



Code of Ethics

Lecta

October 2023

INTRODUCTION

This Code of Ethics of LECTA contains the ethical principles which apply in all areas of its activity and represents a commitment to compliance with all the legal systems in which it carries out its activities and with the ethical values it upholds.

Since 2011, LECTA's activities have been part of the UN Global Compact, making an ethical commitment to incorporate as an integral part of its strategy, culture and day-to-day operation the ten principles of conduct and action in the fields of human rights, labour, the environment and the fight against corruption, established by the UN Global Compact. Every year, LECTA presents its progress report to the Global Compact, detailing the progress made in all these areas.

LECTA defines the following values as essential in its activity:

- focus on results: generating benefits, efficiency.
- focus on the customer: know, assess and meet the customer's needs.
- social responsibility: environmental engagement, awareness raising and internal environmental and social responsibility training.
- innovation: anticipating customer needs, encouraging initiatives and ideas.
- communication: transmit the necessary information to all, put in place mechanisms to facilitate communication.
- identification with the company: create an exciting and inclusive working environment that values diversity and recognises individual and collective contributions.

This Code of Ethics has been drawn up in order to comply with the expressed commitment to values and behaviour and must therefore be respected by male and female directors, executives and employees (hereinafter workers) working in LECTA, but also by external collaborators (commercial agents, subcontractors, suppliers, auditors, consultants, etc.) who provide their services within the aforementioned companies.

1. WORKING CONDITIONS

Within the framework defined in the introductory section above, there are a number of issues relating to working conditions, internal relations between male and female workers, safety and health at work and environmental policy.

LECTA carries out its industrial activity through the use of various management systems designed to offer products and services of the highest quality, to achieve the highest energy efficiency, to protect the environment and to protect the safety and health of workers, with international certifications ISO 9001, ISO 50001, ISO 14001, ISO 45001, ISO 22000, FSSC 22000 and EMAS. LECTA also has PEFC and FSC® C011032 Chain of Custody certifications.

The management of some of the quality, environmental and energy policies is covered by an integrated multi-site management system called LIMS (LECTA Integrated Management System), which applies to all production plants and the central structure of LECTA.

Compliance with and strict compliance with international standards of quality, energy, the environment and occupational health and safety and compliance with the certificates integrated into the LIMS management system and its procedures form an essential part of LECTA's commitment in this Code of Ethics and, as such, should be seen as a complement to it.

1.1. The protection of workers' health and safety

LECTA is committed to promoting, disseminating and consolidating a culture of safety at work, which involves raising awareness of existing occupational risks and ensuring compliance at all levels of the company with legislation on safety and health prevention.

1.2. Relations with male and female workers and relations between colleagues: prohibition of discrimination and any kind of harassment

Each male and female director or worker of LECTA must behave correctly and refrain from any act which could be prejudicial to the dignity, physical or moral integrity, freedom and individual personality of other male and female workers to whom he or she relates in the course of his or her professional activity.

In this regard, LECTA has drawn up a Gender Equal Opportunities Plan with the aim of coordinating measures to ensure equal opportunities for men and women, in a real and effective manner, and above all the integration of equality in the management system. This will be achieved by defining and implementing an orderly set of measures, based on prior diagnosis, aimed at achieving equal treatment and equal opportunities between women and men and eliminating discrimination on grounds of sex.

Prohibition of discrimination

In line with the above, LECTA undertakes to create a working environment free of discrimination on grounds of race, religion, nationality, sex, age (with child labour specifically prohibited), disability, sexual preferences or guidance, marital status or any other illegal criteria, which will apply to the selection, recruitment, remuneration, promotion or termination of the employment contract.

Prohibition of violence and harassment at work

Any conduct involving physical or moral violence is totally forbidden, as is conduct which results in the unjustified exclusion or isolation of a worker. The company also promotes working conditions that make it possible to develop the personality and professionalism of male and female workers.

Under no circumstances will LECTA allow attitudes and practices that could create an intimidating, hostile or offensive working environment.

Harassment at work or mobbing, any kind of hostile or humiliating acts and any form of degrading treatment likely to impair the moral integrity of the workers concerned are totally prohibited.

The creation of an intimidating, hostile and insulating working environment, or in any case discriminatory, the creation of unjustified interference with the performance of work, and the obstruction of individual employment prospects are also prohibited.

Prohibition of sexual harassment

All acts of violence and sexual harassment and any conduct with sexual motivation, whether direct or indirect, which could lead to intimidating, hostile or humiliating situations for the victim is strictly forbidden.

1.3. Environmental policy

LECTA carries out its activity in order to protect the environment and uses management procedures and technology to avoid harmful or dangerous environmental impacts resulting from those activities.

Environmental protection is therefore a business priority, which translates into the provision of specific certified management systems, the use of means and technologies that do not harm the environment, not only in compliance with the legislation in force, but also taking into account the development of scientific research and the best experience in the field and in planning and carrying out investments aimed at achieving the best possible results in terms of respect for the environment and energy saving.

