



Supplier Ethical Code



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A. INTRODUCTION: PURPOSE OF THE CODE OF CONDUCT

The purpose of this Code of Conduct (hereinafter referred as “the Code”) is to determine the principles and guidelines of conduct that must govern LITOGRAFÍA ALAVESA S.L.U. and in GLOBAL THESSALIA (both hereinafter referred to as “LITALSA” or “the Company”) in order to guarantee and consolidate the implementation and consolidation of a culture based on business ethics as far as the development of its activity is concerned.

The Code aims to establish itself as a starting point to show the Company's firm commitment to compliance with legality and transparency, both projected in all its areas of action, with special emphasis on prevention in criminal matters. It seeks to establish in this way the fundamental basis of behavior of the administrators, directors, suppliers and employees of LITALSA (hereinafter, also “the professionals”.)

Each one of the suppliers must respect it and promote its dissemination and respect by their collaborators.

B. SUBJECTIVE CODE OF APPLICATION

This Code of Conduct will apply to the following people, whether natural or legal, according to these cases:

- Employees: regardless of the contractual modality that determines the employment relationship, position job or geographical area where they perform their work. It also includes external commercial advisors, who are not part of the staff of any of the group companies, although they provide their services to them.
- Apprentices and recipients of scholarships.
- Group Managers: regardless of the contractual modality that determines their employment relationship, job position in the geographical area where they carry out their work. This includes the members of the Senior Management (first executive of the company), internal auditor, department heads, directors, etc.
- Clients, suppliers, shareholders, and other interest groups: if applicable to them and if the company has the capacity to make it effective.
- Management board.

C. INTEGRATIVE FUNCTION AND INTERPRETATION OF THE CODE OF CONDUCT

This Code of Conduct is not intended to reflect or regulate all eventual cases that may arise in the ordinary activity of the Company, but rather establishing a clear criterion that serves to instruct the conduct of LITALSA professionals, both inside and outside of the Company. Moreover, it can be used to clarify any doubts that may arise in the performance of their professional work.

Any doubt regarding the interpretation of the Code of Conduct should be consulted with the immediate superior or with the Compliance Committee if appropriate.

Certain protocols and obligations are incorporated into this Code to exercise control over the activities carried out by the Company. It aims to prevent, detect and prosecute behaviors that may arise criminal liability.

D. MANDATORY COMPLIANCE

This Code is in any way a document of voluntary compliance, but rather fully binding and enforceable by and for the Company.

LITALSA professionals will be obliged to know and comply with this Code, respecting its values and principles, as well as being guided by the behavioral guidelines established therein. They must comply with the rules that are applicable to their activity, responsibility job place. They also have the obligation to immediately report any non-compliance or violation that they may eventually become aware of and mainly those that could constitute a crime.

The Company's professionals, especially those who oversee other employees, must ensure the compliance of the Code by promoting in all cases actions, activities and actions.

E. COMMUNICATION AND DISSEMINATION

LITALSA will communicate and disseminate the Code among its Professionals by making a copy available to each of them, as well as through the website.

The Company will promote among its suppliers and collaborating companies the adoption of behavioral guidelines defined in this Code.

All Professionals must assume the commitment in writing.

The Company will endeavor to extend the content of this Code of Conduct to its suppliers and clients.

F. ETHICAL COMMITMENTS OF THE SUPPLIERS

In line with the principles of Corporate Social Responsibility, in the exercise of its activity, THE SUPPLIER promotes respect for ethical values, guaranteeing effective compliance with current Legality and absolute respect for fundamental freedoms and public liberties. It mainly refers to the labor rights of the Company's professionals, which includes the necessary development of said professionals and the maximum respect for the necessary equality of opportunities and absence of any type of discrimination.

THE SUPPLIER collaborates with the community in line with its activity, promoting and guaranteeing the necessary balance between business values and social expectations. Moreover, it also promotes economic development and social action within said community.

In line with the best corporate governance practices, THE SUPPLIER actively promotes the fight against corruption among its clients, suppliers, and contributor companies. It seeks for promoting transparent, objective and impartial processes with its suppliers and providing its clients with all relevant information about the services marketed.

