



Ethical code



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1. Introduction

This Ethical Code constitutes an explicit declaration of the values, principles, and standards that should guide the conduct of the professionals who are part of the companies within the AVINENT GROUP (hereinafter referred to as the Group) as well as its stakeholders. Therefore, the Ethical Code encompasses a set of rules inspired by the Group's own corporate culture and is the highest level standard in the organization, representing the utmost commitment to compliance with the laws and regulations that structure our activity; consequently, non-compliance with the code will constitute an infraction, which in turn may be subject to sanction. In essence, the real and effective application of this code aims to eliminate any behavior contrary to the organization's values, principles, and standards, providing all its recipients with knowledge of the conduct standards they must observe or respect as applicable.

2. Scope of Application

This Ethical Code applies to the entire Group and is mandatory for the administrative bodies, managerial positions, control bodies, and all personnel, meaning it applies to all levels of the Group regardless of hierarchical level and functions within it. It must also be accepted by any person who becomes part of the Group's organizational structure. Since the Group operates internationally, this Ethical Code applies to all activities the Group carries out in any geographical area.

Regarding third parties, the Ethical Code will be applicable, to the extent possible, to clients, suppliers, distributors, franchisees, and agents of the Group, as well as any other individual or legal entity that uses the AVINENT brand. If this is not possible in cases of contracting, the same will be conditioned to companies that have similar policies, and, if necessary, ethical clauses will be contractually imposed, as well as preventive measures and control systems aimed at preventing behaviors contrary to the values, principles, and standards contained in this Ethical Code.

3. Legality and responsibility

The activity carried out will always be under compliance with the current applicable legality. All individuals subject to this code must be aware of the obligation and commitment to enforce the internal rules of the organization that affect each one's work, not being able to participate in any acts that could compromise respect for the principle of legality. Likewise, the terms contained in this Ethical Code will be mandatory for all individuals to whom they may apply in the regular exercise of their functions. In this regard, if anyone observes or becomes aware of the violation of any of these rules, they must immediately inform the competent person designated by the company, through the mechanisms adopted for this purpose (Ethical Channel). This person is Gabriel Palomar Navarro, responsible for Administration.

4. Internal commitment

RIGHT TO EQUALITY

Mutual respect and equality are the principles on which work relationships in the Group are based. The Group promotes and defends, among all personnel, the principle of equal treatment and opportunities for professionals, regardless of their ideology, religion or beliefs, ethnicity, race or nation, gender, sexual orientation, family situation, illness or disability, holding of legal or union representation, etc. This promotion is part of the guiding principle of HR policies and is applied in all areas of the organization.

RIGHT TO SAFETY AND HEALTH AT WORK

For the Group, the continuous improvement of working conditions and safety in all facilities, as well as the safety of its employees and external collaborators in the facilities of clients, suppliers, business partners, or third parties, is a priority. Therefore, the adoption of workplace safety and health policies is actively promoted, and preventive measures are implemented, providing a work environment respectful of the health and dignity of employees.

The Group will promote the application of its health and safety standards and policies to all suppliers and external collaborators with whom it operates, favoring the integration of occupational risk prevention within the coordination of business activities.

All Group personnel, as well as its collaborators, must be aware of and comply with health and safety protection regulations in the workplace, and ensure their own safety and that of all individuals who may be affected by the development of their activities. Consequently, they will also actively strive to create and maintain a safe work environment, strictly respecting current legislation.

Any level of the organization must comply with the safety conditions required by occupational risk prevention regulations. It is explicitly prohibited to:

- » Disregard safety measures.
- » Not participate in training.
- » Remove or neutralize any safety or ergonomic measures implemented in the workplace.

SOCIAL SECURITY

The Group must comply with social security regulations by applying current legislation, the collective bargaining agreement applicable, and established contractual clauses. It is explicitly prohibited to:

- » Hire personnel without reporting their enrollment in social security.
- » Hire foreign personnel without the required residence and work permits.
- » Simulate hiring.
- » Work while on sick leave.

LABOR FREEDOMS

The Group will respect workers' trade union freedom and the right to strike.

SELECTION AND PROMOTION

The management will promote the personal and professional development of all workers, encouraging the improvement of their own skills and competencies. The Group will promote equal opportunities for all employees for their professional development.

Promotion and selection decisions will be objectively evaluated based on criteria such as training, qualifications, competence, and personal and professional merits required for the specific position.

RIGHT TO PRIVACY

The Group will respect and protect individuals' privacy in accordance with current data protection legislation. Likewise, it commits to request and use only those data necessary for the effective management of their professional activity. Individuals subject to this code who, due to their function, have access to systems, networks, or files that handle or store personal data, are responsible for keeping their password confidential, thus avoiding its disclosure, and not communicating it to any person within the organization.

