

CODE OF ETHICS AND BUSINESS CONDUCT

Scope

In Industrias Alegre, integrity, ethics and legal compliance are priority aspects. The Code of Ethics and Business Conduct is the core that identifies the standard of conduct that the Company wants to observe in all its business activity.

Our Code of Conduct defines the basic principles of business ethics, behaviour and corporate values that we must follow in our day-to-day life in our professional relationships, constituting the basic pillars of the way we work. It involves the articulation of a set of principles and values in business behaviour, as well as in the conduct of the Company's managers and employees.

With this document, Industrias Alegre makes public its commitment to:

- The guidelines of the Universal Declaration of Human Rights
- The Guiding Principles of Enterprise and HRD
- Children's Rights and Business Principles
- The United Nations Global Compact
- The guidelines and principles of the International Labour Organization (ILO)
- The Organization for Economic Cooperation and Development (OECD)

The Code has been defined by the Management and endorsed by the Board of Directors and implies a commitment at the highest level.

Applicability

The Code applies to all workers linked to Industrias Alegre, regardless of the contractual model that determines their relationship with the Company, the position that they hold in the organization or territory in which they perform their work, who must promote the Code dissemination and respect.

Industrias Alegre extends its commitment to all the stakeholders that relate to the Company's various companies, including agents, contractors, independent consultants, customers, suppliers and other business partners.

Compliance with the Code of Ethics and Business Conduct is a necessary condition to be part of the Industrias Alegre team, so those who will be part of the Company must read it carefully and adhere to it by signing the acceptance document.

We are always at your disposal to answer any questions about specific compliance issues or about what constitutes ethical and legal conduct.

Those who violate the Code or the Company's policies and procedures will be subject to disciplinary action in proportion to the transgression, which will be sanctioned with the rigour permitted by applicable law. Disciplinary actions will also apply to any person who orders or approves violations or becomes aware of them and does not act immediately to remedy them.

Term and availability

The Code of Ethics and Conduct comes into force from the same day in which it is made public. It is available to all persons who provide their services in the organization and is available as well on the Company's intranet.

Principles/Values of Business Conduct

The principles/values of the business conduct to which Industrias Alegre is committed to, are inspired in the following:

- Compliance and respect for the legislation
- Integrity and objectivity in the business operations
- Respect for the people
- Protection of health and physical integrity
- Correct performance in the international markets
- Use and protection of the information
- Efficient management
- Quality Protection of the environment

Each of these principles translates into a set of rules of conduct. The following explains the most important content of these rules of conduct, which in most cases are deployed into more specific rules through internal Company policies or clauses in contracts.

▪ Compliance and respect for legislation

The first commitment to business conduct of Industrias Alegre is to comply always with the legality and legislation applicable in all the countries in which it operates.

Special emphasis is made on the commitment to pursue its violations and to collaborate with the Justice in the face of possible violations of the law from which it may derive direct criminal liability for the Company in accordance with the provisions of the Spanish Penal Code in force, or with any other provision in this regard that, in the future, could replace and / or supplement it, as well as with any other applicable criminal rule.

Relationship with public authorities and representatives

In all its relations with the Spanish authorities, public representatives and third countries, Industrias Alegre will always act in a respectful manner and in accordance with the applicable legality to promote and defend its legitimate business interests. We will always cooperate with the authorities and public representatives when they exercise their legal functions.

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.

Therefore, we will stick to the rules that such process establishes for the Company.

CODE OF ETHICS AND BUSINESS CONDUCT

Financial Responsibility

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

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.

Money Laundering

Industrias Alegre is especially committed to the prosecution of money laundering and the criminal prohibition of the financing of terrorism. We will have to refrain from promoting, facilitating, participating in or covering any type of money laundering operation, and we will proceed in any case to report any money laundering operation that is known.

