

## CODE OF CONDUCT FOR THIRD PARTIES

### TABLE OF CONTENTS

#### Message from the governing body

- 1. Introduction**
- 2. Scope of application**
- 3. Principles of the Code of Conduct for third parties**
- 4. Behavioural criteria**

- Commitment to the current and applicable laws
- Commitment to transparency, honesty and integrity
- Commitment against conflicts of interest
- Commitment to accounting, tax and fiscal obligations
- Commitment against money laundering
- Commitment against corruption, bribes and influence peddling
- Commitment against contraband
- Commitment to the privacy of physical persons
- Commitment to information assets and IT resources
- Commitment to information society services and e-commerce
- Commitment to intellectual and industrial property
- Commitment to the corporate image and reputation
- Commitment to the environment and natural resources
- Commitment to respect for our professional members and third parties
- Commitment to safety and health at work

- 5. Ethical Channel**
- 6. Non-compliance**
- 7. Approval, entry into effect**
- 8. Third-party commitment of adhesion**

## Message from the governing body

At EIBAR PRECISION CASTING SL we are aware of the importance of inspiring and basing our activity on the fundamental principles of regulatory compliance and zero tolerance against infractions of the rules that apply to us. All this, along with our commitment to transparency, good governance and integrity, has led us to agree on the implementation of a Criminal Risk Prevention Programme (hereinafter, the CRP Programme).

The aim of the CRP Programme is to provide our organisation with the policies, procedures and mechanisms to safeguard the observance of the laws applicable to our entity, as well as the ethical legal principles that govern it.

In the framework of the above, EIBAR PRECISION CASTING SL has approved this Code of Conduct for third parties that includes the principles of action that is expected in our commercial and/or professional relations with third parties with whom we deal so that, along with all our professional members, we contribute to generating a professional environment based on ethics and regulatory compliance.

To achieve it, commitment and goodwill are essential in our organisation as well as of the third parties with whom we deal. We count of you to ensure the compliance of the Code of Conduct for third parties.

Governing body of EIBAR PRECISION CASTING SL

## 1. Introduction

At EIBAR PRECISION CASTING SL we are a consolidated organisation in the INDUSTRY AND RELATED ACTIVITIES sector.

Ethical regulatory compliance is the basis for the decision we take in our professional performance. Therefore, we have approved the implementation of a Criminal Risk Prevention Programme (hereinafter, CRP Programme).

In relation to the implementation of the CRP Programme, a Compliance Officer has been named who will be the person in charge of managing, supervising and communicating the implementation of the policies coming from the CRP Programme in collaboration, support and supervision of the organisation's governing body.

At EIBAR PRECISION CASTING SL we consider third parties with whom we maintain commercial and professional relations to be essential elements for the obtaining of our objectives, seeking to establish with them relations based on trust and mutual benefit, since these intervene actively in our value chain.

For this reason, we incentivise, promote and ensure ourselves that the third parties with whom we deal comply with the ethical standards and with the regulations in force and applicable in their commercial and/or professional relations.

In the framework of the above, at EIBAR PRECISION CASTING SL we have developed a Code of Conduct for third parties that aims to define the ethical and performance standards that all third parties with whom we maintain commercial and professional relations must fulfil and to contribute in this way to making decisions according to the law.

Nonetheless, this Code cannot include all the situations or circumstances we may face in our commercial and/or professional relations, but it has to be the base for actions and decisions in them.

Lastly, the action guidelines included in the Code of Conduct will not replace, in any event, the precepts established in the current and applicable regulations. Similarly, it will be interpreted in accordance with the mentioned regulations.

## 2. Scope of application

This Code of Conduct is applicable to all physical and legal persons with whom we deal professionally and commercially in the performance of our activities, regardless of the contractual relationship existing with them or of the geographical place where they carry out their work.

Therefore, we consider physical and legal persons with whom we maintain professional and commercial relations to be all our suppliers, service providers, customers, advisers, collaborators, etc.

