

CODE OF ETHICS

PURPOSE

The CALMELL GROUP'S Code of Ethics aims to set out the values that must guide the behaviour of all workers, as well as promoting honest business conduct, having as its outcome an image of transparency valued both by the members of the organisation and by the rest of society and valid for establishing the guiding parameters of the group's corporate culture.

SCOPE

This Code of Ethics will apply to the following interested parties, whether individuals or legal persons, in the following cases:

- Employees: regardless of the form of contract determined by their employment relationship, the position they hold, or the geographical area in which they carry out their work.
- Directors and Members: regardless of the form of contract determined by their employment relationship or the position they hold. This includes, in any event, members of the management team and others.
- Customers, suppliers, and other stakeholders: to the extent that it is applicable to them and provided that the CALMELL GROUP has the capacity to effectively influence them.

Relationships between the Organisation and the Public Authorities and Administrations will always be based on the principles of maximum transparency, integrity, and cooperation.

The Code of Ethics is valid in all the organisation's worksites, both in Spain and abroad, always taking into account any cultural, linguistic, social, and economic differences between the various countries in which the CALMELL GROUP operates.

Failure to comply with the guidelines and obligations set out in this code of ethics by any person who is part of the CALMELL GROUP will be subject to the applicable sanction, without prejudice to any legal action that may be taken by the CALMELL GROUP against the offending person, where the breach is considered serious.

PRINCIPLES

1. Transparency and ethics

The CALMELL GROUP considers that transparency, integrity, and business ethics are the fundamental basis for all its relationships, whether employment, commercial or social. At all times it is expected that:

- All applicable laws, rules and regulations will be respected in every sphere of activity at the local, national, and international levels.
- The best sustainable practices will be implemented, in accordance with current regulations.
- Group assets and property will be used appropriately and protected, and all employees must look after their business's assets and facilities prudently, reasonably, and responsibly.
- There will be no unethical practices or behaviours, which, even where they may not breach any regulations, may damage the Group's reputation.

- There will be no engagement in activities compromising or endangering legality and the fundamental ethical principles set out herein.
- The Group will act with transparency and integrity regarding all financial, commercial, or business information issued.
- The necessary means are available to guarantee the privacy of any personal data to which anybody may have access when undertaking their activity.
- The highest standards of ethical and moral conduct will be complied with, practices involving corruption in all its forms, including extortion and bribery, will be avoided, as well as any discriminatory conduct (employment, sexual, sex-based...). To this end, there are procedures in place for a whistleblowing channel (CM_11PR07).

2. Integrity and conflict of interest

All CALMELL GROUP personnel must avoid activities leading to a conflict between their personal interests (or those of persons linked to them) and the interests of the Group. In particular, no employee of the Group may accept external work that may affect their normal performance at work, nor may they provide services that run parallel to the Group's activity.

They must be honest and trustworthy persons in all negotiations in which the interests of the Group are at stake and comply with any commitments acquired. They will also protect the confidentiality of the Group's information entrusted to them.

Gifts or presents that may be interpreted as exceeding normal business or courtesy practices will not be accepted by any group employee and, in any event, no group employee or any person linked to them may offer, grant, solicit or accept, directly or indirectly, gifts, favours or compensation, in cash or in kind, whatever their nature, with the end of seeking to influence or which may influence the decision-making process related to the performance of their role deriving from their position.

3. Respecting individuals' rights

The CALMELL GROUP'S activities are carried out completely respecting all employees' fundamental rights, based on accepted international laws and practice, such as the Universal Declaration of Human Rights of the United Nations and the International Labour.

Organisation and the United Nations Global Compact.

- Any form of forced or compulsory labour is excluded.
- Any possibility of child labour is rejected.
- It will be guaranteed that there is no form of physical, sexual, employment, psychological or verbal harassment or abuse.
- Workers' freedom of association and right to collective bargaining are guaranteed.
- Any manifestation of physical, psychological, or moral harassment or abuse of authority, or any other conduct limiting or offending against people's rights is rejected.

