

# Code of Conduct

## THE UNILABEL GROUP



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## Message from THE UNILABEL GROUP

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*In our company, we are committed to operating ethically and with integrity, which means that among all of the company's members and collaborators we must be able to create an optimum work environment. Where honesty, integrity and transparency, respect for human rights, respect for the legitimate interests of every person and organisation we deal with, and respect for quality and safety standards and dignity in the workplace come first.*

*At the UNILABEL GROUP, we are working to be an international benchmark in manufacturing and distribution of label solutions, RFID and packaging.*

*It is our duty to ensure that, every day, we treat our colleagues, partners, customers, suppliers, collaborators, competitors, the media, and the public administrations fairly, lawfully, and with dignity.*

*In addition to focusing our operations on customisation, innovation, productivity, competitiveness and sustainability, we also make every effort to operate in line with quality, environmental protection, land use, occupational health and safety, and corporate social responsibility standards.*

*This document is set to become our conduct guide. We need to rely on it and ensure it is implemented properly.*

*With your cooperation, we are certain that the UNILABEL GROUP will continue to merit the trust and recognition of our sector and will manage to ensure that these principles and values last over time, just like we have managed to do up to now.*

*We would like to thank you in advance for joining us in this spirit and in this way of doing things.*

Sincerely,

Administrators of the UNILABEL GROUP

## Article 1. Intended scope of this Code.

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Standards of ethical behaviour are hereby established through action principles that the UNILABEL GROUP must apply in all areas of its activity. The purpose is to establish a ***culture of compliance*** among its members by promoting good practices, principles, and values. Therefore, any policy or internal procedure that may be developed will be interpreted in accordance with the spirit of this Code of Conduct.

This Code of Conduct also responds to the recent need for crime prevention, which is imposed within the scope of the criminal liability of legal persons. However, it does not replace that set out in other internal policies which have been implemented or shall be implemented. This is because it is intended to provide a set of principles and rules that characterise and reflect the spirit of the UNILABEL GROUP: guidelines and policies that govern the ethical and responsible behaviour of all the administrators, directors, employees and collaborators of the company when carrying out their job.

Regulatory compliance must not be limited to merely abiding by the law. Ethical behaviour is the basis for all of the company's decisions and actions, thereby ensuring that such decisions and actions are carried out with integrity. And this integrity will also be required of any third parties with which the company may be related, therefore endeavouring an honest and transparent relationship.

Consequently, the success of this project depends on everyone, which is why this Code and the policies that are developed in accordance herewith must be known, understood, and respected by anyone related to the UNILABEL GROUP, regardless of their commercial or labour relationship.

A culture of compliance can only be instilled through everyone's firm commitment.

The various forms of conduct included in this Code are not an attempt to encompass all the situations or circumstances that could be encountered by members of the UNILABEL GROUP, rather they envisage general guidelines of conduct that will indicate how to act when they perform their professional activities.

Given that this Code of Conduct forms a part of the UNILABEL GROUP's system of rules, in order to be effective, it must be translated into the languages needed for all its members and all related third parties to understand the scope and content hereof.

## Article 2. Subjective scope.

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This Code will be respected and implemented by UNILABEL GROUP.

Moreover, compliance with this Code is mandatory for all present and future members of the UNILABEL GROUP, regardless of the hierarchical position or geographic location in question, and it applies to all of the entities that make up the company, partners, executives, administrators, employees, members, and collaborators in general, whether through an employment contract, a commercial agreement, a training agreement, a collective bargaining agreement, or any other.

Members who act as representatives of the UNILABEL GROUP in commercial companies, associations, foundations, or other entities must observe this Code when exercising activities in such entities and will promote the application of its values, policies, and rules of behaviour.

This Code extends to all investee companies and those companies over which the UNILABEL GROUP may hold working control or in which it may hold positions in the administrative or governing bodies, in addition to all natural or legal persons related to the company, such as suppliers, customers, the media, subcontracted companies, or others. They are expected to comply with these principles and to define themselves as persons or businesses with ethical values.

## Article 3. Principles and values.

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The following principles and values are the foundation of this Code of Conduct:

### 1. Integrity:

Integrity in business means that in all the activities performed by the UNILABEL GROUP, high ethical standards must prevail, and it means that we must work with honesty and inspire trust, through consistent and unyielding behaviour, while ensuring the company's good reputation at all times.

Legal rules vary over time, which is why the required behaviour in business must be constantly re-assessed. In order for the UNILABEL GROUP to be successful, we must observe the criteria of integrity, and every member and collaborator must contribute to achieving this. The company works hard so that its members have the information, instruction, guidance, and support they need to comply with rules on integrity in business.