## 3. Principles of the Code of Conduct for third parties

The Code of Conduct for third parties of EIBAR PRECISION CASTING SL that will govern the relations of the organisation with the third parties is based on the following principles and ethical values present also in all our actions and decisions in the organisation:

- Commitment and respect for the current and applicable legislation.
- Respect for human rights.
- Good faith and honesty
- Respect and commitment with confidentiality of personal data.
- Respect and equality of treatment.
- Zero tolerance of corruption and bribes.
- Prevention of occupational risks.
- Compliance in tax and Social Security matters.
- Transparency in the financial and accounting data.
- Commitment and respect for the environment.
- Prevention of conflicts of interest.

## 4. Behavioural criteria

- Commitment to the current and applicable legislation

We are deeply committed to complying with the regulations and observing the laws and regulations that apply to us and work so that all those that we integrate to our organisation comply with them in carrying out all our actions and decisions.

Thus, we support and promote respect for internationally recognised human rights. For this reason we prohibit any form or modality of child or forced labour or that is done under threat or retaliation; we respect the standards in labour matters recognising the rights of assembly, association, affiliation and collective bargaining rights of workers, as well as the right to remuneration in accordance with the law; and we promote equal opportunities for women and men in a fair manner.

We expect the third parties to carry out their activities taking into account the highest ethical standards and the constant strict compliance with the laws that are applicable.

Additionally, we expect the third parties to adapt their decisions and actions with respect of human rights, adopting as many measures as may be necessary to do so.

- Commitment to transparency, honesty and integrity

We are deeply involved with achieving all our objectives and with carrying out each and every one of our actions and activities in a transparent and honest way. For this, we are committed to quality and good workmanship in commercial and/or professional actions.

We expect the third parties to act at all times in a clear manner, respecting the agreed conditions.

- Commitment against conflicts of interest

We are determined to respect the interests of all those who make up the organisation and those with which we have dealings. Furthermore, we intend for all of our organisation's decisions to be based on objective criteria and without the influence of interests or personal relationships. For this reason we establish action guidelines for those situations that may suppose a conflict of interest.

In case of conflict of interest with a worker, customer, supplier, service provider, adviser, etc. of our organisation, we expect the third parties to abstain from acting and to inform us and in this way be able to adopt the necessary measures to correct those situations that denote a conflict of interest.

- Commitment to accounting, tax and fiscal obligations

We are committed to keeping the books, accounts and records up to date so that they reflect at every moment the true accounting and solvency situation of the organisation, complying in this way with the regulations, procedures and obligations in effect on fiscal, tax, financial and accounting matters.

We expect the third parties to keep their books and accounting records with the sufficient level of detail that reflects a faithful image of the transactions with our organisation and that, following a request, allow us access to these records if necessary.

- Commitment against money laundering

We are involved in the fight against money laundering and we do not want to be involved in

any illegal activity, thus we observe with special diligence the compliance of the regulations related to money laundering.

We expect the third parties to cooperate at every moment with our organisation against money laundering and fraud by not participating in illegal activities, not carrying out undue proposals in this matter and being transparent in all the collections and payments related to our organisation.

- Commitment against corruption, bribes and influence peddling

We are committed to the fight against bribes and influence peddling by not tolerating corruption in any of its forms and we are committed to clear, honest, sincere and transparent relationships with all the third parties with which we deal, including the members of public administrations.

In our organisation we do not give or accept gifts, payments, invitations or attentions whose purpose is for the receiver to take advantage of his position or to compromise our professional independence or that of the third party.

We expect the third parties to notify us of any infraction by our members of this commitment against corruption and that they not offer or accept undue gifts, payments, invitations or attentions to any third party, including civil servants and public authorities, in relation to any operation that may affect our organisation.

- Commitment against contraband

We are determined to repress contraband by fulfilling all our obligations in the subject of importing and/or exporting merchandise.

