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| GESTIÓN DE LA CALIDAD        | GESTIÓN AMBIENTAL            | GESTIÓN ENERGÉTICA | GESTIÓN I+D+i | ANTISOBORNO                                     | PENAL COMPLIANCE                                | SEGURIDAD INFORMACIÓN |
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## CODE OF ETHICS AND CONDUCT

———— GRUPO COPISA ————

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| Version | Date of Application | Amendment                                    |
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## **1. SUBJECT-MATTER OF THE CODE OF ETHICS AND CONDUCT**

The COPISA GROUP's CODE OF ETHICS AND CONDUCT has been approved by the Board of Directors and sets out binding values, principles and guidelines for conduct which are to inform the behaviour of the COPISA GROUP and its employees in the performance of their professional duties and compliance with prevailing legislation.

This Code's purpose is to implement a culture of respect for the values and ethical principles on which the COPISA GROUP is based. The Code is to be accepted by any person who joins the COPISA GROUP's organisational structure as a prerequisite for their inclusion and will be binding at all levels of the organisation.

The CODE OF ETHICS AND CONDUCT is the highest-level standard in the organisation and the maximum expression of our commitment to compliance with the laws and moral values which underpin our business operations. Failure to comply with it will constitute an offence which will be penalised.

Real and effective application of this Code is designed to curtail any conduct contrary to the law and to the organisation's ethical principles and values, helping all those to whom it is addressed to be aware of the standards of conduct which are to be observed and respected.

Likewise, this Code sets out the oversight, control and supervision mechanisms required to ensure compliance and prevent the commission of criminal behaviour in accordance with Act 1/2015 of 30 May amending the Criminal Code Act 10/1995 of 23 November.

The ethical values which are a reference and guide the conduct of all COPISA GROUP officers and employees are honesty, integrity, responsibility, transparency, safety, security and respect for human rights and prevailing statutory regulations.

## **2. SCOPE OF APPLICATION AND RECEIVERS**

This CODE OF ETHICS AND CONDUCT is applicable to and must be complied with by all members of the Board of Directors, officers and employees of the Company who are to be aware of and expressly accept the values, principles and guidelines for conduct contained in it

This Code is also binding on all investees (or future investees) in which management control is held and on all other entities and organisations associated with the COPISA GROUP through a relationship of control or for whose management it is or may become responsible. The Board of Directors will propose the adoption of principles of behaviour similar to those set out in this Code. Representatives of the COPISA GROUP shall do the same in the case of temporary consortiums, Joint Ventures and other associations.

Likewise, the COPISA GROUP shall encourage its suppliers, distributors, franchisees, licensees, agents and customers and partner companies or entities to conform their behaviour to guidelines for action similar to those set out in this Code of Conduct. It may demand adherence to the values and principles of this Code and require that non-compliance be considered a breach of a contractual obligation.

The COPISA GROUP shall use all means at its disposal to enforce compliance with the rules contained in this CODE OF ETHICS AND CONDUCT.

## **3. COPISA GROUP'S COMMITMENT**

The COPISA GROUP rejects any criminal behaviour. Any evidence of a criminal offence of which it becomes aware will be investigated, and if its commission is confirmed it will be subject to disciplinary

action. Likewise, the COPISA GROUP rejects any attempt to obtain direct or indirect benefits by illicit means.

The COPISA GROUP is firmly committed to implementing a corporate ethical culture which has a direct impact on its actions in the market and society.

In the COPISA GROUP's relations with the market, its actions shall be governed by the following principles:

- Relations with customers: actions will be based on service quality and excellence standards and on efficiency and transparency in order to gain mutual trust and respect, which are essential for interaction in the course of business.
- Relations with suppliers: suppliers will be selected on the basis of transparency, impartiality, objectivity and efficiency. In turn, suppliers must also be firmly committed to operating in compliance with prevailing regulations and ethical standards.
- Relations with authorities and government: the principles of transparency and cooperation are to be followed.
- Relations with the market and consumers: the principles of free competition, equal opportunities, good contractual faith and fair competition are to be observed.

