

CODE OF CONDUCT GRUPO **CROPU**



CODE OF CONDUCT

2

This Code of Conduct replaces the previous version of the same document.

It has been approved by the General Management of Grupo CROPU in October 2023.

In Burgos, October, 2023

Grupo CROPU's Code of Conduct aims to highlight our principles, those that have accompanied us since our beginnings and that have allowed us to achieve what we are today.

Our commitment and our deep professional ethics are what guide our actions. Always with a view to the future, to stability and, increasingly, to a sustainable growth. A growth that allows our people to develop and ensures strict compliance with the requirements established by current legislation, while forming part of our social contribution to the environment in which we carry out our activity.



This new reflection on our Code of Conduct is the result of the increasingly strict legal requirements, which aim to ensure sustainable performance of the market and each of its participants from a 360-degree perspective.

This Code is more than a list of rules to follow, it is the definition of what we are, what we believe in and how we relate to our environment. The Rules of Conduct included in this document are mandatory for each of the people who make up Grupo CROPU.

To all who maintain a relationship with GRUPO CROPU in some way, we invite you to learn about our Code of Conduct and to adopt and promote these values in your daily life.

María José Basconillos Abad
CEO
Grupo Cropu

INDEX OF CONTENTS

AREA OF APPLICATION	6
IMPLEMENTATION GUIDELINES	7
NON-COMPLIANCE	7
FROM WHAT PERSPECTIVES DO WE APPROACH OUR	8
CODE OF CONDUCT?	8
TRANSPARENCY	9
PEOPLE	10
RESPONSIBILITY	12
USE OF INFORMATION	14
MARKET AND BUSINESS ETHICS	18

CODE OF CONDUCT

Since its creation in 1975, GRUPO CROPU has been governed by a series of fundamental values and principles that are present in both the group's activity and in that of all those who make it up.

Our Code of Conduct includes these essential principles and values with which each of us shows a personal and continuous commitment to respect the Laws and comply with ethics. Some characteristics of our management are part of the group's DNA and we therefore consider them factors whose preservation must be guaranteed:

- **Financial and Managerial Independence**
- **Transparency:** Towards all our interests.
- Respect for current legislation: National and international.
- **Protection of Data:** The collection, processing and use of data will always be carried out in a way that guarantees its security and compliance with current regulations. Under no circumstances will confidential information be disclosed.
- **Reputation:** The image and reputation of GRUPO CROPU are one of its most valuable assets to preserve the trust of its clients, employees, suppliers, authorities, positions and society in general.

Each of the areas of our activity is affected by aspects related to business ethics. This Code includes the rules that are mandatory for all employees to know and comply with, thus guaranteeing respect for legality and ethics within a framework of commitment, honesty, trust, integrity, transparency and security.

AREA OF APPLICATION

This Code of Conduct applies to all Grupo Cropu collaborators and its application is mandatory for each one of its employees. The Code also applies to our relationship with third parties outside Grupo Cropu, such as clients, suppliers, contractors, agents, intermediaries and public and private entities, with which we contribute to creating a society with strong ethical values.

Since its inception, Grupo Cropu has been governed by values that have accompanied its growth. These values are: VISION, which from an innovation perspective allows us to adapt to the evolution of a continually changing market and continue growing; COMMITMENT, the basis of our internal and external relationships; EFFORT, because every challenge requires effort, work, commitment and sacrifice and without it we would not have become what we are today; PRIDE, for the trust that our clients and partners place in us and, above all; HUMILITY, because GRUPO CROPU is a long-term project and to guarantee the continuity and safety of the group, we must all band together without forgetting our origins and maintaining the spirit that unites all our values and makes us stronger for it.



The Group will ensure strict effective compliance with this Code. Failure to comply with the rules contained therein could have serious consequences, both legal and reputational, for the person involved as well as for GRUPO CROPU. The Group's reputation is a key factor in our relationship with third parties, whether they are clients, suppliers or public and private entities. Any activity that may have a negative impact on it, may lead to internal sanctions or legal actions proportionate with its magnitude.

IMPLEMENTATION GUIDELINES

The rules contained in this Code will be mandatory for all workers and collaborators of the Group.