We expect the third parties not to offer us unauthorised merchandise or products and not to trade in products without declaring them in customs or without paying the corresponding taxes in all those operations that could be related to our organisation.

- Commitment to privacy of physical persons

We are involved with the integrity, availability and confidentiality of the personal data and we guarantee the implementation of the timely technical, organisational and security measures that ensure the adequate protection of personal data that we process in our organisation. We are committed to compliance with the current and applicable regulations in the matter of personal data.

We expect the third parties to guarantee the protection of confidentiality of personal information of the individuals with whom they maintain labour relations, as well as

professionals (suppliers, customers, users, and collaborators, among others) and compliance with the applicable regulations in effect on the subject of data protection.

Furthermore, they must preserve and protect the integrity, availability and confidentiality of the personal data that they may process as a consequence of the relationship with our entity in the performance of their professional activity.

- Commitment to information assets and IT resources

We are dedicated to the proper use of the organisation's information assets in the performance of our activities, since they are essential for reaching our objectives, or which reason we transmit messages regarding the information assets to all the members of the organisation.

In the event we provide or make available assets and resources of our organisation to the third parties, we expect them to use them responsibly, using them exclusively for the performance of their professional functions.

- Commitment to information society services and e-commerce

We are committed to complying with the regulations related to Information Society Services and e-Commerce, providing the users with complete, clear and understandable information.

Where applicable, we expect the third parties to take into account and comply with the provisions established in the Law on Information Society Services and Electronic Commerce as well as the different regulations on this subject that may apply.

- Commitment to intellectual and industrial property

We are dedicated to respecting and protecting rights on patents, trademarks, designs, software, utility models, literary, artistic or scientific creations of our own and of our competitors, commercial partners and third parties, prohibiting any practice that could suppose the use or exploitation of these rights without the corresponding permissions and/or authorisations.

We expect the third parties to respect at all times the confidentiality of the information to which they may have access due to our relationship and not to appropriate or make undue use thereof.

At the same time, we expect them to respect at all times the intellectual and/or industrial property rights of our organisation or of third parties, always obtaining the pertinent authorisations and consent and using them exclusively for the purpose for which they have been authorised.

Furthermore, the third parties are expected to adopt the corresponding measures so that the

information of our organisation is not disclosed or used unduly without the corresponding permission.

- Commitment to the corporate image and reputation

We are committed to maintaining an excellent image and reputation of our organisation, since it is an essential asset in preserving and generating trust in our users, therefore we try for all our communication and/or interventions to be authorised and responsible.

We expect the third parties will not make use of our name and/or trademark without our consent or for different uses than those already permitted and ensure that their actions do not damage our image or reputation.

- Commitment to the environment and natural resources

We are committed to the preservation, respect and protection of the environment in all our activities, complying with the current and applicable laws and carrying out our activities in a way that reduces the negative environmental impacts and establishes sustainable environmental management.

We expect the third parties to be committed actively and responsibly to the preservation of the environment, respecting the law and following the recommendations of our organisation in order to reduce the environmental impact of their activities. Also, we expect them to comply with all the obligations that are applicable to them on the subject of the environment, as well as to an efficient environmental policy with equivalent or adequate measures according to their activities in order to minimise the negative environmental impacts.

- Commitment to respect for our professional members and third parties

We are highly involved with our collaborators, users and any third party with whom we deal in the performance of our professional and/or commercial activities, since they are a fundamental and essential part of our activity. In this regard, we establish transparent, efficient and legal relations with all the third parties ensuring that they comply with the ethical standards and those of the required quality, trying to know and satisfy their needs.

We are involved with our professional members and all the persons who make up our organisation. We promote relationships based on dignity, collaboration, professionalism and participation, providing a work environment based on respect.

In addition, we do not tolerate, in any case and under any concept, any situation of harassment, abuse, intimidation or physical or psychological violence or any type of discrimination for reasons of sex, ideology, religion, sexual orientation, disability, etc., in the performance of our



activities or in the relations that we may establish between ourselves or with third parties.