5. Ethical commitment and good governance

CORRUPTION AND INFLUENCE TRAFFICKING

Relationships with the public or private sector, both nationally and internationally, will be based on principles of transparency and equal opportunities, rejecting any illicit acts or actions aimed at gaining an advantage in the market over competitors. It is explicitly prohibited to:

» Offer or provide money, gifts, or any other economic benefit to public officials, directors, and employees of private companies to obtain any kind of advantage in favor of the Group.

- » Engaging in business through bribes or personal payments to actual or potential clients.
- » Making payments to political parties in terms that are not permitted by legislation.

Influence trafficking is considered any act or strategy aimed at conditioning the actions of a private officer or public official, leveraging any situation derived from their personal relationship with this or another officer or public official, to obtain a resolution that may directly or indirectly generate economic benefit or avoid any type of loss, both for the company itself and for a third party.

PUBLIC TREASURY AND SOCIAL SECURITY

The Group will comply with its tax and social security obligations. The Group's financial and economic information, both internal and external, must accurately reflect its economic, financial, and asset reality in accordance with generally accepted accounting principles.

CONFLICT OF INTEREST

A conflict of interest arises when the personal interest of an employee or professional clashes, directly or indirectly, with the interest of any of the Group's companies. Decisions made must be based on the best defense of the Group's interests and should not be influenced by personal or familial relationships or any other particular interest of the employee or professional. Personal interest exists when the matter affects the employee or someone linked to them.

The following individuals shall be considered linked to the employee or professional:

- » The spouse, domestic partner, or person in a similar emotional relationship with the employee.
- » The ascendants, descendants, and siblings of the employee, as well as those of their spouse, domestic partner, or person in a similar emotional relationship.
- » If applicable, the spouses of the employee's ascendants, as well as those of their spouse, domestic partner, or person in a similar emotional relationship.

- » If applicable, the spouses of the employee's descendants, as well as those of their spouse, domestic partner, or person in a similar emotional relationship.
- » The spouses of the employee's siblings, as well as those of their spouse, domestic partner, or person in a similar emotional relationship.

At all times, the following actions shall be taken:

- a. Acting with loyalty to the Group, regardless of personal interests or those of third parties.
- b. Abstaining from intervening or influencing decision-making processes that may create a conflict of interest and affect any of the Group's companies.
- c. Communicating any doubts regarding a possible conflict of interest to the Compliance committee. Once assessed, the committee will make a decision.

MONEY LAUNDERING

The Group expresses its firm commitment to combating money laundering and the financing of terrorism, particularly its willingness to not be used for illicit purposes by any type of illegal activity by its own personnel, clients, suppliers, business partners, or third parties.

INTELLECTUAL AND INDUSTRIAL PROPERTY

The Group is committed to the protection of both its own and third-party intellectual and industrial property. Assets protected by intellectual and industrial property include, among others, copyrights, patents, trademarks, domain names, reproduction rights, design rights, database extraction rights, and rights over specialized technical knowledge.

The Group ensures that its patents and designs are original and will ensure that its suppliers, distributors, franchisees, etc., guarantee the originality of the designs they make available to the company. The use of works, creations, or distinctive signs of third-party intellectual or industrial property will be expressly prohibited if the Group has the corresponding rights and/or licenses.

Intellectual and industrial property resulting from the work of employees during their tenure, regardless of whether it is related to the Group's present and future business, will be the property of the company.

CONFIDENTIALITY

All non-public information owned or safeguarded by the organization is considered confidential. The Group will ensure that at all levels of the organization, there is an obligation to maintain the strictest confidentiality regarding any information that may be accessed, and its content cannot be disclosed to third parties without the express authorization of the highest governing body.

Confidential information includes, but is not limited to, the following:

- a.** Personnel and/or third-party data.
- b.** Information related to business plans, products, or services.
- c.** Information related to budgets and financial forecasts.
- d.** Information related to patents, trademarks, utility models, and other intellectual or industrial property rights or applications thereof, whether registered or not.
- e.** Computer passwords.
- f.** Source codes.
- g.** Inventions, processes, and designs.
- h.** Information related to advertising.
- i.** Characteristic elements of any services that an organization offers in the market.

INFORMATION SECURITY

The Group will ensure the prevention and control of crimes that may be committed through the use of information technologies, thus prohibiting the use of organization resources for any illicit acts or acts that undermine the morals, honor, or integrity of third parties

Additionally, it is prohibited to cause damage, deterioration, deletion, alteration, suppression, or rendering inaccessible of data, software programs, or electronic documents belonging to the organization or others. The use of files or programs of external origin may pose serious risks to the security of the Group's companies or constitute an infringement of intellectual property. Therefore, unauthorized software usage and downloads or any other behavior that poses the risk of introducing viruses or other elements dangerous to information security must be avoided.

