



# **CODE OF CONDUCT**

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**AZKOYEN GROUP**

- **Version control**

Version	Date	Author	Changes made
1.0	September 2019	Support Unit	Initial version

- **Approvals**

Governing body	Entity	Date	Signature
Board of Directors	GRUPO AZKOYEN, SA	September 2019	P.P.



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## 1. Introduction

This Code of Conduct applies throughout Azkoyen Group, to all Group employees and companies. All employees and managers must fully comply with the Code of Conduct.

This Code of Conduct forms an intrinsic part of the Internal Conduct and Corporate Governance rules. This document translates the principles and concepts of the “Corporate Compliance Model” of Azkoyen Group and all of its component companies to individual behaviour. Specifically, this Code of Conduct flows from: 1) the Anti-Corruption Manual; 2) the Compliance Manual; 3) the Disciplinary Regime; 4) the Whistleblower Channel Policy; and any other policy or rules included in the Azkoyen Group Regulatory Framework.

This Code of Conduct has been formally approved by the Board, and all employees must read, understand, and apply it in their daily behaviour.

## 2. Azkoyen Group’s mission and vision

This Code of Conduct reinforces Azkoyen Group’s mission as follows: *“We develop technological products and services, for the vending and HoReCa markets, payment and security systems, meeting the expectations of our customers, achieving long-term returns for our shareholders and building a dynamic, challenging and rewarding environment for our employees”*

Azkoyen Group’s reputation for conducting business in an ethical manner is a valuable asset in Azkoyen’s relationship with its stakeholders. This reputation is maintained with the help of employees through their commitment to do their best to enhance the Group's good name and to work in accordance with our vision: *“To become a global benchmark for innovative automated sales, payments and security solutions, and at the same time, to be one of the most attractive companies to work for”*.

Azkoyen Group looks to the future with long-term sustainability in mind. Business ethics, honesty in communications, human rights and fair working conditions, the environment, and health and safety are fundamental elements of our culture.

Azkoyen Group believes in responsible social and ethical behaviour. Azkoyen feels a great responsibility for the people working in the Company world-wide. Our people are the biggest contributor to our success. Azkoyen will always protect and defend those who are deprived of their basic human rights or forced to suffer physically or mentally because of their work.



Furthermore, Azkoyen management and all of its employees have an obligation to all stakeholders to uphold high standards of integrity and fair dealing. This Code of Conduct applies to all Azkoyen Group companies and employees regardless of the Company's location or the employee's length of service, job title or seniority.

### 3. Breaches of the Azkoyen Group Code of Conduct

Breaches of the Code of Conduct, or failure to detect and report breaches through wilful disregard, may result in disciplinary action, including suspension or termination of employment.

In other words, failure to comply with the provisions and principles contained in this Code of Conduct may lead to disciplinary sanctions, in accordance with the provisions of the applicable Collective Agreements, the Spanish Workers' Statute, and other Social and Labour regulations as applicable in the countries where we operate.

Employees should be aware that, apart from employment-related disciplinary measures, they may be subject to prosecution, fines and imprisonment depending on the nature and gravity of the breach.

There may be situations for which there are no specific guidelines. In such cases, their behaviour must respect the spirit of the Code of Conduct.

The Code of Conduct can never substitute regional, national and/or local legislation which in many cases is much more specific. All Azkoyen companies and entities are responsible for producing and updating any relevant in-depth information about their specific legal requirements in concordance with the Corporate Policies and Regulations.

### 4. Azkoyen Group's Values

Azkoyen Group shall conduct its business in accordance with Azkoyen Group's mission, vision, business strategy and objectives and the Company's values. We always manage our business with the highest level of integrity, ethics and legal compliance in all countries where the Group operates.

Azkoyen's values influence and guide all of our actions and practices across our production, commercial, development, administration and all other areas within the Company; as well as both internal and external communication.

The key values that dictate our actions and methods of interacting are:

- a) **PROFESSIONALISM:** We are effective, efficient, rigorous and agile. We pursue improvements relentlessly. We promote transparency and ethical behaviour. All customers, employees and partners are treated equally and with respect in accordance with the applicable legislation and in line with this

Code of Conduct. This is reflected in our honesty and in the way we deliver on our promises and commitments.