In the COPISA GROUP's relations with society in general, its actions will give effect to the following commitments:

- In keeping with the COPISA GROUP's commitment to its surroundings, donations to social, cultural and scientific projects will be made on the basis of legal criteria, ensuring that the beneficiary entities are of recognised standing and good character with an appropriate organisational structure in place to make certain that resources are appropriately administered.
- The COPISA GROUP will conduct its operations anchored in respect for the environment, minimum use of resources and monitoring environmental impact.
- The COPISA GROUP will establish the required checks in terms of discharges, emissions, noise, vibrations, waste, destructive gases and any other environmental threat. Rational use of resources and sustainability will be ensured across all levels of the COPISA GROUP.

## **4. BASIC PRINCIPLES OF BEHAVIOUR.**

### **4.1. Respect for the law.**

COPISA GROUP directors, officers and employees undertake to perform their business and professional activities in accordance with prevailing legislation, to behave ethically in all their actions and be aware of and comply with the commitments and guidelines for conduct set out in this Code.

Likewise, directors, officers and employees who are summoned as persons under investigation or defendants in criminal proceedings related to the Company's activity are to immediately notify the Compliance Committee accordingly.

#### **4.2. Respect for the dignity of individuals in their jobs.**

Mutual respect and equality are the principles on which the working relationships of the COPISA GROUP are based.

The COPISA GROUP rejects any form of physical, psychological or moral harassment or abuse of authority. Any conduct which may engender a threatening, intimidating, offensive or hostile environment with respect to the rights of individuals is prohibited.

COPISA GROUP employees shall be treated fairly and respectfully, fostering a healthy and safe working environment.

The COPISA GROUP is determined to prevent any conduct which undermines the dignity, equality and sexual freedom of employees of the Company or third parties and to preclude any discrimination on grounds of gender, colour, age, religion, political, trade union or religious affiliation, sexual orientation, race, culture, education, marital status or nationality, and any other degrading, hateful or public glorification conduct.

#### **4.3. Occupational health and safety policies.**

Health and safety in the workplace are crucial issues for the COPISA GROUP. The Company will drive the adoption of health and safety at work policies and put in place the preventive measures laid down by law to minimise risks at work for the Company's own staff and also subcontracted personnel.

The Company undertakes to assess the risks to the health and safety of workers, bearing in mind the nature of the activities performed and the features of the jobs and the workers themselves.

The COPISA GROUP undertakes to review this risk assessment when working conditions change and to take the necessary measures to protect the health and safety of all its employees and officers together with subcontractors, suppliers and other stakeholders engaged in work activities on the Company's premises.

All COPISA GROUP employees are required to be aware of and comply with occupational health and safety protection regulations and to ensure their own safety, the safety of other employees and that of anyone else who may be affected by the performance of the Company's business operations.

Working under the influence of drugs or alcohol is prohibited.

#### **4.4. Respect for the rights of workers.**

The COPISA GROUP shall not employ children or teenagers or foreign nationals without a work permit, use forced labour or impose working conditions which are in breach of the law.

Everyone working in the COPISA GROUP has the right to strike and to freedom of association.

The COPISA GROUP will ensure equal opportunities for all employees in the development of their professional careers. All decisions made in relation to promoting and selecting staff or candidates will be objectively assessed based on objective criteria concerning training and the personal and professional merits required for each job.

#### **4.5. Protection of the right to privacy and secrecy of communications.**

The COPISA GROUP shall respect the right to privacy in the use of digital devices in the workplace; the use of video surveillance and sound recording devices in the workplace; and the use of geolocation systems in the workplace as set out in Spain's Data Protection and Digital Rights Safeguards Act 3/2018 of 5 December.

Pursuant to section 87 of the Data Protection and Digital Rights Safeguards Act 3/2018 of 5 December, the COPISA GROUP may access the content derived from the use of digital media provided to employees for the sole purpose of verifying compliance with employment or statutory obligations and ensuring the integrity of such devices. To this end, criteria shall be drawn up for the use of digital devices, respecting in all cases the minimum standards for the protection of their privacy in accordance with social customs and constitutionally and statutorily recognised rights.

Likewise, the Company shall respect the right to digital disconnection from the workplace pursuant to section 88 of the Data Protection and Digital Rights Safeguards Act 3/2018 of 5 December. The scope of this right will be implemented by means of internal regulations.

