



BUSINESS ETHICS POLICY

At Industrias Alegre S.A., integrity, business ethics and regulatory compliance are priority aspects. The Business Ethics Policy is the core that identifies the behaviour standard that the Company wants to observe in all its business activity.

■ Legal Compliance

Relationship with public authorities and representatives:

In all its relations with the Spanish authorities and with any third-country public authorities and public representatives, Industrias Alegre will always act respectfully and in accordance with what is established by the applicable legality to promote and defend its legitimate business interests.

Compliance:

Industrias Alegre has started an implementation plan of a Corporate Compliance System as a measure to minimize the risks arising from article 31a of the Penal Code and any legislation within the international framework. Subsequently, there is a plan to develop the model according to UNE 19601:2017.

Financial Responsibility:

Industrias Alegre acts in accordance with generally accepted accounting practices, ensuring the veracity of accounting records correctly and truthfully.

Fight against Corruption, Extortion and Bribery:

Industrias Alegre rejects all forms of corruption by applying a zero tolerance criterion on the use of unethical or contrary to law practices, performed to obtain some benefit or competitive advantage. There is awareness of the high risk associated with potential criminal behaviours, both to gain advantages with customers and those received by suppliers to opt for a business with the Company. In both cases, Industrias Alegre prohibits both bribery practices in the countries in which it operates.

Fight against money laundering:

Industrias Alegre is especially committed to the pursuit of money laundering and the criminal prohibition of the financing of terrorism.



Fair Competition and Antitrust:

Industrias Alegre competes by conducting commercial operations in full compliance with the antitrust and fair competition laws governing the jurisdictions in which such business operations operate.

Operations in the international markets

Import, export and economic sanctions:

In all import, export and re-export operations of any type of goods or services, including information, Industrias Alegre always acts in accordance with the applicable legislation of the affected countries including the control of economic sanctions.

Anti-corruption legislation:

When acting in international markets, Industrias Alegre is committed to always respecting anti-corruption legislation.

Respect for free competition and antitrust:

Industrias Alegre is firmly committed to free competition and antitrust as well as fair market behaviour.

- **Ethics and business practices**

Responsible procurement of materials:

Industrias Alegre S.A. is committed to responsible mining and believes that mining activities that fuel conflict are unacceptable. Industrias Alegre's efforts related to mining conflicts align with the work of the Electronic Industry Citizenship Coalition[®] (EICC[®]) and the Global e-Sustainability Initiative (GeSI). The EICC and GeSI feature includes the Conflict-Free Smelter Program. Industrias Alegre ensures throughout its supply chain that its suppliers do not use refineries from mining conflicts according to <http://www.responsiblemineralsinitiative.org>

Rejection of arbitrariness:

Industrias Alegre does not act arbitrarily or in any case by putting the interest of own or third parties, either to favour it or to harm it, making a decision other than that objectively suitable to the interests of Industrias Alegre.



Conflict of interest:

Industrias Alegre makes business decisions based on a solid business judgment, without the favouritism resulting from personal relationships and opinions.

Business Records:

Industrias Alegre records and communicates in an honest and accurate manner all commercial information complying with all applicable laws regarding its completeness and accuracy. Create, maintain and delete business records with full respect for all applicable legal and regulatory requirements.

Product Counterfeit:

Industrias Alegre develops, implements and maintains appropriate methods and processes to minimize the risk of introducing counterfeit parts and materials into its finished products. In turn, it has effective processes to detect fake products in its supply. It also confirms that sales to all customers comply with local legislation, ensuring the legal use of their products sold.

Prohibition of retaliation:

Industrias Alegre guarantees that retaliation will never be taken and will maintain confidentiality against anyone who in good faith informs the company of a possible violation of its code of conduct, collaborates in its investigation or helps to resolve it. This guarantee does not extend to those who act in bad faith in order to disseminate false information or harm people. Against these unlawful conducts, Industrias Alegre will take any legal or disciplinary action as appropriate.

Ethical Control:

To ensure compliance with the business ethics policy, Industrias Alegre provides its employees, suppliers and customers with an exclusive reporting channel by email, telephone and mail for any queries or complaints that may arise, which will guarantee the complete anonymity of the senders.

Discrimination:

Industrias Alegre will respect cultural differences, providing equal treatment and opportunities without discrimination based on race, nationality, sex, religion, age, disability, sexual orientation, marital status, political affiliation or union.

Respect for the environment:

In Industrias Alegre We are committed to carry out the activities and services performed by the company guaranteeing the protection of the environment throughout the life cycle of the



product, applying principles of prevention and minimization to all environmental aspects, with special relevance to waste and the consumption of resources, protecting the health and the environment. Likewise, we are committed to adequately informing our workers, customers, suppliers, partners and collaborators about the company's environmental activities, so that a transparent and sustainable environmental management is developed. As well as demanding from the entire supply chain the environmental improvement of its processes.

Child labour:

Industrias Alegre does not employ people below the legally established minimum age to work. In Industrias Alegre, we comply with the current legislation to carry out employment contracts, ensuring that they are prepared taking into account legal regulations and specific requirements in this matter in all countries where we have a presence and with all the people who collaborate with our organization.

Human Rights:

Industrias Alegre respects the human rights of all natural persons. In addition, it maintains a special interest in the control and monitoring of compliance with human rights in its relationship with the Company's staff, with special attention to those linked to business activity such:

- The right of association (freedom of association and the right to collective negotiation)
- The rights of children and youth (suppression of child exploitation and forced labour)
- Women Rights
- The right to equitable and satisfactory employment conditions, including responsible recruitment, considering wages, benefits, working hours, and complying with the applicable legal legislation and against any kind of modern slavery.

Compliance with training:

Industrias Alegre establishes training measures for its managers and employees in order to understand and comply with the content of all policies, codes of conduct, laws, applicable regulations and generally recognized standards. It has a process and a management system to communicate obligations, train all employees and agents working on company matters.

■ Use and protection of information

Protection of reserved and confidential information:

Industrias Alegre has access in its business to information from customers and suppliers that is provided under the contractual commitment of confidentiality. The company undertakes not to disclose and to protect this confidential information. Like all companies, in the course of its operations, Industrias Alegre generates reserved or confidential, technical or commercial information, which is valuable to the company or whose disclosure could harm its interests, those of its customers and suppliers, or its operations in the market. Industrias Alegre



undertakes to regulate in a clear and reasonable way the identification, handling and protection of your reserved, confidential or secret information.

Protection of personal data:

The laws of many countries protect the most sensitive information for individuals, especially natural persons, preventing it from being disclosed or managed through unsecured computer systems. Industrias Alegre takes special care in implement processes and responsibilities protecting the personal data of the people to which it has access in the course of its business, always complying with the applicable legislation.


Disclosure of Information:

Industrias Alegre publishes financial and non-financial information in accordance with applicable regulations and use practices in the industry and, discloses information regarding its workforce, health and safety practices, environmental practices, business activities, financial situation and performance where appropriate.

Intellectual Property:

Industrias Alegre respects intellectual property rights, protects confidential information and complies with privacy rules and regulations.

CEO Industrias Alegre S.A.



Enrique Careaga Sánchez