### 2. Transparency:

Conveying transparency is a way to achieve a climate of trust, truth, and security. Transparency must be the central core that governs the company's competitiveness.

The UNILABEL GROUP's relationships with customers, suppliers, collaborators, members, the competition, the media, and public administrations (among others) will be developed according to the principles of cooperation and transparency.

The UNILABEL GROUP will truthfully, adequately, usefully, and consistently inform about its purposes, activities, and projects. Transparent information is a basic principle that must govern the actions of all members of company.

The UNILABEL GROUP is firmly opposed to practices that could be deemed irregular in its relationships with suppliers, customers, civil servants, etc.

### 3. Regulatory compliance:

The UNILABEL GROUP is committed, at all times, to acting in accordance with regulations in force. Likewise, all members and collaborators of the UNILABEL GROUP shall be committed to internal policies and procedures, and it is the task of all its partners and executives to make internal obligations and protocols known to all members and collaborators and ensure that they are strictly complied with. The behaviour of members and collaborators must comply with the spirit and letter of this Code.

#### **4. Privacy and confidentiality:**

The UNILABEL GROUP respects and ensures compliance with its obligation to protect the personal data of all its members and third parties with which it relates. It therefore undertakes not to disclose personal data, except when express consent is given and in cases of a legal obligation or to comply with court or administrative rulings. It is also committed to adopting the necessary measures to ensure that information, regardless of the format (physical or electronic), is protected and stored in a secure location against any internal or external risk of access without consent and against manipulation or destruction, whether intentional or accidental.

All non-public information that is owned by the UNILABEL GROUP is considered to be classified and confidential. Therefore, all members of the company are bound to protect said legal, technical, commercial, and financial information, as well as the data of third parties that may be available to members and collaborators, thus committing to maintaining the confidentiality of the information to which they may have access and preventing misuse.

In the event that the employment or professional relationship is terminated, members or collaborators must return all confidential information that they may possess, including documents and storage media or devices, as well as the information stored on their computer terminal, mobile phone, or any other medium.

All obligations regarding confidentiality and personal data processing will continue after the employment relationship has ended.

#### **5. Independence:**

Independence is a basic quality principle of the activity. Consequently, all members of the UNILABEL GROUP will abstain from participating in matters in which, whether directly or indirectly, their personal or family interests or those of the people belonging to their circle of close friends could be affected. If there is any conflict of interests, it will be handled in accordance with article 7 of this Code.

#### **6. Professionalism and technical rigour:**

Members of the UNILABEL GROUP shall apply objective professional criteria in all their actions, with the necessary diligence and quality to guarantee excellence in the supply for manufacturing and distribution of label solutions, RFID and packaging.

Technical quality, professionalism, rigour, and excellence are the qualities that members must possess so that they can carry out their activity in the most productive, competitive, and sustainable manner.

#### **7. Fair competition:**

The UNILABEL GROUP ensures respect for competitors, therefore complying with all applicable laws on competition and consumer rights. Collaborators and members of the company must avoid unfair actions, such as the abuse of confidential information, collusion to reach price-setting agreements, market-sharing agreements, participation in monopolies, or abuses of a dominant position, as well as any other conduct that goes against free and healthy competition.

#### **8. Commitment to constitutional rights:**

The UNILABEL GROUP expresses its commitment to and dependence on constitutional rights, such as the right to opinion, association, expression, privacy, and image, in addition to the secrecy of the communications and dignity of its collaborators, according to the scope and content conferred to them by the Constitutional Court in the workplace. These principles apply to all aspects of the employment relationship, which includes hiring, the assignment of tasks and placements, promotion, remuneration, disciplinary measures, and termination of the contract.

#### **9. Equal opportunities:**

The UNILABEL GROUP promotes fairness and equal conditions and treatment between men and women regarding access to employment, training, remuneration, mobility, and all other working conditions.

A culture of merit, effort, objectiveness, and personal improvement is fostered.

One of the UNILABEL GROUP's core values is the talent and professionalism of its collaborators. It is therefore committed to hiring personnel based on education, experience, and personal merit.

#### **10. Non-discrimination:**

The UNILABEL GROUP promotes non-discrimination based on race, nationality, age, sex, civil status, sexual orientation, ideology, political opinions, religion, or any other personal, physical, or social condition of its members, and it promotes equal opportunities among them all. The UNILABEL GROUP opposes any demonstration of violence and of physical, sexual, or psychological harassment, or any other behaviours that may create an intimidating or offensive environment with respect to the personal rights of its collaborators, and it adopts the necessary measures for preventing conduct of such nature and for putting an end to the same once detected.