The COPISA GROUP shall ensure that whenever controls on the use of IT resources are in place, they are the most appropriate, proportional and necessary to achieve the constitutionally legitimate purpose pursued, such as ensuring that the resources the Company makes available to officers and employees are used for strictly productive purposes.

Pursuant to section 89 of the Data Protection and Digital Rights Safeguards Act 3/2018 of 5 December, the COPISA GROUP may process the images captured by camera or video camera systems for the purpose of performing the employee control duties set out in section 20(3) of the Workers' Charter, provided that these duties are exercised within its legal framework and the restrictions intrinsic to it. The Company shall expressly, clearly and concisely tell workers about this measure in advance.

Under no circumstances may the installation of sound recording or video surveillance systems be allowed in places intended for the rest or recreation of employees such as changing rooms, toilets, canteens and the like.

Pursuant to section 89 of the Data Protection and Digital Rights Safeguards Act 3/2018 of 5 December, the COPISA GROUP may use sound recording systems in the workplace only when the risks to the safety of facilities, property and people arising from the operations performed at the worksite are relevant and always respecting the principle of proportionality, the principle of minimum intervention and statutory and regulatory requirements.

Likewise, pursuant to section 90 of the Data Protection and Digital Rights Safeguards Act 3/2018 of 5 December, the COPISA GROUP may process the data gathered by geolocation systems for the purpose of performing the employee control duties set out in section 20(3) of the Workers' Charter, provided that these duties are exercised within its legal framework and the restrictions intrinsic to it.

The COPISA GROUP shall expressly, clearly and unambiguously inform employees of the existence and characteristics of these devices beforehand. Likewise, it shall also advise them of their rights of access, rectification, restriction of processing and erasure.

#### **4.6. Respect for corporate image and reputation.**

The COPISA GROUP's image and reputation is an essential asset for maintaining the trust of its customers, employees, suppliers, administrative authorities and society in general. Accordingly, COPISA GROUP officers and employees are required to refrain from any conduct which might harm the Company's reputation.

Employees are to be especially careful in any public interventions and are required to notify the Company when they are going to intervene as COPISA GROUP employees in the media, on social media, at professional conferences or seminars and at any other type of event which may be publicly disclosed.

#### **4.7. Loyalty to the Company and conflicts of interest.**

The relationship between the COPISA GROUP and its officers and employees is to be based on the principle of business loyalty.

COPISA GROUP directors, officers and employees, and any individuals professionally or personally related to them, shall act only in the interests of the Company in all business decisions or operations and consequently shall refrain from any private activity or purely personal interest which entails or may entail the emergence of conflicts of interest. Similarly, they shall not take personal advantage of any business opportunity pertaining to the Company or of which they have become aware during the course of their work as COPISA GROUP employees or officers, including once their employment relationship with the Company has ended, except with the express permission of the Board of Directors.

For the aforementioned purposes, a conflict of interest is considered to exist when the personal interest of the employee or professional clashes, whether directly or indirectly, with the interests of the COPISA GROUP.

In case of doubt, the Compliance Committee is to be informed immediately, refraining from making any decision which may run counter to the interests of the Company and no action is to be taken unless express permission is received in this respect.

#### **4.8. Personal data protection.**

The COPISA GROUP shall respect the right to privacy by protecting the personal data entrusted to it by its employees, customers, suppliers and partner companies and entities in compliance with the law.

The COPISA GROUP and its employees shall comply with the personal data protection regulations laid down by law.

#### **4.9. Information processing and confidentiality. Protection of trade or industrial secrets.**

Under no circumstances may COPISA GROUP directors, officers and employees voluntarily provide incorrect or inaccurate information which may mislead its recipient. They further undertake to disclose information both internally and externally in ways that are truthful, reliable and easy to understand.

COPISA GROUP directors, officers and employees who enter any kind of information (industrial, trade, business, accounting, financial, import, export, etc.) in the Company's files and computer systems are to ensure that it is thorough, reliable, accurate and complete.

All non-public information is considered privileged and confidential, especially any relating to services provided, industrial and trading operations and business strategy. COPISA GROUP directors, officers and employees who have access to this information have a duty to keep it confidential and refrain from using it improperly for their own benefit or for the benefit of third parties. In certain cases when stipulated in their employment contract, this duty of confidentiality shall continue even after the relationship is terminated.