- b) COMMITMENT TO CUSTOMERS: We strive and act at all times to meet the needs and expectations of all our clients, both external and internal.
- c) COMMITMENT TO RESULTS: we target our actions and promote accountability to achieve business objectives in the short and the long term.
- d) TEAMWORK: We share a vision as a Group and team and work together, overcoming challenges and barriers, to achieve collective success.
- e) RESPECT FOR OUR PEOPLE: We value all of our people, we listen carefully to their needs, we promote their development and growth; we recognise and reward their performance and successes.

Additionally, in Azkoyen Group we promote and respect other guiding principles of our daily behaviour, such as:

- Legality: At Azkoyen we are committed to all current laws, in all areas and territories; with business ethics and transparency in all our areas of action.
- Worker safety: At Azkoyen we provide a working environment in proper safety conditions, promoting training efforts, full respect for all regulations on health, safety and hygiene at work.
- Respect for the environment: At Azkoyen we want to be an example of respect and protection of our environment, in all the countries where we do business; including full respect for all regulations on health, safety and hygiene at work.
- Combating all forms of corruption: Any form of corruption, bribery or extortion, public or private, is strictly and absolutely prohibited. We reject the use of unethical practices or practices that may unduly, unjustifiably and improperly influence the will of people outside Azkoyen in order to obtain, unlawfully, any benefit, advantage or consideration. In this sense, acting unlawfully in the belief of obtaining a benefit for Azkoyen does not justify any behaviour and is equally reprehensible and punishable. At Azkoyen we have a zero tolerance approach and will make all necessary efforts to prevent, investigate and, where appropriate, punish any conduct that may be considered corrupt.

## 5. Implementation of the Code of Conduct

This Code of Conduct is adopted in line and in accordance with the Criminal Risk Prevention Model approved within Azkoyen with the purpose of ensuring the Group is not subject to criminal liability for individual unlawful criminal acts that may result, in certain cases and circumstances, in criminal liability for the Company itself.

The overall responsibility for the Code of Conduct and its implementation lies with the Corporate Director of Human Resources, and ultimately with the Corporate Managing Director of Azkoyen Group. All this, in addition

to the responsibilities and functions that, under Spanish Legislation, are attributed to the Azkoyen Group Audit Committee and its Support Unit, as its support body.

All managers have additional responsibilities in conjunction with the Code of Conduct. They are expected and required to behave in accordance with Azkoyen's standards of ethical conduct, to demonstrate their commitment, and to reinforce compliance with the Code of Conduct by all of their employees. They must also foster a working environment that encourages employees to act ethically in accordance with this Code of Conduct.

Managers should also be available to provide information and advice in ethics and compliance matters. All directors are responsible for the communication and dissemination of the Code of Conduct to employees as well as for handling queries and complaints. If this is not possible, the directors can seek advice from the Group's Director of Human Resources.

This version of the Code of Conduct should be included in all employment contracts and also be signed by all existing Azkoyen Group managers and employees in all countries.

## 6. Questions and complaints about the Code of Conduct

All inquiries and complaints relating to this Code of Conduct can be channelled in two ways. First, they can be reported simultaneously to the line manager and the local HR manager. If any employee faces difficulties in contacting the local management, they can contact the Corporate HR Director directly, who will provide assistance to properly manage the question or complaint.

Second, and in parallel, we remind all employees that Azkoyen Group has a Whistleblower Channel, accessible via the corporate website, where any employee can report breaches of this Code of Conduct.

Additionally, Azkoyen Group also has an absolutely confidential and secure communication tool to facilitate the notification of both serious complaints about unethical conduct within the Group, of any situation of risk or irregularity that may generate criminal liability for the Company. This tool is called the "Whistleblower Channel". Any individual can access the channel directly from the Azkoyen Group corporate website, under the "Compliance" section. [www.azkoyen.com/en/corporate-compliance/](http://www.azkoyen.com/en/corporate-compliance/)

Azkoyen Group's management is fully committed to the correct implementation of this Code of Conduct, will follow up and monitor any complaint, and act upon any breach.

