of all types of documents related to the application of the Code and their referral, where appropriate, to the body or department of the company responsible for

processing and resolving them.

- c) The control and supervision of the processing of files and their resolution.

- d) Interpretation of doubts arising from the application of the Code.

- e) The proposal to the Governing Body of any clarifications and implementing rules required for the application of the Code and, at least, an annual report analysing its application.

- f) Monitoring of the Complaints Channel and compliance with its procedures.

In the performance of its duties, the management of the Company shall ensure that:

- a) The confidentiality of all data and background information handled and of the proceedings carried out, unless the law or court order requires the transmission of information.

- b) The exhaustive analysis of any data, information or documents on the basis of which its action is promoted.

- c) The investigation of a procedure appropriate to the circumstances of the case, in which it will always act independently and fully respect for the right to a hearing and the presumption of innocence of any person concerned.

- d) The indemnity of any complainant

as a result of the submission of requests or complaints in good faith.

The management of the Company shall have the necessary means to ensure the application of this Code.

The decisions of the Company's management shall be binding on MONTRA and on the employee.

06 Publicity of Code

The Code will be made available in their own language to all employees.

07 Annex I: Global codes and commitments made voluntarily by MONTRA

UNI GLOBAL UNION (www.uniglobalunion.org). It promotes the respect and promotion of fundamental rights and decent work in the commercial and distribution network.

The United Nations Global Compact (www.globalcompact.org). United Nations initiative for the promotion of social dialogue between business and civil society.

Ethical Trading Initiative (ETI) (www.ethicaltrade.org).

The CEO Water Mandate (www.ceowatermandate.org). United Nations initiative to support companies in developing, implementing and communicating their water-related strategies and

08 Annex II: Terminology

For the purposes of this Code, the following definitions shall apply:

Personnel or employees: All directors, officers and other employees of MONTRA, regardless of their form of contract, when they act in their capacity as such, i.e. in the name and on behalf of or for MONTRA, and whether they do so directly or indirectly, by themselves or through an intermediary or through any company or other type of controlled entity.

Related person - Any person who is in any of the following situations with MONTRA personnel:

- Spouse or person with an analogous relationship of affectivity.
- Ascendant, descendant or sibling.
- Ascendant, descendant or sibling of the spouse or person with an analogous relationship of affectivity.

Suppliers - Suppliers of goods and services that maintain direct commercial relations with MONTRA.





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