

ETHICAL CODE



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ALONARTI / SOCIEDADE
ARTISTICA GROUP
ETHICAL CODE

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INTRODUCTION

01

We believe
it is essential
to go further



We believe in the value of capturing in a document, such as this Ethical Code for the ALONARTI / ARTÍSTICA group, the principles and values that have guided this group's activity for more than 100 years. This serves as a compass to guide us, reminding us of the standards we should uphold in our dealings with employees, business partners, and society in general.

We must, above all, honor our legal commitments, those agreed upon in collective bargaining with our employees, and unwavering standards such as the *United Nations Sustainable Development Goals (SDGs)* or the *Ethical Trading Initiative's Ethical Code*. However, we believe it is essential to go further by establishing a comprehensive framework of conduct in labor relations, business practices, and social and environmental commitment. This allows us to truly embody the essence of ethics, defined as *upright and aligned with morality*.

We aim for the Ethical Code of the Alonarti / Artística Group to be a living document that not only reflects our non-negotiable values in the group's operations but also responds to issues of concern in our environment at any given moment. Thus, with this update, we fulfill our commitment to regularly review such a document, ensuring it remains current and responsive to societal changes and concerns. We are confident that if it fulfills its purpose, it will also serve as an opportunity to establish lasting relationships based on mutual trust.

Likewise, we aspire for our Ethical Code to be embodied in commitments that are as concrete and measurable as possible, allowing compliance to be monitored both internally and by independent third parties.

Finally, we commit to disseminating this Ethical Code within our organization, among our suppliers and customers, and to anyone interested in knowing who we are. We are proud to uphold these principles and aim to engage with partners who share them.

Javier Martínez Bello
CEO of Alonarti / Artística Group
November 2024



The **Chief Executive Officer** is responsible for approving the Ethical Code of the ALONARTI / ARTÍSTICA Group.

The **General Manager** is responsible for drafting the Code, identifying key variables to address, setting objectives, and establishing the means to achieve them.

The **Quality and Sustainability Director**, reporting to the General Manager, is responsible for monitoring the objectives set and reporting any deviations.

The Equality Committee, equally composed of the General Manager, the Human Resources Director, and employee representatives of ALONARTI and SOCIEDADE ARTÍSTICA, will now serve as the **Ethics and Equality Committee**. Its role will expand beyond approving and ensuring compliance with the Equality Plan to also analyzing cases where breaches of the Ethical Code commitments are reported.

Both companies will establish a **whistleblowing channel** managed by an independent third party, where employees can report anonymously or openly, as they choose, any practices within the organization that they believe violate current laws, applicable collective agreements, or the Ethical Code.

We also commit to raising **awareness** within the organization. In this regard, we will publish this Ethical Code on the Group's website and display it on staff information boards. Additionally, new hires will receive training that includes a section on the Ethical Code and sustainability within the organization.

