

## I.- Code of Ethics or Conduct<sup>1</sup>

### CODE OF ETHICS OR CONDUCT OF RELATS SAU

#### 1. Introduction

**Relats SAU** (hereinafter referred to as “**Relats**” or “the company”) is a corporation committed to complying with ethical standards and principles, as well as all applicable laws and regulations.

Within the framework of social responsibility that characterizes **Relats SAU**, this Code of Ethics or Code of Conduct has been approved. It establishes and specifies the Corporate Principles that must govern the company's activities and those of its members, establishing certain non-negotiable behavioral norms. This Code does not intend to cover every possible situation within the company but rather aims to offer a reference framework to guide **Relats SAU** members in the proper development of their tasks within the company. It fosters a shared culture and behavior patterns accepted and respected by everyone within the company.

It is the responsibility of each employee to ensure full compliance with all the provisions of this Code and its Action Protocols and, where applicable, to seek assistance from Chief Officers, Managers, Directors, or the Responsible Officer for Criminal Compliance.

The provisions or principles in this Code are considered minimum standards. If the applicable laws or any other regulation are more stringent or provide greater guarantees, the conduct of **Relats SAU**'s human team will adhere to the latter.

This Code is part of a set of measures implemented by **Relats SAU**. Together with the internal action protocols established by the company, the designation of a Responsible Officer for Criminal Compliance (who also serves as the Responsible Officer for the Internal Information System), the implementation of a query/complaint channel (which also functions as the company's Internal Information Channel), and the training provided to employees to effectively implement all the above, this framework reflects **Relats SAU**'s commitment. This commitment extends to all suppliers or entities who voluntarily adhere to the same principles.

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**Relats SAU** commits to communicating and disseminating the Code to ensure it is known, embraced, and respected by everyone within the company.

## 2. Mission. Vision. Values

### Mission

**Relats** mission is to make a difference through technical textile coating solutions, being the global favorite option.

### Vision

**Relats** aims to become the first global and sustainable choice for clients and employees, leading in technically innovative coating solutions that anticipate disruptive market needs.

### Values

The company bases its activities and synergies on the following values:

- Leadership
- Innovation
- Responsibility
- Sustainability
- Agility
- Competitiveness.

Relats has also implemented a Strategic Plan that includes several pillars and challenges reflecting the company's evolution and addressing new objectives at all levels: *Digital Attitude, Cultural Transformation, Quality Excellence, Disruptive Innovation, Environmental Impact, and Competitive Growth.*

## 3. General principles

The activities within the company will be governed by the following general principles:

### 3.1 Compliance with Laws, Regulations, and Internal Protocols

**Relats** and its team commit to acting in accordance with applicable laws at all times, including, but not limited to, labor laws, health and safety regulations, environmental protection laws, anti-

corruption laws, and consumer safety standards.

Employees will always act honestly and in good faith, both internally and with third parties. Furthermore, they must adhere to and respect the internal regulations (internal action protocols) that apply. These protocols address specific areas of the company where the risk of criminal activity is more pronounced.

Employees commit to participating and cooperating in relevant internal or external audits, reviews, investigations, and inspections.

### 3.2 Respect and Integrity Towards Individuals; Workplace Safety and Health

**Relats** bases its human resources management and internal relationships on the utmost respect for human dignity, trust, and mutual respect. It commits to ensuring fair labor relations, respecting fundamental rights, and actively opposing child labor, forced labor, slavery, and human trafficking in all forms. **Relats** also commits to creating a safe and healthy work environment, complying with labor regulations, and promoting diversity while respecting cultural differences in countries where it operates.

**Relats**'s management of human resources and the relationships among the people who make up the company always stem from scrupulous respect for human dignity and are based on the principles of mutual trust and respect. The company commits to ensuring that all its labor relations are conducted within a fair framework and with respect for the fundamental rights and principles of individuals.

For this reason, **Relats**:

- a) Expressly declares its opposition to child labor, forced labor, slavery, and human trafficking in any form, particularly any work or service performed by a person involuntarily under threat of punishment and/or without compensation.