In case of doubt as to the nature of the information, COPISA GROUP directors, officers and employees are to consider it to be confidential unless they are instructed otherwise. They are to seek the advice of the Compliance Committee as to the nature of the specific information concerned.

All information and knowledge generated within the boundaries of the Company is the property of the Company under the terms regulated by law.



No COPISA GROUP director, manager or employee may appropriate by any means the trade or industrial secrets of its competitors or spread false information or rumours about the quality of the products or services of these competitors.

The COPISA GROUP shall adopt the necessary measures to preserve and maintain the secrecy of all information that is considered a business secret for the purposes set out by law.

#### **4.10. Respect for industrial and intellectual property.**

The COPISA GROUP's industrial and intellectual property includes the trademarks registered by the Company, packaging designs, domain names, reproduction rights, logos, copyrights, inventions, patents, utility models and trade secrets.

COPISA GROUP directors, officers and employees may not allow any third party to use the registered trademarks or other intellectual property of the Company without due authorisation and a licence agreement or allow any defamatory or offensive use of it.

Inventions, ideas, discoveries, improvements, processes, designs, software or any other material that is required for officers and employees to perform their duties are the property of the COPISA GROUP.

The COPISA GROUP shall respect the legitimate intellectual property rights of other individuals or Companies. In particular, any use of works, creations or distinctive signs of third parties' intellectual or industrial property which are duly registered is expressly banned.

#### **4.11. Use of information technology systems.**

The computer and communication equipment and systems and corporate network which the COPISA GROUP provides to its officers and employees are its property and may only be used for professional purposes and in a responsible manner. They may not be used for private activities and communications or to harm or impair the computer systems of third parties.

COPISA GROUP directors, officers and employees undertake and agree to use the computer systems, the Company's corporate network and the information and/or data found therein without engaging in activities which may be considered fraudulent, illicit or illegal or which infringe the rights of the Company or third parties.

Specifically, the computer and communication equipment and systems and corporate network which the COPISA GROUP provides to its officers and employees may not be used to store, distribute or visit Internet sites whose content breaches the fundamental rights to privacy, good reputation, personal image and religious freedom, or violates the dignity of individuals due to its racist or xenophobic content, or because it advocates violence or terrorism or contains pornographic or sexist material.

The computer and communication equipment and systems and corporate network which the COPISA GROUP provides to its officers and employees may not be used to express personal opinions or access forums or social media, except with express permission to that effect, or to send or take part in mass emails, chain messages, jokes or inappropriate images. Likewise, emails containing threatening, abusive or offensive content or content which may harm the Company's image may not be sent.

Using files or software from external sources may seriously jeopardise the security of the COPISA GROUP and may also constitute an infringement of industrial and intellectual property rights if the relevant licence or authorisation has not been secured. Consequently, it is forbidden to use, introduce, download, copy, transmit, reproduce, distribute or store any type of software without the appropriate licence or authorisation and to perform downloads or engage in any other behaviour that entails the risk of introducing viruses or any other item endangering computer security into the Company's network.



Likewise, it is forbidden to use or have on COPISA GROUP computer equipment any means designed to disable software protection.

#### **4.12. Using and protecting the assets and resources of the COPISA GROUP and third parties.**

The COPISA GROUP provides its directors, officers and employees with the resources they need to perform their professional duties.

COPISA GROUP directors, officers and employees are responsible for the appropriate use and protection of the assets and resources provided by the Company. These resources include facilities, vehicles, supplies, equipment, machinery, spare parts, raw materials, finished products, intellectual property, whether proprietary or belonging to third parties, and financial resources.

COPISA GROUP directors, officers and employees may not use these resources for personal or non-professional purposes (unless expressly authorised) and/or for the performance of activities which are not directly related to the interests of the Company.

Likewise, they shall not remove or allow third parties to remove these resources or any property, effects or other assets of any kind that have been entrusted to them by reason of their position or to which they have access, and shall safeguard them against theft, loss, damage or improper use.