To learn more about the Whistleblower Channel, employees are invited to visit and read our Public Policies on the matter, available to all employees on both the corporate website and the internal employee portal. Additionally, the Human Resources team is always happy to answer any questions on this matter.

## 7. Ethics culture: Main principles

At Azkoyen Group our way of doing things is a key part of our organisational culture. It is governed by principles that all Azkoyen employees must know and comply with as they are an essential benchmark when assessing professional performance.

- **Customers:** Always treat our customers with respect, honesty and a service-oriented attitude. Our customers are the fundamental reason behind our work and therefore, they deserve all our attention and consideration.
- **Colleagues:** Treat all colleagues with respect, promoting team work based on communication, mutual trust and cooperation, ensuring the application of the principles laid down in the Code of Conduct.
- **Equality:** Ensure the application of exclusively professional criteria in all areas of personnel management, based on individuals' abilities, attitude and qualifications.
- **Occupational health and safety:** Provide safe working conditions, making the prevention of occupational risks a precondition for all decisions.
- **Professional impartiality:** Maintain impartiality and professional objectivity in our work as a safeguard for our decisions. Apply the same principle in relation to decisions taken by others. Neither accept nor offer gifts, beyond courtesy gifts, and under no circumstances to public officials or representatives.
- **Conflicts of interest:** Maintain a clear separation between Company interests and private, personal or family interests. Employees with decision-making powers to procure, contract, execute or decide financial transactions or those with financial implications must always act to safeguard the Company's interests. In any event, the immediate hierarchical chief and the Human Resources Department must be notified of any issue of this nature.
- **Competence:** Act professionally in accordance with the principle of free competition in relationships with our partners, clients or competitors.
- **Management and accounting principles:** Act and reflect the financial situation of the Company according to the rules and accounting procedures established by law. Ensure that the necessary records are completed to adequately document management decisions and their corresponding authorisations.
- **Environment:** Respect and enforce the legal regulations on environmental protection when exercising our activities, ensuring the organisation's commitment to the management standards in the ISO-14000 standard at all industrial centres.
- **Confidentiality:** Ensure the adequate protection of data and information belonging to the Company and that their use is legal and for Company purposes.



- **Compliance:** Act respecting all applicable regulatory and legal frameworks in all territories where we operate, with special focus on the Spanish regulatory framework for companies listed on the stock market, especially in their relationship with shareholders.
- **Transparency:** At Azkoyen we are especially transparent and loyal to our shareholders and investors. Thus, and among other issues, Azkoyen employees refrain from transmitting to the media or any third party, on their own initiative or at the request of third parties, any information or news about the Group, or about third parties, without first obtaining proper authorisations, or without following the internal channels established for this purpose. Employees are prohibited from spreading remarks or rumours.

## 8. Azkoyen Group's business ethics

Azkoyen Group respects and abides by the United Nations Universal Declaration of Human Rights and all the standards and regulations of international, European and national labour organisations. We understand our responsibility and respect all of the rights of employees and local communities to the extent that they are affected by any of the activities of the Group's subsidiaries.

Azkoyen Group respects all applicable laws and regulations in all the countries and territories where it operates and, consequently, all employees are required to behave in the same way. The Company has a clear zero-tolerance attitude to any activity related to corruption and/or illegal conduct such as bribes, conflicts of interest, fraud, extortion, embezzlement or illegal payments. In this regard, and to underscore this point, Azkoyen Group has a robust compliance model and corresponding policies, which all employees are required to know. Please contact Human Resources if you have any questions.

This Code of Conduct does not substitute legislation applicable in your territory and, in the event of a conflict between the two, statutory requirements always take precedence. However, if the Code of Conduct contains higher or more demanding requirements than local legislation, this Code of Conduct shall apply.

The mandatory concepts are listed below:

Relationship with the Government, Government Bodies and Agencies. Azkoyen Group will never seek any unlawful treatment to benefit the Company when dealing with any level of Government, politicians and Government Bodies. Our values and conduct are always based on the principles of compliance and transparency.

