

Corporate Code of Conduct



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Message from E. BACHILLER B., S.A.'s Sole Administrator.

BACHILLER's Code of Conduct (hereinafter referred to as the 'Code') establishes the Company's rules on fair, safe and healthy working conditions, as well as the environmental responsibility regime of the Company and its employees, and serves as a guide for the conduct of all BACHILLER members, whether they are employees, commercial agents, subcontractors or personnel assigned by temporary work agencies.

Since the foundation of **BACHILLER** in 1971, the company has been carrying out its operations based on the strong values that are part of its corporate philosophy, in addition to conducting its business activity responsibly. We understand that, in order to meet the current needs of all our stakeholders, we must make the most of not only our economic but also social and environmental performance.

Our actions convey this commitment. All our facilities comply with the strictest environmental and safety rules. We work closely with our collaborators to offer products and services of the highest quality and maximum safety. Where appropriate, we conduct life-cycle assessments of our products in order to examine and understand their environmental impact. Besides, we are committed to lawful and ethical behaviour in all business aspects.

As a responsible company, our workforce actively promotes these principles. This corporate Code of Conduct has been implemented to ensure that employees understand our expectations.

A handwritten signature in blue ink, appearing to be 'DB', with a large, stylized 'B'.

David BACHILLER
Managing Director

Article 1.- Objective Scope of this Code

Ethical behaviour standards are hereby established through principles of action that E. BACHILLER B., S.A. (hereinafter referred to as '**BACHILLER**') shall apply to all areas of its activity in order to foster a compliance culture among its members by promoting good practices, principles and values. Therefore, any internal policy or procedure shall be construed in accordance with the principles of this Code of Conduct.

This Code of Conduct also responds to the need for criminal prevention arising from the criminal responsibility of legal persons. However, it does not replace the provisions of other internal policies implemented or pending implementation since it aims to provide a set of principles and rules that inspire and reflect the spirit of **BACHILLER**. Guidelines and policies shall govern the responsible and ethical behaviour of all administrators, directors, employees and collaborators of the organisation when carrying out any activity.

Regulatory compliance is not limited to compliance with the law. Ethical behaviour is the basis for taking all the organisation's decisions and actions with integrity. Such integrity shall also be maintained by third parties related to the organisation, seeking a fair and transparent relationship with them.

As the success of this project depends on everyone, this Code and the policies implemented by virtue thereof must be known, understood and followed by anyone related to **BACHILLER** regardless of the business or employment relationship.

A compliance culture can only be instilled if everyone is firmly committed.

The behaviours described in this Code are not intended to include all situations or circumstances that **BACHILLER** members may encounter, but rather to provide general conduct guidelines that indicate how to act during the performance of any professional activity.

Since this Code of Conduct is part of BACHILLER's system of rules, in order to ensure effective dissemination, it shall be translated into any language necessary so that all company members and third parties understand its scope and content.

This Code of Conduct, as well as the entire Criminal Compliance Model in which it is included, shall be monitored by a Compliance Officer appointed for this purpose. This body shall supervise, control and prevent criminal conduct contrary to the ethical and moral standards that prevail in this organisation, as well as resolve any doubts that may arise from the application of this Code's rules.

Article 2.- Subjective scope

This Code is mandatory for all current and potential members of E. BACHILLER B., S.A. (hereinafter referred to as '**BACHILLER**'), regardless of their job position or geographical location, including members of the Board of Directors, partners, executives, employees, members and collaborators in general, whether under a contractual, employment, commercial, training or another type of contract.

Likewise, members acting as representatives of **BACHILLER** in business corporations, associations, foundations or other entities shall comply with this Code to perform any activity, and shall promote the application of its values, policies and rules of conduct.

This Code applies to all current or potential investee entities or those which E. BACHILLER B., S.A., or its subsidiaries, has effective control over or holds positions in the administrative and governing bodies; as well as to any natural or legal person related to the organisation, including suppliers, clients, communication media, subcontracted companies or others, provided that they comply with these principles and define themselves as ethical persons or companies.

Article 3.- Principles and values

This Code of Conduct is based on the following principles and values:

Integrity:

Honesty and integrity are the governing principles of BACHILLER, and all employees are expected to share this same commitment.

Business integrity means that all activities carried out by **BACHILLER** shall be guided by high ethical standards, working with honesty, inspiring trust, showing consistent and steady behaviour and maintaining, at all times, the excellent reputation of the organisation.

Legal rules change over time. Therefore, it is necessary to constantly assess the required business behaviour. The adherence to integrity criteria is essential for **BACHILLER**'s success, so every member and collaborator must contribute to this goal. The organisation makes great efforts to provide its members with the necessary information, training, guidance and support to comply with business integrity rules.