COPISA GROUP directors, officers and employees further undertake to respect the industrial property of others (patents, utility models and trademarks) by first securing the relevant licences or authorisations from its owners before using it.

#### **4.13. Anti-corruption measures.**

The COPISA GROUP's relationships with the public and private sectors shall be based on principles of transparency and equal opportunities.

COPISA GROUP directors, officers and employees shall comply with applicable laws and under no circumstances shall they influence the intentions of people outside the Organisation in order to obtain any illicit benefit or advantage for the Company.

Corrupt agreements with customers, suppliers, public officials or other third parties are strictly forbidden. COPISA GROUP directors, officers and employees may not receive, offer or give payments in cash or in kind, gifts or any other benefit to individuals working for state-owned enterprises or private companies, political parties or candidates for public office with the intention of illegally obtaining or maintaining business or gaining unfair advantages.

Gifts of any kind, whether internal or in dealings with third parties, which might be construed as overstepping the boundaries of normal business practice or courtesy and reasonable value are not allowed. Likewise, gifts which might be construed as being designed to receive favourable treatment in the performance of any activity which could be associated with the COPISA GROUP are also forbidden. In particular, any form of gift which may influence the independence of judgement or lead to securing any kind of favour is prohibited.

In private business relations, no illicit advantage of any kind may be offered to the officers or employees of other Companies to encourage them in breach of their duties to purchase COPISA GROUP services or products.

The COPISA GROUP prohibits any conduct by directors, officers and employees seeking to rig the outcome of a tender called by a government authority through agreement with or bribery of other bidders so that they do not take part in the tender or through bribery of public officials, whether national or foreign, for the disclosure of relevant data or for the award of the tender or in any other way.

COPISA GROUP directors, officers and employees may also not make payments for the purpose of expediting procedures with the authorities or before a court of law.

The COPISA GROUP prohibits any action or strategy by any of its directors, employees or partners aimed at steering or influencing the actions of a public official or authority by taking advantage of any situation arising from their personal relationship with them in order to secure any type of decision which may directly or indirectly generate a financial benefit or avert a loss of any kind for the Company or a third party.

COPISA GROUP directors, officers and employees are required to report their relationships with public officials.

#### **4.14. Respect for free competition and market behaviour.**

The COPISA GROUP undertakes to operate in the market with due respect for free competition and in compliance with applicable laws.

COPISA GROUP directors, officers and employees will not engage in unfair actions or unlawful advertising of its business operations or those of its competitors, and will refrain from any conduct which might constitute an abuse or unlawful restriction of competition.

Likewise, and in relation to taking part in public tenders, competitions and auctions, the principles of action required to ensure respect for free price formation resulting from the practice of such actions and compliance with prevailing legislation in general are to be observed.

The COPISA GROUP shall never enter into agreements or alliances, whether written or verbal, with other competitors to fix prices or sales areas, assign customers or product lines, set sales conditions, coordinate tenders or be part of any other activity in breach of applicable antitrust or free competition laws.

#### **4.15. Environmental protection.**

Respect for the environment is a core principle in the COPISA GROUP's actions. The Company is committed to implementing the best environmental practices in all its operations by preventing and minimising adverse environmental impacts and conserving natural resources.

COPISA GROUP directors, officers and employees shall protect and care for the environment, complying with the applicable internal and external regulations, sharing the knowledge they have gained and constantly monitoring and enhancing the performance of the activities in which they are involved.

#### **4.16. Licences, authorisations, concessions and permits required for the performance of its operations.**

The COPISA GROUP shall have all the licences, authorisations, concessions, permits and public liability insurance required to perform its business operations.

COPISA GROUP directors, officers and employees shall ensure that any information submitted to the authorities is accurate, free from falsification or concealment of data and consistent with any instructions as may have been given by the Administrative Authorities.

**4.17. Public Treasury and Social Security.**

The COPISA GROUP undertakes to comply with its tax and social security obligations. All tax-relevant information shall be included in all its filings. Likewise, any conduct designed to avoid tax obligations or unduly obtain benefits to the detriment of the national, regional or local public treasury and social security is prohibited.

The COPISA GROUP undertakes to be truthful when applying for public grants and to use them for the purposes for which they were awarded.