#### **11. Political and religious neutrality:**

The UNILABEL GROUP does not embrace any political or religious ideology or tendency, wherefore, without prejudice to the constitutional rights of its members regarding freedom of expression and regarding ideological and religious freedom, any conduct or practice that could link the UNILABEL GROUP to a specific political or religious current will be rejected. When any members or collaborators may be linked to, belong to, or collaborate with political parties or any other type of entities, institutions, or associations with public purposes or religious institutions, it must take place such that the personal nature thereof is clear, thus avoiding any relationship with the UNILABEL GROUP.

## 12. Work-life balance:

The UNILABEL GROUP respects the personal and family life of its collaborators, and it undertakes to foster harmonisation between the occupational and family responsibilities of its members in a responsible manner, with equal opportunities and equal treatment between men and women coming first. It also implements measures that are effective and meet the real needs of its members, in accordance with applicable regulations.

## 13. Quality:

The company aims to provide its clients with the highest quality service possible, which is why it is constantly working to improve processes, goods, and services. With this in mind, it is committed to:

- identifying the needs and requirements of stakeholders (customers, suppliers, company staff, regulatory bodies, etc.);
- monitoring and reviewing service deployment and processes by identifying possible errors and implementing the steps needed to remove them;
- providing extensive training to staff and promoting a “do-the-right-thing” attitude towards quality; and
- striking partnerships with external providers and the main public and private sector actors to ensure the best business performance.

## Article 4. Relational scope.

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### Article 4.1. Relations with members and collaborators.

Internal members and collaborators of the UNILABEL GROUP are hired according to the principles of merit and ability.

The company considers people to be its fundamental cornerstone, and it therefore defends and ensures compliance with human and occupational rights. Moreover, it is committed to applying regulations in force and good practices regarding employment, health, and safety conditions in the workplace.

The UNILABEL GROUP ensures the rights included in the Statute of Workers’ Rights for all its collaborators and members, as well as the rights that may be derived from specific employment contracts. It likewise ensures a safe and healthy work environment, therefore providing Personal Protective Equipment (PPE) like safety shoes, glasses, gloves, earmuffs, and masks among others when required by regulations.

All members of the UNILABEL GROUP must, in their employment relations with other collaborators and members, act while respecting their dignity, values, and culture, therefore avoiding circumstances of violence, harassment, abuse, or other circumstances of discrimination due to race, religion, age, nationality, sex, or other personal or social conditions. Likewise, the occupational integration of collaborators who may suffer from any disability or impairment must be ensured.

On the other hand, conduct will not be accepted by the company as those detailed below:



- I. Behaviours that could involve undue use of, damage to, or harm to the image and/or reputation of the UNILABEL GROUP or any of the members thereof.
- II. Attitudes that reveal, to the exterior and/or to third parties unrelated to the UNILABEL GROUP, any type of information concerning the practice of its members, as well as information related to their personal and family development and, especially, related to their personal or contractual data.

#### Article 4.2. Relations with suppliers and customers.

Operations with suppliers and customers take place according to objective and impartial criteria that guarantee equal opportunities, therefore avoiding favourable treatments or interference during hiring processes.

The UNILABEL GROUP requires that its suppliers have an adequate level of commitment to socially responsible practices that are compatible with this Code of Conduct.

All requests made for external procurement and purchasing must be followed up on with maximum transparency, therefore avoiding any favourable treatment.

Participating in or influencing procurement processes for products and services with companies or persons with which collaborators and members may have economic or family ties is not allowed. Whenever these circumstances occur, they shall be reported to the UNILABEL GROUP's COMPLIANCE COMMITTEE as soon as they are noted and will be dealt with in accordance with the rules set out in art. 7 of this Code of Conduct.

Transmitting the values of and generating honest and transparent dialogue with customers are principles that govern the business activities of the UNILABEL GROUP.

All members of the company must interact with customers in a lawful, ethical, and respectful way. An open and empathetic attitude towards the suggestions made by customers must be endeavoured, in addition to a permanent disposition to not only adopt all actions that may be necessary to clarify doubts and correct deficiencies and errors but also introduce the pertinent improvements in the activity.

Offering, promising, and/or delivering any type of memento, commission, advantage, or gift to companies, institutions, suppliers or customers with which the UNILABEL GROUP may have a relationship and that may inappropriately have an influence on their decision processes is not permitted.

On the other hand, members of the UNILABEL GROUP may not give or accept, from persons, companies, suppliers or customers, any gifts, invitations, or payments in kind that exceed mere courtesy. In other words, their value could be considered overly expensive due to exceeding thresholds that are considered reasonable, normal, or ordinary according to the current practice in the sector.