International Trade

In the development of its international business, Industrias Alegre will be guided by the recommendations and guidelines issued by the Organization for Economic Cooperation and Development. In that case, as a pre-export step, we will need to know the trading partners with which we will deal and we will have to take care of obtaining all the necessary licenses, as well as information about the final destination of our products.

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, therefore, we will have to act in accordance with the provisions of the applicable legislation in each case. Likewise, we will respect any international export control treaty to countries under embargo conditions.

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 competes by conducting commercial operations in full compliance with the antitrust and fair competition laws governing the jurisdictions in which such business operations operate. Consequently, as long as Industrias Alegre competes with one or more competitors to develop a business operation, we will refrain from performing any practice contrary to free competition to favour the interests of Industrias Alegre. As measures that ensure free competition we will pursue the following practices:

- Sales refusal
- Collusion
- Abuse of dominant position
- Concentration Operations
-

Integrity and objectivity in business action

The integrity and objectivity of business action implies that the action of all of us must always seek a single objective within certain limits. The objective is to ensure that, solely and exclusively in the interest of Industrias Alegre, the most convenient alternative to the interests of the Company is always sought from all possible (the objective) that

CODE OF ETHICS AND BUSINESS CONDUCT

are permitted by the applicable legality, by this Code of Conduct, by the internal regulations of Industrias Alegre and by the applicable collective contracts or agreements (the limits).

Responsible procurement of materials

Industrias Alegre requires its foundry suppliers a due diligence procedure to ensure compliance with the Conflict-Free Foundries Program protocol developed by EICCGeSI. Understood by "Conflict Minerals" the columbita-tantalite, casiteite, wolframite and gold ore, whose refining transforms them into tantalum, tin, tungsten and gold, respectively, or other minerals or compounds that are included in the future by the relevant authorities. Therefore, in the procurement process we will not use suppliers that do not adhere to compliance with the protocol, as well as the corresponding due diligence procedure.

Rejection of arbitrariness

In Industrias Alegre we will not act arbitrarily or putting the interest of own or third parties, either to favour or to harm, by making a decision other than that objectively appropriate to the interests of Industrias Alegre.

Conflict of Interest

Industrias Alegre makes business decisions based on a solid commercial judgment, without the favouritism resulting from personal relationships and opinions. There is a conflict of interest when one of us must make a decision that affects both the interests of Industrias Alegre and our own interests and related persons. Persons linked to the employee for the purposes of this Code are parents, siblings, minor children, spouses or persons with equivalent affective relationship, representatives, agents, agents or controlled companies.

For example, it would be a conflict of interest:

- Decide or recommend the award of an Industrias Alegre contract to a Company in which a relative of the person in charge of making the decision worked.
- Making a business decision that can directly benefit a person linked to the person in charge of deciding, either because you are one of those who make money from the decision or because the Company you work in is the one that will make the profit.

When we find ourselves in a conflict of interest situation, we must bring it to the attention of our hierarchical superior and the Compliance Body and refrain from making any decision on the matter in which there is conflict. If your superiors authorize the action or operation in question, once the possible conflict of interest has been studied, then we may make the decision that is objectively more appropriate to the interests of Industrias Alegre

In this situation, when we are allowed to make the decision in which the conflict exists, our superiors will take into account not only the integrity and objectivity of the person to decide, but also whether the image of objectivity of the Company may be affected against third parties.

When we find ourselves in a conflict of interest situation, belonging to the group of people collectively responsible for making the decision (such as committees or working groups) we will bring it to the attention of other decision-makers when it is collective and we will refrain from participating in any vote.

Any transaction linked between the Company and the employee or persons linked to it, must be expressly authorized by the corresponding hierarchical superior and shall inform the Compliance Body. Any transaction or contract in which the employee or linked person has any direct or indirect interest is considered a linked transaction.

Gifts, entertainment and donations

In relations with third parties, institutions and companies, we will never make gifts or invitations whose economic value exceeds what may be considered reasonable and moderate attended to the circumstances of the matter and the country concerned.