**4.18. Accurate commercial and accounting records.**

The COPISA GROUP undertakes to ensure that its economic and financial information is a true reflection of its economic, financial and equity position in conformity with generally accepted accounting principles.

Industrial and commercial records, including contracts and all documents in paper or electronic format that are generated in the course of its business, shall be as accurate as possible and directly and completely reflect the facts. Any falsification, omission, alteration or concealment of information is strictly forbidden.

Similarly, the Company's accounting records are to reflect all components of financial transactions and events as accurately as possible. All financially significant transactions performed by the companies are to be recorded as accurately and clearly as possible in the accounting records, representing a true and fair view of the transactions carried out.

All transactions shall be duly authorised, performed and recorded in documentary and accounting form in compliance with legal requirements and shall be related to the Company's corporate purpose.

Directors, officers and employees shall not engage in any action which might entail failure to record income earned, recording non-existent expenses, falsifying documents or undertaking simulated or fictitious transactions.

**4.19. Prevention of Money Laundering, Terrorist Financing and Smuggling.**

The COPISA GROUP shall ensure that irregular payments, smuggling or money laundering originating from illicit or criminal activities are prevented in the course of its business activities. Under no circumstances may any cash payment of more than €1,000 be accepted.

COPISA GROUP directors, officers and employees shall examine with special care any financial transactions which by their nature or amount may be considered unusual, in particular checking any transactions carried out in cash, with bearer cheques, to bank accounts in tax havens, payments made in currencies other than those specified in the contract, agreement or invoice, and payments made by third parties not mentioned in the contract.

Likewise, the COPISA GROUP shall diligently analyse the professional probity of the companies or individuals it is going to enter into significant commercial relations with in order to prevent transactions carried out with the COPISA GROUP from being used for the purposes of money laundering or terrorist financing.

The COPISA GROUP shall in all cases consider factors that may point to a higher risk, such as new customers who are not resident in Spain, who have a shareholding and control structure that is unclear or unusual or merely hold assets with no clear business purpose, transactions that are too large or unusual in amount, use of bearer means of payment or intermediaries, and suppliers offering products at below-market prices.

Similarly, the COPISA GROUP shall abide by the ban on concealing or removing any kind of goods from the customs administration, and shall ensure that all goods imported or exported are lawfully traded, comply with customs regulations and are submitted for clearance at the customs offices or at the places authorised by the customs administration.

#### **4.20. Donations and social projects.**

Donations made by the Company to social projects shall have the appropriate internal authorisations and be made to entities of recognised standing that have an appropriate organisational structure to ensure the resources are soundly administered. They are to be accurately entered in the Company's accounting records and books and may not be used to cover up an undue payment or bribe.

No donations or contributions intended for a political party, federation, coalition or voter association may be made to political parties or their representatives either directly or through an intermediary.

Likewise, the COPISA GROUP shall track the donation made in order to ascertain where it has gone or how it has been used.

### **5. COMPLIANCE COMMITTEE**

The Compliance Committee has been appointed by the Board of Directors to perform duties including the following with independent initiative and oversight powers:

- Foster publicity for, awareness of and compliance with the CODE OF ETHICS AND CONDUCT.
- Interpret the CODE OF ETHICS AND CONDUCT in case of doubt.
- Run the ethics channel as manager of the in-house whistleblowing system for the entire COPISA GROUP.
- Provide a channel of communication for all employees to ask any questions or report any breaches of the CODE OF ETHICS AND CONDUCT or purported wrongdoing, such as actions or omissions which may constitute a serious or very serious criminal or administrative offence or an infringement of European Union law.
- Keep the CODE OF ETHICS AND CONDUCT up to date, making recommendations, reports or proposals to enhance its content and the crime prevention model.
- Conduct or supervise internal investigations in relation to compliance with the CODE OF ETHICS AND CONDUCT.