Likewise, employees must act, at all times, with a view to achieving the best possible results for the Company and make decisions according to the best interests thereof, as well as strive to efficiently use available resources, always acting honestly and with integrity in all interaction areas arising from the development of assigned tasks.

Transparency

Conveying transparency is a way to achieve a trustworthy, honest and safe environment. Transparency must be the central axis governing the organisation's competitiveness.

The relationship established between **BACHILLER** and its clients, suppliers, collaborators, members, competitors, communication media and Public Administrations, among others, shall be built under the principles of cooperation and transparency.

BACHILLER shall truthfully, adequately, usefully and consistently inform its purposes, activities and projects. Information transparency is a basic principle that shall govern the actions of all the organisation members.

BACHILLER declares its firm refusal of all practices that may be deemed as improper in the development of its relationship with suppliers, clients, public officials, etc.

Regulatory compliance

BACHILLER undertakes to act at all times in accordance with regulations in force. All **BACHILLER** members and collaborators shall be committed to internal policies and procedures. Besides, the partners and executives are responsible for informing these obligations and internal protocols to all members and collaborators, making sure that they are strictly complied with. The behaviour of members and collaborators shall be aligned with the spirit and content of this Code.

Confidentiality and privacy

Employees must comply with the Company's intellectual property rights and may not use or disclose confidential information of BACHILLER or its clients when performing their legal and/or contractual obligations.

BACHILLER fulfils and guarantees its obligation to protect the personal data of all members and related third parties. Therefore, it agrees not to disclose personal data, except in the case of express consent, legal obligation or compliance with judicial or administrative decisions; and undertakes the commitment to take the necessary measures in order to ensure that the information is stored in a secure place, either in a physical or digital format, and protected against any internal or external risk of non-authorized access, manipulation or destruction, whether intentional or accidental.

All BACHILLER members are urged not to use or store personal data, except in the case of a specific activity that requires so, always in compliance with the Spanish Organic Law on Data Protection (LOPD).

Non-public information owned by BACHILLER is private and confidential. Therefore, all organisation members must protect the legal, technical, commercial and financial information thereof, as well as third-party data available to members and collaborators, undertaking the commitment to preserve the confidentiality of information to which they have access and preventing its misuse.

In the event of the employment or professional relationship being terminated, the member or collaborator shall return all confidential information in their possession, including documents and storage media or devices, as well as information stored in their computer terminal, cell phone or any other medium.

All obligations regarding the confidentiality and processing of personal data shall remain in full force in spite of the employment relationship termination.

Independence

Independence is a basic principle of activity quality. Accordingly, all **BACHILLER** members shall refrain from participating in matters in which, directly or indirectly, their personal or family interests or those of close friends may be affected. In the event of a conflict of interest, the procedure that shall be followed is set forth in Article 7 of this Code.

Professionalism and technical accuracy

BACHILLER members shall follow, in all their actions, objective professional criteria, including the due diligence and quality standards that guarantee excellence in the design and manufacturing of process equipment and pressure vessels for the chemical, petrochemical, pharmaceutical, cosmetics and food industries. High technical quality, professionalism, accuracy and excellence are the characteristics that **BACHILLER** members should possess in order to carry out their activity in the most productive, competitive and sustainable way.

Fair competition

BACHILLER ensures respect for competitors, complying with applicable laws on competition and consumers rights. Collaborators and members of the organisation shall avoid unfair actions, such as confidential information abuse, collusive price-fixing and market sharing agreements, participation in monopolies or abuses of a dominant position, as well as any other conduct that threatens free and healthy competition.

Commitment to constitutional rights

BACHILLER is committed to constitutional rights, such as the right to freedom of opinion, association, expression, privacy, image, secrecy of communications and dignity of collaborators, according to the work environment scope and content set by the Spanish Constitutional Court. These principles apply to all aspects of the employment relationship, including hiring, relocation, task assignment, promotion, remuneration, essential benefits and disciplinary measures until contract termination.

By virtue of the above, **BACHILLER** respects the legitimate rights of its employees to create or join an organisation and to bargain collectively, preventing harassment, interference or retaliation. This includes the right of employees to openly discuss working conditions with the Management Team without fear of retaliation.

Likewise, the workplace and operations of **BACHILLER** employees do not involve any kind of human trafficking, forced labour or child labour. **BACHILLER** ensures that its workers' contracts clearly explain the employment terms and conditions in the particular language they speak.

Equal opportunities

BACHILLER promotes fair and equal conditions and treatment for men and women as regards access to employment, training, salary, mobility and other working conditions.

