



Code of Ethics and Conduct

COLEFRUSE INTERNACIONAL S.A.

Version 04
ESG MANAGEMENT SYSTEM
CSR Department

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1. Introduction/ Scope of the code

Colefruse International's Code of Ethics and Conduct is based on the principles of the SMETA International Standard, as well as the United Nations Global Compact Principles. We detail the guidelines for conduct to specify the behaviors required by the company throughout the entire supply chain. The purpose of this document is to apply the concept of due diligence for the prevention, detection, and eradication of non-compliance with the principles of this code and with established internal regulations. By sharing this code with all stakeholders—employees, customers, suppliers, external partners, institutions, and society in general—we are committing to these principles, which represent a three-dimensional concept of quality: a safe and healthy product, environmental protection, and respect and care for the people who, through their daily work, make it possible for consumers to enjoy the best product. In the event of non-compliance, we will be obliged to take the corresponding corrective, disciplinary, and organizational measures to resolve the situation, as specified in this document.

2. Ethical principles

2.1 Volunteer work

We do not resort to any form of forced labor, slavery, abuse, or involuntary work. Working conditions must be determined in compliance with all applicable laws in the country.

ILO Conventions 29 (Forced Labour) and 105 (Abolition of Forced Labour).

United Nations Global Compact Principles 1, 2, and 4. Universal Declaration of Human Rights.

ILO Convention No. 98, Article 1: Prohibition of wage withholdings that involve payments to the employer or intermediaries to obtain or retain employment

2.2 Child Protection

We do not permit the employment of individuals under the age of 15 or the age at which compulsory education ends in the country. The employment of young people will only take place under circumstances that fully protect them from exploitation, moral or physical harm, and long-term damage to their health. Furthermore, it must be ensured that their education is not interrupted. Eligible young workers must also be encouraged to attend school or participate in vocational training or other educational programs

Convention 138 and Recommendation 146 (minimum age).
ILO Convention 182 (worst forms of child labor).
Principles 1, 2, and 5 of the Global Compact. United Nations Convention on the Rights of the Child

2.3 Right of association and collective bargaining

Workers shall have the freedom to join legally recognized associations without discrimination. An open attitude shall be adopted toward the activities of trade unions and other associations. Workers' legal representatives shall not be discriminated against and shall have the freedom to perform their representative functions. To enable and fulfill their duties, they shall have access to all workplaces.

ILO Convention 87 (Freedom of Association and Protection of the Right to Organise);
ILO Convention 98 (Right to Organise and to Bargain Collectively).
ILO Convention 135 (Workers' Representatives). Principle 3 of the Global Compact.

2.4.- Equality

It must be ensured that all workers are treated equally and offered the same opportunities. People with the same skills must receive equal treatment, and there must be no discrimination in access to jobs, internal promotions, or any other necessary information.

Discrimination based on race, social or national origin, caste, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political opinions, age, or any other condition that may give rise to discrimination will not be practiced or supported.

ILO Conventions 100 (Equal Remuneration) and 111 (Discrimination in Respect of Employment and Occupation).

Principle 6 of the United Nations Global Compact.

United Nations Convention on the Elimination of All Forms of Discrimination against Women.

United Nations Convention on the Elimination of All Forms of Racial Discrimination.

Universal Declaration of Human Rights.

2.5.- Responsible employment contracting

The employment relationship must be specified in a written contract, written in a language the employee can understand. The employee must receive at least a copy of this contract. Employees may not be required to provide identification documents and are free to leave their employment after giving reasonable notice.

ILO Convention 102 (Social Security - Minimum Standards).

2.6.- Legal and consistent working hours

Working hours, wages, overtime pay, and vacation entitlements shall be determined in accordance with all applicable laws in the country and the applicable collective bargaining agreement. Employees shall not be required to regularly work more than 48 hours per week and shall be entitled to at least one day off per week. It is a fact that overtime is frequently required in certain situations.

periods or seasons, although overtime should not be excessive in any case and overtime hours must be performed voluntarily.

**ILO Convention 1 concerning Hours of Work (Industry)
and Recommendation 116 (Reduction of Working Hours).**

2.7.- Legal and consistent remuneration

Remuneration for a typical work week must comply with minimum legal standards. Employees must be informed clearly and in detail about the exact structure of their wages (breakdown). Wages must be paid on time, and records of payments to employees must be maintained. No deductions from wages are permitted under any circumstances except those provided for by national law.

ILO Convention 131 (fixing of minimum wages).

2.8.- Safety, occupational health and adequate working conditions

A safe and hygienic workplace must be provided, ensuring that the job does not compromise the health or safety of personnel. Internationally recognized health and safety standards must be observed. Hygienic restrooms must be available on site, and their use must not be restricted. They must have adequate lighting, be well-ventilated, and have access to potable water. Necessary training will be provided to personnel to ensure they are aware of occupational health and safety regulations. Job risk assessments will be reviewed periodically, and the right to suspend work may be exercised in the event of a serious risk.

**ILO Convention 155 and Recommendation 164 (Occupational Safety and Health).
ILO Convention 159 (Vocational Rehabilitation and Employment of Disabled Persons).**

ILO Convention 183 (Maternity Protection).

2.9.- Commitment to environmental protection

The company must make a clear commitment and strive to avoid or reduce waste production, environmental pollution, and the depletion of natural resources through concrete measures and systems that demonstrate this commitment.

Principles 7, 8 and 9 of the United Nations Global Compact.

2.10.- Good governance and the fight against corruption.

Colefruse International's Management rejects bribery, extortion, favors or undue advantages related to any form of corruption or conflict of interest, as defined in applicable international conventions.