If applicable and for the purpose of the provisions set forth in this section, the threshold of 50 euros shall be established as the maximum limit of mere courtesy.

#### Article 4.3. Relations with national and international civil servants.

Relations with the public administration, with the judiciary, and with regulatory bodies are established according to the principles of cooperation and transparency. Collaborators and members of the UNILABEL GROUP must conduct their relations with public and court authorities and institutions in accordance with the law and ethics. Moreover, relations must always be governed by the procedures officially established by the public sector, while respecting laws and avoiding any conduct related to corruption.

It is expressly prohibited to offer, grant, request, or accept any gifts, mementos, favours, or compensation, regardless of their nature, to or from public authorities or officials.

Moreover, all members of the UNILABEL GROUP must abstain from making payments to facilitate or streamline processes (consisting of money or other valuable goods and regardless of the amount), in exchange for ensuring or speeding up the course of a procedure, action, or process of public procurement, regardless of the nature, at any judicial body, public administration, or official organisation.

#### **Article 4.4. Relations with the media and use of social networks.**

As a general rule, and unless the UNILABEL GROUP has designated spokespersons or the communications department has given express authorisation, collaborators and members of the company will abstain from supplying information on any type of mass communication media regarding subjects that are directly or indirectly related to the company.

In the event that members of the company engage with the media, they shall commit to maintaining dignified, respectful, and truthful relations with those working for the media. Misleading information may not be given, which is understood as that which, in any way, may or could lead to error in the recipients thereof. Misleading or disparaging advertising about the competition or third parties also may not be distributed.

Likewise, we must undertake to ensure that publicised information is truthful and transparent and respects the privacy and confidentiality of the persons involved.

All information and knowledge that may be generated within the scope of the UNILABEL GROUP is the property of the same, under the terms established by legislation in force.

#### **Article 4.5. Relations with political parties.**

Except in the execution of agreements that are duly adopted by the UNILABEL GROUP, and in any event respecting the principles and values contained in this Code, members and collaborators will abstain from making contributions to political parties, authorities, bodies, and public administrations in general that are charged to the company.

If applicable, when any members and collaborators may be related to, belong to, or collaborate with political parties or with any other type of entity, institution, or association that has a public purpose, the personal nature thereof must be shown and must be unequivocal. In other words, actions are taken on one's own behalf, and any relationship with the UNILABEL GROUP must be avoided.

#### Article 4.6. Relations with third-party contractors and subcontractors.

The selection of contractors and subcontractors for providing services to the UNILABEL GROUP is governed by the criteria of objectivity and transparency, thereby balancing the company's interest with the suitability of maintaining stable and responsible relations in order to achieve quality and excellence in the goods and services that are reciprocally provided.

Commercial actions of the UNILABEL GROUP take place both nationally and internationally.

The UNILABEL GROUP expects that these third parties will act according to applicable laws, regulations, sector codes, and contracts, as well as according to generally accepted criteria of sustainability, such as those pertaining to the protection of human rights, safety, and the environment and pertaining to the prevention of criminal behaviours.

Before starting a business relationship, the UNILABEL GROUP analyses, evaluates, and checks subcontracted parties with due diligence in order to ensure, first hand, their integrity, quality, and suitability.

#### Article 5. Financial transparency and honest collections.

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The company's information is a true reflection of its economic, financial, and net worth situation according to generally accepted accounting principles.

The UNILABEL GROUP is governed by commonly admitted accounting principles, wherefore it prohibits carrying out any action that prevents or obstructs the tasks of verifying and evaluating financial statements.

The company ensures that its commercial and financial records are accurate and complete, which is the responsibility of all its members. Therefore, the UNILABEL GROUP provides its members with the necessary training so that they know, understand, and comply with the internal monitoring commitments made.

Making any declarations or annotations that may be false or that lead to error in any information, publication, document, or expense receipt is prohibited. The falsification of documents and accounts or a distorted presentation of the facts could constitute fraud.

The UNILABEL GROUP will, at all times, endeavour to bill reasonable financial amounts in accordance with its activity.

#### Article 6. Accepting and giving gifts and invitations.

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The UNILABEL GROUP rejects all forms of bribery or corruption, either with public institutions or between individuals. The company refuses any incentives, gifts, and invitations that may infringe this principle.

These corrupt practices involve accepting and offering any type of unjustified benefit or advantage, on its own behalf or for third parties, as consideration for giving undue preferential treatment to another party in a procurement process for products or services, in business relations, or in dealings with public

authorities. For that purpose, and as stated hereafter, the company has established the threshold of 50 euros as the maximum limit of mere courtesy.

All members and collaborators acting on behalf of the UNILABEL GROUP shall conduct lawful, ethical, and respectful relations with public and private institutions.