There are procedures in place for preventing and taking action against workplace harassment (CM_11PR01), discrimination (CM_11PR03), sexual violence, sexual harassment, and/or sex-based harassment (CM_11PR02).

4. Respecting equality

All CALMELL GROUP'S activity is based on respecting equality regardless of a person's race, sex, gender, nationality, ideology, etc., as well as practising equal treatment and opportunities. Everybody has the right to respect for their dignity, and to receive respectful and non-discriminatory treatment.

Employees' right to training, promotion and professional and personal development alike will be promoted, and equal opportunities guaranteed.

The following business policies are in place to reinforce this principle:

- CM_2PO18 Equal Treatment and Non-Discrimination Policy.
- CM_2PO19 Sexual and Gender Diversity Policy.

5. Respect for legality

The CALMELL GROUP demands scrupulous compliance with current legislation in every field in which it operates, both nationally and internationally.

No interested party, when performing their professional work, will knowingly collaborate with third parties to breach any regulations, whether national or international, nor will they cooperate with them to undertake actions or omissions compromising the principle of legality or, which may, if disclosed, damage the Group's reputation.

6. Occupational Health and Safety

The CALMELL GROUP promotes the adoption of occupational health and safety policies with the implementation of the necessary preventive measures in each field of work. Likewise, it requires any suppliers and collaborating companies with which it works to have the same occupational health and safety policies.

Disseminating and consolidating a preventive culture by developing awareness of health and safety risks and promoting responsible behaviour on behalf of all employees is a priority commitment.

Compliance with occupational health and safety regulations is the responsibility of everybody who collaborates with the CALMELL GROUP, who must not only be aware of and ensure their own safety, but also that of their colleagues, suppliers, and customers.

7. Protecting the environment

The CALMELL GROUP has implemented an Environmental Management System (EMS) in accordance with standard ISO 14001. It has an effective environmental policy and complies with current legislation, committing itself to promoting initiatives that seek to reduce the environmental impact of its activity, combat climate change, and conserve biodiversity.

The CALMELL GROUP has implemented a chain of custody system that makes it possible to guarantee the environmental protection of forests and to ensure that the products it sells to its customers are environmentally friendly, in accordance with FSC certification standards.

Its environmental policies are developed through:

- CM_2PO1 Integrated Management policy
- CM_2PO2 Chain of Custody Policy

It upholds a preventive approach, encouraging initiatives promoting greater environmental responsibility, seeking greater efficiency in activities, facilities, equipment and means of work.

It designs production processes involving an efficient use of available resources and which minimise any environmental impacts; promoting responsible and efficient water consumption among its collaborators and activities to be carried out, minimising their energy consumption, etc...

Developing and implementing environmentally friendly technologies is encouraged.

8. Data protection and data security

The CALMELL GROUP has implemented a Data Security Management System in accordance with ISO 27001 standard. CALMELL GROUP employees will refrain from communicating in any way, much less from using for their own benefit, any data, information, or document obtained during the exercise of their activity.

All personal data collected for necessary and clearly defined legitimate purposes will be processed in compliance with applicable regulations and stored securely with limited access.

Confidential personal data may only be transmitted with the appropriate authorisation and if the required technical security measures are observed.

Falsifying, manipulating or deliberately using false data constitutes fraud. The CALMELL GROUP supports the principle of data transparency, understood as a commitment to transmitting reliable information, both financial and of any other nature. Thus, the company's economic and financial information, both internal and external, will faithfully reflect the reality of its economic, financial and equity status in accordance with generally accepted accounting principles.

Employees must convey information truthfully, comprehensively, and understandably. In no event will they knowingly provide incorrect, inaccurate, or imprecise information.

The data security policy is developed in the document " CM_2PO1 Integrated Management policy".