CODE OF ETHICS **CONTENUR**

2024

CONTENUR

Index

01. Purpose and scope of application 3

02. Basic principles 3

2.1. Respect for human rights 3

2.2. Legality and integrity 3

2.3. Commitment to the environment and the Sustainable Development Goals (SDGs) 3

03. Responsibilities 3

04. Behaviour 4

4.1. Respectful treatment, discrimination and equal opportunities 4

4.2. Abolition of child labour 4

4.3. Confidential information and data protection 4

4.4. Relationship with public administrations, customers and suppliers 4

4.5. Bribery and anti-corruption 5

4.6. Laws against money laundering 5

4.7. Fair competition 5

4.8. Protection of business assets 5

4.9. Conflict of interest and hiring of family members 5

4.10. Occupational health and safety 5

4.11. The environment 5

05. Code of conduct 6

06. Change control 7



01.

PURPOSE AND SCOPE OF APPLICATION

This Code is intended to serve as a guide for responsible action by all employees and managers belonging to the **CONTENUR** Group, focusing on sustainability, legality, respect for human rights, ethics and integrity.

Any internal laws, practices or procedures that are stricter than those set forth herein will take precedence.

CONTENUR shall ensure that the principles established in this Code are observed in all companies and/or subsidiaries of the Group.

This Code will enter into force on the day following its publication.



02.

BASIC PRINCIPLES

2.1. | Respect for human rights

All activities of **CONTENUR** and its employees shall fully respect the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights.

2.2. | Legality and integrity

All activities shall be performed in strict compliance with current legislation, based on the values of loyalty, honesty, respect and trustworthiness.

2.3. | Commitment to the environment and the Sustainable Development Goals (SDGs)

All programmes and actions of employees, customers, supply chain, shareholders and other interest groups shall be performed under the firmest commitment to the environment.

03.

RESPONSIBILITIES

All employees must adhere to the principles contained in this Code and ensure that other individuals, including contractors, suppliers, consultants and other business partners do so as well.

All employees who are aware or have a reasonable suspicion of a breach of this Code of Ethics (Section 4.) must notify their superiors or report it through the ethical channel. Neither **CONTENUR**, nor any of its administrators, directors or employees, shall take retaliation against the person who has filed a complaint in good faith under any circumstances.

All managers must ensure that their collaborators are aware of and respect the behaviours set out in this Code.

Failure to comply with the behaviours included in section 4 of this Code may constitute a labour violation and be subject to appropriate sanctions, regardless of other responsibilities that the employee may have incurred.

A Compliance Committee will meet when necessary, composed of the General Director, the HR Director and the Compliance Manager to resolve incidents or doubts regarding the interpretation of this Code and propose improvement measures.

04.
BEHAVIOURS

4.1. | Respectful treatment, discrimination and equal opportunities

A work environment must remain free of all discrimination and any conduct that involves personal harassment. Every worker must be treated fairly and with respect by their managers, collaborators and colleagues. Any abusive, hostile or offensive conduct, whether verbal or physical, will not be tolerated.

All employees will enjoy equal opportunities for the development of their professional career regardless of their age, sex, marital status, race, nationality and beliefs.



4.2. | Abolition of child labour

CONTENUR does not allow, nor will it resort to child labour, nor will it incorporate any product or service related to the same into its activity, requiring strict observance of this principle from all its employees and suppliers.

4.3. | Confidential information and data protection

We seek to safeguard the confidentiality of the information, maintain its integrity, as well as guarantee its availability when any user requires through our information security policy.

All **CONTENUR** employees must maintain the strictest level of confidentiality for the information to which they have access, making them individually responsible for how they use it. **CONTENUR**'s collaborators undertake to use the media, computer systems and any other means that **CONTENUR** provides them with in a responsible manner in accordance with the established policies and criteria.

Revealing, disseminating or using reserved and confidential information for uses outside the organisation and in cases in which there is no prior authorisation constitutes a lack of lack of loyalty towards **CONTENUR**.

4.4. | Relationship with public administrations, customers and suppliers

CONTENUR is committed to maintaining open and honest communication with its partners. Employees who interact with third parties on behalf of **CONTENUR** must ensure that all communications, both direct and through intermediaries, are accurate and comply with legislation.