### **6. ETHICS REPORTING CHANNEL (WHISTLEBLOWING CHANNEL)**

The COPISA GROUP provides officers, employees and third parties with its ethics channel (whistleblowing channel) on the Copisa Group website, [www.grupocopisa.com](http://www.grupocopisa.com), which they can use to submit queries on the interpretation of the CODE OF ETHICS AND CONDUCT or make an anonymous or non-anonymous complaint about a potential infringement or breach of the Code or any internal regulations, which may also be done by post:

Dpto. Cumplimiento Normativo  
Plaça d'Europa 2-4  
08902 L'Hospitalet de Llobregat, Barcelona. Spain

**6.1. Queries on the interpretation of the CODE OF ETHICS AND CONDUCT.**

The Compliance Committee shall respond to all queries or issues raised by COPISA GROUP officers and employees in relation to the interpretation of the Code of Conduct.

**6.2. Reporting a potential breach of or failure to comply with the CODE OF ETHICS AND CONDUCT.**

COPISA GROUP directors, officers and employees are under the duty to report through the internal communication system (whistleblowing channel) or to the Compliance Committee all unlawful conduct, wrongdoing and breaches of which they become aware, not only to reveal or prevent potential wrongdoing but also to continuously improve the crime prevention model required by our legal system.

The COPISA GROUP shall ensure the integrity and confidentiality of the information, prohibition of unauthorised access, long-term storage of the information, protection of the informant and respect for good faith through the operation of the Compliance Committee as the body responsible for the internal whistleblowing system. To this end, the aforementioned principles shall be enshrined in the internal whistleblowing system policy.

The COPISA GROUP shall also ensure objectivity and impartiality in the examination of the information received; prevent conflicts of interest; respect the presumption of innocence; safeguard the right of defence and not allow any kind of retaliation against employees who report purported breaches in good faith.

Directors, officers and employees are required to respond diligently, fully and truthfully to all questions from the Compliance Committee regarding the performance of their professional activities in the Company. Intentional or grossly negligent provision of untruthful or incomplete information shall be considered a disciplinary offence.

If a report is made in bad faith, in the knowledge that it is false or with reckless disregard for the truth, the perpetrator shall be subject to disciplinary action, notwithstanding any criminal and civil liabilities which may arise from false accusations.

**7. ACCEPTANCE OF AND COMPLIANCE WITH THE CODE**

The Company's directors, officers and employees are required to be familiar with the contents of the Code of Ethics, to respect it and to ensure it is complied with.

The COPISA GROUP shall notify and publicise the contents of this CODE OF ETHICS AND CONDUCT to all its directors, officers and employees.

Likewise, the COPISA GROUP shall provide new employees with a copy of the Code of Conduct and have them sign their acceptance of it.

**8. DISCIPLINARY SANCTIONS FOR BREACH OF THE CODE OF ETHICS AND CONDUCT**

In cases of breach of this CODE OF ETHICS AND CONDUCT, the COPISA GROUP shall take the appropriate legal and disciplinary measures in conformity with the Workers' Charter, legal regulations and collective bargaining agreements.

**8.1. Staff with an employment relationship.**

Breach of the CODE OF ETHICS AND CONDUCT or the measures taken by the Company as part of its crime prevention policy when perpetrated by an officer or employee with an employment relationship shall be penalised pursuant to the range of offences and sanctions established in applicable legal regulations and collective bargaining agreements.

**8.2. Staff with a special Senior Management employment relationship.**

Breach of the CODE OF ETHICS AND CONDUCT or the measures taken by the Company as part of its crime prevention policy when perpetrated by an officer with a special Senior Management staff employment relationship shall be penalised pursuant to contractual terms and applicable legal regulations.

**8.3. Business relationships.**

Breach in business relationships of the CODE OF ETHICS AND CONDUCT or of the measures taken by the Company as part of its crime prevention policy shall lead to termination of the contract, notwithstanding any claim for damages as may be warranted.

Disciplinary measures may be taken against anyone who breaches the CODE OF ETHICS AND CONDUCT and against anyone who, by action or omission, approves such behaviour or is aware of such breaches and does not seek to remedy them promptly.

**9. VALIDITY AND AMENDMENT OF THE CODE OF CONDUCT AND ETHICS**

This Code, which supersedes the previous Code of Conduct and the previous CODE OF ETHICS AND CONDUCT by updating and merging both documents into a single one for the sake of practicality and flexibility, was approved by the COPISA GROUP's Board of Directors on 25 November 2024 and shall remain in force until it is revised, updated or superseded with the Board's approval.