Azkoyen Group does not engage in anti-competitive agreements or practices. The antitrust and competition laws vary from country to country, but the main principles are the same. Employees must avoid any kind of anti-competitive agreement or concerted practice, common understanding or otherwise, with any actual or



potential Azkoyen competitors. Exchanging information of a competitively sensitive nature between competitors or potential competitors is also illegal.

Employees must not agree resale prices with retailers or dictate minimum prices to be charged by them for Azkoyen's and its subsidiaries' products. Maximum or recommended resale prices are permissible.

Azkoyen Group does not offer, deliver, or receive, directly or indirectly, any kind of favours which may be deemed a bribe. Azkoyen categorically rejects, and no Azkoyen employees should accept or make, any gift or other forms of compensation that could influence their behaviour. All employees should remain alert to any indication of a lack of honesty, integrity or professionalism reflected in bribes, illegal payments and other fraudulent conduct.

This means that Azkoyen Group prohibits its employees from making or offering any promise, payment or gift or any other item of value to any individual with the intent of improperly influencing a decision by the individual. Similarly, this also means that all employees are prohibited from receiving anything of value with the intent of improperly influencing their decision-making process.

Entertainment and courtesy gifts should be limited in value and be specific to each country, for a business purpose, and properly documented and reasonable. All procurement and sales activities should be handled with maximum integrity. After careful consideration, entertainment, courtesy gifts and expenses of modest value may be acceptable, except whenever such arrangements could improperly affect the outcome of business transactions. All employees must avoid activities that could cause even the appearance of impropriety.

Azkoyen Group could be held liable for the wrongdoing of business partners acting or instructed to act for or on behalf of the Company. Therefore, they should be carefully reviewed and used only for legitimate business purposes, on commercially reasonable terms. Those acting on behalf of Azkoyen Group and its subsidiaries are expected to comply with this Code of Conduct.

Excessive discounts, rebates, commissions, discounts and compensation can be used to facilitate bribery. Close monitoring is therefore necessary. The terms of these arrangements should always be in writing and should be commercially reasonable.

Azkoyen Group does not permit so-called "kickbacks" as they involve payments with the aim of achieving a certain volume of business. This is not acceptable under any circumstances.

Azkoyen Group supports charitable groups for legitimate purposes. Donations must be aimed to benefit society, and, in a manner that demonstrates corporate social responsibility. No donations should be made with the express or implicit requirement to use or purchase any of the Company's products and/or services.



Azkoyen Group does not accept fraud in any form. Azkoyen does not accept any kind of action and/or any level of involvement with financial market offences, smuggling and/or money laundering activities. Furthermore, all employees are expected to formally raise any grievance or concern in case of suspicion.

Intellectual Property (IP) and IT rights. Azkoyen Group and all employees must always observe the highest legal and ethical standards when dealing with inventions, patents and intellectual property rights. This same principle applies to IT systems and the security of digital communications. Employees are responsible for correct use.

The integrity of the Company's record keeping and reporting system is of utmost importance. All employees must take special care to make sure that records are accurately and completely prepared and reviewed, whether they are for internal or external usage. Employees must apply accounting and legal rules and controls, as communicated by the corporate guidelines, and following Company procedures for retaining and disposing of records.

Azkoyen Group cooperates with all proper government investigations. If a Government Agency or Institution files a complaint in this regard, the immediate hierarchical superior must be informed before any action is taken. Documents must never be destroyed or altered in anticipation of an investigation or any misleading or untrue statements made to investigators. No coercion or pressure may be put on employees to violate the applicable legislation and/or this Code of Conduct.

Conflicts of interest between employees and the Company must be avoided. Should such a conflict occur, or if there is concern that one may arise, the employee is required to notify the Company in writing and to discuss the matter with his line manager and/or with the Corporate HR team.

Activities outside the Company: Azkoyen Group expects all employees to devote their full working hours exclusively to their work for their Company. Employees are not permitted to engage in any external activity that may represent competition with any Azkoyen Group company, business unit or line.