Each and every male and female director, worker and collaborator of LECTA, in carrying out their respective activities, must undertake to apply maximum efficiency and diligence in order not to harm the environment and biodiversity.

2. CONDUCT IN BUSINESS AND RELATIONS WITH THIRD PARTIES

2.1. Avoidance of conflicts of interest.

A conflict of interest arises where a male and female director, worker, assistant or collaborator is in a position to exercise the authority derived from his/her own position in order to: (a) influence LECTA's business decisions in such a way as to secure an improper advantage or financial benefit for himself/herself, a relative or an acquaintance; (b) to obtain for himself/herself, a relative or acquaintance a financial advantage in addition to the compensation which the worker receives from LECTA.

With that in mind, LECTA's male and female directors, workers or collaborators must avoid any situation and refrain from any action which is liable to place a personal interest above the interests of the company or which is liable to interfere with or hinder the ability to take decisions in an impartial and objective manner which are in the interests of the company. Tolerance of conflict of interest situations, as well as conflicting with the legal rules and principles laid down in the Code of Ethics, is detrimental to the image and integrity of the company.

2.2. Prohibition of corruption and illegal payments between private individuals.

Gifts made with the intent of commercial corruption infringe the law, and directors and workers responsible for such practices may be subject to criminal liability. Similarly, the acceptance of gifts for the purpose of corruption, improper payment or other benefits is also prohibited and may lead to individual and corporate criminal liability.

2.3. Customer relations.

LECTA seeks commercial success in the markets by offering high-quality products and services under competitive conditions and complying with established standards to safeguard free and fair competition.

The commitment to quality and to the customer, together with the prohibition on engaging in corrupt practices, means that there must be an emphasis on the fact that LECTA's male and female directors, workers or collaborators cannot under any circumstances make promises or offer payments or assets to promote or favour the interests of the company, except in cases where, expressly and exceptionally, gifts or hospitality are permitted which, by their nature or value, cannot be interpreted as being intended to obtain favourable treatment.

2.4. Relations with suppliers and external collaborators.

LECTA's policy is also to select suppliers on the basis of merit, taking into account, inter alia, price, quality, delivery capacity, general level of service, reputation and integrity.

LECTA is committed to ensuring that suppliers and external staff have an adequate level of professionalism and demonstrate their commitment to sharing the principles contained in the Code of Ethics, promoting the creation of long-term relationships in order to achieve progressive improvements in their performance.

2.5. Relations with agents and representatives.

LECTA requires that all agents, advisers and third parties representing the company act in compliance with the laws and ethical standards set out in this Code of Ethics.

2.6. Relations with public administrations.

LECTA does not tolerate any kind of corruption or influence with respect to public authorities or officers or any natural or legal person connected, directly or indirectly, with public authorities or officers.

Commitments to public administrations and public institutions may only be made by workers duly designated and authorised to do so. They may not promise or offer to public authorities or officers, employees of a public administration or persons engaged in the exercise of public functions any payment, assets or promises to favour LECTA's interests. The payment of money or the granting of other advantages of economic substance or gifts is totally forbidden, as are the provision of valuables, luxurious meals or entertainment, or the payment of travel or accommodation costs for inappropriate purposes.

The above prohibition is imposed on public authorities and officers of any country or international organisation and is binding on agents, advisers and representatives acting on behalf or in the interest of LECTA, who must comply with this Code of Ethics and are not permitted to engage in conduct which the male and female directors or workers of LECTA are prohibited.

2.7. Relations with political organisations and trade unions.

LECTA establishes as a principle that no contributions are paid to political parties, trade unions, committees or organisations. In the exceptional and hypothetical case that a contribution is considered appropriate in terms of public interest, the company will determine in the specific case whether it complies with the laws in

force and, if it makes the contribution, will record the contribution in an appropriate form.

2.8. Respect for free competition.

LECTA regards compliance with legislation on the protection of free competition as a fundamental principle and demands full compliance with it in all the countries in which it operates.

In this respect, male and female workers and agents should be familiar with the applicable competition laws; they must not enter into any (formal or informal) agreements with competitors; they should not exchange information with competing companies; in the case of possession of inside information, they should not disclose such inside information; they must not engage in any form of unfair action that puts companies in a position of advantage on the market; they cannot receive, solicit or accept by themselves a benefit or advantage or offer or promise to obtain it; they must not disseminate, directly or indirectly, by any means, news or rumors or convey false or misleading signals to individuals or businesses; they should not engage in transactions, give false or misleading signals or give orders which give false or misleading indications of supply, demand or ensure a dominant position on the market for the purpose of setting prices at abnormal or artificial levels.

All behaviours above extend to financial instruments, contracts, behaviours, transactions and orders provided for relevant legislation on markets and financial instruments.

They are prohibited from using violence, threats, deception or any other form of artificial arrangement which could lead to changes in prices which would result from the free competition of products, goods and spot commodity contracts.

