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SPAIN

ETHICAL CODE



**GRUPO
INDUSTRIAL**

Industria con alma

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1. OUR PRINCIPLES AND VALUES

1.1. OUR PRINCIPLES

At CL Grupo Industrial we believe that we can only achieve our objectives by always seeking the best for our Employees and the rest of Society. Therefore, all of us who are part of CL Grupo Industrial must be truly committed both to our daily work and to civic and responsible conduct, respecting the principles and values contained in this text.

CL Industrial Group is made up of very diverse companies, but they all have a common point of union, the same goal and the same commitment, and that is why this Code of Ethics is unique for all the companies of the Group, and its purpose is to serve as a guide for our Collaborators, Suppliers, Customers and other Stakeholders when carrying out any activity related to the Company.

This Code is supported by the Management Body and the Board of Directors of CL Grupo Industrial and must be complied with by all the people who make up CL Grupo Industrial, without exception.

1.2 OUR VALUES

WE ARE TRANSFORMERS “We always aspire to more”

- We like to improve ourselves.
- We are proactive.
- We promote innovation.
- We are nonconformists, we seek continuous improvement.
- We promote a different way of working, we break with convention.
- We believe that if you stand up, you fall.

WE ARE COLLABORATIVE “We help and ask for help”.

- We work as a team.
- We have integrity.
- We promote transparency.
- We believe in mutual support.
- We feel like collaborators, not workers.
- We help and allow ourselves to be helped.
- We are open to diversity and inclusion of styles, ideas and perspectives.

WE ARE COMMITED “We care about what we do”.

- We promote sustainability.
- We watch over the quality of supply
- We are responsible with the environment.
- We are responsible with people and society.
- We don't just collaborate, we commit to each project.
- We show a high level of professionalism.
- We maintain a strong professional and personal commitment.
- We ensure that our activities and projects are excellent in terms of the environment and sustainability.

WE ARE CLOSE “Make yourself comfortable, we are at your side”.

- We have a clear customer orientation.
- We like human relationships.
- We put ourselves in the other's shoes.
- We treat all people with the same respect.
- We like people and relating to them.
- We make everyone involved in a project a winner.

2. OUR OBJETIVE

This Code of Ethics contains the values and principles that should guide the professional behavior of those of us who form part of CL Grupo Industrial:

Both **internal** (Employees, Management Body, and Board of Directors) and **external** (Suppliers, Customers, Stakeholders...).

The purpose of this text is to establish the principles that guarantee an impeccable conduct, beyond what can be considered as “legally enforceable”.

Any Group Employee may suggest modifications or proposals for improvement to ensure the effectiveness and usefulness of this Code.

This Code is available to everyone, both internal and external collaborators. To this end, it has been included on our website and on the websites of the different companies that make up CL Grupo Industrial and, if necessary, a copy can be requested at the following e-mail address: cumplimiento@clgrupointustrial.com.

Additionally, and in order to deepen its knowledge and application, periodic training sessions will be given, and any modification or update of the same will be communicated so that we can all know, apply and improve the changes that are implemented.

Annual audits will verify that this text is known and applied in a real and effective manner, and the Compliance Body will issue a report to the Board of Directors. Both the approval of this Code and any modification to it will require the approval of the Board of Directors of the parent company, as well as the Administrative Body of each of the subsidiaries..

▪ **TO WHOM IS IT ADDRESSED?**

This Code must be respected:

- The Partners and Shareholders of each of the companies comprising CL Grupo Industrial.
- The members of the Board of Directors of the companies of CL Grupo Industrial and its subsidiaries. - Members of the Management Committee and Senior Management of CL Grupo Industrial.
- Internal Collaborators who work in any company of CL Grupo Industrial, in their capacity as employees.
- External Collaborators, whether they are Suppliers, Customers....
- Stakeholders related to each of the Group's companies.

This Code only makes sense if the rest of the people and entities with which we interact in our day-to-day business also maintain ethical and responsible behavior.

Therefore, all our suppliers, contractors, customers and third parties with whom we maintain business relationships must establish measures to integrate the principles contained herein into their daily operations.

If necessary, we will incorporate contractual clauses and controls to ensure that these third parties comply with this Code, and we will establish compliance audits.

▪ **ACCEPTANCE AND DISSEMINATION OF THE CODE**

In order to ensure that all Group members, as well as Suppliers, Customers and Stakeholders, are aware of and accept the contents of the Code of Ethics, it will be disseminated through the relevant internal and external communication systems and dissemination channels. It will be published on the Group's website, as well as in each of its subsidiaries, and will be the subject of training, awareness and sensitization actions for its timely understanding and implementation.