Principle 10 of the United Nations Global Compact.

3. Responsibility

Colefruse International's management has designated Fco Javier Fernández, the current plant director, as the emergency contact, providing a 24-hour telephone number (620395731) for handling and managing any incidents, defining the following functions for this contact:

- Receiving urgent alerts
- Activating emergency protocols
- Coordinating initial response
- Decision-making and ensuring incident documentation

4. Guidelines for conduct and rules of behavior

All employees, managers, suppliers, and other stakeholders must act in accordance with the principles set forth in this Code of Ethics, maintaining at all times conduct based on respect, legality, and integrity. In particular, the following aspects are highlighted as standards of behavior:

- Maintain respectful, dignified, and professional treatment; any form of harassment, abuse, intimidation, or discrimination is prohibited.
- Comply with current legislation, internal regulations, and procedures established by the company.
- Act with honesty in all professional relationships, avoiding conflicts of interest and rejecting any form of bribery, improper gifts, or personal advantage.
- Make responsible use of company resources, avoiding their use for personal or improper purposes.
- Ensure compliance with occupational health and safety regulations, using equipment properly and respecting preventive measures.
- Act responsibly with respect to the environment, minimizing negative impacts, managing waste correctly, and making efficient use of natural resources.
- Report any irregular situation or non-compliance detected.

4.1 Whistleblowing channel

All stakeholders and partners in the Colefruse International supply chain have access to a reporting channel for registering complaints. This channel allows them to report risks and adverse effects related to human rights and the ethical principles upheld in this code. This communication mechanism is confidential and anonymous, protecting whistleblowers from any form of retaliation and enabling objective and impartial analysis. Company management is committed to analyzing all reports received, diligently investigating the facts, and taking the necessary steps to resolve them.

Reporting Options:

- Company website
- canaldenuncias@colefruseinternacional.com
- Anonymous mailbox (located on-site)
- Emergency contact (page 5)

For any questions or further information regarding the management of this reporting channel, please consult the current protocol, which explains all important aspects and steps in more detail.

4.2 Disciplinary regime

Failure to comply with the rules set forth in this Code may result in disciplinary measures in accordance with current legislation and applicable agreements. Depending on the severity of the offense, these measures may include:

- Warnings
- Disciplinary sanctions
- Suspension from employment and salary
- Termination of employment
- In the case of third parties (suppliers, subcontractors, or clients), non-compliance may result in the termination of the contractual relationship.

For these reasons, Colefruse International will formally communicate and disseminate the content of this code to all its employees and collaborators to ensure their commitment from the moment they join the company, through contract renewals, and in any other circumstances deemed appropriate. No one, regardless of their level or position, is authorized to instruct any employee to violate this code. Breaches of these principles jeopardize the company's reputation and could compromise our image and stability. Therefore, everyone has an obligation to report any breach or misconduct they observe while performing their professional duties.

4.3 Application to third parties (suppliers and collaborators)

This Code of Conduct will be mandatory for all supplier companies, subcontractors and collaborators that maintain commercial relations with Colefruse International.

These parties shall:

- Comply with applicable legislation and the principles established in this Code.
- Guarantee decent and safe working conditions.
- Act with integrity in their business dealings.
- Respect the environment.

The company reserves the right to verify compliance with these requirements through assessments, audits, or other control mechanisms. Failure to comply with these obligations may result in the termination of the contractual relationship.

4.4 Practical application examples

To facilitate the correct interpretation of this Code, the following illustrative examples of conduct are included:

- Conflict of interest: If an employee has a personal or financial relationship with a supplier, they must inform management and refrain from participating in related decisions.
- Gifts and benefits: Gifts, favors, or invitations that could influence professional objectivity or create an undue obligation will not be accepted.
- Workplace safety: If a serious risk situation is detected, the employee must stop working and report it immediately.
- Environment: In the event of a spill, improper use of resources, or poor waste management, the situation must be reported immediately, and the established corrective measures must be implemented.

4.5 Training, communication and acceptance

Management is committed to ensuring the proper dissemination and application of this Code through:

- Regular training for employees on ethical, social, environmental, and compliance matters.
- Delivery and explanation of the Code during the onboarding process (welcome manual).
- Availability of the document to all stakeholders via the employee app and official website.
- Signature or express acceptance of the Code by employees and, where applicable, by suppliers.

4.6 Supervision, monitoring and continuous improvement

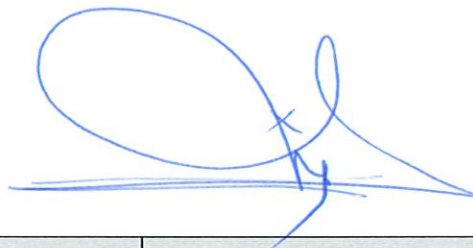
The company will establish mechanisms to ensure effective compliance with the Code, including:

- Periodic internal assessments.
- Social and/or compliance audits such as SMETA.

- Review and update of the Code based on regulatory changes or the business context.
- Recording and analysis of incidents for continuous improvement of the system.

Management will be responsible for leading and ensuring the implementation of these principles throughout the organization. Furthermore, these principles will be reviewed to incorporate any necessary modifications, or even before this period, due to regulatory changes or other relevant factors.

MANAGEMENT SIGNATURE AND DATE



01	MARIA SIRVENT 2024	2024
02	ROCIO A 16.02.2026	Structuring information
03	ROCIO A 08/04/2026	Add emergency contact
04	ROCIO A 08.06.2026	Complete document with code of conduct