ALONARTI /
SOCIEDADE ARTÍSTICA GROUP
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LABOR RELATIONS

03.1

01. Employment will be freely chosen. There will be no forced or involuntary labor. Workers will not be required to deposit money or hand over identification documents to their employer, and they will be free to leave their employment with reasonable prior notice.
02. Freedom of association and the right to collective bargaining will be respected. Worker representatives will not be discriminated against and will be able to perform their representative duties in the workplace.
03. The development and professional training will be promoted through internal or external training. Professional promotion will be based on clearly known merits and professional competencies, disregarding personal aspects, affiliation, ideology, gender, race, etc., and remuneration will be linked to these skills and/or competencies.
04. Working conditions will be safe and hygienic, considering prevailing industry knowledge and any specific hazards. Measures will be taken to prevent accidents or health issues arising from work by minimizing, as far as reasonably possible, the inherent risks of the workplace environment.
05. Workers will regularly receive training on health and safety.
06. Access to clean restrooms, potable water, and, where necessary, sanitary facilities for food storage will be provided.
07. Child labor will not be employed, defined as work by persons under the age of 16 or the legally established minimum age. Young workers under 18 will not perform hazardous work.
08. A living wage will be paid, complying with national legal standards or collective agreements, and sufficient to meet basic needs and allow some discretionary income.
09. All workers will receive written and understandable information about their working conditions regarding wages before employment and details of their wages with every payment.
10. Wage deductions as a disciplinary measure will not be allowed, nor will any unauthorized deductions without the worker's explicit consent. All disciplinary measures will be recorded.
11. Working hours will not be excessive and will comply with national laws and collective agreements. Overtime will be voluntary, performed responsibly, and compensated with a premium.
12. There will be no discrimination in hiring, compensation, training, promotion, termination, or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, or political or union affiliation.
13. Regular work will be provided, based on legally recognized employment relationships. Obligations to employees will not be avoided through the use of short-term contracts, subcontracting, or unpaid internships without a genuine intent to provide training or regular employment.
14. Inhumane or severe treatment will not be permitted. Physical abuse, punishment, threats, sexual or other forms of harassment, verbal abuse, or intimidation are strictly prohibited.
15. There will be no wage discrimination based on gender. Equal pay will be provided for work of equal value or the same professional category.
16. Measures will be taken to ensure the safety and health of employees and to guarantee the best possible working conditions at all times.
17. Necessary precautions will be taken to protect pregnant women or nursing mothers, preventing risks to the mother, fetus, or infant from physical, chemical, or psychological agents.
18. Work-life balance for employees will be promoted, ensuring that exercising this right does not infringe upon others' rights. Efforts will be made to accommodate the personal and family needs of employees to the greatest extent possible while respecting the company's requirements.
19. The inclusion of workers with disabilities, disadvantaged groups, and those facing barriers to employment will be encouraged through partnerships with organizations, associations, and public programs aimed at integration and employability.

RESPONSIBLE MANAGEMENT

03.2



- 01.** We commit to ensuring the safety and quality of our products.
- 02.** We pledge to responsibly manage confidential data, safeguarding it against unauthorized access. Only strictly necessary personal data will be collected, and its secure handling will be ensured. Our data protection policy will be available in emails and on the group's website.
- 03.** We will foster business relationships with suppliers and clients who share our ethical standards. We will select suppliers who respect human dignity, comply with the law, and maintain a good reputation, preferably those with and adhering to a code of conduct. Selection criteria will include quality, suitability, price, and delivery timelines.
- 04.** We will not engage in actions that hinder free market competition. Directors and managers will respect competitors and engage in fair practices, avoiding unethical methods to gain clients from competitors.
- 05.** We will not tolerate active or passive corruption. Any suspected corruption or money laundering will be reported immediately. Any gifts received by employees must be reported to their supervisor and, if deemed necessary, returned. Cash or in-kind gifts affecting fair competition will not be accepted.
- 06.** Administrators and executives will be appointed based on values, experience, and qualifications to balance profit with ethical and responsible practices. They will prioritize the interests of the ALONARTI / ARTÍSTICA group and avoid conflicts of interest.
- 07.** We will comply with and enforce accounting, labor, environmental, and preventive standards, establishing internal and external control mechanisms to ensure compliance.
- 08.** Business records and books will be maintained accurately and honestly, providing real-time information to support responsible decision-making. Auditors, both internal and external, will have access to all necessary information and explanations.

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

03.3

01. Our activities will align with the United Nations Sustainable Development Goals (SDGs) most relevant to our sector, including:

SDG 3. Achieve gender equality and empower all women and girls.

SDG 7. Ensure access to affordable, reliable, sustainable, and modern energy.

SDG 8. Promote inclusive and sustainable economic growth, employment, and decent work for all.

SDG 10. Reduce inequality within and among countries.

SDG 12. Ensure sustainable consumption and production patterns.

SDG 13. Take urgent action to combat climate change and its impacts.

We will develop a sustainability plan with measurable goals and defined timelines, providing regular updates on progress.

02. Human rights and democratic institutions will be respected, upheld, and promoted wherever possible, especially with goods or services suppliers.

03. Political neutrality will be maintained, refraining from interference or taking political positions in the regions where we operate, respecting the diverse opinions and sensitivities of stakeholders or commercial partners.