▪ **NON.COMPLIANCE WITH THE CODE**

Failure to comply with any of the rules of this Code, the Policies and Procedures that develop it and any other rule, regulation or similar that is applicable to each Group company, will be analyzed by the Compliance Body in accordance with the Communication and Incident Management Policy, the Disciplinary System, the Regulations and the applicable Agreements, and, if applicable, the appropriate sanctions will be applied.

▪ **OUR COMMITMENTS**

6.1. **OUR COMMITMENTS TO SOCIETY**

6.1.1. We comply with the Law and respect Human Rights.

The activities we carry out must always comply with current legislation, regardless of the country in which we work. For this reason, each company must protect and promote the protection of all Human Rights and Public Freedoms included in the Universal Declaration of Human Rights, complying with all the principles related to the rights established in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the eight Fundamental Conventions that develop them. We avoid situations that could have negative effects on people and on the company's reputation, and we encourage behavior that is not only legal, but also ethically and socially responsible.

6.1.2. Safety is an inseparable part of our job

We are all responsible for strict compliance with health and safety standards, whatever our position and our place of work.

The Group undertakes to constantly update its Occupational Risk Prevention measures and to scrupulously comply with the applicable regulations in this area wherever it carries out its business activities.

To minimize the risk of occupational accidents, it is necessary to use the Group's resources in a responsible manner, especially if risky activities are carried out. All employees must ensure their own safety and that of the employees in their environment and facilities, using all the preventive measures established.

CL Grupo Industrial provides all Employees with the necessary training and resources in occupational health and safety, and requires Suppliers and third parties to comply with the regulations on Occupational Risk Prevention, including in the agreements signed with them, the necessary clauses to ensure such

compliance, as well as the possibility of terminating the Contract in case of non-compliance or deficient compliance by them.

6.13. We comply with the highest professional standards.

We shall carry out our work with honesty and responsibility and all the tasks we perform shall pursue the highest level of professionalism, facilitating and providing access to the necessary training.

6.14. We do not tolerate discrimination or harassment.

All CL Industrial Group employees are entitled to equal treatment. To ensure this, the Group is committed to combating and prosecuting any signs of discrimination based on gender, race, physique, origin, ideology, religion, marital status or social status that are detected.

We take equal opportunities in access to jobs in the Group and in career advancement very seriously. For this reason, all Employees will always promote, and at all professional levels, a respectful and egalitarian work environment, carrying out an objective evaluation of the people in their charge.

The company will apply the appropriate disciplinary measures, including dismissal, if the existence of any situation of harassment, intimidation or any other situation is verified form of harassment (verbal, non-verbal, physical, sexual) and will report the facts to the competent authorities.

6.15. Time is everyone´s business: work-life balance.

CL Industrial Group is committed to promoting measures that favor a work environment compatible with personal development, helping Employees to best reconcile the demands of their job with their personal and/or family obligations.

6.16. Commitment to the development of our Society.

In CL Grupo Industrial we are committed to the development of our Society, respecting in all our activities the environment of our companies, and opting for local growth, supporting, and promoting initiatives focused on improving the quality of life of the communities where we operate, through sponsorship, patronage and other forms of collaboration.

In addition, CL Grupo Industrial participates in the development of this commitment, with actions that, among others, allow:

- Favor the development of education and equal opportunities.

- Contribute to improving the living conditions of society in general.
- Develop its own social action programs and those of third parties.
- To manage, promote, encourage, disseminate, protect, and defend the artistic, cultural and historical-technological heritage.
- To develop actions in the field of sustainability and protection of nature.
- To promote and disseminate science and technology and their impact on society, culture, contemporary art, and new technologies.
- To promote research, training, and education.

6.1.7. Respect for the Environment, a better world

CL Grupo Industrial's activities must be carried out with the utmost respect for the environment in which it operates. For this reason, we must all commit ourselves to responsible and sustainable behavior that seeks to respect and promote the conservation of the environment. All the activities we develop are analyzed and evaluated seeking and minimizing their impact on the environment and its conservation.

Whenever possible, we set environmental objectives that are more demanding than the applicable regulations, we implement the best available technologies, we develop processes and activities in an environmentally friendly manner, seeking environmental excellence.

6.2. OUR COMMITMENTS AS COLLABORATORS

6.2.1. We cooperate to prevent irregularities.

To give meaning to this Code, we can only do so if we report possible violations or irregularities that could lead to a breach of the Code. This duty is incumbent upon all employees.

To do so, Employees must inform the Compliance Department, by the means provided for this purpose, in accordance with point 8 of this Code.