To guarantee its knowledge by employees and compliance with the guidelines it establishes, this Code of Conduct will be disseminated as follows:

- Each new employee in their incorporation and initial training process will receive a copy of this Code along with an explanation of its scope of application and mandatory compliance. Signature received from this delivery and formal notification must be collected.
- On an annual basis, the latest version of the Code will be sent, as well as an invitation to all staff to training sessions in which they can expand on the information it contains and clarify doubts. Human Resources will require the entire workforce to sign a document confirming that the employee has read and understood the policies, standards and procedures required by GRUPO CROPU included in this Code and that they acknowledge being subject to them, accepting disciplinary measures in case of non-compliance.

NON-COMPLIANCE

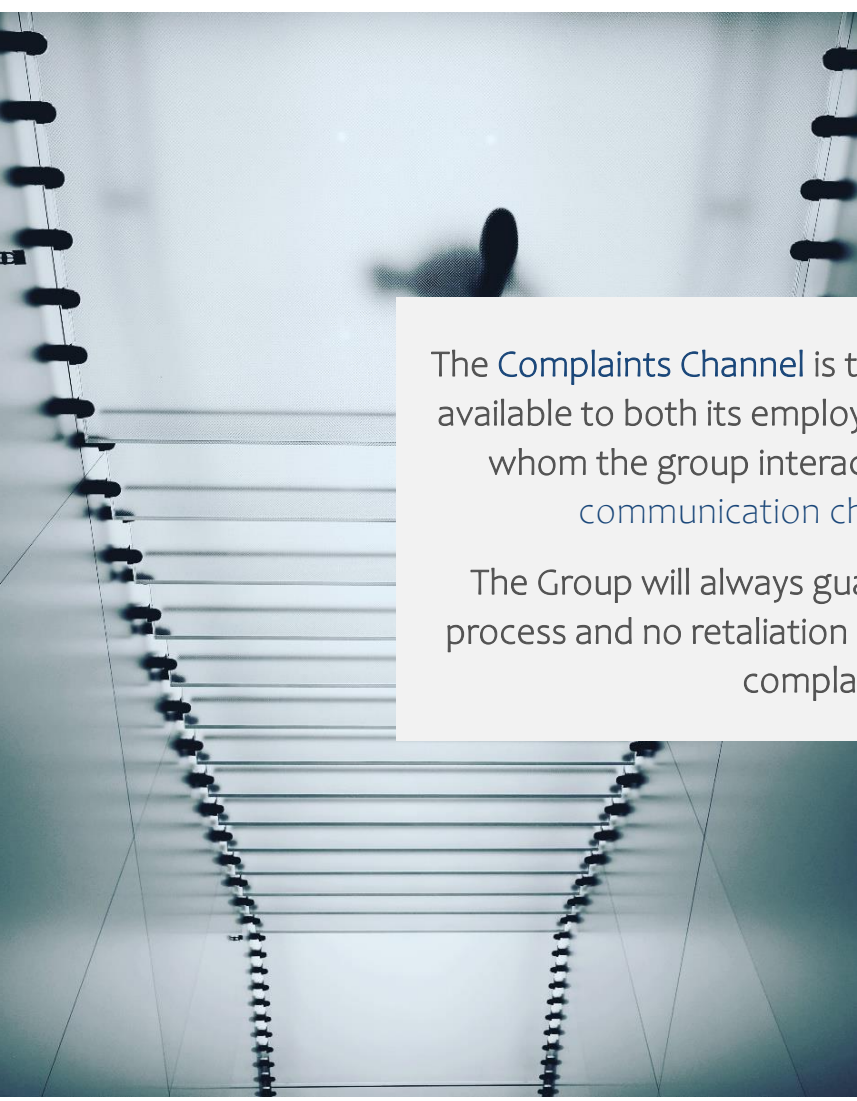
Failure to comply with the rules contained in this Code may lead to the application of disciplinary measures, always in accordance with legal provisions. Non-compliance may also lead to legal and/or civil actions and even proper dismissal in the event of very serious non-compliance.

From What Perspectives Do We Approach Our Code of Conduct?

There are 6 main areas to which this Code tries to respond. These are the relevant matters from an ethical and legal point of view. On the following pages, we expand on each of them:



TRANSPARENCY



Part of the responsible attitude of the Group's employees includes reporting those practices that involve a potential breach of the standards established in this Code, in the organizational model or that are contrary to the Law. Reports must be made through duly established channels.

The **Complaints Channel** is the tool that GRUPO CROPU makes available to both its employees and external third parties with whom the group interacts, and which serves as a **direct communication channel with Management**.

The Group will always guarantee the **confidentiality** of the process and no retaliation of any kind will be tolerated to the complaints presented.