Likewise, it commits to respecting human rights and various international ethical guidelines, including those of the International Labour Organization (ILO), the United Nations Universal Declaration of Human Rights, and the European Convention on Human Rights.

- b) Promotes diversity and respects the personal dignity of employees. Therefore, **Relats** rejects any manifestation of physical, psychological, or moral harassment, discrimination, or abuse of authority of any kind, especially on the grounds of race, caste, ethnic and national origin, age,

religion, political and/or union affiliation or non-affiliation, gender, marital status, sexual orientation, or any other personal characteristic, as well as any other conduct that may create an intimidating or offensive environment concerning people's rights.

- c) Fosters the creation of a healthy and safe work environment. In this regard, it guarantees compliance with all labor and occupational risk prevention regulations and the adoption of pertinent measures to ensure the proper training of workers and their use of appropriate protective equipment. The company is committed to consolidating a culture of safety, developing awareness of risks, and promoting responsible behavior by all individuals and collaborating entities. All of them are responsible for strictly observing health and safety regulations at work, ensuring their own safety and, in general, that of all people who may be affected by their activities.
- d) Commits to promoting the professional and personal development of all its employees, ensuring equal opportunities. Discrimination is prohibited in all aspects of employment, including hiring, payment, benefits, promotions, access to training and development, dismissal, and retirement, based on race, caste, ethnic and national origin, age, religion, political and/or union affiliation or non-affiliation, gender, marital status, sexual orientation, or any other personal characteristic.
- e) Commits to respecting the culture of the different countries where it is present, contributing to their progress and development.

### **3.3 Commitment Against Corruption, Bribery, and Influence Peddling**

**Relats** will not tolerate under any circumstances attempts to influence the will of individuals outside the company to obtain any benefit through the use of unethical practices.

Nor will it tolerate, under any circumstances, attempts by third parties to influence the will of Relats and its members through the use of such unethical practices.

For this reason, the company's team will in no case offer or promise an improper personal or financial favor or any other type of favor, either directly or indirectly, with the purpose of obtaining or securing a business deal, an advantage, or preferential treatment from a third party. The making of non-contractual or illicit payments to any person or entity, public or private, for the same purposes is also

expressly prohibited.

Likewise, obtaining any illicit advantage or benefit as a consequence of the influence of a public official or authority is totally prohibited.

### **3.4 Commitment to Combating Money Laundering and Fraud Prevention**

The company's commitment to legality and ethical, responsible behavior also extends to organizational aspects related to accounting and finance. In recent years, the fight against money laundering stemming from illicit or criminal activities has intensified in this sphere.

For this reason, regarding this issue, the company expresses its firm commitment to adopt the pertinent measures to prevent any type of money laundering, paying special attention to payments that appear unusual given the nature of the operation, those made in cash, and those made with bearer checks. Special attention will also be paid to payments made by third parties different from those mentioned in the corresponding contracts, as well as payments originating from tax havens.

Furthermore, **Relats** adopts informational transparency as a guiding principle of behavior. The falsification, manipulation, or deliberate use of false information constitutes fraud. Therefore, the company's commitment to transparency towards third parties translates into the obligation of its members to reflect the company's real situation in the accounting at all times, in order to facilitate third parties contracting with the company to understand its situation.

### **3.5 Commitment to Fiscal, Social Security, and Public Subsidy Obligations**

Compliance with tax obligations and social security contributions constitutes one of the pillars of the welfare state. Aware of this reality, the company reaffirms its commitment to continue promptly fulfilling its tax obligations at all times, as well as its obligations to the General Treasury of Social Security.

Furthermore, **Relats** is also aware that public resources are limited and, due to their special nature, extreme precautionary measures must be taken to guarantee their correct use and prevent embezzlement. Within the company's scope, this can occur in cases of improper obtaining or application of public aids or subsidies. For this reason, and as a demonstration of the company's commitment to prevent embezzlement, it has the pertinent internal mechanisms to ensure that it meets the required criteria in each case for obtaining the subsidy/aid, and that once obtained, it is

applied to the purposes for which it was granted.