6.2.2. Comunicación de la existencia de procedimientos judiciales o administrativos

Any Employee, Manager or Director who is investigated, accused, called as a witness in a legal proceeding related to their professional activity in the Group or any related or participated company, or has knowledge of any other legal proceeding that may affect the Group must inform, as soon as possible, their superior, the Corporate Legal Department or the Compliance Body.

Likewise, they must inform of the existence of Administrative Proceedings or any other type of proceedings affecting them within the framework of their work activity, regardless of their relation to such proceedings.

6.23. Responsible Use of Group Assets

It is essential that all members of the Group have the means and resources necessary for the performance of their professional activity, which must be used for these purposes, unless other uses are permitted by the Group.

All Employees shall ensure the custody and protection of the means entrusted to them.

6.24. Use of the Group's IT and Electronic Resources

Employees shall make appropriate use of the Group's IT resources and shall always comply with the specific policies governing the use of such resources, as well as those relating to Information security. All devices used by Group Employees may be monitored if necessary.

The improper use of these means may lead to the imposition of the corresponding disciplinary sanctions.

6.25. Expenses for the Group's account.

CL Industrial Group shall bear all expenses necessary for our Employees to properly perform their duties, in accordance with internal expense policies.

The Group will not assume those that involve unlawful or ethically reprehensible conduct contrary to this code of ethics and other applicable policies.

6.26. Conflicts of the interest

A conflict of interest is a situation in which a decision is unduly influenced by a secondary interest, generally of a financial or personal nature, either for us or for people related to us (family members, partners, friends, etc.).

All of us who are part of CL Industrial Group must avoid situations of conflict of interest. This applies to all relationships we have with Customers, Suppliers or any other third party related to the Group.

In the event of any conflict of interest situation, this must be reported immediately to the hierarchical superior, to the Legal Department or to the Compliance Body.

6.27. Fulfillment of accounting and tax obligations.

All Employees of CL Industrial Group shall ensure, to the extent of their competence, that they comply with the applicable accounting obligations.

They shall also refrain from obtaining undue benefits for the Group in tax matters and shall ensure that all information relating to these matters is correct and represents the true state of the Group's affairs.

Any application for public aid or subsidies and the management thereof, should they be granted, shall scrupulously comply with the established legal requirements.

6.3. OUR COMMITMENTS TO CUSTOMERS AND THIRD PARTIES

6.3.1. Truthfulness of information

At CL Grupo Industrial we avoid creating confusing or obscure situations for our customers. To this end, we always provide them with truthful, clear, useful and accurate information when marketing our products and services.

The advertising of our activities will always be done within the terms allowed by law.

6.3.2. Hiring and selection of suppliers and contractors

The Group's supplier and contractor selection processes shall be carried out with transparency and objectivity, avoiding situations that could affect the impartiality or objectivity of the persons participating in them, promoting in all cases the principles of Social Responsibility in the Supply Chain.

Supply.

Any contracting must be carried out (from the selection of the supplier to the fulfillment of the agreement) with the principles of Transparency, Truthfulness, Trust, Good Faith and Honesty, being mandatory that in the relations with suppliers, Corruption, Bribery or any other practice contrary to the principles detailed in this Code are expressly excluded.

All Group Employees directly involved in decisions on the contracting of supplies, services or the setting of economic conditions thereof, shall avoid any type of interference that may affect their impartiality or objectivity in this regard.

The Group shall require that Suppliers and Contractors comply with the Principles contained in this Code of Ethics.

6.3.3. Our relationships with intermediaries

To avoid liabilities because of the actions of third parties or intermediaries, the following measures shall be implemented:

- a) They shall adopt Due Diligence measures in the selection of commission agents or intermediaries.
- b) The intermediary shall be bound in writing to comply with this Code of Ethics, as well as the policies and procedures applicable to the work they perform.
- c) A record shall be kept of all third parties, agents or intermediaries who collaborate with or act on behalf of the Group.
- d) The actions performed by the third party on behalf of the Group shall be supervised.

6.3.4. Commitment to the Protection of Personal Data, Industrial and Intellectual Property.

At CL Grupo Industrial we will only obtain, process and use personal data to the extent necessary for clear, defined and legitimate purposes. We undertake to take the necessary measures to protect all personal data entrusted to us.

All Employees shall refrain from any inappropriate or unauthorized use of such data, in accordance with the provisions of the laws in force from time to time.

Any discovery, invention, drawing, design, research line, system, program or any other information or document produced by an Employee or Administrator during the performance of his or her professional activity in the Group shall be the intellectual and industrial property of the Group.

No computer programs may be installed on the Group's computers, except those installed by the Systems Department.

The provisions of the applicable industrial and intellectual property regulations, the Group's Confidentiality Policy and the applicable Systems Department procedures shall apply.