It should be borne in mind that in relation to conduct which may be contrary to the protection of free competition, not only the laws of the country where the act takes place (for example, where the conversations or agreements between competitors take place) are applicable, but also the law of the country where the agreements reached may produce effects.

2.9. Unfair competition.

If LECTA decides to employ staff or to use contractors or consultants with experience in the line of business of such companies, it should be assessed whether potential candidates have employment contracts with their current or past employers prohibiting them from working for competition, including LECTA.

2.10. Respect for intellectual and industrial property.

Within the scope of their commercial functions, LECTA male and female workers have access to information that is confidential or owned by others, including customers and suppliers: this information has to be used for the purpose for which it was obtained and, if it is covered by a non-disclosure agreement, it has to be safeguarded and used in accordance with the terms of such agreement.

LECTA undertakes to respect third-party intellectual property rights. It is not permitted to use the intellectual property of others without their permission.

2.11. Accounting transparency.

The information contained in periodic reports or accounts, both general and analytical, must comply with the principles of transparency, correctness, completeness and accuracy, commitment and duty of all male and female directors, workers or collaborators of LECTA.

For all actions or operations, the computer resources made available by LECTA to male and female workers shall be used.

2.12. Compliance with tax rules.

LECTA's policy implies strict compliance with the tax rules it applies from time to time, from a substantive and formal point of view. In any case, particular attention shall be paid to checking that their tax policies cannot be considered as overly aggressive; that the position taken by the Group's companies in general and in particular with regard to specific operations can always be reasonably defended; that the reputation will never be damaged as a result of the tax policies adopted; that it will always be in a position to defend the good faith of its elections with regard to its fiscal policy with the authorities; that tax decisions and actions will be reviewed, in cases where legislative reforms introduce issues or limits that make adjustments to decisions necessary, and that it will be vigilant and take all necessary measures to prevent customers and suppliers from making improper use of LECTA transactions.

2.13. Fulfilment of obligations relating to the social security system.

As regards the submission of documents and payment of social security contributions and taxes, the request for refunds and the receipt of deductions, the legislation in force must be complied with, avoiding any kind of conduct that could be regarded as defrauding social security or detrimental to workers' rights.

2.14. Prevention of money laundering.

Under no circumstances may LECTA engage in or be involved in activities involving the laundering (i.e. acceptance or processing) of proceeds from criminal activities of any kind.

3. APPLICATION OF THE CODE OF ETHICS AND VIOLATIONS

3.1 Application of the Code of Ethics.

All LECTA workers must be aware of the principles and contents of the Code of Ethics.

The publicity and need for compliance with this Code of Ethics is made known to customers, suppliers, third parties and collaborators via LECTA's web pages, through the General Purchase and Sale Conditions, and by other, more specific means such as contracts or orders.

3.2 Queries

Any queries on the content and interpretation of the Code of Ethics and internal rules should be addressed to the Monitoring and Supervision Committee through the Whistleblower and Query Service.

3.3 Reporting violations

Breaches of the law, the Code of Ethics or domestic legislation must be reported through the Whistleblower and Query Service.

The worker may inform anonymously if he/she so wishes. Confidential treatment of all communications received through the Whistleblower and Query Service and the absence of retaliation of any kind against bona fide whistleblowers shall be ensured.

The Whistleblower and Query Service is available through the following means:

- Email: denuncias@lecta.com
- Intranet: [Inquiries and complaints](#)
- Website: [Inquiries and complaints](#)

The Whistleblower and Query Service is not an emergency service. If you are in this situation and immediate assistance is required, the local emergency service must be contacted or call 112.

Complaints of breaches are handled by the Monitoring and Supervision Committee, which decides the investigation or corrective measures required in each case.

3.4 Responsibilities of the Monitoring and Supervision Committee

Lecta have assigned the following responsibilities to the Monitoring and Supervision Committee:

- constantly monitor changes in legislation to ensure that the Code of Ethics is consistent with all applicable regulations, and in the event of discrepancies propose any changes it deems necessary in the Code of Ethics to the Executive Committee and Board of Directors for the appropriate decision;
- promote measures to ensure that the Code of Ethics is distributed, circulated and observed;
- promote communication initiatives and specific training programmes for Lecta workers;
- submit weekly reports on observance and, if necessary, updated versions of the Code to the Executive Committee and Board of Directors.

3.5 Consequences for violating the Code

Any violation of the law, the Code of Ethics of the internal regulations may constitute a fundamental breach of the employment contract or an act of non-compliance subject to disciplinary measures, as well as all applicable legal consequences, and may even incur liability for damages.

Penalties shall not only be imposed on persons whose conduct has caused the violation but may also be applied to any other person who has not followed the applicable legislation for the prevention, detection and/or correction of the risk, which is considered in itself to be a violation of the ethical values and principles of this Code of Ethics.

3.6 Development of the Code of Ethics.

On the basis of the Code of Ethics, a regulatory body consisting of policies, regulations, rules and procedures, which apply to LECTA's various internal activities, is developed. The regulatory body includes the preventive measures and controls that must necessarily be applied to LECTA's daily activity.