#### Article 6.1. Accepting gifts and invitations.

As a general rule, no member or collaborator shall accept gifts or entertainments, including cash, as a means to generate business for the UNILABEL GROUP or for a third party. In other words, as consideration for giving undue preferential treatment to another party in a procurement process for products or services, in business relations, or in dealings with public authorities.

Members and collaborators of the UNILABEL GROUP shall only accept a gift, hospitality, invitation or benefit from company members or third parties (customers, suppliers, collaborators, or others), provided that each of the following conditions is met:

- I. It is not money.
- II. It is not overly expensive. In other words, its price range is within reasonable, normal and ordinary thresholds, and complies with current sector practices. Any questions shall be answered by the UNILABEL GROUP's COMPLIANCE COMMITTEE. For that purpose, the threshold of 50 euros has been established as the maximum limit of mere courtesy.
- III. It cannot be considered as a restriction on the independence and professionalism of a member/collaborator or of the UNILABEL GROUP.
- IV. It does not entail any kind of influence over the operations of the UNILABEL GROUP which would generate obligations or commitments with third parties.
- V. It does not lead to undue economic benefits for the member and/or collaborator or for the UNILABEL GROUP.
- VI. It does not cause a conflict of interest for any of the parties.

If all of the conditions stated are not met then the gift cannot not be accepted and therefore shall be returned the same way it was received. If returning it might offend the person who delivered it or it is not possible to return it due to circumstances, the gift may be accepted and the COMPLIANCE COMMITTEE shall be notified, and it shall decide whether the gift shall be given to charity, or, rather, whether it shall be distributed or lots shall be drawn among a group of company's collaborators and members.

The provisions herein apply to suppliers, customers, civil servants, collaborators and to any individuals or legal persons that are contractually bound to the UNILABEL GROUP.

#### Article 6.2 Giving gifts.

Gifts can be made as long as they are used for promotional or professional purposes related to company operations.

But, in any event, any gift, entertainment, and hospitality that the UNILABEL GROUP members and collaborators may give shall not be overly expensive. In other words, its price range is within reasonable, normal and ordinary thresholds, and complies with current sector practices. For the purpose of the provisions set forth in this section, the threshold of 50 euros shall be established as the maximum limit of mere courtesy.

In the event that the gift, entertainment, or hospitality could be considered as being overly expensive, a notification explaining the reasons shall be sent to the COMPLIANCE COMMITTEE and it shall grant the proper authorisation, provided that it is in line with what the commercial and promotional practices of the UNILABEL GROUP deem socially acceptable.

Under no circumstances shall gifts, entertainments, or hospitalities conceal or be regarded as consideration for gaining unjustified advantages and/or undue favourable treatment. Undue favourable treatment is when a person or organisation benefits without providing goods or a service as consideration.

Any event that raises questions shall be reported to the COMPLIANCE COMMITTEE in order for it to establish whether or not the event is justified.

The provisions herein apply to relations with suppliers, customers, civil servants, collaborators and with any individuals or legal persons that are contractually bound to the UNILABEL GROUP.

## Article 7. Conflicts of interest.

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Members and collaborators of the UNILABEL GROUP shall avoid situations that might create a conflict between their interests and those of the company. A conflict of interest happens when there is a direct or indirect clash between the personal interest of a member or collaborator and the interests of the company.

These parties are considered to have a personal interest when the matter directly concerns them or affects someone connected to them.

All members are required to promote the interests of the UNILABEL GROUP and it shall be prohibited to personally benefit from opportunities created by company's information or to benefit third parties by using them.

The member or collaborator affected shall report immediately to the COMPLIANCE COMMITTEE whether they are currently in a similar situation in order to find an appropriate solution to the matter.

### Article 7.1. Connected persons.

For the purpose of this Code of Conduct, the following shall be treated as individuals or legal persons connected to executives, members, or collaborators:

- a) the spouse or spousal equivalent.

- b) the ascendants, descendants, and brothers and sisters of the member or collaborator or of the spouse (or spousal equivalent).
- c) the spouses (or spousal equivalents) of the ascendants, descendants, and brothers and sisters.
- d) the organisations where the member, collaborator, or their connected persons, personally or through an intermediary, are in one of the control situations set out by law or the organisations where they conducted these control relations during the two years immediately preceding their taking up duties as a member.
- e) the companies or organisations where the executive, member, collaborator, or any of the connected persons, personally or through an intermediary, holds, or has held a management or executive position during the two years proceeding their taking up duties. Furthermore, persons in respect of whom the executive, member, or collaborator receives or has received emoluments for whatever reason during the two years proceeding their taking up duties shall be treated as connected legal persons, provided that the executive, member, or collaborator also directly or indirectly exerts or has exerted significant influence on the financial and operational decisions of said companies or organisations during the two years immediately preceding their taking up duties, and, furthermore, when these situations have taken place in the two years proceeding their taking up duties.