A culture of merit, effort, objectivity and personal improvement is promoted.

BACHILLER's main values include the talent and professionalism of collaborators. For this reason, it is committed to recruiting personnel based on their training, experience and personal merits.

Non-discrimination

In accordance with fundamental human rights, at **BACHILLER**, all employees treat each other with dignity and respect. **BACHILLER** complies with all applicable laws on employment, salary and labour rights, and promotes the respect of fundamental human rights for all employees. Thus, no discrimination or harassment of any kind is expected within the company's work environment. This includes harassment or discrimination on the grounds of race, colour, religion, sex, gender identity, national origin, age, marital status, military service, disability, sexual orientation, genetic information, citizenship, social or economic status or any other condition of its members, as well as equal opportunities among them.

BACHILLER rejects any situation of violence as well as any physical, sexual, psychological, moral or other type of harassment that intimidates or offends the personal rights of collaborators, and takes the necessary measures to prevent this kind of behaviours or stop them once detected.

Political and religious neutrality

BACHILLER does not adhere to any political or religious ideology or tendency. Therefore, without prejudice to the respect for the constitutional rights of its members, including freedom of expression as well as ideological and religious freedom, any conduct or practice that links or may link **BACHILLER** to any political or religious ideology shall be rejected. The affiliation, membership or collaboration of members and collaborators with political parties or other entities, institutions, non-profit organisations and religious institutions shall be made in a clearly personal manner, thus avoiding any relationship with **BACHILLER**.

Work-life balance

BACHILLER respects the personal and family life of its collaborators and is committed to promoting the work-life responsibilities' balance of its members, fostering equal opportunities and treatment for men and

women, and implementing measures that are effective and meet the actual needs of its members in accordance with applicable regulations.

Article 4.- Relationship scope

Relationship with its members and collaborators

BACHILLER's internal collaborators and members are recruited in accordance with the principles of merit and ability.

The organisation's fundamental pillar is its employees and, therefore, defends and guarantees compliance with human and labour rights. It assumes the commitment to following regulations in force and good practices in terms of employment, health and safety conditions in the workplace.

BACHILLER guarantees to all collaborators and members the rights established in the Spanish Workers' Statute, as well as all the rights deriving from the specific work contract. It also guarantees a safe and healthy work environment, providing the Personal Protective Equipment (PPE) required by law.

In all working relations with other collaborators and members, **BACHILLER** members must respect their dignity, values and culture, avoiding situations of violence, harassment, abuse or discrimination on the grounds of race, religion, age, nationality, gender or other personal or social conditions. Likewise, the labour integration of collaborators with disabilities or handicaps must be ensured.

Besides, the organisation collaborators and members may not engage in behaviours such as the following ones:

- I. Behaviours that may imply exploitation, damage or harm to the image and/or reputation of **BACHILLER** or any of its members.
- II. Attitudes that reveal, to the outside and/or to third parties outside **BACHILLER**, any type of information concerning the members' activities or related to their personal and family development and, especially, to their personal or contractual data.

Relationship with suppliers and clients

Operations with suppliers and clients are carried out in accordance with objective and impartial criteria that guarantee equal opportunities, avoiding preferential treatment or personal conflicts in the recruitment processes.

BACHILLER demands to its suppliers an appropriate level of commitment to socially responsible practices that are compatible with this Code of Conduct.

All external procurement requests must be processed with the utmost transparency, avoiding any kind of preferential treatment.

It is forbidden to influence or participate in the procedures for acquiring products or services from companies or persons with whom collaborators and members have any economic or family relationship. In the event that such situation occurs, BACHILLER's Compliance Officer shall be notified by the member as soon as they becomes aware of it.

The transmission of values and the promotion of an honest and transparent dialogue with clients and suppliers are the principles that govern the development of BACHILLER's activity.

All members of the organisation shall relate to clients and suppliers in a lawful, ethical and respectful manner. An open and empathetic attitude towards the suggestions made by the client and a permanent willingness to take any actions may be necessary to clarify doubts and correct deficiencies and errors, as well as to make relevant activity improvements, shall be ensured.

Relationships with national and international public officials

Relationships with the Public Administration, members of the Judiciary Branch and regulatory bodies are based on the principles of cooperation and transparency. BACHILLER collaborators and members shall relate with public and judicial authorities and institutions in a lawful and ethical manner, always following the procedures officially established by the public sector, complying with rules and preventing any corruption behaviour.

It is expressly forbidden to offer, grant, request or accept, either directly or indirectly, gifts, handouts, favours or compensations, regardless of their nature, from authorities or public officials.

