

CODE OF CONDUCT of OXIRIS CHEMICALS, S.A.

The Code of Conduct of OXIRIS CHEMICALS, S.A includes the principles, values, and basic rules that OXIRIS applies in its business activity, establishing the guidelines of action shared, accepted and respected by all workers, both in their internal relations and in its relations with the main stakeholders wherever it develops its business activities.

All the operations of OXIRIS CHEMICALS, S.A. will be developed under an ethical and responsible prism, being the commitment to current legislation and human rights the values on which this Code is based.

The OXIRIS Code of Conduct is based on the following principles:

1. Respect for the applicable Law and Regulations.
2. Respect for human, labor and social rights.
3. Respect in business activity.
4. Health and Safety, Environment and Quality.
5. Bribery and corruption.
6. Data Protection.
7. Confidential information.
8. Competition and Antitrust Law.
9. Conflict of interest.
10. Administration of the Code of Ethics and Conduct

This Code of Conduct is adequately disseminated within the organization to ensure that workers are familiar with the rules set forth in this Code of Conduct and participate in the corresponding training session

1. Respect for the Applicable Law and Regulations

OXIRIS is committed to compliance with all applicable laws and regulations, and all workers must comply with the rules and procedures established, as well as the instructions that may be approved in their development.

OXIRIS undertakes to put the necessary means so that its staff knows and understands the internal and external regulations necessary for the exercise of their responsibilities, for which it expects the Management Team leads by

example and reinforce the commitments described in this Code of Conduct.

Any action that involves a violation of the law must be immediately brought to the attention of this management team to initiate the relevant investigations and establish the appropriate measures to avoid the infringement of the Code of Conduct.

2. Respect for human, labor, and social rights.

Equal opportunities, diversity and equity and respectful treatment of others plays a key role for OXIRIS as an Organization. Important points for OXIRIS are:

- the right to equal opportunities and non-discrimination.
- the prevention of all forms of child labor and forced labor.
- the right to freedom of union association and collective bargaining.

- fair remuneration and additional benefits based on local market conditions.
- observance of the applicable rules in working hours.

Workers must respect the rights of others, no employee or collaborator may be treated unfairly, given preferential treatment, placed at a disadvantage, or excluded on the grounds of reason for race, physical disability, illness, religion, sexual orientation, political opinion, age, nationality, gender, or other attributes protected by law.

All forms of physical, sexual, psychological, or verbal harassment or abuse, as well as any other conduct that could generate an intimidating, offensive or hostile work environment are prohibited.

OXIRIS does not employ anyone who is not 18 years old. OXIRIS does not tolerate the use of forced, compulsory, involuntary or child labor.

All OXIRIS workers have the right to organize, freedom of union association and collective bargaining recognized.

Working hours and overtime hours shall not exceed the legal limit established by current legislation. Overtime shall always be voluntary and remunerated in accordance with the law.

The salary received by OXIRIS workers is in accordance with the function performed without any discrimination based on sex in any of the elements or conditions and always respecting the Chemical Industry Convention in force.

All workers are responsible for strictly complying with occupational safety and health standards and for ensuring their own safety and that of the persons affected by their activities. The

consumption of substances that could affect the proper fulfillment of professional obligations is forbidden.

If any of the employees is concerned about any of the problems referred to in this section, they should contact their direct manager or Human Resources department.

3. Respect in business activity

This Code of Conduct is defined as an ethical commitment that includes basic principles and standards for the proper development of business activity between OXIRIS and its main stakeholders wherever it develops its business activities.

3.1- Suppliers

Purchasing and procurement activities will be governed by criteria of objectivity and transparency, reconciling the interest of OXIRIS in obtaining the best conditions, with the convenience of maintaining stable relationships with ethical and responsible suppliers, to guarantee a safe supply and that complies with strict compliance with the rules and procedures established by OXIRIS.

3.2- Customers

The satisfaction of our customers is one of our priorities. OXIRIS is committed to offering all its customers a high standard of quality in its products, guaranteeing that they do not involve risks to health and / or safety in their use, to strengthen the development of commercial activities. These products shall be produced ethically and responsibly.

3.3- Collaborating companies

OXIRIS promotes in its collaborating companies the monitoring of this Code of Conduct. The relationships and selection of collaborating companies must be based exclusively on objective criteria, avoiding any suspicion of indications of corruption and bribery.

3.4- - Society

OXIRIS is committed to collaboration with the local, national or international communities in which it operates its business, always acting in a lawful, ethical, respectful and aligned manner with national and international provisions for the prevention of corruption and bribery. OXIRIS develops its business model without interfering politically in those communities where it develops its manufacturing, distribution and/ or marketing activities.