CODE OF ETHICS AND BUSINESS CONDUCT

In line with the foregoing, in relations with third parties and companies, we will reject any gift or invitation whose economic value exceeds what may be considered reasonable and moderate in the circumstances of the case and the country concerned. The rejection will always be done politely, explaining that it obeys what is established by the Code of Conduct of Industrias Alegre

In exceptional cases where, in accordance with the business practices of a foreign country, it is necessary to accept gifts that exceed the value that in Spain is considered moderate or reasonable, the gift will always be accepted on behalf of the Company, which will be its sole owner. In such cases, the employee shall inform his or her hierarchical superior.

Any donation or liberality of the Company must be authorized by the Board of Directors or, by delegation thereof, by the Compliance body, must be duly accounted for and may not be used as a means of covering up an improper payment or bribery.

Business Records

We must record and communicate all business information honestly and accurately, and comply with all applicable laws regarding its completeness and accuracy. We must create, maintain and delete business records with full respect for all applicable legal and regulatory requirements.

Image and communication

We must be sincere, direct and truthful in communications, including those with government officials and representatives of regulatory agencies. We should not:

- Falsify any information, both financial and otherwise (e.g. security, environment or qualitative results of any kind).
- Deliberately enter false or misleading data in any report, record, file or expenses claim.
- Carry out any activity that could damage the image and reputation of the Company and maintain any kind of relationship with the media, which will be channelled exclusively through the organs and persons assigned to such functions in the Company.

Relationships with partners and collaborators

In relationships with partners, agents, collaborators and third parties, as well as in the negotiations and operations of restructuring or acquisition of companies, alliances with third parties or corporate participation, we will ensure that such persons or entities comply with standards of conduct and business and professional ethics aligned and consistent with those contained in this Code of Conduct.

Fulfilment of contracts

Whenever Industrias Alegre enters into a contract, it does so with the will and the commitment that the contract enters into force, as well as to fulfil everything agreed. The performance of the Company's contracts shall not be unreasonably prevented or impeded.

Supplier Relations

We must ensure that supplier selection processes will be conducted with impartiality, objectivity and transparency.

Honest negotiation

When we negotiate on behalf of or in the interest of Industrias Alegre, we will always do so by refraining from dishonest or unfair practices.

CODE OF ETHICS AND BUSINESS CONDUCT

▪ Respect for people

Respect for individuals is a fundamental principle and value in Industrias Alegre

Respectful treatment

We will always treat all natural persons with which we relate, whether employees or not, whether aware of the Code of Conduct or not, with due respect. Disrespectful verbal or written performances or manifestations shall not be permitted against any person or group of persons, whether or not present.

Violence and aggressive behaviours

Industrias Alegre categorically prohibits any type of violent behaviour and aggressive behaviour, including aggression, the threat of physical aggression or verbal violence.

Diversity, equality and non-discrimination

Industrias Alegre guarantees all its employees equal and non-discriminatory treatment regardless of race, colour, religion, sex and sexual orientation, nationality, age, pregnancy situation, degree of disability and other legally protected circumstances. Industrias Alegre has a firm commitment to its equality policies and all of us, we must act accordingly, knowing and promoting such policies.

Harassment

Industrias Alegre prohibits and prosecutes harassment behaviours in the workplace, including sexual harassment.

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.

Respect for human rights

Our Code of Conduct has a general commitment to respecting the human rights of all natural persons. Also, 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 as 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) or the right to equitable and satisfactory employment conditions.

▪ Protecting health and physical integrity

Risk Prevention

Industrias Alegre gives the utmost importance to the protection of the physical integrity and health of people and to the prevention of any type of risk to them in the workplace. We must comply at all times with the laws that apply in each country in which you operate and we will firmly follow the comprehensive policy of prevention of occupational risks appropriate to the activity of each workplace. Industrias Alegre maintains a clear commitment to inform its workers of business rules and procedures regarding the prevention of occupational risks.