In addition, all BACHILLER members shall refrain from making facilitating or expediting payments consisting on the delivery of money or other valuable goods, regardless of the amount, in exchange for securing or expediting a procedure, proceeding or public procurement process, regardless of its nature, before any judicial body, public administration or official body.

Relationship with communication media and use of social media

As a general rule, unless BACHILLER appoints a spokesperson or grants express authorisation, its collaborators and members shall refrain from disclosing information on issues that are directly or indirectly related to BACHILLER in any type of social media.

In the case of being in contact with the media, the organisation members undertake to treat them with dignity, respect and truthfulness. Misleading information, that is to say, information which, in any way, misleads or may mislead its recipients, shall not be disclosed, nor shall misleading or denigrating advertising of competitors or third parties be carried out.

Likewise, they undertake to ensure that disseminated information is truthful and transparent, respecting the privacy and confidentiality of everyone involved.

All information and knowledge generated within the scope of BACHILLER is owned by the organisation under the terms established by current legislation.

Relationship with political parties

Except for the execution of agreements duly signed by **BACHILLER**, following, in all cases, the principles and values included in this Code, members and collaborators shall refrain from making contributions to political parties, authorities, bodies and Public Administrations in general at the organisation's expense.

If applicable, the relationship, membership or collaboration of the above-mentioned with political parties or other types of entities, institutions or non-profit organisations must be undoubtedly personal, i.e., it shall be clear that they were carried out in their own name, avoiding any relationship with **BACHILLER**.

Relationship with third parties, contractors and/or subcontractors

The selection of contracted and/or subcontracted entities for the provision of services to **BACHILLER** is governed by objectivity and transparency criteria, preserving the organisation's interest in maintaining stable and responsible relationships with the goal of achieving high quality and excellent goods and services that are reciprocally provided.

BACHILLER's business activity is carried out both nationally and internationally.

BACHILLER expects third parties to act in accordance with applicable laws, regulations, industry codes and contracts, as well as generally accepted sustainability criteria, such as those related to the protection of human rights, safety and the environment and the prevention of criminal conduct.

Before starting a business relationship, **BACHILLER** analyses, assesses and checks with due diligence any third party to ensure first-hand its integrity, quality and suitability.

Article 5.- Financial transparency and honest collections

The organisation's information accurately includes its economic, financial and equity situation in accordance with generally accepted accounting principles.

BACHILLER is governed by generally accepted accounting principles and, therefore, prohibits any action that prevents or obstructs the assessment and audit of financial statements.

The organisation ensures that business and financial records are accurate and complete under the responsibility of all members. To that end, **BACHILLER** provides its members with the necessary training to ensure that they know, understand and comply with the commitments established for internal control.

False or misleading statements and entries in any information, publication, document or proof of expenditure are prohibited. The falsification of documents and accounts as well as the misrepresentation of facts may constitute fraud.

BACHILLER shall attempt, at all times, to invoice reasonable economic amounts in accordance with its business activity.

Article 6.- Acceptance and provision of gifts and invitations

BACHILLER rejects any form of bribery or corruption, whether with public entities or between individuals. The organisation rejects incentives, gifts and invitations that violate this principle.

Corruption behaviours consist of accepting or offering an unjustified benefit or advantage of any nature, either for oneself or for a third party, as consideration for unduly favouring someone in the procurement of products or services, in business relationships or in dealings with public authorities.

All members and collaborators acting on behalf of **BACHILLER** shall interact with public and private entities in a lawful, ethical and respectful manner, complying with **BACHILLER**'s policies when receiving presents and invitations to entertainment activities from suppliers or clients.

Acceptance of gifts

As a general rule, no member or collaborator shall accept gifts or presents, including cash, from suppliers or clients as a means of conducting business with **BACHILLER** or a third party, i.e., as consideration to unduly favour someone in the procurement of products or services, in business relationships or in dealings with public authorities.

BACHILLER employees must not accept anything that may jeopardise the objective assessment of a contract with a supplier or client, i.e. anything whose value could be considered excessive or exaggerated because it exceeds thresholds that are reasonable, customary or ordinary in the usual sector practices. All cash presents are prohibited, regardless of the amount. This includes cash equivalents, such as prepaid Visa gift cards.