The operation of the Complaints Channel is established in the corresponding internal process, which is the responsibility of the Group's Human Resources Department. This channel gives all our stakeholders the opportunity to inform Group Management, both personally and anonymously, of any act that may be considered illegal, illicit, contrary to ethics or Human Rights, which represents

an environmental risk or that involves illegal business practices.

Confidentiality throughout the entire process is a key point. Both employees and third parties can manage their complaints through the internal mailbox canal.etico@grupocropu.com; Furthermore, in the Terms&Conditions section of the website www.grupocropu.com, information about this channel and management of notifications is available.

The Group's Management is the owner and last person in charge of the process, which will be managed by the Human Resources department, together with Production Management on issues related to it and a third-party external to the organization that acts as guarantor of its management. After receiving the complaint, an investigation will be carried out to establish the facts and a report will be issued that includes the entire process carried out along with the decisions taken.

No type of retaliation will be tolerated against employees who report these situations in good faith.

PEOPLE

Diversity and Equality.

GRUPO CROPU values diversity from a 360-degree approach to its activity. All its employees receive similar treatment without discrimination of any kind, whether based on gender, age, race, religion, politics, disability or social type. Likewise, the hiring processes for new personnel are governed by ethical criteria of impartiality and are associated with factors relevant to the position to be filled, such as the training, attitude or previous experience of the people who apply.

The people who make up GRUPO CROPU must be governed by this Code and have the reciprocal obligation to treat their colleagues, superiors and employees fairly and respectfully. Likewise, the relationships between the group and the entities or companies that provide its services will be based on professional respect and collaboration. Harassment or discrimination will not be permitted in any case.

All collaborators and employees of GRUPO CROPU will foster an environment of cooperation and teamwork for the best use of all the capabilities and resources of their employees.

Always act with equanimity, respect and dignity

Do not display hostile, intimidating, threatening or offensive behaviour or attitudes

Respect other people's customs and cultures

Base your decisions on merit and objective facts. Ensure the application of the Principle of Equality

Development and Training.

GRUPO CROPU considers the training and development of its workers a priority. Regardless of their place of work, age, sex or function, the Group will strive to allow each of its employees, access to the necessary training for the correct exercise of their activity and the consolidation of their career.

GRUPO CROPU motivates each of its employees to lead their professional evolution and is committed to guaranteeing equal opportunities in professional evolution and mobility.

Prevention and Occupational Health

The health and safety of its collaborators and employees constitute essential priorities for GRUPO CROPU, which is committed to maintaining a work environment that protects the health and safety of its workers by enabling the necessary means to do so.

Safety regulations are mandatory for all Group employees. Each employee must know the health and safety regulations associated with their function and must immediately report any situation that may represent a risk to their safety or health to their immediate superior or to the HR manager at the plant in which they work.

Use of Company Property and Assets

GRUPO CROPU's assets include facilities, equipment, machinery, tools, intellectual property, software, information, cash and intangible property rights, among others. Employees and collaborators of the group must guarantee that they are not used in a personal capacity, whether for commercial or personal purposes, unrelated to their work at GRUPO CROPU.

11

Freedom of Association

GRUPO CROPU is committed to respecting the freedom of association established in Article 20 of the Declaration of Human Rights, guaranteeing, recognizing, and respecting the right of workers to freely associate and bargain collectively.

All group employees are free to form or join the trade union organization of their choice. The group makes available to trade union representatives the means that allow them to carry out their functions.

Rules of Coexistence

Respect for the rules of coexistence contributes to creating a good work environment and improving relationships with our colleagues.

The schedules established for each work shift are mandatory. Each worker must always sign in and out of his or her workplace and do so properly uniformed. The use of PPE is mandatory as established by the plant's safety regulations. For those people whose activity does not require a uniform, clothing must be appropriate to the position and work environment, normally defined as Smart casual or Business casual clothing. Furthermore, and in any case, the basic rules of personal hygiene must be respected.

It is expressly forbidden for employees and collaborators of GRUPO CROPU to work under the influence of alcohol and/or drugs.

The ethical and conduct principles are supported by current legislation and the Professional Agreements that apply.

The Risk Law imposes obligations and responsibilities on both the employer and the worker, establishing sanctions for non-compliance for both.

GRUPO CROPU undertakes to strictly comply with the guidelines established in the Sectoral Agreement, which covers, among other matters, the establishment of professional levels and/or categories, application of salaries with criteria of equality and equity, definition of working hours, shifts and schedules, holidays and days off and any other concepts contemplated therein. In the event of a discrepancy in any sense, a written claim must be sent to the group's Human Resources Director, who will be obliged to respond within a reasonable period.