#### Article 7.2 Rules of conduct for conflicts of interest.

Regarding possible conflicts of interest, members and collaborators of the UNILABEL GROUP shall comply with the following rules of conduct:

- a) Independence: always conducting oneself in a professional manner and treating the UNILABEL GROUP fairly regardless of personal or third-party interests. As a result, members and collaborators of the company shall refrain from putting their own personal interests first at the expense of those of the company.
- b) Refraining: refraining from intervening in or influencing decision-making that could affect the UNILABEL GROUP where there is a conflict of interest; refraining from taking part in meetings where said decisions may be considered; and refraining from accessing confidential information that may affect said conflict.
- c) the occurrence or potential occurrence of a conflict of interest shall be reported in writing to the immediate superior, who shall notify the COMPLIANCE COMMITTEE thereof.

The member or collaborator shall state the following when reporting:

- a) whether the conflict of interest personally affects them or through someone connected to them, in which case this connected person shall be identified.
- b) the situation leading to the conflict of interest, in which case they shall specify the object and the essential terms of the situation or the intended decision.
- c) the measures taken to avoid this conflict and ensure that general interest is protected.

These general principles of conduct shall be complied with in a special manner for cases where the situation surrounding the conflict of interest is, or may justifiably be expected to be, one that represents a structural and permanent situation and, more specifically, when it comes to the procurement of goods and services and the recruitment and hiring of the UNILABEL GROUP staff.

All of these issues shall be put to the UNILABEL GROUP's COMPLIANCE COMMITTEE for prior discussion and decision, with the latter being legally binding.

## Article 8. Corporate image and reputation.

A positive image is an intangible value that is built. It responds not only to the behaviour shown by the company and its members over time, with respect to its various stakeholders, but also to the perception generated by this behaviour. Therefore, the UNILABEL GROUP deems the company's image to be one of its most valuable assets for preserving the trust of its shareholders, customers, employees, members, suppliers, authorities, and society in general.

Members and collaborators who leave the institution or who set up a spin-off or a new company must not, in their corporate image or name, use factors that allude to the UNILABEL GROUP, unless they have the company's express, written consent. This includes identification as current members of the UNILABEL GROUP on public profiles and social networks.

Members of the UNILABEL GROUP, even personally in their profiles on social networks, blogs, etc., will avoid making comments or spreading rumours that could jeopardise the public image of any company of the company. Likewise, in their communications, they will follow all the other principles listed in this Code of Conduct, especially in Article 4.4 on Relations with the media and use of social networks.

- Unless the UNILABEL GROUP has designated spokespersons or the communications department has given express authorisation, members will abstain from maintaining relations with any type of social media regarding subjects that are directly or indirectly related to the company.
- The confidentiality of the Customer-Company relationship will be preserved. Therefore, data about operations or affairs in which the company has taken part will not be disclosed without the customer's prior consent.
- Neither political, nor religious, nor moral positions will be taken, therefore avoiding any opinion about these matters in any situation in which a member or collaborator may be identified as a spokesperson of the firm.
- Information that may be prejudicial to the firm, to customers, or to the company's interests will not be published on social networks or other media, therefore avoiding giving negative opinions or participating in debates in which the firm or its interests could be affected. Misleading information also may not be given, which is understood as that which, in any way, might or could lead to error in the recipients thereof.

- The competition will not be publicly criticised, therefore avoiding criticisms of the work and/or activity thereof.

## Article 9. Use of assets.

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The UNILABEL GROUP undertakes to provide its members and collaborators with the necessary and adequate resources and means for performing their business activities.

Members and collaborators undertake to make responsible use of resources and assets when exercising their activity and to exclusively use such resources and assets for performing professional activities in the UNILABEL GROUP's interests.

If applicable, the use of IT equipment, systems, and programmes made available by the company for its members and collaborators to perform their job, including access to and operations on the Internet, must comply with the criteria of security and efficiency. Therefore, any IT use, action, or function that is illegal or contrary to the rules and instructions of the UNILABEL GROUP is prohibited.

The UNILABEL GROUP is the holder of the ownership and rights of use and exploitation of the equipment, programmes, systems, and all other works and rights that may have been produced, improved, and used by their members and collaborators within the framework of the occupational activity thereof and/or based on the IT systems, programmes, or equipment owned by the company.

