

CODE OF
ETHICS
AND
OF CONDUCT





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Scope

The Code of Conduct aims to establish the behavioral guidelines that will regulate the conduct of any individual acting on behalf of the company Trefilados de Navarra SA (hereinafter, “TREFINASA”), and compliance with it is equally mandatory for all members of the company, as well as for any company with which there may be a contractual relationship.

Failure to comply with the provisions of this Code of Conduct will constitute an infringement that may result in disciplinary action as indicated in the "Disciplinary Policy and Procedure" section of TREFINASA's Legal Compliance Manual.

General principles

All natural and legal persons subject to this Code of Conduct must comply with the ethical principles set forth below:

- *Regulatory compliance*

Individuals subject to the Code of Conduct undertake to strictly comply with the regulations required by law that govern the business and professional activities of TREFINASA, regardless of where they carry them out, and will not falsify information or adopt illicit principles that may harm the reputation of the company, respecting its primary and ethical objectives and contributing to them.



- *Ethical and professional integrity. Gift acceptance policy*

Every individual subject to the Code of Conduct must act in accordance with ethical principles and moral criteria, which requires that they act with honesty, integrity and transparency in order to avoid any breach of the law or professional negligence.

- *Conflict of interest*

A conflict of interest situation is understood to exist when a natural person subject to the Code of Conduct who, according to his functions, must decide whether or not to carry out an action, has the option of choosing between the interests of the company and his own interest or that of a third party, the second choice benefiting his or the third party's interests, and had it not been for his decision he would not have obtained an advantage or benefit.

To avoid such situations, all individuals subject to the Code of Conduct must act confidentially and honestly and must not allow third parties to manipulate or influence their decisions. Individuals will abstain from voting or expressing their opinions if they are subject to a conflict that could harm the corporate interests of TREFINASA and will at all times act independently, with freedom of opinion and loyalty to the company.

Any person subject to this Code of Conduct who has doubts regarding a possible conflict of interest should contact the Compliance Committee or report it through the Whistleblowing Channel.



- *Recording of transactions and generation of financial information. Duty of transparency*

The company will ensure that its economic and financial information, particularly its annual accounts, accurately reflects its economic, financial, and asset position, in accordance with generally accepted accounting principles and applicable international financial reporting standards. To this end, no professional may, on behalf of the company, conceal or misrepresent information in the company's accounting books and reports, which must be comprehensive, accurate, and complete.

A lack of transparency in the disclosure of information, both within the company and to authorized third parties (auditors, shareholders, and investors, among others), would constitute a breach of this Code of Conduct. The distribution of erroneous information, the misleading structuring of information, or an attempt to mislead the recipient would also constitute a breach of the duty of transparency.

- *Internal control and crime prevention in matters of anti-corruption*

The company, through the corresponding internal body, will guarantee the prevention of crimes by identifying the sectors and activities susceptible to this type of risk, in accordance with current legislation, and establishing measures and controls to avoid such risks.

The company is committed to strict compliance with regulations on the prevention and fight against corruption, developing the principles contained in this Code of Ethics and Conduct and extending its compliance not only to all people employed in the company but also to its business partners.

The anti-corruption policy applies to all employees, managers, and members of the board of directors. Trefinasa will also promote conduct and values similar to those established in this policy among its subsidiaries and suppliers.



For these purposes, the following definitions shall apply:

- ✓ **Corruption:** To offer, promise, grant, receive, solicit, or accept a benefit unjustified, for oneself or for a third party, to unduly favor another in the acquisition or sale of goods, in the contracting of services or in commercial relations.
- ✓ **Extortion:** whoever, with the intention of making a profit, forces another, by violence or intimidation, to perform or omit an act or legal transaction to the detriment of one's assets or those of a third party.
- ✓ **Bribery:** the act of corrupting someone with gifts to obtain something from them.
- *Non-disclosure of confidential information*

Every person subject to this Code of Conduct must comply with current regulations relating to Information Security and Data Protection, committing to transmit and communicate accurate and comprehensive information to any Authority receiving such information, avoiding falsifications or providing erroneous or inadequate information.

Any person related to the company who has relevant or confidential information must be aware of the obligation not to disclose such information, as well as its private nature and be familiar with the penalties that would result from inappropriate use.

In this regard, TREFINASA's Confidentiality Policy will apply.



- *Protection of personal data*

The company undertakes to make appropriate use of any personal information to which it may have access, regardless of whether it belongs to suppliers, clients, institutions, or other related parties, respecting their right to privacy and adopting the necessary Data Protection measures in accordance with Spanish Data Protection regulations. Personal data of parties related to the company will not be disclosed, in accordance with applicable laws, guaranteeing its confidentiality and security, unless otherwise determined or required by applicable laws or regulations. Those who, by virtue of their professional activity, are in a position to handle such confidential data must use it responsibly and confidentially.

- *Corporate social responsibility*

TREFINASA The company is committed to conducting its business activities within a framework of responsibility based on economic and social dimensions. This framework will enable the company to operate sustainably over time, from a perspective that encompasses transparency, business collaboration, a responsible approach to the tax system, and the generation of social value and environmental responsibility, leading to appropriate economic development and fair competition.

- *Transparency and Good Governance*

The company will manage its relationships with stakeholders (shareholders, suppliers, public administrations, and any legal entity with a business or commercial relationship with TREFINASA) in accordance with the principles of transparency and good governance, engaging in dialogue with them to initiate strategies and actions that ensure their demands and suggestions are taken into account in the best interests of society, while appropriately balancing the general and company interests based on the principle of collaboration. In this regard, the company undertakes to provide accurate and understandable information, as relevant, regarding negotiations with all parties with whom it has a contractual relationship.



- *Young workers and child labor*

The company strictly prohibits child labor under any circumstances. Only individuals who have reached the minimum legal working age as established by applicable legislation may be employed. The company will promote the training and professional development of young workers, ensuring that their tasks are appropriate to their age, abilities, and experience level, and that they do not interfere with their education or their health and safety.

- *Forced labor and human trafficking*

No form of forced labor, servitude, or human trafficking will be tolerated. No worker shall be compelled to provide services through coercion, threats, or withholding of personal documents. All employment relationships must be free and voluntary.

- *Discrimination and Equality*

The company guarantees equal opportunities and rejects any form of discrimination based on sex, age, ethnic or national origin, religion, sexual orientation, gender identity, disability, opinion, or any other personal or social condition. An inclusive and respectful work environment, based on merit and professional competence, will be fostered.

- *Freedom of association*

The right of all workers to freely associate, join trade unions, and participate in union or representative activities, in accordance with current legislation, is fully respected. The company will maintain constructive channels of social dialogue and promote labor relations based on respect and cooperation.



- *Wages, benefits and working hours*

The company will strictly comply with all applicable labor regulations regarding wages, benefits, and working hours. It will be guaranteed that all employees receive fair, timely, and sufficient remuneration, in accordance with the collective bargaining agreements for the metal sector and current legislation. Furthermore, legally mandated rest periods, vacations, and working hour limits will be respected.

- *Environment, safety and health.*

The safety and health of our employees is a top priority. The company will take all necessary preventative measures to ensure a safe and healthy work environment, promoting training and active participation of staff in occupational risk prevention.

Furthermore, a culture of respect for and protection of the environment will be fostered, promoting sustainable practices, waste reduction, efficient resource use, and compliance with applicable environmental regulations. This code of ethics is complemented by the quality, environmental, and health and safety policies.