Professional entertainment activities are allowed if they are reasonable and appropriate to the occasion in order to fulfil a valid business purpose. These rules remain in force during holidays

BACHILLER members and collaborators shall only accept presents, courtesies, invitations or benefits from members of the organisation or third parties (clients, suppliers, collaborators or others), provided that each of the following conditions are met:

- I. It shall not consist of money or an equivalent.
- II. Its value shall not be excessive or exaggerated, i.e., it shall be within reasonable, common or ordinary thresholds according to the usual practices of the sector. Any doubts shall be solved by **BACHILLER**'s Compliance Officer. For this purpose, a 100 euros threshold is established as the maximum limit of mere courtesy.
- III. It may not influence the independence and professionalism of the **BACHILLER** member and/or collaborator.
- IV. It may not have any kind of influence on **BACHILLER**'s activities that gives rise to obligations or commitments to third parties.
- V. It may not provide undue economic benefits to the member and/or collaborator or to **BACHILLER**.
- VI. It may not cause a conflict of interest for any party.

If all of the above circumstances are not met, the gift acceptance is prohibited and, consequently, it must be returned in the same manner in which it was received. If the gift return may offend the person who gave it or if the circumstances in which it was given prevent its return, it may be accepted, notifying the Compliance Officer, who shall decide whether to donate the gift to a charity or, on the contrary, to distribute or raffle it among a group of collaborators and members of the organisation.

The provisions herein apply to suppliers, clients, officers, collaborators and any other natural or legal persons that are linked to **BACHILLER**.

Giving gifts

Similarly, **BACHILLER** members may not give gifts, invitations or payments in kind to persons, companies or clients that go beyond mere courtesy and that jeopardise or is likely to jeopardise the objective assessment of a contract with a supplier or client. In other words, its value may not be excessive or exaggerated because it exceeds thresholds that are considered reasonable, common or ordinary in the usual practice of the sector.

Gifts may be given only for promotional or professional purposes related to the organisation's business activity.

In either case, gifts, presents and courtesies given by **BACHILLER** members and collaborators to third parties may not have an excessive or exaggerated value, i.e., their value must be within reasonable, common or ordinary thresholds according to the usual practices of the sector. For the purposes of this section provisions, a 1,000 euros threshold is established as a maximum limit of mere courtesy

In the event that the gift, present or courtesy value is considered as excessive or exaggerated, the Compliance Officer shall be notified, stating the reasons, and they shall grant the corresponding authorisation, provided that it is socially acceptable according to **BACHILLER**'s business and promotional practices.

In no case may gifts, presents and courtesies be given if considered as concealment or undue consideration to obtain unjustified advantages and/or undue preferential treatment, which benefits a person or entity without there being a service or good in consideration.

Any case that gives rise to doubts must be communicated to the Compliance Officer in order to determine whether or not it is appropriate.

The provisions herein apply to relations with suppliers, clients, officers, collaborators and any other natural or legal persons related to **BACHILLER**.

Article 7.- Conflicts of interest

BACHILLER members and collaborators shall avoid situations that may give rise to a conflict between their personal interests and those of the organisation.

A conflict of interest arises in specific situations in which the personal interest of the member or collaborator directly or indirectly disagrees with the interests of the organisation.

A personal interest consists of a matter that directly concerns them or affects a person related to them.

All members have the obligation to promote **BACHILLER's** interests. It is forbidden to get personal benefits or to benefit third parties from opportunities arising from the organisation's information.

The concerned member or collaborator must immediately inform the Compliance Officer in case of being in a similar situation in order to find an appropriate solution to the issue.

Related parties

For the purposes of this Code of Conduct, the following individuals shall be considered as natural or legal persons related to the executive, member or collaborator:

- a) The spouse or person with a marriage-like relationship.
- b) The ascendants, descendants and siblings of the member or collaborator or of the spouse (or person with a marriage-like relationship).
- c) Spouses (or persons with a marriage-like relationship) of ascendants, descendants and siblings.
- d) Entities in which the member, collaborator or their related persons, either by themselves or through an intermediary, are in any of the situations subject to control according to the law or have maintained these control relationships for two years immediately prior to becoming a member.
- e) Companies or entities in which the member, collaborator or any related person, either by themselves or through an intermediary, holds or has held for two years prior to taking office, an administrative or management position or from which emoluments are or have been received for any reason for two years prior to taking office, provided that, in addition, the executive, member or collaborator has or has had for two years immediately prior to taking office, directly or indirectly, a significant influence on the financial and operating decisions of such companies or entities, as long as these situations have taken place during the two years prior to taking office as an executive.

Rules of conduct in case of a conflict of interest

In the case of potential conflicts of interest, **BACHILLER** members and collaborators shall comply with the following rules of conduct:

- a) Independence: to act, at all times, with professionalism, remaining loyal to **BACHILLER**, independently of their own or third-party interests. Consequently, they shall refrain, in any case, from prioritising their own interests at the expense of those of the organisation.
- b) Refraining: to refrain from intervening or influencing decisions that may affect **BACHILLER** if there is a conflict of interest, from participating in meetings in which such decisions are raised and from accessing confidential information concerning such conflict.
- c) The occurrence or possible occurrence of a conflict of interest must be communicated in writing to the immediate superior, who shall inform the Compliance Officer.