Members of the UNILABEL GROUP will respect the principle of confidentiality regarding the rights, licences, programmes, systems, and technological knowledge whose ownership or rights of exploitation or use correspond to the company. Any information or disclosure about the company's IT systems will require prior authorisation from the COMPLIANCE COMMITTEE.

Members and collaborators will not use, reproduce, replicate, or assign the IT systems and applications of the company for unrelated purposes. Likewise, they will not install or use, on the UNILABEL GROUP's IT equipment, programmes or applications that may be illegal to use or that could damage the systems or jeopardise the company's image or interests or the interests of third parties.

Given the exposure of IT files to hacking, to infection by viruses, and to other, similar risks, members of the UNILABEL GROUP are bound to respect the security rules established for this purpose. In this regard, all personnel undertake to only use and keep secret their personal access passwords, which may not be given to third parties for any reason.

## Article 10. Access to assets.

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The IT media that the UNILABEL GROUP makes available to its members, including email, are work tools owned by the company (including not only the installed hardware and software but also the content thereof). As such tools, they must be used for strictly professional purposes according to the occupational tasks entrusted to each individual.



Therefore, the UNILABEL GROUP may make the checks that it deems necessary regarding the use of such media placed at the disposal of collaborators, including access to email content and any other file that a collaborator could have on their computer, given that any such content will be considered, for all purposes, as documentation of the company.

## **Article 11. Intellectual or industrial property protection.**

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The UNILABEL GROUP is committed to protecting both its own and others' intellectual and industrial property.

Members and collaborators of the UNILABEL GROUP are prohibited from using the intellectual and industrial property rights of third parties (trademarks, distinctive signs, industrial designs, patents, utility models, copyrights, etc.) without record of the fact that they hold the corresponding rights and/or licences. The organisation's personnel will adopt the necessary measures to protect the intellectual and industrial property of third persons, therefore endeavouring to ensure that processes and decisions within this scope are documented and can be checked and justified.

Members and collaborators will respect the intellectual or industrial property rights of others at all times. Regarding content, images, and programmes downloaded from the Internet, the appropriate licence is obtained from the holder of any intellectual or industrial property rights, even if they have been obtained through search engines such as Google.

All programmes installed on the company's computers and mobile devices have the corresponding licence for use.

No member of the UNILABEL GROUP will, for personal purposes, either use or transmit to others any content, technologies, trademarks, methodologies, know-how, or any type of information that belongs to the organisation, even though it may have been obtained or developed by a particular collaborator within their work environment.

## **Article 12. Occupational health and safety.**

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The UNILABEL GROUP promotes occupational health and safety as an essential part of its activity. It therefore applies the preventive measures established by legislation in force for such purpose and ensures that those measures are strictly observed by members and collaborators.

The UNILABEL GROUP ensures that members, collaborators, and third-party subcontractors have the means necessary to minimise occupational risks. It is also the responsibility of all members and collaborators who work at the company to maintain an adequately clean and tidy environment at the facilities, thereby contributing to safe practices and the elimination of risky conditions on the job.

Furthermore, showing up at the workplace and performing entrusted functions under the influence of any type of drug, toxic substance, psychotropic drug, or narcotic, as well as alcoholic beverages, is prohibited.

Possessing or carrying weapons of any kind or any potentially dangerous device is also prohibited.

## Article 13. Environmental protection.

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The UNILABEL GROUP affirms its commitment to be environmentally responsible. All its operations will be conducted with the upmost respect for the environment, thus minimising their environmental impact, and the company will develop measures for reducing and compensating said impact during every stage of the manufacturing process for its products.

Furthermore, endeavours shall be made to efficiently manage the company's waste and energy savings to preserve the natural environment.

Along this line, all members are required to minimise the company's impact on the environment by using socially responsible, scientifically sound and/or economically beneficial methods, and by promoting the company's social and environmental sustainability as a way to responsibly create value for all of its interest groups.

## Article 14. Corporate social responsibility.

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The UNILABEL GROUP undertakes to maintain an ethical and responsible commitment to projects related to solidarity-based, voluntary, and constant contribution in favour of the community and the environment.

Within the framework of such actions, the UNILABEL GROUP invites its members to participate in the same, while always and in any event respecting the principles and values of this Code but endeavouring to not participate with or benefit political parties, authorities, bodies, or public administrations in general.

All of the UNILABEL GROUP's activities will be performed in a sustainable manner, therefore promoting not only social, economic, and environmental improvement but also improvement of quality of life.

## Article 15. Compliance and disciplinary scheme.

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This Code of Conduct is an internal regulation that must be complied with by all members of the UNILABEL GROUP, regardless of the hierarchy, seniority, or functions that members may have within the company.