DATA PROTECTION

The Group must comply with data protection regulations in accordance with the specific legislation in force at any given time, establishing relevant security measures for its protection. It will protect, among other things, information from selection processes, information about external collaborators, etc. Access to information will be based on the principle of strictly necessary access to carry out assigned tasks. All personal data are adequately protected to prevent any unauthorized disclosure or modification, with mechanisms and control procedures in place to prevent unauthorized access, copying, transfer, and/or disclosure. Personnel within the organization who have access to systems, data, networks, etc., are responsible for preventing their disclosure.

6. Commitment to the market and third parties

RELATIONSHIP WITH CUSTOMERS

The Group assumes, leads, and promotes commitment to legality and quality, acting under standardized and recognized national and international practices. Therefore, the Group's staff, as well as all external collaborators, must act with integrity and professionalism towards customers, aiming for a high level of quality and excellence, as well as efficiency and transparency, seeking to develop relationships based on trust and mutual respect.

RELATIONSHIP WITH SUPPLIERS

The Group considers its suppliers indispensable for the development of its activities and the achievement of its growth objectives and improvement of the quality of services provided, seeking to establish relationships with them based on trust, respect, transparency, and mutual benefit. The supplier selection process will be conducted under criteria of transparency, impartiality, objectivity, and efficiency. The hiring of services or purchase of goods must be carried out independently of any personal, family, or economic ties that may cast doubt on the criteria followed in the selection process. Suppliers will be communicated the commitment to operate in compliance with current regulations and ethical standards.

RELATIONSHIP WITH INSTITUTIONS, ORGANIZATIONS, AND PUBLIC ADMINISTRATION

Relations with institutions, organizations, and public administration are governed by institutional respect and will be developed under criteria of maximum collaboration and compliance with their resolutions. Judicial, administrative, and/or technical communications, as well as requests for information, must be attended to by the person responsible for their management with the utmost diligence and within the established deadlines.

MARKET AND CONSUMERS

The Group's market actions are based on principles of free competition and equal opportunities, and reject any actions aimed at obtaining an unfair or illegitimate benefit, advantage, or unfair advantage over customers, suppliers, competitors, and other market actors. The Group commits to compete in the markets fairly and will not engage in misleading or denigrating advertising against its competitors or third parties.

7. Commitment to society

SOCIAL RESPONSIBILITY

In line with the Group's commitment to its environment, donations to projects with social, cultural, and/or scientific content will be made under criteria of legality. Entities receiving donations will be evaluated to ensure they have a recognized reputation, moral solvency, and an appropriate organizational structure to ensure proper resource management.

ENVIRONMENT

At all levels of the Group's companies, efforts will be made for rational use of resources, respect for the environment, and sustainability. Activities will always consider respect for the natural environment, minimal resource consumption, and control of environmental impact. Additionally, the Group will ensure its companies comply with applicable environmental legislation and any additional voluntary commitments. Necessary controls will be established regarding discharges, atmospheric emissions (from various sources), noise, vibrations, waste, and any other environmental threats within the Group's companies. The Group will also promote the implementation of good environmental practices among its employees and extend this to its customers, suppliers, business partners, or third parties.

PUBLIC HEALTH

Controls will also be established over any activity or product that may directly or indirectly pose a risk to public safety due to the toxicity of its components or any other threat to individuals.

8. Ethics channels

It will be mandatory to report situations of non-compliance with the law, the Ethical Code, or regulatory provisions, as well as any behavior that may pose a risk to the organization. For this purpose, an Ethics Channel is available through which communications alerting to non-compliance, risk situations, or any improvement proposals can be addressed. Communications through the Ethics Channel can preferably be made via email to the address canaletic@avinent.com, or by phone or postal mail to the Group, addressed to the competent and designated person. The competent and designated person appointed by the company will be responsible for managing the Ethics Channel and handling communications sent to it. In any case, this person may outsource the management of the Ethics Channel to a specialized company or firm. Communications made through the Ethics Channel will be protected by maximum confidentiality.

9. Sanctioning procedure

Non-compliance with the Ethical Code will constitute an infraction that will be studied and, if necessary, sanctioned based on the provisions of the applicable collective agreement.

10. Review and improvement

This Ethical Code may be updated at any time to include necessary improvements and/or to adapt it to changing circumstances. For example:

- » When significant changes occur within the Group or in its activities.
- » When changes occur in the Group's control structure.

If anyone within the Group's organization identifies any aspect of the Ethical Code that needs improvement, they will communicate it to the competent and designated person, who will study it and, if necessary, submit the corresponding improvement proposal to the Board of Directors.

11. Approval and effectiveness

This Ethical Code was approved by the Board of Directors of AVINENT Science and Technology Group at the meeting held on November twenty-ninth, two thousand seventeen, and will be effective from January first, two thousand eighteen.

12. Internal control

The Group reserves the right to conduct checks within the framework of applicable law to verify compliance with this Ethical Code and/or to prevent behaviors that may affect legal compliance, confidentiality, integrity, and availability of information.

**Building a
happier
society**





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