The above mentioned is based on corporate values such as: professionalism, teamwork, competitiveness, impartiality, innovation, excellence, commitment, leadership, improvement, respect, responsibility, diligence, sustainability, efficiency and integrity; fundamental principles that govern and inspire the Company's activity.

G. GENERAL RULES OF PROFESSIONAL CONDUCT OF THE SUPPLIER

This section contains the ethical principles that must govern the actions of the SUPPLIER, which must be expressly accepted by the SUPPLIER before starting their contractual relationship.

The provisions of this Code of Conduct are understood without prejudice to the additional conditions and requirements that may be established in the applicable legislation; in the practices and standards of the different jurisdictions where THE SUPPLIER carries out its activity and in the different contracts with each supplier, which will be applicable in any case.

The SUPPLIER Code establishes the following standards of conduct that must be observed by the Company's suppliers:

- **Respect for human rights and public liberties**
 - THE SUPPLIER is committed to the application of the content of the UN Global Compact, as well as those other pacts or conventions that are applicable in matters of Human Rights.
 - THE SUPPLIER endorses the content of the UN Convention against Corruption, as well as the OECD Guidelines and the social policy of the International Labor Organization.

- **Compliance with legality. Prevention of criminal behavior**
 - The Company and all its professionals in all areas respect current legality, with special reference to the SUPPLIER, who must particularly know the laws and regulations that affect their respective areas of activity. It also ensures that the professionals who depend on him/her receive adequate training in this regard.
 - THE SUPPLIER and all its professionals will always avoid the performance of fraudulent practices, especially those acts that entail direct or indirect benefit for the Company or for themselves, mainly if such conduct may involve the commission of possible crimes.
 - To this end, all employees must observe appropriate ethical behavior in all their actions and know the laws and regulations applicable to their specific professional activity. If needed, they may request the necessary information from their superior or whoever corresponds, and strictly complying with the established protocols to detect or prevent the commission of illegal acts within the Company's activity.

- **Respect for equality, non-discrimination and professional development. Harassment**
 - THE SUPPLIER guarantees that in its selection, hiring and remuneration policies and practices, the conditions of employment or access to training and promotion of its professionals meet exclusively criteria of merit and capacity. It must be done with respect to the principle of equal treatment and opportunities between men and women, as well as guaranteeing non-discrimination based on race, sex, ideology, nationality, disability, belief or any other personal, physical or social condition. Moreover, the Company guarantees that it evaluates all its professionals objectively and in accordance with their professional performance.
 - The Company develops policies that guarantee the adequate training of its professionals, contributing to their development at a professional and personal level. It also promotes a work environment of respect and rejection of all types of violence, abuse or offensive behavior of any nature, with special reference to the prevention of any form of physical, sexual, psychological or verbal harassment or abuse.

- THE SUPPLIER pursues and reports harassment in the work environment and encourages anyone to report this kind of situation.
- The Company prohibits abuse of authority and any type of harassment, whether physical, psychological or moral, as well as any other conduct that may create an intimidating, offensive or hostile work environment for people.
- The SUPPLIER's workers must treat each other and their subordinates in a respectful and professional manner, providing a pleasant and safe work environment; therefore, people can give the best of themselves, promoting a culture of effort and reward for merit.

- **Integrity**

- Employees undertake not to request, accept or offer any type of payment - in cash or in kind that exceeds normal commercial or courtesy practices; that is to say, any type of unjustified benefit or advantage of any nature that favors him/her, the Company or a third party against others. Likewise, they will refrain from making payments in order to facilitate or expedite procedures, consisting of the delivery of money or goods in kind, regardless of the amount, in exchange for ensuring or expediting the course of a procedure or action before any judicial body, public administration or official body anywhere in the world.
- Therefore, any practice of corruption, bribery or payment of illegal commissions in all its forms is prohibited, whether through acts or omissions or through the creation or maintenance of favorable or irregular situations with the objective of obtaining some benefit for the company or themselves.
- Exceptionally, the delivery and acceptance of gifts and presents will be permitted when the following circumstances occur:
 - They respond to signs of courtesy or customary business attention,
 - They have irrelevant or symbolic economic value (less than 100 euros.)
 - They are not prohibited by law or generally accepted business practices.
- In any situation of doubt or knowledge of an unethical practice that arises, this must be declined or, where appropriate, consulted first with the immediate superior or with the responsible Management, as appropriate.