RESPONSIBILITY

GRUPO CROPU considers that, as a market player, it has an obligation towards the environment and society in which it carries out its activity. Part of this obligation entails active participation and contribution towards the people who make it up and to leave a sustainable environment for future generations.

12

To comply, GRUPO CROPU has designated:

- Environmental Manager whose objective is to ensure the proper management of resources.
- CSR Manager, who ensures the social performance of the company and with the institutions.
- Compliance Manager, who guarantees strict regulatory compliance in all areas.
- Human Rights Manager, who knows and guarantees compliance in this matter.

Due to the size of the group, these functions are integrated with positions already existing in the structure, all of them reporting directly to the General Management of the group.

CROPU GROUP undertakes to publish annually and in accordance with the law, a non-financial report that includes the progress made in these areas, as well as the group's commitments in the short, medium and long term from a business, commercial, sustainability and people perspective. This report, which is presented in a non-consolidated manner, will always have an external audit that guarantees the veracity and traceability of the data collected therein. (Can be consulted at www.grupocropu.com/business).

SUSTAINABLE DEVELOPMENT GOALS



Human Rights

GRUPO CROPU subscribes to the internationally recognized Human Rights policy and follows the principles established in the United Nations Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organisation (ILO) and other applicable international and local labour standards, as well as the United Nations Guiding Principles on businesses and human rights.

13

Likewise, GRUPO CROPU firmly rejects and undertakes not to contract directly or indirectly with companies or activities carried out by child labour, models of modern slavery or that violate the rights of ethnic minorities. The group undertakes to require third parties with whom it relates to comply with Human Rights regulations, as well as to establish, for these purposes, effective control systems throughout its supply chain.

GRUPO CROPU is committed to respecting the freedom and rights of ethnic minorities and indigenous communities, as well as contributing to the development of said groups in those countries in which it carries out its activity. Likewise, the group undertakes not to benefit from activities related to people in forced exile due to geo-political, armed conflicts or environmental emergencies and to contribute to mitigate the effects that these situations have generated.

Security Forces

GRUPO CROPU is committed to making responsible use of public or private security forces.

Environmental Management

GRUPO CROPU is committed to protecting the environment, incorporating the best environmental practices in its activities, limiting possible negative repercussions of its activity on the environment and actively working to optimise resource management, always within current legislation.

Upon joining GRUPO CROPU and on an ongoing basis, all employees receive training in environmental matters, waste management, action in case of emergencies and environmental emergencies. Participation in these actions and the application of the knowledge acquired in the workplace are mandatory.

Any activity or situation detected that may in any way pose a risk of any kind, whether for people or facilities, must be notified immediately following the established process. Likewise, any situation of non-compliance that could give rise to a risk or that could be contrary to the law or this Code, must also be communicated to the group through the channels created for these purposes.

Development and Training.

As part of its contribution to society, GRUPO CROPU is committed to promoting initiatives that favour insertion into professional life, either with specific contracts that accompany students during their training or through internship models.

USE OF INFORMATION

Data protection is a very broad term that refers to the collection, processing and use of information both by the group and by the people who make it up, and both in their personal and professional lives.

14

The General Data Protection Regulation (GDPR) establishes the framework and rules of action in all areas. In the event of any discrepancy regarding what is established in this Code, policies set by GDPR will be followed.

Information is considered one of the group's main intangible assets, the misuse of which can lead to both non-compliance with current legislation and economic consequences for the group.

Incorrect use of information may be subject to legal proceedings under the applicable provisions of labour, civil or criminal law.

SOMETIMES SILENCE IS THE BEST ANSWER

Dalai Lama

HUMAN RESOURCES	PEOPLE
<p>Human Resources Department is responsible for ensuring that the collection, processing and use of employee data is carried out in accordance with the law and always guaranteeing their confidentiality.</p> <ul style="list-style-type: none"> ✓ Collection of personal information for exclusive use of the company. ✓ Treatment according to the law ✓ Guarantee of access and rectification 	<p>The people who make up GRUPO CROPU have the obligation to protect the information to which they have access in their activity.</p> <p>Misuse of confidential information of the group or third parties may put the group at risk. Disclosure of personal information is a crime.</p> <p>Both can be subject to legal action.</p>
COMMUNICATION	BUSINESS
<p>Any conduct that, although not contrary to the Law, may harm the group's reputation or negatively affect its interests must always be avoided.</p>	<p>Commercial information is one of the main assets for the group and is therefore subject to special protection measures.</p> <ul style="list-style-type: none"> ✓ Confidentiality of own and third-party commercial data ✓ Duty to protect information ✓ Protection of intellectual property ✓ Prevention against cyber attacks

GRUPO CROPU considers information and knowledge as one of its main and essential assets for business management, which is why they must be subject to special protection.