All members and collaborators of the UNILABEL GROUP must comply with and apply this Code of Conduct, as well as all other internal policies of the company that respect the legal and ethical imperatives governing the profession or activity. Along this line, every employee that may be hired or may become a part of the company must accept the action principles and rules set forth in the Code of Conduct. To that end, this Code will be available on the organisation's website.

Moreover, third parties who are related to the UNILABEL GROUP must know and undertake to respect this Code in their relations with the organisation, which is why it is distributed and why reading it and undertaking to comply with it is required.

No one, regardless of their hierarchical level, is authorised to request that an employee violate any provisions of this Code.

Neither “obeying orders” nor “unawareness” will relieve anyone from liability for a breach of any provision of this Code. Consequently, no employee may justify improper conduct due to obeying the order of a superior or being unaware of the Code.

Lastly, any breach of this Code may lead to the disciplinary scheme being applied. In this regard, such a breach will be considered a violation of contractual good faith, as well as on-the-job negligence for the purposes that are appropriately determined in accordance with legislation in force on the subject of occupational discipline and/or contractual termination. As such, the UNILABEL GROUP may impose a disciplinary fine in accordance with the legal system in force, which will be assessed according to the seriousness of the breach committed by the collaborator and, if applicable, the damages that such a breach could cause at any of the entities that are part of the UNILABEL GROUP.

This disciplinary scheme is complementary to any court proceeding that could be brought against the collaborator/employee and any sanction or consequence that could be derived from such a proceeding.

## Article 16. Compliance Committee and Communications Channel.

In keeping with the spirit of this Code, the organisation has set up a COMPLIANCE COMMITTEE, whose most important task is to monitor and control, prevent and stop irregular and unlawful behaviour which may give rise to liability for the UNILABEL GROUP.

This COMMITTEE takes the form of a collegial body and is made up of THREE company members, with each one of them representing a the UNILABEL GROUP operational area chosen according to its special exposure to risks. The current members are:

- Elena Fernández González (HR Specialist)
- Alicia Viguera García (Quality Officer)
- Antonia Pardo Morgades (Chief Quality Officer)

Its appointments and updates shall be published and reported through the Communications Channel.

In this respect, members and all other collaborators of the company have a confidential and anonymous communications channel at their disposal, where they shall report any irregular activity that goes against the principles set forth in this Code of Conduct, as well as any behaviour that violates regulations in force, including criminal risk prevention.

All communications of this type should be made in writing and be sent to the following email address: [canaldecomunicaciones@twin.cat](mailto:canaldecomunicaciones@twin.cat). These written communications should include a detailed and honest description of the events that serve as the basis for the communication, therein explaining how the matter became known, identifying the persons involved, and attaching any evidence deemed appropriate to prove the reported events, if any.

The consequence of behaviours that violate the law or violate the provisions set forth in this Code of Conduct is application of the disciplinary measures provided for in labour legislation in force for collaborators and members of the UNILABEL GROUP.

Regarding outside collaborators, the measures that are deemed necessary will be applied, if applicable and in accordance with the criterion of proportionality ensured by compliance with this Code.

Likewise, members of the UNILABEL GROUP must report the initiation, development, and result of all legal disciplinary proceedings, whether civil, labour, criminal, or administrative, in which a collaborator of the company may be investigated, charged, or accused and such an event could affect the exercise of the company's duties or harm the image or interests of the same.

Lastly, it should be highlighted that only irregular or illegal behaviours or a violation of this Code must be reported through the communications channel. Therefore, the following are excluded from being reported through the communications channel: reporting human resources matters, claims due to defects of work equipment, requests for office materials, complaints, opinions, etc., among other suggestions of a similar nature.

## Article 17. Prohibition of reprisals.

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The UNILABEL GROUP will ensure that no member who, in good faith, has reported a violation or irregularity through the communications channel will be the subject of any type of reprisal. Moreover, a reprisal of any kind is an infringement of this Code of Conduct, which must be reported as soon as possible.

## Article 18. Approval, validity, and reviewal.

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This Code of Conduct has been drawn up by the UNILABEL GROUP's COMPLIANCE COMMITTEE on 6<sup>th</sup> of November 2020 and submitted to the Administrator for final approval.

It shall be periodically reviewed and updated according to possible changes in legislation, and when a change is deemed appropriate depending on the structure and the dynamics of the company. In brief, it may be amended for the purpose of maintaining the culture of compliance at the company at all times, which is shown through the principles of transparency, responsibility, and prudence towards third parties and towards its own members and business partners.

Any amendment or reviewal of the Code will be appropriately communicated to members and collaborators of the company and will be made available to any persons, entities, or administrations that may be related to THE UNILABEL GROUP.