- **Safety and health at work**

- THE SUPPLIER actively promotes and applies an adequate policy regarding the prevention of occupational risks, also guaranteeing its due communication to all professionals of the Company, as well as its effective compliance and observance.

- The SUPPLIER's Professionals are thus obliged to comply with the regulations relating to safety and health at work, with the aim of preventing and minimizing occupational risks as much as possible.
- Likewise, THE SUPPLIER adopts the relevant preventive measures in each work area to provide its employees with a healthy and safe work environment. It will try to continually improve the measures to prevent occupational risks and promote health at work in all sectors and places where it carries out its activity.
- **Fight against fraud and prevention of money laundering**
 - THE SUPPLIER ensures that in the development of its activity the law is respected, and corruption in all its forms is fought. In this sense, THE SUPPLIER expresses its firm commitment to not carrying out practices that may be considered irregular, including those related to money laundering, both in its relationships with clients, suppliers, competitors and authorities.
 - The Company's employees must pay special attention to those cases in which there may be indications of lack of integrity of the people or entities related to the Company maintains relations, regarding collections and payments.
 - They will pay special attention to cash payments that are unusual considering the nature of the operation, those made by checks to bearer or those made in currencies other than the one previously agreed upon.
 - Employees will report, through existing channels, those transactions that, in accordance with the provisions of this section, may be irregular.
 - Professionals will avoid any possible situation of conflict of interest, when the personal interest of a professional and the interest of the SUPPLIER come into collision, directly or indirectly. The professionals must notify the Company through their superior hierarchical manager in order to inform the Compliance Committee to adopt those measures that are appropriate in each case to put an end to the conflict situation.
 - If they become aware of possible illegal behavior, the SUPPLIER's professionals must inform or make a consultation through their superior hierarchical manager or the Compliance Committee.
- **Internal control of financial information**
 - The Company assumes a behavioral principle of information transparency, understood as the commitment to transmit reliable information to the markets, both financial and of any other nature.
 - The economic-financial information of the SUPPLIER will faithfully reflect its economic, financial and patrimonial reality, always in accordance with generally accepted accounting principles and applicable international financial reporting standards. For these purposes, no Company professional will hide or distort the information in the SUPPLIER's accounting

records and reports, which will in all cases be complete, accurate and truthful.

- **Transparency and loyalty in the relationship with the tax authorities and Social Security. Correct use of public funds.**
 - THE SUPPLIER is engaged to carry out good practices in tax matters, complying always with tax regulations. Moreover, it maintains an appropriate relationship with the Administration, prohibiting the obtaining of illicit benefits, as well as the avoidance of paying taxes, amounts retained or that should have been retained. Likewise, it is prohibited the receipt of any payment on account of remuneration in kind through which undue returns are obtained, any other possible breach of accounting obligations established by current regulations or in the keeping accounting, as well as books or records.
 - It is the SUPPLIER's commitment to punctually comply with its obligations with Social Security. To this end, the Company will do everything necessary to guarantee the veracity of the information through transparent behavior and will adopt all the controls and measures that are necessary to avoid any type of fraud.
 - If it obtains subsidies, deductions or aid from the Public Administration, THE SUPPLIER guarantees the proper use of the funds obtained for the purposes for which they are granted.

- **Respect for Intellectual Property and Industrial Property rights**
 - THE SUPPLIER respects and defends the Intellectual and Industrial Property rights as well as those that correspond to third parties, including its competitors.
 - In order to protect the Intellectual and Industrial Property rights of which THE SUPPLIER is the owner or has legally been granted the rights, or to protect the rights that would correspond in the same sense to third parties, the Company's professionals are prohibited performing the following behaviors:
 - Distribute, plagiarize, reproduce or publicly communicate a literary, artistic or scientific work, protected by copyright, without the authorization of the owners of the corresponding intellectual property rights.
 - Reproduce, imitate, modify, usurp an identical or confusing distinctive sign (brand) of a third entity, (to distinguish the same or similar products, services, activities or establishments for which the Industrial Property right is registered), without having the consent of the owner of the registered right.
 - Manufacture, import, possess, use, offer or introduce into commerce procedures or results fundamentally protected by patents, without the consent of their owners.