6.3.5. We reject unfair competition.

CL Grupo Industrial undertakes to compete and compete in the market in a fair manner, complying with Antitrust regulations. All conduct that could constitute a violation of the principle of free competition for the purpose of obtaining a benefit shall be avoided.

6.4. OUR COMMITMENT TO LEGALITY: THE SAME RULES OF THE GAME FOR EVERYONE

6.4.1. We prohibit facilitation payments and bribes.

We conduct a fair business, avoiding any situation that could put us in a better position by contravening the rules or simply behaving unethically. Therefore, we will never promote or pay facilitation payments to third parties to achieve our objectives, and they are strictly prohibited in all Group businesses.

Likewise, we will never offer or accept bribes of any kind that place us outside the law.

We extend this commitment not only to public officials, but also to any private subject with whom we interact, regardless of the place in which they operate.

6.4.2. Attentions and Gifts

To ensure that our business is based on honest conduct, we refuse any attention or gifts to or from third parties.

Despite this, we are aware that local customs and practices may lead to consider that small gifts may be received or offered, and therefore we elaborate on what is allowed in the Group's Gifts and Hospitality Policy.

6.4.3. Philanthropic Contributions, Donations and Sponsorships

CL Grupo Industrial is committed to contributing to and promoting the social and economic development of the communities where it operates. To avoid ethically reprehensible or even illegal situations, special care will be taken when authorizing sponsorship or collaboration with any activity of this type, whether or not it is related to its corporate purpose.

The sponsorship, donation or contribution should be made in accordance with the Donations, Patronage and Sponsorship Policy and channeled, whenever possible, through the Foundation.

6.4.4. Political Neutrality

All employees of CL Grupo Industrial shall maintain an attitude of respect and collaboration with public authorities, regulatory bodies, or any other authority within the framework of their competencies.

CL Grupo Industrial will not interfere or participate in the political processes of those countries and communities where it carries out its activities.

CL Grupo Industrial will refrain from exerting any type of illicit pressure, directly or indirectly, on politicians and any relationship that the company maintains with the formations or groups to which they belong will be based on the principles of legality and neutrality.

In any case, CL Grupo Industrial will not finance political parties, their foundations, representatives or candidates, either in Spain or abroad, nor will it sponsor any event whose exclusive purpose is political propaganda.

▪ **PERSON IN CHARGE OF THE COMPLIANCE BODY**

The functions of the Compliance Officer include the following:

- Identification and evaluation of the risk of non-compliance, in each of the Group's companies, of the applicable regulations, both external and self-regulatory.
- Determining the Group's compliance procedures and controls, monitoring them and making the necessary improvements.
- Promote, update, and monitor the Code of Ethics, the Communication Channel, and the Policies comprising the Group's Compliance Program.
- Evaluating any legislative modification or any change in the activity of the Group's companies.
- Preparing an Annual Compliance Report to be submitted to the Board of Directors of the Group's parent company.

▪ **NO QUESTION UNANSWERED: THE COMPLIANCE CHANNEL**

CL Grupo Industrial places at the disposal of all its Employees and all persons or companies related to it an Internal Information System to securely and confidentially communicate any doubts that may arise to Employees when applying this Code or to report the existence of any irregularity or non-compliance with regulations.

This channel will be managed by the Group's Compliance Body, it is known as the Compliance Channel and its operation will be governed by the procedure established in the Communication and Incident Management Policy that develops it.

THE COMPLIANCE CHANNEL has three possible means of access:

Electronic means:

Through the following link:

<http://centinela.lefebvre.es/public/concept/1702804?access=7teK94JV8p1VkJOSQ8TULTca%2bGcDmiPtBq8QFVSkwxg%3d>

Through the following QR code:



Through the e-mail address cumplimiento@clgrupointustrial.com, which is managed by the Compliance Officer under the strictest confidentiality criteria.

a) By post:

In addition, the possibility of communicating incidents is enabled through the following postal mail: Órgano de Cumplimiento, Ctra. Badajoz 54 06380 Jerez de los Caballeros (Badajoz).

b) By telephone:

Through the contact telephone numbers: +(34) 683 340 076 | Ext. 7103 | 924569103. In this case, it can be done by phone call or by voice messaging system.

c) In person:

By arranging a meeting with the Compliance Officer through the e-mail or telephone numbers provided.

d) Other means:

If the communication of infringement is carried out through any channel not included in this section, or to other members of the company other than the Compliance Officer, the Corporate Compliance Department must be notified immediately, and the confidentiality of the information received must be always kept confidential.

Any communication shall comply with the law 2/2023 of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, as well as with any other applicable regulations.

Retaliation against any person who reports any possible irregularity in good faith is expressly prohibited and the rights of any person who is incriminated will also be protected.