Personal financial interests: Personal financial involvement in activities that may conflict with Azkoyen Group's interest must be avoided, e.g. stakes in companies whose activities are significantly impacted by our business units. This may also apply to family members.

Family and close friends: Azkoyen Group strives to maintain a fair workplace free from special advantages due to family or other personal relationships. Therefore, prior approval by a senior manager is required before a family member or personal friend may be recruited. Furthermore, employees must not be employed in any position where they have an influence on the employment of a family member or friend. The above also applies to purchasing from or selling to a family member or personal friend.



Insider information: Azkoyen promotes and asks all employees to make the greatest possible commitment to transparency regarding internal and external information. Without prejudice to the foregoing, employees should not use internal or other confidential information to their own advantage. Confidential information must not be disclosed to any external party, person or legal entity either during or after employment at Azkoyen Group.

Employees should not use or disclose to any person, either during or at any time after their employment with the Company, any confidential information about the Company's business or affairs, or any of its business contacts or any other matters which the employee came to know during their employment with Azkoyen Group (or its companies). This relates to any information, data or matter which is not in the public domain and which concerns the affairs of the Company and/or any of its business contacts.

Confidential information: Any information that, if disclosed, risks placing Azkoyen Group (including all its subsidiaries) at a competitive disadvantage shall be treated as confidential and must only be disclosed on a strictly need-to-know basis to perform work for the Company's benefit. This also applies after termination of employment. Employees should not provide confidential information about our business, products and customers, except pursuant to a written and binding confidentiality agreement.

Brands: Azkoyen Group recognises the significant value of its brands. They should be nurtured and protected to further develop their value. Any invention, technology, process, IP or other works developed or discovered during employment with Azkoyen Group shall be the sole property of Azkoyen Group.

Consumer interests: Azkoyen Group ensures that its products and services meet applicable health and safety requirements, and that necessary and relevant information about its products and services is published through the appropriate channels, in compliance with local and international standards and regulations.

Advertising should always be truthful: Evidence must be available to substantiate any specific claims made about a product. Products should not be labelled or marketed in any way that might cause confusion between Azkoyen Group's products and those of its competitors.

Similarly, employees should be alert to any situation where a competitor may be attempting to mislead potential customers as to the origin of products, and should report any such cases to their line manager.

Competitors' products, services or employees should not be treated with contempt. Any comparisons made between Azkoyen Group products and those of the competitors should be fair. Comparative advertising is subject to regulations and, in the event of uncertainty, should be pre-cleared with the Company's legal advisors.



Computer software: Azkoyen Group respects computer program copyrights and confirms that it abides by all laws and regulations concerning the use of computer software and expects all employees to follow applicable laws and regulations, for example, not to copy any program unless the licence specifically permits it.

## 9. Human rights and labour standards

Azkoyen Group recognises the right of every child to be protected from economic exploitation and from doing work that is very likely to be hazardous to their physical, mental and/or spiritual health, harmful to their moral or social development or to interfere with their education.

Azkoyen Group does not accept child labour, in accordance with both the international legislation and local legislation of every country in which the Company operates. Azkoyen Group realises that child labour cannot be eradicated simply by instituting rules and inspections, but by actively contributing to improving children's social situations. If a child is found producing products or providing services for Azkoyen Group, a request will immediately be made to the employer to take action, in accordance with the legislation, this Code of Conduct and the best interest of the child.

Azkoyen Group will always cooperate in seeking a satisfactory solution to improve the individual child's overall situation, and the child's age, social situation and education will always be considered before a final decision is made.

Forced or bonded labour. Azkoyen Group does not employ or accept any form of forced or bonded labour, or illegal workers. Azkoyen Group acknowledges that the means used to force people to work can include a deposit payment or demand to surrender identity documentation or other personal belongings, all of which are prohibited. If foreign workers are employed on a contract basis, they must not be required to remain in employment against their will, and they must have the same rights as the local workers.

All workers must have the right freely to leave the workplace and their accommodation (if provided by the Company) during the hours when they are not working.

All Azkoyen Group employees have the freedom to join, or not to join, an association of their choice, as well as to establish an association if they so wish, to organise and to bargain collectively and/or individually according to the applicable legislation. No employee should fear harassment or retaliation for exercising these universal rights.