In the communication, the member or collaborator must include the following:

- a) If the conflict of interest affects them personally or through a related person, identifying such person, if applicable.
- b) The situation giving rise to the conflict of interest, detailing, if applicable, the purpose and main conditions of the potential operation or decision.
- c) The measures taken to avoid the conflict and guarantee the safeguarding of the general interest.

These general principles of action shall be particularly followed in those cases in which the conflict of interest is or can reasonably be of such a nature that can constitute a structural and permanent situation, specifically, with regard to the procurement of goods and services and the recruitment and hiring of **BACHILLER's** personnel.

Such matters must be subject, in any case, to the prior deliberation and binding decision of the Compliance Officer.

Article 8.- Corporate image and reputation

A positive image is an intangible value that must be built up. It responds to the behaviour that society and its members build over time with respect to the different stakeholders and the perception derived from this behaviour. This is why **BACHILLER** considers the organisation image as one of the most valuable assets to preserve the trust of its shareholders, clients, employees, suppliers, authorities and society in general.

Members and collaborators who leave the institution or establish a spun-off entity or a new one shall not use factors alluding to **BACHILLER** in their corporate image or name unless they have the express written consent of the organisation. This includes identification as members of the organisation in public profiles and social media.

BACHILLER members, even in a personal capacity, shall avoid the dissemination of comments or rumours that could jeopardise the public image of any company within the organisation in their own profiles on social media, blogs, etc. Likewise, they shall follow, for communication purposes, the rest of the principles

listed in this Code of Conduct, especially in Article 4.4 on Relations with communication media and the use of social media.

- Unless **BACHILLER** appoints a spokesperson or grants express authorisation, members shall refrain from maintaining any relationship with any type of social communication media regarding issues directly or indirectly related to the organisation.
- The confidentiality of the Client-Company relationship shall be preserved, and no data on operations or matters in which the organisation has been involved may be disclosed without the client's prior consent.
- No political, religious or moral stance shall be taken, avoiding opinions on these topics in any situation in which the member and collaborator are identified as the company's spokesperson.
- No information harmful to the company, clients or the interests of the organisation may be published in social media or other media, avoiding negative opinions or participation in discussions in which **BACHILLER** or its interests may be affected. Besides, misleading information may not be disclosed, i.e., information that, in any way, misleads or may mislead recipients.
- Competitors shall not be publicly criticised because of their work and/or activity.

Article 9.- Use of assets

BACHILLER undertakes to provide its members and collaborators with the necessary and adequate resources and means for the development of its business activity.

The members and collaborators undertake to responsibly use resources and means to perform exclusively professional activities in the interest of **BACHILLER**.

Where appropriate, the use of equipment, systems and programmes that the organisation provides to members and collaborators to perform their job, including access and use of the Internet, must comply with the security and efficiency criteria, excluding any use, action or computer function that is illegal or contrary to **BACHILLER**'s rules or instructions.

BACHILLER is the owner of the property and holds the rights of use and exploitation of the equipment, programmes, systems and other works and rights that have been developed, improved and used by its members and collaborators within the framework of their work activity and/or based on the systems, programmes or computer equipment owned by the organisation.

BACHILLER members shall follow the principle of confidentiality with respect to the rights, licenses, programmes, systems and technological know-how whose ownership and exploitation or use rights are

held by the organisation. Any information or disclosure about the organisation's IT systems shall require the prior authorisation of the Compliance Officer.

Members and collaborators may not exploit, reproduce, replicate or transfer the organisation's software and systems for any other purposes than the intended one. Likewise, they shall not install or use, on **BACHILLER's** computer equipment, programmes or applications whose use is illegal or may damage the systems, image or interests of the company or third parties.

Due to the exposure of computer files to hacking, virus infection and other similar risks, **BACHILLER** members are obliged to follow security measures established for this purpose. In this regard, all personnel agree to use their personal access codes exclusively and may not transfer them to third parties for any reason whatsoever.

Article 10.- Access to assets

Computer media, including the email address, that **BACHILLER** provides to its members are work tools owned by the organisation in terms of the installed hardware and software as well as its contents. Therefore, such tools must be intended for strictly professional use according to the work tasks entrusted.