See **policy on relations with public officials and third-party diligence policy.**

4.5. | Bribery and anti-corruption

CONTENUR requires compliance with all applicable laws prohibiting bribery. All employees must refrain from engaging in any activity that could bring **CONTENUR** into disrepute in the market, such as offering personal or financial favours with the aim of obtaining business or an advantage in the market.

See **anti-corruption policy.**

4.6. | Laws against money laundering

Employees must comply with all anti-money laundering laws, conduct business only with reputable partners, and receive funds only from legitimate sources. Reasonable measures must be taken to detect and prevent unacceptable or suspicious forms of payment and inform those responsible or report it through established channels.

4.7. | Fair competition

CONTENUR prohibits any action that involves the exercise of illegal practices of unfair competition.

4.8. | Protection of business assets

All employees shall always seek the greatest level of protection of all assets and rights that constitute the assets of the **CONTENUR** Group within their scope of action and their obligations and are responsible for protecting the assets entrusted to them and preserving them from any loss, damage, theft or illegal or dishonest use.

4.9. | Conflict of interest and hiring of family members

All employees must avoid situations that may involve a conflict between their personal interests and those of **CONTENUR** and refrain from representing, intervening or influencing decision-making whenever they or any third party linked to them by any economic relationship, personal or professional have a personal interest either directly or indirectly.

Employees who find themselves in a conflict situation are obliged to notify the Compliance Manager.

Any employee who is interested in hiring a family member, whether a spouse, partner, descendants or ascendants and other relatives up to a 3rd degree by blood or through marriage, must follow the procedure established for this purpose, which establishes the guidelines for their authorisation.

See **policy on conflict of interest and procedure for hiring family members.**

4.10. | Occupational health and safety

CONTENUR shall provide its employees with a safe environment, keeping occupational risk prevention measures up to date, demanding strict compliance with the regulations applicable in this matter in all workplaces.

All employees are responsible for observing strict compliance with health and safety regulations in order to protect themselves and other employees or third parties.

4.10. | The environment and SDGs

Our principles are governed by sustainable development, environmental protection and reduction of the negative impact of our factories and branches on the environment, where compliance with our environmental policies is the duty of all employees.



CONTENUR

05.

GUIDE OF CONDUCT

RELIABILITY

"We are a company with a clear and homogeneous line of action".

- We meet all the obligations inherent to our position, without evading any responsibilities.
- We are committed to performing our tasks.
- We meet our commitments/ promises in a timely manner. If we cannot meet any of them, we firstly notify the internal/external customer.
- We strive to do the job right and the first time.

PEOPLE

"We encourage the development of our professionals".

- We clearly define the role and objectives of each person.
- We provide honest and frequent feedback.
- We are aware of the areas for improvement of our collaborators, and we propose technical and skills training.
- We prioritise internal promotion.

INNOVATION

"New approaches to respond to our customers' needs".

- We encourage the proposal of new ideas to improve the solutions provided to the customer and internal processes.
- We clearly understand the needs of our customer (internal or external).
- We seek to provide solutions that surpass the expectations of our internal or external customers.

COMMITMENT TO GROWTH

"We strengthen leadership in our key markets".

- We work to be the leading company for customers in our key markets.
- We support the achievement of new business opportunities.

SPIRIT OF SERVICE

"The customer is at the core of our actions".

- We offer and transmit vocation and a willingness to serve.
- We work collaboratively to meet our external and internal commitments in a timely manner.

ENVIRONMENTAL COMMITMENT

"We promote the improvement of the environment".

- All our actions are conditioned to generate a positive impact on the environment.
- We define, review and implement our environmental master plan annually.

CONTINUOUS IMPROVEMENT

"We constantly improve the efficiency of our activities".

- We actively promote continuous improvement in all our products/services and processes.
- We look for a way to perform tasks more effectively, requesting the necessary training for this and avoiding a "it has always been done this way" attitude.
- We share the improvements achieved within the organisation.

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06.

CHANGE CONTROL

REVISION	DATE	AFFECTED POINTS	REASON FOR AMENDMENT
0	03/06/2024	All	Initial draft

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