We expect the third parties to establish commercial or professional relationships solely with those who guarantee compliance with the applicable laws and the required and expected quality.

We also expect the third parties to act in a socially responsible manner under the principles of transparency, equality of treatment and objectivity in the relations with the third parties and with all the members of our organisation.

- Commitment to safety and health at work

We are dedicated to preserving the rights of the workers, as well as to the safety and health in our work environment by providing all the means and resources to avoid work accidents, whether of our members or of third parties.

We expect the third parties to apply all the established means and tools to respect the preventive measures that may apply on the subject of occupational safety and health with the purpose of ensuring that all their workers, users, or third parties carry out the activities in healthy and safe conditions.

## **5. Ethical Channel**

All the persons related to the organisation, that is, its professional members and third parties with whom we deal, must inform us of the situations or events related to infractions, non-compliances with this Code of Conduct for third parties or of any regulation, policy or internal procedure, as well as any act contrary to the principles and values of our organisation, of which they may have knowledge, in the shortest time possible.

For this, the organisation through the Ethical Channel has established the following communication channels:

- Specific e-mail address: [info@eipc.es](mailto:info@eipc.es)
- Specific forms available to the persons concerned that once filled out can be sent to the specific e-mail address above to the attention of the Compliance Officer.

Moreover, if you desire to make the communication anonymously, it can be sent by postal mail to the attention of the Compliance Officer at the address of the organisation (TORREKUA KALEA, 3, 20500 EIBAR (GUIPÚZCOA)). In this case, it will be necessary for the communication to have the following minimum content: date that the communication is presented; and the events subject of the report (data of the person or persons involved in the events, date of the reported events and list of the events to report).

The Ethical Channel is not for the purpose of receiving interpersonal complaints that affect only the communicating person, as could be doubts, complaints, and consultations on their relationship with the organisation or interpersonal conflicts between the reporting person and the organisation or any of its members, which could be channelled by corresponding procedures other than the Ethical Channel.

EIBAR PRECISION CASTING SL ensures the confidentiality of the persons that make use of the Ethical Channel and the managing of all the personal data of the persons intervening in the procedure, in accordance with the current and applicable regulations on data protection. In addition, any type of reprisal against those persons who make the communications in good faith and on the basis of reasonable assumptions is prohibited.

The management of the communications received through the Ethical Channel correspond to the Compliance Officer. Therefore, EIBAR PRECISION CASTING SL makes available the protocols and operational procedures of the Ethical Channel to all persons concerned.

## **6. Non-compliance**

EIBAR PRECISION CASTING SL will abstain from establishing commercial, contractual or professional relations with those who do not comply with this Code of Conduct for third parties and the principles flowing from said Code.

In the event that the third part does not comply with the requirements or provisions of this Code of Conduct for third parties, it must take measures and carry out the necessary actions to remedy the non-compliance and avoid its repetition.

Additionally, according to the seriousness of the non-compliance and of its repetition, EIBAR PRECISION CASTING SL reserves the right to terminate the contractual, commercial or professional relationship with the third party.

## **7. Approval, entry into effect**

This Code of Conduct for third parties will enter into effect at the approval by the governing body of the Criminal Risk Prevention Programme and with binding effects for the receivers of its communication, ratification and/or signing. This Code will also remain in effect until its update, revision or repeal is approved.

Likewise, the Code of Conduct for third parties will remain updated at every moment and will be revised whenever relevant or substantial changes are produced in the activities carried out by EIBAR PRECISION CASTING SL, which could have an impact on the compliance with the regulations applicable to the organisation.

### 8. Commitment of adhesion of the third parties

The undersigned, ....., with I.D. card number (DNI) .....  
..... in the name of the organisation .....  
..... hereby declares that he/she has received a copy of the Code of Conduct for  
third parties of EIBAR PRECISION CASTING SL, and that he/she has read, understood and  
undertakes to abide by and respect its contents.

**Date and signature**