BACHILLER may carry out the controls it deems appropriate on the use of such available means, including access to the contents of any e-mail and file that the collaborator may have on the computer since such contents shall be considered, for all purposes, as part of the organisation's documentation.

Article 11.- Intellectual property protection

BACHILLER is committed to the protection of its own and third parties' intellectual property.

BACHILLER members and collaborators may not use the intellectual property rights of third parties (trademarks, distinctive signs, industrial designs, patents, utility models, copyright, etc.) without proving that they hold the corresponding rights and/or licenses. The organisation personnel shall take the necessary measures to protect third parties' intellectual property, ensuring that processes and decisions in this regard are documented and can be verified and justified.

Members and collaborators respect, at all times, the academic authorship of third parties. With regard to contents, images and programmes downloaded from the Internet, the appropriate license from the holder of the intellectual property rights must be owned, even if such contents, images and programmes have been obtained through search engines such as Google.

All programmes installed in the organisation's computers and mobile devices are licensed for use.

No **BACHILLER** member shall use for private purposes nor transfer to others the content, technologies, trademarks, methodologies, know-how or any type of information belonging to the organisation, even if they have been obtained or developed by such collaborator in their work environment.

In short, **BACHILLER** employees must respect the company's intellectual property rights and may not use or disclose confidential information of **BACHILLER** or its clients when performing their legal and/or contractual obligations.

Article 12.- Occupational health and safety

The health, safety and welfare of **BACHILLER** employees are fundamental to the company success. **BACHILLER** has implemented effective health and safety management practices in its business activity for employees. Besides, it promotes health, welfare and safety at work as an essential part of its activity, and takes preventive measures established in this regard, according to the legislation in force, ensuring that they are strictly met by members and collaborators.

Employee welfare

BACHILLER's work environment ensures the health and safety of its employees. **BACHILLER** has implemented safety procedures and provides adequate personal protective equipment to minimise the risk of accident or injury.

In short, **BACHILLER** ensures that both members and collaborators, as well as contracted third parties, have the necessary means to minimise risks at work. The organisation members and collaborators are responsible for maintaining a tidy and clean environment in the facilities to contribute to safe practices and the elimination of risk conditions at work.

Likewise, it is forbidden to attend the workplace under the influence of any type of toxic, psychotropic or narcotic drug or substance, as well as alcoholic beverages, while performing assigned duties.

The possession or carrying of any kind of weapons or potentially dangerous devices is also prohibited.

Safety training

BACHILLER provides the necessary occupational health and safety training and implements disaster prevention processes. The company provides information on how to identify potential emergency situations as well as health and safety information for handling hazardous materials.

Likewise, **BACHILLER** ensures that health and safety programmes are systematically applied to employees working at facilities.

Incident management

BACHILLER has implemented systems for its employees to report health and safety incidents. Such incidents shall entail corrective action plans to mitigate potential risks. **BACHILLER** provides the necessary medical treatment and facilitates the return to work of its employees.

Permits and operating licenses

BACHILLER complies with all applicable laws and regulations regarding the health and safety of employees. In addition, the company holds all the licenses and permits required to operate.

Article 13.- Environment protection

BACHILLER is aware of the potential impact its operations and products may have on the planet, and is committed to minimising its corporate footprint through several initiatives including the supply chain, reaffirming its commitment to being an environmentally responsible organisation.

BACHILLER complies with all applicable environmental laws, regulations and directives regarding waste, atmospheric emissions, hazardous materials and wastewater discharge, including the manufacture, transportation, storage, disposal and release of such materials into the environment.

It also uses natural resources efficiently and responsibly. In order to carry out all its activities in the most environmentally-friendly manner, minimising or eliminating negative environmental effects, the company is dedicated to developing sustainable practices and activities.

BACHILLER ensures that its products are manufactured and distributed in accordance with applicable laws. The products also meet all applicable quality and safety rules.

In addition, **BACHILLER** implements appropriate environmental management policies with a view to reducing the environmental impact of its operations. As a result, it strives for the efficient management of its own waste as well as for energy savings to preserve the natural environment, continuously improving its organisations' policies and promoting sustainability throughout any value chain.

In this regard, members are required to minimise the organisation's impact on the environment through methods that are socially responsible, scientifically based and/or economically beneficial, promoting the social and environmental sustainability of the company as a way to responsibly create value for all its stakeholders.

Article 14.- Corporate Social Responsibility

BACHILLER undertakes to maintain an ethical and responsible commitment to projects of solidarity, voluntary and constant contribution to the community and the environment. By means of compliance with conduct guidelines included in this code, **BACHILLER** shall act, in all cases, in accordance with the criteria of a responsible company involved in the welfare of society and the community to which it belongs.