Drugs and Non-permitted substances

Industrias Alegre is committed to a drug-free working environment and the influence of other non-permitted substances that can alter people's behaviour. All of us, while we are in the facilities of Industrias Alegre or do our work outside of them, will refrain from using prohibited drugs or substances, as well as from abusing the consumption of alcohol or any other substance permitted or not by the applicable legality that may affect our conduct.

CODE OF ETHICS AND BUSINESS CONDUCT

Security

We must adhere to security standards. It is strictly forbidden the use of weapons of any kind on the Company's premises, extortion, cyberattacks, phishing, kidnappings, threats... Etc.

▪ Use and protection of information

Protection of sensitive information

Generally, we will not be able to use the information we know because of our relationships with Industrias Alegre to gain a personal advantage, nor will they provide it in any case to third parties.

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 protect this confidential information. This commitment must be made and fulfilled by all of us.

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, so we must know and comply with such regulation.

Protection of personal data

The laws of many countries protect the most sensitive information for individuals, especially for natural persons, preventing it from being disclosed or managed through unsecured computer systems. Industrias Alegre takes special care in protecting the personal data of the people to which it has access in the course of its business, always complying with the applicable law. All of us, responsible for the handling or archiving of legally protected personal data, are obliged to know the applicable legislation and to ensure its proper application and compliance.

Intellectual and industrial property

We must promptly communicate to the management of the Company any invention, possible patent or trademark. We will need to identify confidential information properly, to protect intellectual property by sharing only with authorized parties. We must respect property rights, as well as prevent counterfeiting and piracy.

▪ Efficient Management

Margin

The purpose of Industrias Alegre's business action is to obtain margin in its business operations, which must be carried out with respect to the principles contained in this Code of Conduct, so we will have to try to obtain the margin within the permitted limits.

Proper management of resources

To facilitate the obtaining of the business margin, we must strive to manage the Company's resources in the way that is most efficient, avoiding all kinds of superfluous expenses.

Use and protection of the Company's resources and assets

Except for cases where Company laws or rules authorize the use of the Company's means for personal purpose, we will refrain from using any of the Company's means for own use.

The Company owns the ownership and rights of use and exploitation of software and systems, equipment, telephones, computers, storage devices, e-mail and internet access systems or internal and external databases, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected or used by its

CODE OF ETHICS AND BUSINESS CONDUCT

employees. In any case, the use of the Company's assets, resources and means must comply with the security and protection protocols established by the Company.

■ Environmental protection

Environmental protection governs the business performance of Industrias Alegre, which always acts in accordance with the provisions of the laws and other rules on environmental protection.

Industrias Alegre has an Environmental Policy and an Environmental Management System. We will ask our service suppliers as well as our goods suppliers to have an adequate system of environmental management rules and procedures, appropriate to the legality in force in each case, to identify and minimize the various environmental risks. Especially in the case of waste disposal, handling of hazardous materials and prevention of spills and leaks, as well as the reduction of energy consumption and greenhouse gas emissions, water consumption and responsible chemical management.

We must ensure compliance to it and to bring to the attention of our superiors or environmental managers all risks and violations of such procedures that we are aware of.

Control of Criminal Responsibility

The Board of Directors of Industrias Alegre reiterates its strong opposition to any practice that may pose a risk of constituting criminal or violations of the Code of Conduct, both in Spain and in any country in which the Company operates.

The internal control of Criminal Responsibility is a priority objective for Industrias Alegre, committed to the task of preventing, detecting and excluding any unlawful action carried out in the field of its responsibilities, on behalf of or on its own and to its advantage, by any of its legal representatives, administrators of fact or law, managers, employees, agents and collaborators.

