

SUPPLIER CODE OF CONDUCT - GRUPO CUÑADO COMPANIES

I.- DECLARATION OF ETHICAL PRINCIPLES

In GRUPO CUÑADO, we have some fundamental values that are essential for our business operations and are key to our ambition to achieve sustainable growth.

Operations and are key to our ambition to achieve sustainable and profitable growth.
and profitable growth.

These values are clearly expressed in our Code of Ethics which is available on our corporate website.

On our corporate website, with strict compliance with legal precepts and the rejection of the Legal precepts and the rejection of any form of corruption; maintaining in its relations with third parties, an honest and integer behaviour with third parties, honest and honest behaviour, without discrimination.

Therefore, all our suppliers, advisors and external professionals must be fully committed to these fundamental principles and to totally committed to these fundamental principles and to the ethical business culture of the

GRUPO CUÑADO; assuming that non-compliance with the rules is not an option but can result in serious responsibilities for GRUPO CUÑADO may arise and this may be a cause of termination of the commercial relationship with CUÑADO GROUP.

Therefore, they must comply with the following principles.

II.- BASIC GENERAL ETHICAL PRINCIPLES

Transparency

Always strive for the highest possible degree of ethical excellence, by having in place practices that guarantee transparency and ensure integrity in the behaviour of all employees and customers.

Anti-corruption

GRUPO CUÑADO is an organisation which condemns and works against fraud and corruption in all its forms, including extortion and bribery. We do not allow corrupt actions in our commercial, administrative or industrial relations.

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GRUPO CUÑADO • Calle Camino del Olivar, 2 (Esq. Calle México) • 28806 Alcalá de Henares • MADRID • SPAIN • Telf.: +34 91 887 87 00 • www.GRUPOCUÑADO.com



Our suppliers must ensure that they do not engage in money laundering activities in their business and ensure that they do not engage in money laundering activities in their business.

In their business and ensure the integrity of their financial data or other information provided to official bodies, certifying bodies, or other provided to official bodies, certification bodies, auditors, etc. Maintain transparent records and conduct annual audits of accounts, in compliance with the applicable legislation.

Human Rights

Support and respect the fundamental principles of human rights and labour in accordance with the Universal Declaration of Human Rights (UDHR), the United Nations Global Compact (UNGC) and the United Nations Global Compact (UNGC) and the International Labour Organisation (ILO). They must ensure that these standards are not violated by action or omission.

Equal opportunities and non-discrimination

They shall provide equal opportunities in access to employment and professional promotion, ensuring at all times the absence of discrimination on grounds of sex or sexual orientation, disability, race, religion, origin, marital status or social condition.

Harassment, abuse, intimidation, discrimination or any other type of physical or verbal aggression will not be permitted or tolerated in the workplace.

They shall have an EQUALITY POLICY or, if they are required because of their size, a duly registered EQUALITY PLAN, with measures to ensure the application of the principle of equal pay for men and women for work of equal value, in accordance with national legislation.

Conditions of employment

Strictly respect local, national and international laws, regulations and standards applicable to their activity; comply with legal requirements regarding minimum wages, overtime and benefits.

In matters of occupational risk prevention, they will take the necessary measures to comply with the provisions of Community Directives, Law 31/1995 on Occupational Risk Prevention and subsequent amendments and Royal Decree 486/1997 'Workplace Regulations' and will fully comply with the applicable legislation in this area, applying the necessary measures and verifying that they are up to date.

Violence and harassment

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GRUPO CUÑADO rejects violence, exploitation and harassment in all its forms. We do not tolerate attitudes that affect the dignity of our workers.

Forced labour

We advocate the abolition of all forms of forced or compulsory labour, so that all workers can have access to decent work. Corporal punishment, coercion, exploitation and oral or physical abuse are prohibited in our company.

Child labour

GRUPO CUÑADO is a company that supports the elimination of child labour and ensures compliance with the minimum age for admission to employment.

Environmental protection and social responsibility policies

They must commit themselves actively and responsibly with the conservation of the environment, following the usual practices of their activity, as well as the measures determined in the quality policies of the company.

They shall promote efficiency in the consumption of resources and the prevention of environmental pollution.

We require our suppliers to take appropriate steps in their manufacturing or supply chain to ensure that the metals and minerals used in their products are not sourced from mines and smelters in 'conflict zones'.

Freedom of association

Respect trade union rights, so that all workers can freely exercise the right to form and join the organizations they deem appropriate, as well as the right to collective bargaining; so that there is no discrimination whatsoever derived from the exercise of these rights.

Prevention of sexual or gender-based harassment and harassment in the workplace

Prevention of harassment in all its forms, rejecting any attitude that violates the dignity of workers; to this end, they shall have the relevant protocols for the prevention of sexual or gender-based harassment and the prevention of harassment at work, which shall be available to all workers.

Conflicts of interest

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A conflict of interest occurs when the personal interests of a worker or a third party compete with the interests of the CUÑADO GROUP, so they will always act in the best interest of the latter, making appropriate use of the means at their disposal and avoiding actions that may be detrimental to the CUÑADO GROUP.

All suppliers with the employees of the CUÑADO GROUP must work in a lawful and ethical manner, and their selection will be governed by criteria of objectivity and transparency that must be accredited.

It is forbidden to give, promise or offer any kind of payment, commission, gift or retribution to any employee and/or public official, whether it is made directly to them or indirectly through persons or companies linked to them or through intermediaries.

Gifts or donations that employees may receive from customers or suppliers, which are outside normal business practices, are unlawful. Normal business practice is understood to be gifts or business courtesies that are within the limits of market courtesy and of modest value.

Confidentiality

We are committed to maintaining the confidentiality of all information, both confidential and proprietary, from third parties.

The suppliers must keep professional secrecy with respect to all non-public data or information known because of the exercise of their commercial activity with CUÑADO GROUP, whether they come from or refer to other clients or to CUÑADO GROUP itself and, especially, they will abstain from using this information for any purpose other than the business relationship.

This obligation of secrecy persists even after the termination of the relationship with CUÑADO GROUP.

Competitive practices

Our company supports efforts to promote and protect free competition, so our suppliers will respect the exercise of this right, as well as the intellectual and industrial property rights held by third parties.

Data protection

They shall have measures in place to safeguard the personal data they process, as well as procedures to prevent unauthorized access or use of the same. Any processing

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of data relating to employees, customers, distributors, suppliers or other third parties shall always be carried out in accordance with current legislation.

III.- COMPLIANCE BODY

GRUPO CUÑADO has a compliance body for the control and development of internal policies, which is responsible for the interpretation of this code of ethics and to adopt the necessary recommendations and decisions for the application of this code.

IV.- COMPLAINTS CHANNEL

In accordance with current legislation, GRUPO CUÑADO has a complaints channel available to employees, customers and suppliers; therefore, any breach of the code of ethics or suspicions of unlawful conduct should be reported through this channel.

V.- DECLARATION OF CONFORMITY

As a supplier of GRUPO CUÑADO, you are responsible for the fulfilment of these rules, as well as to establish processes to monitor your compliance. GRUPO CUÑADO reserves the right reserves the right to request proof of compliance with these standards.

And as a sign of knowledge and full acceptance of these rules, you sign this document.

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