

ETHICAL CODE

JANUARY 2024

1. HUMAN RIGHTS

▪ **Freedom of Association**

The right of all personnel to join the trade unions of their preference and to negotiate collectively will be respected.

▪ **Social discrimination**

Discrimination based on sex, age, religion, race, social origin, disability, ethnic or national origin, membership in workers' organizations, including trade unions, political affiliation, sexual orientation or any other personal characteristic will not be tolerated. The Company has a **Plan of Equality** that regulates these aspects, as well as the specific legislation that applies to it.

▪ **Forced labour, harassment and disciplinary measures**

All types of forced labour, workplace or sexual harassment, bodily harm, mental or physical coercion and verbal abuse are prohibited.

▪ **Child labour**

Child labour is prohibited, as established in the ILO Conventions and the United Nations Conventions and national laws.

▪ **Wages and compensation**

Wages will not be lower than the minimum legal wage, and will be paid in full conformity with the collective agreement and the applicable laws.

▪ **Working hours and holidays**

The Company will comply with all the applicable laws and regulations with regard to normal working hours and overtime worked, as well as with regard to breaks, holidays, and leaves, as established in the collective agreement.

▪ **Employment practices**

Only person with legal authorization to work and the appropriate documentation will be employed. All work will be voluntary and the worker will have freedom to rescind his/her contract with reasonable advance notice. Obligations with employees will be subject to labour law, social security and the collective agreement or the current applicable laws.

2. SAFETY AND HEALTH

▪ **Workplace environment**

A safe and healthy work environment will be provided, adopting the measures necessary to prevent accidents or harm to the health of the personnel, especially with regard to the provision and use of protective equipment, clean toilets and changing rooms, and access to drinking water.

▪ **Rules and Procedures**

A set of clear rules and procedures will be established with regard to occupational health and safety. A representative of Management is designated who acts as personnel health and safety officer; he/she will oversee the implementation and compliance with all the rules, procedures and protocols established; systems will be maintained to detect, prevent or respond to possible risks to the health and safety of all personnel.

▪ **Preparation for emergencies and training**

There will be a Plan for response to situations of emergency, risk or hazards to the health and safety of the personnel, which includes procedures of evacuation, drills, provision of first aid, appropriate equipment for fire detection and extinguishing and emergency exits. All workers will be provided with adequate training in occupational safety and health and emergency response.

▪ **Product safety and quality**

All the products used and manufactured must comply with the safety and quality standards required by applicable law.

3. ENVIRONMENTAL COMMITMENT

▪ **Environmental management system**

The Company agrees to document, implement and maintain an environmental Policy and a management system based on the principles and requirements of the international standard ISO 14001, designed to identify, control and minimize environmental impact, maintaining a preventive focus in environmental management.

▪ **Permits and presentation of reports**

The Company will ensure that all environmental permits necessary to operate the activity are obtained, as well as following the guidelines for presentation of legally valid reports and records at all times.

▪ **Product safety and hazardous materials**

All substances, chemical products and hazardous materials must be adequately identified, having the documentation necessary to guarantee its appropriate transport, handling, storage and use complying with all product safety restrictions and requirements.

All the applicable laws and regulations will be followed strictly relating to hazardous substances, chemical products and materials and all employees will be provided with precise information about the safety practices of the same.

▪ **Consumption of resources and prevention of pollution**

The Company agrees to optimize the consumption of natural, material and energy resources, based on responsible and sustainable use; likewise, specific measures will be implemented to avoid pollution and reduce to a minimum the emission of pollutant gases, the generation of waste and wastewater, likewise, prior to their elimination or dumping they will be treated appropriately in accordance with the applicable laws and regulations.

4. BUSINESS INTEGRITY

▪ **Legal compliance**

The Company agrees to fulfil all national and international laws and rules, ILO conventions and any other regulatory requirement.

▪ **Respect for free competition**

Free competition will be respected, avoiding illicit conduct, especially relating to agreements between competitors for the fixing of prices, limitation of production and shares of the market or of sources of supply.

▪ **Information and confidentiality**

The Company agrees to preserve both own and external information, and to implement the measures necessary to maintain the confidentiality of the same and to use it strictly for the authorized purposes.

▪ **Anti-bribery and anti-corruption**

An ethical and transparent position will be maintained with regard to bribery and corruption; bribes or personal or inappropriate advantages will not be offered or accepted to obtain or conserve the business or advantage of a third party, either public or private. Actions of any type that suppose the violation of national and international anti-corruption laws will not be taken.

▪ **Conflict of interests**

The Company agrees to prevent situations that may suppose conflict of interests, both with Suppliers and with Customers, likewise including the possible interests of the employees.

▪ **Complaints procedure**

A system will be implemented for the management of complaints, so that they are appropriately documented and registered, adopting the appropriate action for each case in a confidential manner.