15

All those who make up GRUPO CROPU have the obligation to maintain the confidentiality of the information to which they have access within the framework of their activity. This refers to both our own information and that of third parties from a 360-degree perspective of our actions.

BUSINESS

The people who make up GRUPO CROPU have the duty to keep confidential all non-public information of the Group, taking the necessary measures to protect the confidential information of the group and that entrusted to it by third parties. Confidentiality clauses contained in the agreements signed by the company must be respected with special attention to the group's intangible assets.

Likewise, employees are subject to the duty of secrecy regarding all non-public information related to the Group that they possess or know, and to which they have access as a result of the performance of their professional activity. They must refrain from improperly using it for their own benefit or that of third parties.

The files, assets, technical data and various confidential information relating to the Group constitute important assets that may prove critical to preserving its results and competitive advantage. All of these elements belong to GRUPO CROPU and must be returned in the event of termination of the employment contract. Any use for personal purposes, direct or indirect, of the information obtained within the framework of professional activity is strictly prohibited.

HUMAN RESOURCES

The people who make up GRUPO CROPU have the duty and obligation to respect the personal data to which they have or may have access due to their relationship with the Group. GRUPO CROPU will strictly comply with current legislation regarding the protection of personal data entrusted to it by its workers and collaborators and undertakes to use, in any case, only the data that are necessary for the effective management of its activity.

All information relating to the private life of workers and data relating to performance evaluations, promotions and remuneration is considered confidential and subject to data protection regulations. Access to this type of information is reserved for expressly authorised individuals.

Therefore, the collaborators of GRUPO CROPU:

- must not collect information about the private lives of other employees, except that necessary for human resources management or for other legitimate professional reasons, and only within the limits authorised by current legislation.
- must guarantee the right of access, verification and rectification of personal data about workers, in accordance with current laws or regulations.
- They must not communicate personal data to third parties, except in exceptional cases authorised by current laws or regulations.

COMMUNICATION

Any communication made both internally and externally, whether in a private or public setting, must always respect our obligation of confidentiality. All information that must be transmitted must be true, complete and in no case will incorrect or inaccurate information be provided that could mislead the person receiving it.

16

The obligation of confidentiality established in the employment contract also extends to communications that are made externally both in person and in the media and social networks. Any mention relating to the group, its companies, businesses, clients, partners, competitors or suppliers must be governed by the same confidentiality criteria. No information about other people in the group should be used, nor may photographs be used without proper permission.

Social networks should not be used to exchange information owned by the group, its clients or suppliers, except with restricted access to a highly controlled and closed community with a login for each participant who has been authorised to receive said information. Publicly accessible web pages are not appropriate sites for internal communication between GRUPO CROPU employees.

When making any type of contribution in the media or social networks, all members of GRUPO CROPU must follow these guidelines whenever they refer to GRUPO CROPU:

- Think before you post, online social platforms are public places.
- Responsibility, each person is responsible for their words and actions.

The creation of an official GRUPO CROPU account or the dissemination of group information through any media and/or press requires the approval of the Corporate Communication Department. Only the group's official accounts can display the logo(s) of any of the companies that make up GRUPO CROPU.

Communication on Social Networks

When a worker publishes information or opinions of his or her own as an employee of GRUPO CROPU, he or she must comply with the internal rules of behaviour on social networks. He/she must act with respect, using good judgment and common sense and always taking care about the content of the information he/she shares. He/she must not publish, in any case, confidential information of any of the companies that make up GRUPO CROPU, its clients or employees, or opinions that can be attributed in any way to the Group. He/she must always request prior authorisation from his hierarchical superior to upload any image of our facilities or events related to GRUPO CROPU companies.

When an employee publishes information or opinion on his or her own behalf, he or she must always do so in the first person and clearly indicating that the ideas or opinions expressed will not in any way be attributable to the group. The condition of employee or any other reference that could attribute the published content in any way to any of the CROPU GROUP companies should never be used.



MARKET AND BUSINESS ETHICS

Business ethics are a fundamental element of the reputation of a company and the people who are part of it. It is the basis of the confidence of the different operators in the market in which they carry out their activity. As such, we must pay special attention to our actions, ensuring behaviour that is always consistent with it.