Employment contracts. Azkoyen Group complies fully with international, national and local laws and regulations regarding workers' contracts and working hours, including overtime and overtime compensation. Salaries should be paid regularly and comply with the local applicable legislation and local market practice and situation.



Employees should be granted weekly rest time, time off for national and local public holidays, annual leave, sick leave, maternity leave, and any other leave pursuant to local laws, and always without any negative repercussions.

Discrimination, harassment and diversity. Azkoyen Group values and promotes diversity, inclusion and gender balance. Azkoyen Group provides a working environment where everybody should be treated with the same respect and dignity and be given fair and equal opportunities for development.

As such, Azkoyen Group does not accept or tolerate any form of discrimination or harassment in the workplace on the grounds of race, ethnicity, sexual orientation, gender, religion, age, disability, illness, political opinion, social group, nationality or any other potential discriminatory factor.

Employment and medical records. Employment contracts and medical records are kept confidential and will not be disclosed to any person unless required by law and/or with the written consent of the employee concerned. Employees' medical records should be kept separately from all other employee records in locked cabinets or an equivalent according to the applicable legislation.

In this regard, as with any personal information that we handle at Azkoyen, the necessary legal, technical and organisational measures will be adopted to give faithful, exact and strict compliance with the current regulations on data protection: Especially the European General Data Protection Regulation 2016/679, and Spanish Organic Law 3/2018, of 5 December, on the Protection of Personal Data.

Tobacco, alcohol and/or drug abuse. Azkoyen Group works proactively to eliminate workplace hazards. Employees should not be on Company premises or in the workplace if they are under the influence of, or adversely affected by, alcohol, to the extent this impairs the employee's ability to perform their professional duties properly.

Azkoyen Group applies zero tolerance to drugs and does not allow its employees to be on Company premises or in the workplace if they are under the influence of drugs.

To protect the well-being of all our employees, they are not allowed to smoke at work, or on any Company premises at any Azkoyen Group subsidiary.

Responsible sourcing of minerals: Azkoyen Group is committed to complying with relevant laws and regulations requiring disclosure of the use of conflict minerals. Conflict minerals are minerals from high risk and conflict-affected areas that have directly or indirectly contributed to the financing of armed groups, where these groups are believed to be responsible for serious human rights violations.

## 10. Relations with shareholders and investors

At Azkoyen, our principles include strict compliance with our obligations to provide the markets with reliable financial information about our operations, our financial position and, in general, promptly to facilitate, in accordance with the applicable rules, any information must be provided.

Both senior management, by designing and implementing appropriate policies and controls, and the rest of our workers and collaborators are obliged without exception to ensure that the information provided to shareholders, regulators and the markets is truthful, complete and unbiased. We must do our utmost to be realistic and rigorous in communicating the Company's growth expectations.

All members of senior management and other collaborators who participate in Company promotional and public communication activities must act in accordance with maximum transparency and truthfulness, and may in no way transmit false expectations or hide valid relevant information, when this involves breaching any applicable regulations and/or harming the legitimate interests of the recipients of such information.

## 11. Relations with the Tax and Social Security authorities

As a result of its firm commitment to compliance with current legislation, at Azkoyen we always take the necessary measures to guarantee compliance with applicable Tax and Social Security obligations, in accordance with all current legislation. Likewise, unlawful avoidance of Tax payments and Social Security contributions, or obtaining of undue benefits on behalf of Azkoyen to the detriment of the Inland Revenue is strictly prohibited.

## 12. Relations with competitors

At Azkoyen we fully respect market laws when competing. We must avoid any practices that distort, restrict or tend to eliminate competition, such as price fixing or denigrating our competitors. The promotion and commercialisation of our products must be based on their intrinsic added value, on their innovative nature and on the rigorous dissemination of information on their quality.

## 13. Handling communication in Azkoyen Group

All communication on behalf of Azkoyen Group, regardless of the communication channel used, must be in line with Azkoyen Group values, policies and this Code of Conduct. All employees must be professional, honest, accurate and always maintain confidentiality in their communication. Sensitive or undisclosed corporate information may never be published, shared or commented on in public, both inside and outside the workplace.