### 3.6 Commitment to Fair Competition

**Relats** undertakes to comply with the applicable current regulations in this regard.

In particular, it commits not to adopt any agreement, decision, or collective recommendation, nor to carry out any concerted practice aimed at preventing, restricting, or distorting market competition.

### 3.7 Compliance with Customs and Tariff Obligations; Commitment Against Smuggling.

**Relats** undertakes, within the framework of its activities, to comply with the current regulations related to imports and exports, as well as tariffs and customs.

To this end, the company may seek specialized external advice when necessary.

Likewise, **Relats** commits to respecting, during their validity and when applicable, any legally established trade prohibitions and/or restrictions, especially those arising from sanctions imposed on third countries.

### 3.8 Confidentiality

**Relats** protects the company's confidential information and respects the confidential information of employees and third parties.

The data and documents that employees access in the course of their work are strictly confidential, and their dissemination, manipulation, deletion, copying, or use for any purpose other than the performance of the professional activity entrusted to the employee is completely prohibited.

Reference data will not leave the company unless it is strictly necessary for the development of its activities.

Individuals who are part of **Relats** will not use reserved information for purposes unrelated to the exercise of their own activities, and under no circumstances will they disclose the referenced

information to third parties. They will also not disclose it to other company personnel who do not require it for the execution of their assigned tasks.

In cases where someone within the company, in the performance of their duties, needs to speak publicly on its behalf, they must first request and obtain prior authorization from the Management.

### **3.9      Respect for Intellectual and Industrial Property Rights**

During their activities, the individuals who make up **Relats** will always respect the intellectual and industrial property rights of third parties.

To this end, the staff of **Relats** will refrain from downloading files or computer programs of any kind without the prior authorization or license from the owner. They also may not use the company's equipment to download, store, or view content that may be offensive or illegal.

Respect for intellectual and industrial property rights will be especially considered during the development of design and manufacturing tasks for products, ensuring that they do not infringe on third-party rights protected by patents or utility models, and that they do not use third-party information protected by confidentiality agreements.

### **3.10    Environmental Commitment**

**Relats** carries out improvement actions and invests the necessary resources to achieve optimal management of environmental issues, for which it holds the ISO14001 certification:

- Implementing specific internal procedures, policies, and regulations.
- Using its own resources efficiently.
- Maintaining its facilities in optimal conditions.

**Relats** commits to complying with all applicable local and international environmental protection regulations, including all laws related to the elimination, transport, and storage of waste, toxic substances, and hazardous waste; the reduction of atmospheric emissions and greenhouse gases; the

control and reduction of discharges; the reduction of water and energy consumption; noise pollution; and soil contamination.

**Relats** promotes the efficient use of available resources and the reduction of environmental footprint through recycling, the use of recycled materials, limiting the use of natural resources, and the reduction or elimination of components that are harmful to the environment.

### 3.11 Relationships with Clients and Suppliers

**Relats** assumes a commitment to quality by providing the necessary resources and implementing appropriate measures to ensure that this commitment to quality is embraced and applied by all individuals within the company. In this regard, the company holds the **ISO9001** and **IATF 16949** certifications.

**Relats** considers its suppliers and collaborating entities as indispensable partners in achieving these objectives of growth and quality improvement, seeking to establish relationships based on trust and mutual benefit. For this reason, the company will contract suppliers that comply with the principles outlined in this Code.

In its relationship with clients and customer entities, the people who make up **Relats** are obligated to provide truthful and accurate information about the characteristics and performance of products, taking into account, in particular, the intended use by the clients, and avoiding in all cases any misleading, fraudulent, or malicious conduct that could harm them.

In this sense, the company is committed to being respectful of the commitments made with suppliers, collaborators, and clients.

## 4. Prohibition of Conflict of Interest Situations

La The relationship between the company and its members must be based on loyalty that arises from shared interests.

Conflicts of interest occur when the personal interests of the individuals who make up **Relats**, or those of a third party with whom they are directly or indirectly linked, are contrary to or clash with the company's interests. Therefore, whenever possible, employees should avoid situations that present a conflict of interest.