18

TRUST IS EARNED WITH A THOUSAND ACTS AND LOST WITH ONLY ONE

GRUPO CROPU is a very dynamic company in its commercial development. Your activity must always be in accordance with current legislation. We consider it especially important to ensure [fair trade and competition](#).

GRUPO CROPU strictly complies with the regulations and laws of competition law applicable in the European Union and in each State where the Group carries out its activity, considering that this right particularly prohibits agreements, formal or informal, agreements, projects, arrangements, or concerted behaviour between competitors related to prices, territories, market shares or clients and any type of agreement between agents that may be considered lobbying.

All people who make up GRUPO CROPU must ensure that the exchanges of information, conversations or other direct or indirect communications that they may maintain with third parties, whether they are clients, suppliers or competitors, can never be interpreted as constituting an agreement or prohibited agreement.

Forbidden Practices Associated With:

- **Bribery and Corruption:** No payment or contribution may be made, whether in cash or in kind, in order to obtain a favourable intervention. They expressly include but are not exclusive to invitations, meals, entertainment activities, gifts, services or sumptuary attention offered to employees or managers that exceed what is reasonably attributable to professional courtesy.
- It is prohibited to request or accept, for oneself or a member of one's family, propose or give to representatives or collaborators of a supplier, a client or an organisation, money or any other gift that could reasonably be considered an [influence on business relationships](#).
- **Conflicts of Interest:** A conflict of interest exists when an employee or an immediate family member can take personal advantage of a transaction carried out on behalf of the group or if an employee attempts to select, or influence the selection as a supplier, of a company in which he or she or a relative nearby possess, directly or indirectly, a financial interest. Any situation of conflict of interest must be reported immediately to a superior.

In case of doubts that could be related to any of the cases described, you should always consult your superior or, failing that, the Group's Human Resources department.

The performance of a [managerial function](#) within GRUPO CROPU represents a [full-time commitment](#): No member of management may exercise a second professional activity, nor own or operate a business that requires an active investment of their time without the express authorisation of the person responsible for Human Resources or the General Management of the Group.

MARKET

As part of GRUPO CROPU's commitment to fair trade and competition, and in order to guarantee internally and to third parties with whom it relates the ethics and legality of its operations from a 360-degree perspective of the business, the following is established:

- ✓ **Responsible Purchasing Policy:** *Due Diligence* with contractors and suppliers. GRUPO CROPU is committed to carrying out an analysis of the suppliers with which it relates in terms of their legal and ethical compliance. As established in the group's purchasing conditions (www.grupocropu.com/Terms&Conditions) any supplier with whom a relationship is established must confirm compliance with the terms established in this Code of Conduct.
- ✓ The production and trafficking of **fake goods** or counterfeit parts represent a danger to the health and safety of consumers, while impacting the economic growth of legitimate businesses and consumers. It is a practice contrary to business ethics and as such, GRUPO CROPU firmly rejects and expressly prohibits any activity related to its use and marketing.
- ✓ **Accounting Records:** All employees and collaborators of GRUPO CROPU with functions in management and financial management have the obligation to maintain accounting records accurately and honestly, clearly reflecting their true image and in accordance with the applicable principles, standards and laws.
- ✓ **Money Laundering:** Both GRUPO CROPU and its workers and collaborators must strictly comply with current national and regional legislation and will comply with the prevention and money laundering policy at the national and international level.
- ✓ **Cooperation with Administrative and Judicial Authorities:** Any request for information emanating from the administrative and judicial authorities, with or without prior notification, received by a worker or collaborator, must be immediately transmitted to the Group Management who will decide on the steps to follow.
- ✓ **Export Control:** CROPU GROUP is committed to establishing control mechanisms for its exports, especially ensuring compliance with Human Rights, non-contribution to armed conflicts and the destination and final use of its products.

Promoting and guaranteeing transparency in commercial relations constitutes an effective tool in the fight against fraudulent and corrupt practices. GRUPO CROPU is committed to carrying out its activities in a transparent manner and promoting transparency within the automotive sector.

All employees are personally responsible for compliance with the laws, regulations, standards, policies and procedures that apply to them. Any violation of applicable laws and regulations may result in appropriate legal and disciplinary action.

Criminal conduct is understood to be all that is contrary to the law, expressly including but not exclusive to fraud, bribery, financing of terrorism, child labour, modern slavery and any other activity contrary to the law or that involves the violation of people's rights.