4. Health and Safety, Environment and Quality

Health and Safety, Environment and Quality at OXIRIS, understood as its social, environmental commitment and the safe use of its products, is an inseparable part of its business model.

OXIRIS is a company committed to chemistry and conducts its activities to ensure that its products improve the quality of life and are manufactured and distributed in a safe and environmentally friendly way.

Workers are committed to preventive culture of safety, health, environmental protection, quality and food safety. Supervision gives way to the commitment of all, and there is a Decalogue of Zero Tolerance against attitudes that may go against this commitment or may be a grievance for all its members.

There are different mechanisms to ensure that all staff, collaborators, know and follow the regulations on safety, prevention of occupational and environmental risks that affect them, as well as report any risk detected, and any incident or accident occurred in these matters. OXIRIS promotes an active attitude by proposing initiatives aimed at avoiding risks, including the prevention against fraud and the adulteration of our products.

As it cannot be otherwise, it falls within the concept of health, psychosocial health, which is periodically evaluated at OXIRIS and, as in any other discipline, there are protocols available to the worker to avoid any type of violence or harassment in the workplace

5. Bribery and corruption

OXIRIS does not seek to obtain competitive advantages through illicit or unethical business conduct or activity.

Corruption means asking, accepting, offering, or granting personal benefits in connection with a business transaction or a public function. As a benefit, the benefits can be a gift, an invitation or another favor that benefits the person involved or a third party, for example, a relative.

As a rule, no OXIRIS worker may offer, grant, request or accept, directly or indirectly, gifts, favors or compensation, whatever their nature.

Only gifts and services of little value that are proportionate and reasonable according to local practice, transparent, delivered for legitimate, socially acceptable, and sporadic interests, are exempt from the above rule, to avoid that their content or regularity could lead an independent third party to doubt the good faith of the employee or OXIRIS.

In no case should the acceptance of an appropriate benefit influence or even appear to influence the employee's decisions.

6. Data Protection

OXIRIS ensures an appropriate level of protection of all data throughout the Organization.

When handling personal data of workers and collaborating companies, OXIRIS protects and respects the personal rights and privacy of the persons concerned and will ensure that its systems comply with data security measures.

All OXIRIS workers must know and respect all the internal procedures implemented regarding the storage, custody, and access to data and that are intended to guarantee the different levels of security required according to the nature of these.

7. Confidential Information

OXIRIS values and protects your confidential information and respects the confidential information of third parties. If third parties (suppliers and collaborating companies, customers, competitors) share confidential information with OXIRIS, said information will receive the same care as the confidential information of the Organization.

All employees have the duty to protect the assets, ideas, intellectual property and information of the company and keep them confidential.

The intellectual and industrial property of OXIRIS, and that is related to the present and future business of the Organization, will be the

property of OXIRIS, and in no case will it be used for the benefit of any employee or third parties.

8. Competition and Antitrust Law

OXIRIS is committed to complying with all applicable legislation on the defense of free competition and against unfair competition.

We require our employees and all third parties with whom we enter business relationships to act in accordance with all applicable antitrust and competition laws.

9. Conflict of interest

All OXIRIS workers must avoid situations that may involve a conflict between their personal interests and those of the company, understanding as such any personal, social, financial or political activity that may interfere or have the potential to interfere with their responsibilities towards the company.

Specifically, the following are potential conflict situations and should be the subject of communication:

- The realization by workers or persons linked to this, of activities similar to those developed by OXIRIS, either with customers, suppliers or collaborators.
- The realization by the workers or persons linked to it, of activities of exchange of goods and / or services with OXIRIS, for their own benefit.

10. Administration of the Code of Ethics and Conduct

It is the responsibility of OXIRIS to implement all the commitments mentioned in this Code of Conduct as well as the supervision of compliance and dissemination.

All workers must report when they have knowledge, or well-founded suspicion, of any illegal act or any violation of the Code of Conduct committed in the Organization. To facilitate this communication, an ethical line has been created.

All workers can address their questions or information to the following e-mail address:

canaldenuncias@oxirischemicals.com

It is the responsibility of OXIRIS:

- The interpretation of the doubts raised by the application of this Code of Conduct.
- The confidentiality of any communication or complaint submitted.
- The control and monitoring of the processing of all communications.

This document will be reviewed periodically with the aim of adjusting its requirements to the needs of the company and its relationship with the environment and its stakeholders.

General Manager
Zoe Bouligaraki
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