In the event that a conflict of interest arises, the employee must communicate it to the company and to the person responsible for Criminal Compliance (and the person responsible for the Internal Information System) so that they can adopt the pertinent measures in each case.

## 5. Oversight of Compliance with the Code of Conduct

**Relats** has a person responsible for Criminal Compliance ("*Compliance Officer*"), who is also the person responsible for the Internal Information System (RSII) (hereinafter, the "RCP/RSII" person) for the purposes of Law 2/2023, dated February 20, regulating the protection of individuals who report regulatory infringements and the fight against corruption. Currently, this position is held by the person occupying the role of Governance Risk Compliance & Admon Group Manager (GRC & Admon).

The RCP/RSII person has the following essential responsibilities, which they will carry out directly or with the support of other professionals they deem necessary at any given time:

- a) Clarify any doubts that may arise among company members regarding the compliance of specific behaviors with the principles and guidelines established in this Code of Ethics and the action protocols.
- b) Oversee and coordinate the external dissemination of this Code of Ethics to clients and supplier entities.
- c) Evaluate the risk of criminal offenses in the different areas of the company's activity.
- d) Provide training for the effective implementation of the Code of Ethics and the Action Protocols.
- e) Establish and manage the pertinent communication channels for receiving and resolving compliance queries and reporting possible non-compliance.
- f) Investigate reports of possible conduct contrary to criminal law, EU law, occupational health and safety regulations, as well as serious or very serious administrative infractions, and apply the pertinent corrective/sanctioning measures.
- g) Initiate necessary organizational changes determined during the course of investigations in matters of criminal regulatory compliance.
- h) Prepare and issue periodic reports to the company's management regarding the implementation and incidents of the Crime Prevention Plan and the Internal Information System.

i) Periodically review the documents that comprise the company's Crime Prevention Plan to adapt them to ongoing changes and ensure their validity at all times.

## 6. Reporting of Illegal Conduct and Other Information

**Relats** provides a mechanism that allows its members, suppliers, as well as third parties authorized by law, to confidentially, in good faith, and without fear of retaliation, report any complaints, make inquiries, or report possible breaches of this Code or the company's internal operating protocols. This includes bringing to attention any infringements in the realm of EU law, criminal offenses, serious or very serious administrative violations, and labor infractions in the area of occupational health and safety. Possible breaches of the Code of Conduct and other infractions will be resolved in accordance with the applicable regulations at any given time.

Such communications can be sent to **Relats**, addressed to the RCP/RSII person, through any of the following means:

- **Ordinary mail** to the company's address: Carrer Priorat 17-19, 08140 Caldes de Montbui, Barcelona.
- **Email** to: [complianceofficer1@relats.com](mailto:complianceofficer1@relats.com).
- **Written letter** delivered to the RCP/RSII person.
- **Telephone conversation** with the RCP/RSII person at: **+34 938 627 510**.
- **Requesting an in-person meeting** with the RCP/RSII person within a maximum of seven days.

In communications via telephone and during the in-person meeting, the submission of the communication will be documented through one of the following methods, with the prior consent of the informant:

a) By recording the conversation in a secure, durable, and accessible format; or

*(\*) The informant will be warned that the communication will be recorded and will be informed about the processing of their data in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council, dated April 27, 2016.*

b) Through a complete and exact transcription of the conversation made by the person

responsible for handling it.

*(\*) Without prejudice to the rights that correspond to them in accordance with data protection regulations, the informant will be offered the opportunity to review, correct, and accept the transcription of the conversation by means of their signature.*

The communications received will be treated confidentially. The data of the involved parties may be disclosed only if the reported matter leads to the initiation of proceedings by administrative or judicial authorities and to the extent required by those authorities, as well as in compliance with current Data Protection regulations and any applicable legislation, including the aforementioned Law 2/2023, when applicable.

**Relats** expressly declares that it will not tolerate any type of retaliation against persons who, in good faith, make use of the established procedures for reporting irregular conduct.