E-mail communication should be handled in the same way as other written business communication with regard to content, formal language and document handling.

Company e-mail, and internet functions should be used for Company purposes only. All traffic is therefore Company property. The Company reserves the right to monitor emails, internet use, and any other technology owned by the Company and used by individual employees, always and at all times in accordance with applicable legislation.

All posts about Azkoyen Group on social media, including blogs, content communities, internet forums and social networks, shall always respect the laws, the image and values of the Company. Only designated individuals may act on behalf of the Company on social media channels. Social media may not be used in any way that could harm Azkoyen Group's reputation and public image.

## 14. Environment and sustainability

Azkoyen Group shall meet all legal environmental and sustainability requirements and expects all its companies to do the same. All Azkoyen Group companies must have all environmental permits and licences needed for their operations. All employees are expected to support and take responsibility for the Company's environmental performance.

Azkoyen Group encourages the development and dissemination of environmentally friendly products and services. Azkoyen Group requires all its companies and entities to implement certifiable environmental management systems, in accordance with the relevant Corporate policies.

Azkoyen Group will continuously seek ways to reduce the consumption of resources, including energy, water and waste, prevent pollution, keep noise at acceptable levels and improve the overall environmental impact of its operations and all products along the value chain.

Chemical and hazardous materials should be labelled properly and stored safely, always applying the principle of reduce, reuse, recycle, and disposing of them legally and correctly. Azkoyen Group is committed to taking active steps towards a more circular economy that will improve the environmental footprint of the whole business.

## 15. Health and safety

Azkoyen Group will promote, guarantee and work to achieve fair and legal working conditions that protect, care for, develop and motivate all employees so that they can carry out their functions successfully.





Azkoyen Group systematically works in accordance with international, national and local health and safety laws and regulations. The Company is actively committed to provide a safe workplace and environment. All risks that could cause accidents and impair the health and well-being of our employees should be eliminated or at least reduced. As such, occupational health and safety hazards are identified, evaluated and managed through a prioritised systematic process of hazard elimination, engineering controls, and/or administrative controls.

Azkoyen Group's contractors are responsible for and in charge of their own security. However, Azkoyen Group requires all contractors to take part in our Company's safety process and procedure. Contractors that identify health and safety practices that are not in line with Azkoyen Group standards and principles for a safe working environment are encouraged to raise any concerns on this matter.

Hazardous material and equipment must be stored according to the applicable legislation, rules and policies. Emergency exits should be clearly marked. These exits must not be locked or obstructed and should be kept clean and well lit.

All employees should receive information about the safety arrangements in their premises; i.e. emergency exits, fire extinguishers, first aid equipment, and any other aspect required under the applicable legislation. An evacuation plan should be displayed on each floor of a building, the fire alarm should be tested regularly, and evacuation drills carried out on a regular basis.

First aid equipment should be stored and available at appropriate locations and the appropriate person(s) in each location should be properly trained to operate the first aid equipment. All of our companies should provide medical services for injuries which occur on our premises, in accordance with applicable local laws, provided that the safety rules have not been breached.

## 16. Community involvement

Community outreach: Azkoyen Group aims to act as a good corporate citizen wherever it operates and to support local, regional, national and global communities' development in appropriate ways.

Each of the companies in Azkoyen Group strives to establish long-term ethical relationships in the local communities where we are active because Azkoyen takes our Corporate Social Responsibility seriously and approaches it very actively.

Business decisions which may be assumed to affect the local community at large, should whenever possible be preceded by another friendlier alternative or followed by corrective and improvement actions. All within a



context of open and honest discussions with local community representatives for the purpose of identifying any needs for joint decision and intervention.

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## 17. Certification

I, the undersigned, certify that I have read the Azkoyen Group Code of Conduct. I understand that it is my responsibility to comply with all its sections. I sign below as proof of my agreement and commitment.

Name and surname:	
Identification document:	
Job:	
Company:	
Location:	
Date:	
Signature:	