In any case, we will refrain from acts and omissions that risk incurring any of the criminal types that may affect Industrias Alegre

Where we detect conduct that incurs a breach of criminal law, any other mandatory legal rule, this Code of Conduct or other internal rules of supervision and control of Industrias Alegre, we must bring it to the attention of the Compliance body through the Ethical Channel or by any other means valid for this purpose.

Any such person who, in the normal exercise of the management, control or audit functions, detects or is aware of allegedly unlawful conduct shall communicate it to the Compliance body through any of the means indicated.

No employee shall be required to comply with orders or instructions contrary to the law or this Code of Conduct. If such a situation occurs, the employee shall contact the Compliance Body by any of the means indicated.

CODE OF ETHICS AND BUSINESS CONDUCT

Dissemination and implementation of the code of conduct

Training

Industrias Alegre training will carry out the necessary training actions so that all its employees have sufficient knowledge of this Code of Conduct and its content. Training will include criteria and guidance to resolve doubts according to the experience gained.

Along with general training, Industrias Alegre will give specialized training to those groups of its managers or workers who, due to the tasks they perform, must have a more precise and detailed knowledge of the rules of conduct applicable to their area of activity.

Support and advice

We have at our disposal the following channels to transfer our doubts about the Code of Conduct in our respective field:

- Our hierarchical superiors.
- The Human Resources department.

Verification and Control

Verification and internal controls: The Regulatory Compliance Body of Industrias Alegre will establish an appropriate monitoring and control system that verifies compliance with the Code of Conduct without waiting for the complaints to be received.

In addition to the bodies responsible for ordinary management, the Human Resources Manager will carry out the monitoring and control of compliance with the Code of Conduct, and will report this directly to the Compliance Officer.

Ethical Channel

Whenever we want or need to inform the Company of a possible violation of criminal law or the Code of Conduct, we may contact the Human Resources Manager and/or the Compliance Officer directly, through the Ethical Channel, by email, telephone or regular mail:

HR Manager:

Llanos Micó Sanchez

llanos-mico@ialegre.com

+34 96 122 02 10

Ethical Channel:

Responsible for Regulatory Compliance

ialegre-ethics@ialegre.com

Independence and confidentiality

Industrias Alegre guarantees, to the person who files their complaint or denunciation in the manner indicated in the previous section, the confidentiality of their identity, except when it has to be identified with the authorities in accordance with the provisions of the law. Industrias Alegre also guarantees that it will carry out the investigation of the reported or reported facts.

CODE OF ETHICS AND BUSINESS CONDUCT

Prohibition of retaliation

Industrias Alegre guarantees that no retaliation will ever be taken against anyone who, in good faith, informs the Company of a possible violation of the 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. Industrias Alegre will take appropriate legal or disciplinary action against any unlawful conduct,

Investigation of possible violations

The Human Resources Manager and/or the Compliance Officer will analyse the reported or reported facts and may request information from other bodies of the Company who will always be obliged to provide it, if there is no legal prohibition for it. The provisions of the Protocol of Action to Breaches of the Industrias Alegre's Code of Conduct and the Industrias Alegre Complaint Procedure, shall apply to this effect except where the applicable law provide that it must be otherwise appropriate. When the investigation progresses, the Human Resources Manager and/or the Compliance Officer shall bring the facts to the attention of the persons concerned so that they can provide additional information and, where appropriate, to plead or justify the reasons for its action.

Reaction to breach of the Code of Conduct

Industrias Alegre will proceed to inform the competent authorities when it is legally required because it is established that there is a violation of the Code of Conduct that is pursued by law,

If the violation of the Code of Conduct legitimizes the Company to take disciplinary action against its officers, employees or workers, including dismissal, the Company will initiate appropriate procedures to bring them into effect.

Finally, if the violation has been carried out by the representatives, manager, agents and mediators of Industrias Alegre, the Company will act in accordance with what establishes their respective contracts and in any case, in accordance with the principles of this Code of Conduct with the possible consequence of the relationship termination.