Within the framework of the aforementioned actions, **BACHILLER** encourages its members to participate in them, always and, in any case, following the principles and values of this Code, without participating or benefiting political parties, authorities, bodies and Public Administrations in general.

All **BACHILLER's** activities shall be carried out in a sustainable manner, promoting social, economic, environmental and life quality improvement.

In this sense, **BACHILLER** is aware of the potential impact its operations and products may have on the planet, and is committed to minimising its corporate footprint through several initiatives that include its supply chain:

- Complying with all applicable environmental laws, regulations and directives on waste, atmospheric emissions, hazardous materials and wastewater discharge, including the manufacture, transportation, storage, disposal and release of such materials into the environment.
- Using natural resources efficiently and responsibly. In order to minimise or eliminate negative environmental impacts, the company is dedicated to developing sustainable practices and activities.
- Ensuring that its products are manufactured and distributed in accordance with applicable laws. The products also meet all applicable quality and safety rules.
- Implementing appropriate environmental management policies with a view to reducing the environmental impact of its operations. As a result, it continuously improves its own organisations' policies and promotes sustainability throughout any value chain.

Article 15.- Compliance

This Code of Conduct, as well as the set of internal rules governing the organisation, are mandatory for all members of **BACHILLER**, regardless of their hierarchy, seniority or duties.

All **BACHILLER** members and collaborators must follow and apply this Code of Conduct, as well as other internal policies that comply with legal and ethical standards that govern the activity.

Failure to comply with them may jeopardise the professional relationship with the company and shall lead to disciplinary actions established in the Collective Bargaining Agreement governing this activity and in the labour legislation in force. If an audit must be carried out to confirm **BACHILLER's** compliance with the Code, full and prompt cooperation shall be required.

Likewise, third parties related to **BACHILLER** must be aware of and commit to following this Code in their relationship with the Group, which is why their commitment is disseminated and promoted.

Article 16.- Compliance Officer and Whistleblower Channel.

In line with the spirit of this Code, the Board of Directors has appointed a Compliance Officer, whose main function is to supervise, control and prevent irregular and/or criminal behaviours that may give rise to **BACHILLER's** responsibility.

Likewise, members and other collaborators of the organisation have at their disposal a whistleblower channel where, confidentially, anonymously or by identifying themselves, they shall report any irregular

activity that contravenes the principles included in this Code of Conduct, as well as any behaviour contrary to the regulations in force, including criminal risk prevention.

Any type of communication in this regard must be made in writing through the Ethics, Communication and Whistleblower Channel at the following address: <https://www.corporate-ethicline.com/BACHILLER/> or by post to Can Guasch, 3 Polígono Industrial Levante, 08150 Parets del Vallés, guaranteeing at all times the confidentiality of the communication and its sender.

Behaviours that are contrary to the law or the provisions of this Code of Conduct shall result in disciplinary measures as established in the labour legislation in force for collaborators and members of **BACHILLER**. With respect to third-party collaborators, the measures deemed necessary in such case and in accordance with the proportionality criterion that ensures compliance with this Code shall be taken.

Likewise, **BACHILLER** members must notify the initiation, progress and outcome of any legal sanctioning procedure, whether civil, labour, criminal or administrative, in which a collaborator of the organisation is a party under investigation, accused or defendant, provided that the event may affect the performance of their duties or damage their image or interests.

Finally, it should be noted that only irregular or unlawful behaviours or any contravention of this Code shall be reported through the whistleblower channel. Therefore, the following are excluded: reporting human resources issues, claims for defects in work equipment, requests for materials, complaints, opinions, etc., among other similar suggestions.

Article 17.- Prohibition of retaliation.

BACHILLER shall ensure that no member who, in good faith, has reported a breach or infringement through the whistleblower channel is subject to retaliation in any way. Moreover, retaliation of any kind violates this Code of Conduct and shall be immediately reported.

Article 18.- Validity and review

This Code of Conduct has been approved by the Sole Administrator of E. BACHILLER B., S.A. in the Minutes dated 1 October 2021, and shall be reviewed and updated periodically according to potential changes in legislation, as well as when deemed appropriate to make any modification based on the structure and dynamics of the organisation. It may be modified in order to foster a compliance culture within the organisation at all times, fulfilling the principles of transparency, responsibility and prudence with respect to third parties, its own members and business partners.

Any Code modification or review shall be duly notified to the organisation members and collaborators and made available to all persons, entities or administrations related to **BACHILLER**.

Version history

Version	Date	Approved by	Reason for change
V.0	01/10/2021	Sole Administrator of E. BACHILLER B., S.A.	