- **Relationship with groups of interests**

- THE SUPPLIER is engaged to maintain a relationship with the Stakeholders linked to it based on compliance with the law and mutual respect and trust.
- Regarding the relation with its partners, THE SUPPLIER provides them with a transparent, clear, truthful and complete information, always guaranteeing the creation of permanent value in the progress of the Company.
- In relation to its clients, THE SUPPLIER is committed to meeting their needs and expectations, promoting the establishment of lasting business relationships based on trust, transparency, professional excellence and protection. The SUPPLIER looks for guaranteeing the total confidentiality of all information related to its clients, agreeing not to reveal them to third parties, except with the client's consent or due to legal obligation or in compliance with judicial or administrative resolutions. Independence will be safeguarded, preventing professional performance from being influenced by economic, family or friendship ties with clients. The Company will promote and disseminate if possible and appropriate, the contents and principles of this Code among its clients.
- The collection use and processing of personal data of clients must be carried out in a way that guarantees the right to privacy and compliance with legislation on the protection of personal data. Moreover, it must guarantee the rights recognized to clients by the legislation on information society services and electronic commerce, and other applicable provisions.
- In relation to its suppliers and contractors, THE SUPPLIER is also committed to fostering relationships based on trust and transparency in information. The SUPPLIER needs to carry out supplier and contractor selection processes presided over by independence and objectivity, based on standards of solvency, technical suitability, quality and price. In any case, it will choose suppliers whose company practices respect the internationally accepted human rights.
- Regarding its competitors, THE SUPPLIER carries out its activity in the market in a loyal manner, in accordance with the principles of free competition and absolute respect for its competitors and legality. The eventual obtaining of information from third parties, including competitive information, will be carried out inexcusably legally. THE SUPPLIER will avoid engaging in any action that involves abuse or illicit restriction of free competition.
- In relation to the Public Administration, the SUPPLIER's actions are always governed by absolute respect for the Institutions, pursuing in all cases effective compliance with the Legality and under criteria of maximum collaboration. The Company's employees must behave in a manner that does not induce any public worker to violate their duties of impartiality or any legal precept.

- **Cooperation, participation and collaboration**

- THE SUPPLIER promotes an environment of cooperation, participation and teamwork that favors adequate and better use by its professionals of all capabilities and resources.
- The Company's professionals must thus act in a spirit of collaboration, making available to the SUPPLIER any knowledge or resources that can facilitate the achievement of the Company's objectives and interests. They must work efficiently and make use of the Company's resources that THE SUPPLIER makes available to them.

- **Corporate image and reputation**

- THE SUPPLIER considers its image and corporate reputation as assets of great value to preserve the trust of its partners, employees, clients, suppliers, contractors, authorities, and society in general.
- The Company's professionals are therefore obliged to take the utmost care to preserve the image and reputation of the SUPPLIER in all their professional actions, avoiding any possible conduct that may directly or indirectly imply potential damage to them.
- THE SUPPLIER encourages its employees to follow and promote the values of the Society every day with the aim of making the SUPPLIER a dynamic and modern company that encourages creativity, the achievement of its goals and a sense of responsibility.

- **Right to privacy**

- THE SUPPLIER complies with current legislation regarding the Protection of Personal Data entrusted to it by its employees, clients, suppliers, partners, candidates in selection processes, among others. The Company therefore is committed to preserve them properly, using them for authorized purposes, and will not disclose them unless with the consent of the interested parties or if obliged to do so by legal imposition.
- The Company's professionals are committed to make responsible use of the media, computer systems and, in general, any other means that the Company makes available to them in accordance with the policies and criteria established for this purpose. These media are not provided for non-professional personal use and are therefore not suitable for private communication. They do not therefore generate an expectation of privacy if they must be supervised by THE SUPPLIER in the performance of their control duties.
- The Company guarantees that it will not disclose personal data of its professionals, except with the consent of the interested parties and in cases where there is a legal obligation to do so or in compliance with judicial or administrative resolutions. In this sense, the professionals who access personal data of other professional groups will be committed to maintain the confidentiality of that data.
- Under no circumstances may the personal data of the professionals be processed for purposes other than those legally or contractually provided for.

- **Treatment of reserved, confidential and privileged information**

- THE SUPPLIER considers that the information and knowledge constitute one of its most valuable assets for the development of its activity, which is why it must be subject to special protection.
- The information owned by and/or entrusted to the SUPPLIER is considered reserved and confidential information. It will be subject to professional secrecy, without its content being provided to third parties, individuals and/or legal entities, unless express authorization of the Company when justified by the concurrent circumstances, or in the event of a legal requirement for this purpose, or if it is appropriate in compliance with a judicial resolution or administrative authority.
- It is the responsibility of the SUPPLIER and all its professionals to put in place enough security means to protect reserved and confidential information against any internal or external risk of unauthorized access, manipulation or destruction, both intentional and accidental. For these purposes, the SUPPLIER's professionals will maintain confidentiality about the content of their work in their relationships with third parties and may be sanctioned by THE SUPPLIER in accordance with the applicable regulations otherwise.
- At the same time, this type of information should not be disclosed internally, unless its use is needed for the regular exercise of the functions of each of the jobs.
- Likewise, confidential information received from companies outside this Company and its group will be treated with the same confidentiality
- Employees are committed to comply with the included commitments in terms of confidentiality and information processing, even after the relationship between them and the Company has finished for any reason.

- **Performance of honest professional conduct**

- The professionals will strictly comply with current legality and will adjust their actions to the principles of loyalty, good faith and prohibition of arbitrariness. They are committed to maintain the highest ethical and moral criteria in their conduct, exercising their professional work in a complete, honest, diligent, responsible and efficient, and guaranteeing maximum customer satisfaction at the highest performance standards.
- Internal or external relationships established due to the job position will not be used either for one's own benefit, family members or related companies. The information available as a result of the exercise of professional activity should not be used for personal benefit; therefore, all staff must avoid activities that lead to a conflict between their personal interests (or those of people linked to them) and the interests of the Company.
- It is prohibited to contract as a worker, supplier, client or service provider, whatever the legal modality that determines your relationship, to or with related people, without the prior approval of the responsible person.

- It is the obligation of all SUPPLIER professionals to inform their immediate superior and the Compliance Committee (If applicable) about the initiation, evolution and result of any judicial, criminal or administrative procedure of a sanctioning nature, if professionals are an investigated or accused party and may affect them in the exercise of their functions as a professional of the Company. It will proceed to adopt the disciplinary and/or sanctioning measures that THE SUPPLIER considers appropriate.
- The creation, membership, participation or collaboration of the professionals in social networks, forums or blogs. The opinions or statements will be made that makes clear its nature. It is prohibited the use, mention or act on behalf of the SUPPLIER in any of the above cases.
- **Dedication and not competition**
 - Employees must give priority to the exercise of their functions in THE SUPPLIER and may not provide professional services to other entities or competing companies on their own or on behalf of others. There is an exception if there is a prior and express written authorization of the management responsible for the function of human resources of the SUPPLIER, taking into consideration that the provision of said services cannot in any way interfere with the work of the employee.
- **Political activity**
 - The connection, membership or collaboration with political parties or with other types of entities, institutions or associations with public purposes or that exceed those of the Company, as well as contributions or services to them, must be done in a way that their personal nature is perfectly reflected, and any involvement of the Company is avoided.
 - A worker will never commit and/or use funds and/or assets of the Company in a way that can be used to support a political option, whether in the context of a campaign to obtain public office or outside of it. Likewise, they will not recommend or pressure any of their subordinates to support a certain political option.
- **Promotion of innovation. Information protection.**
 - THE SUPPLIER understands that innovation constitutes an essential value for current business management and one of the main means to improve its competitive position in the market. Hence, the Company promotes the continuous improvement of its services and the know-how behind them, also guaranteeing that the data, information and knowledge generated in the exercise of its activity enjoy full protection.
 - Professionals will protect and take care of the information and knowledge to which they have access. They won't use more than needed for the correct performance of their functions, in a responsible, efficient and appropriate manner to the environment of their professional activity, complying with the current authorization procedures.
 - The documentation will be preserved or destroyed in accordance with the Company's document retention policies; however, those that are related to current conflicts or investigations may under no circumstances be destroyed, unless ordered by the SUPPLIER's

Legal Department. Employees will contact this department with questions regarding the Company's document retention policies.

- **Respect for the environment**

- THE SUPPLIER is committed to take care of the environment and sustainable development at all levels. The SUPPLIER faces its environmental commitment by ensuring compliance with applicable legislation on the matter in all its areas of operation, to which end (i) the SUPPLIER assumes the commitment to develop its activities with the greatest respect for the environment and minimizing the negative effects that they may cause; and (ii) the SUPPLIER will establish best practices and promote among its workers the necessary training to preserve the environment.
- THE SUPPLIER will avoid making useless use of energy and natural resources, using only those essential to carry out its activity.

H. COMPLIANCE COMMITTEE

The Compliance Committee must ensure the observance and effective compliance with the Code, promoting its knowledge, dissemination and understanding by LITALSA's SUPPLIERS, as well as encouraging its review and updating when appropriate in view of the concurrent circumstances.

The Committee will be responsible for resolving any doubts or questions that, in relation to this Code and the rest of the documents, may arise both inside and outside the Company.

It will establish control systems for the prevention of crimes, the rules and procedures necessary for their operation, as well as periodic surveillance and the design of training plans in criminal matters aimed at workers in the exercise of their functions.

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The Compliance Committee will also be competent to promote and carry out the investigation of any possible irregular behavior and non-conformity with the principles included in the Code, giving them the appropriate channel and applying the disciplinary and sanctioning regime rules that are applicable. If a LITALSA SUPPLIER has knowledge or reasonable indication of actions that are illegal or contrary to this Code, they will be obliged to report it.

The identity of the complainant will be considered confidential information, and no disciplinary measure, direct or indirect, may be adopted due to the fact of the complaint, without prejudice to the rights that correspond to those reported in accordance with current regulations. Additionally, all communications received by the Compliance Committee will be treated confidentially, without prejudice to the obligation to communicate to the corresponding judicial or administrative authorities, if applicable.

The Compliance Committee will also proceed to prepare an annual report on compliance with this Code, with LITALSA carrying out any modifications or updates to this Code that are pertinent in view of the content of the report indicated above.

SUPPLIERS must report as soon as possible any of the previous conduct of which they are aware due to their commercial relationship with LITALSA.

LITALSA has established an ethical email for suppliers (the complaints channel), as a communication channel for the Company's suppliers and the companies that are hired to provide services or carry out supplies to the Company (the "Subcontractors"), their respective professionals, as well as companies that have participated in a tender for services or supplies to be suppliers. They could report conducts that may imply non-compliance by any LITALSA professional of the System of governance and sustainability or any act contrary to the law or the commission by a SUPPLIER, by one of its Subcontractors or by their respective professionals, of any act contrary to the law or the provisions of this Code of Conduct within the framework of their relationship commercial.

I. ENTRY INTO FORCE

This document has been approved by LITALSA'S administrative body, coming into force on March 29, 2023, and being fully valid if there is no modification, update, revision or repeal in it. Any review or update that affects, modifies or complements the conditions of the labor or commercial contracts of LITALSA employees must be expressly accepted by them.

J. ACCEPTANCE

The administrators, professionals and SUPPLIERS of LITALSA, subject to this Code of Conduct, expressly accept the rules of action established therein that apply to them.

The professionals who in the future join or become part of LITALSA, and the SUPPLIERS who contract with it, will expressly accept the rules of action established in this Code of Conduct.

In the case of LITALSA SUPPLIERS, it will be attached to their respective contracts.

The Company will positively value those suppliers who express their commitment to the principles promoted in this Code of Conduct through their acceptance and compliance. Likewise, the Company reserves the right to terminate its contractual relationship with those suppliers who repeatedly or seriously break the Code and may claim compensation for damages (including moral damages, if applicable).

Date:

Acceptance and signature: