

# CODE OF CONDUCT

NEOLITH

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# Introduction

## PURPOSE & SCOPE

Neolith is the leading sintered stone company, deploying pioneer technologies and business practices. It also keeps Neolith in the vanguard of ethical behaviour, construed together with integrity and good judgment, beyond the compliance of applicable regulations.

The Code applies to Almazora Acquisitions S.L.U. and all its subsidiaries and affiliates ("Neolith" or the "Company").

We operate in many markets and jurisdictions around the world. Whenever there is a difference between local requirements and this Code, apply the strictest standard and do not follow customs or apply practices that would violate our Ethics Code (<https://www.neolith.com/en/company/ethics-channel>). Use [compliance@neolith.com](mailto:compliance@neolith.com) if you have questions.

## HOW TO USE THE CODE?

This Code aims to provide minimum conduct guidelines to orientate our business and the expectations of Neolith about personal behaviour. In addition to our Code, Neolith has other resources that provide more information on expectations related to specific areas referenced in our Code. Making the right decision could be difficult. There will be times when you could be under pressure or unsure of what to do. When faced with a tough decision, it may help to ask these questions:

- Is it legal?
- Does it meet the high expectations reflected in our Code?
- Is it consistent with our policies?
- Is it aligned with the Neolith Values?
- Would you still be comfortable with the decision if it becomes public?

If the answer to any of these questions is "No", then stop and ask for guidance from your direct supervisor or the Compliance Officer through the Ethics Channel ([compliance@neolith.com](mailto:compliance@neolith.com)). Any employees shall feel they are not alone.

## ROLES AND RESPONSIBILITIES

Everybody must take responsibility for acting with integrity, even when this means making difficult choices. Meeting our responsibilities is what enables us to succeed and grow, today – and in the future. It is crucial that stakeholders in the process maintain regular communication in order to ensure ethical behaviours.

ROLE	RESPONSIBILITIES
Chief Executive Officer (CEO)	Overall sponsor of the Code of Conduct, together with the SLT members.
Compliance Officer (CO)	Process document owner.
Employee's manager	The Manager shall lead by example: be a role model, supporting co-workers when they ask questions and raise concerns. Also, the Managers throughout the Neolith Group shall manage and address appropriately any breach or suspected breach of the Code that has been brought to their attention.
Employee	Acts in a professional, safe and ethical manner consistent with Neolith policies and standards. Be familiar with and abide by the information contained in this Code and applicable laws and policies. Pay particular attention to the policies that relate to their job responsibilities. Promptly report concerns about actions inconsistent with laws, regulations, the Neolith policies or this Code. Fully cooperate with investigations and audits. Help the Neolith business partners to understand the practical applications of the Code. Remember: pressure or demands due to business conditions are never an excuse for operating outside of the law or behaving in a way that is not consistent with Neolith standards.

## EXCEPTIONS TO CODE

Exceptions shall be never allowed if compliance is at risk.

Any waiver of the application or this Code must be approved by the Compliance Officer in accordance with applicable law and promptly disclosed to the extent required by law, regulations or listing standards.

# Responsibilities to one another

## HEALTH AND SAFETY (H&S) AT WORK

Neolith has the strongest commitment to grant a safe and healthy work environment for personnel and others who visit or work at our facilities and job sites. Fulfilling our commitment to health and safety is everyone's job.

Expectations for employees:

- Integrate health and safety in all activities and all phases of the business lifecycle in the execution of their job.
- Understand their responsibilities to comply with the applicable H&S standards.
- Always wear required safety equipment and never relax safety equipment or systems' duties.
- Participate in all required health and safety training.
- Stop work if they consider it unsafe and report it immediately to their direct supervisor.
- Never work while impaired by, for example, a lack of sleep, alcohol, or drugs - including prescription or over-the-counter medication.
- Report any accident, injury, illness, or unsafe condition immediately. Never assume that someone else has reported a risk or incident.
- Know, understand and comply with the operational procedures that apply to their work, ensuring that risks are assessed.
- Know the emergency procedures that apply where they work.
- Report all concerns regarding health and safety immediately to their direct supervisor and the H&S personnel.

## ACTION AGAINST HARASSMENT

We all have the right to work in an environment free from intimidation, harassment and abuse. Expectations for employees:

- Help each other by speaking up when a co-worker's conduct makes you or others uncomfortable.
- Never tolerate intimidation or harassment of any kind.
- Do not use Neolith information systems to visit inappropriate internet sites or share inappropriate materials.
- Report incidents of intimidation and harassment. Never act aggressively in a manner that causes someone else to fear injury to themselves or their property.
- Never threatening remarks, obscene phone calls, stalking or any other form of harassment.
- Never causing or threatening physical injury to another.
- Never intentionally damage someone else's property.

## FAIR TREATMENT AND EQUALITY

Neolith brings together employees in a multicultural and multi-skill environment. However, attracting and retaining the best available talent worldwide is a global challenge faced by most of the organizations, including Neolith Group.

We prohibit discrimination based on race, ethnicity, religion, political affiliation, trade union status, nationality, language, gender, social condition, age, disability, sexual orientation or other protected grounds as established by local law.

Expectations for employees:

- | Treat others respectfully and professionally.
- | Do not discriminate against others based on any characteristic protected by law or Company policy.
- | Learn about local behavior and customs that may differ from those you are used to, be sensitive to differences and be prepared to adapt your behavior accordingly when travelling or working in another office or country.

## PERSONAL INFORMATION

Regulations protecting personal information and how it may be collected, shared and used have become more common in recent years. While preserving this information may now be a legal requirement with which Neolith complies, privacy has always been a matter of trust for us.

Expectations for employees:

- | Learn about the types of information protected by the law or Neolith internal policies, and protect that information through appropriate means. This includes, among others, personal information, such as ID numbers, contact details and home addresses.
- | Protect the confidentiality of personally identifiable information of current and former co-workers, job applicants and stakeholders.
- | Don't access, discuss or share employee personal information within the Company or outside the Company unless (1) you are authorized to do so by your job duties; (2) there is a legitimate business need to do so, and (3) doing so does not violate the law.

## CONFLICT OF INTEREST

A conflict of interest can happen when an employee may have a competing interest that interferes or could be perceived to interfere with his/her ability to make an objective business decision. The whole workforce is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict - which can undermine the trust others place in us and damage our reputation.

Conflicts of interest are not always clear. If you have a question, make a written inquiry to your direct supervisor or Compliance Officer (compliance@neolith.com). This will allow the Company to properly evaluate, monitor and manage the situation.

### Friends and relatives

Since it is impossible to anticipate all situations involving relatives and close friends that may create a potential conflict, as far as possible, potential conflicts should be identified in advance and reported to your direct supervisor or Compliance Officer (compliance@neolith.com) so that the Company can determine if any precautions need to be taken. In any case, Relatives cannot directly or indirectly report between them, and the Company will take proper action to mitigate such a situation (e.g. relocation if possible). By Relative, for the Code, it is understood as a bloodline relative (e.g. father, mother, brother, sister), and married or equivalent kinship.

Conflicts of interest can include, but are not limited to, situations where one employee has the influence over a friend or relative in these ways:

- | Hiring, compensation or disciplinary decisions;
- | Awarding or selecting contracts or influence over the terms;
- | Crossed approvals between Relatives.

### Corporate opportunities

If you learn about a business opportunity because of your position at work, it belongs to the Company first. Personnel may not take for themselves or direct to any Relative or friend, opportunities that are discovered on the job.

### Outside activity

Neolith does not prohibit personnel from engaging in certain types of outside activity, but if these activities constitute a potential conflict of interest (which may include working for a competitor, supplier or partner) or may affect your job performance. You must immediately disclose them to your direct supervisor.

Expectations for employees:

Avoid conflict of interest situations whenever possible.

Always make business decisions in the best interest of the Company.

Disclose any relationship, outside activity or financial interest that may present a possible conflict of interest or the appearance of a conflict. Make your disclosures to your direct supervisor and copy the Compliance Officer in writing.

Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with the Company.

## GIFTS AND ENTERTAINMENT

The exchange of gifts and entertainment without the proper guidance can create or appear to create a conflict of interest, especially if it may reasonably influence a business decision.

When it comes to gifts and entertainment, personnel must not accept or offer gifts, entertainment and other courtesies that could affect their (or the person's to whom the gift or entertainment is offered) objectiveness or influence them in a commercial, professional or administrative relationship. We hereby refer to the Principles and Guidelines approved by the CEO and deployed by the People Department.

Expectations for employees:

Only provide and accept gifts and entertainment that are reasonable and customary for the business relationship.

Do not request, solicit personal gifts, favours, entertainment or services. Accepting or offering gifts of money or money equivalents (i.e., gift cards) is never allowed.

No gifts, entertainment or other benefits that could be considered as influencing any business decision to obtain improper advantage can be offered directly or indirectly to public and government officials.

# Responsibilities to protect information and assets

## PROTECTING ASSETS AND PROPERTY

Personnel is responsible for adequately using Neolith's assets, protecting them from waste, abuse, sabotage or loss. Company assets include Neolith corporate image and reputation as well as information, vehicles, tools, materials, supplies, intellectual property, computer systems, software, hardware and facilities.

Personnel is expected to take the most excellent care in preserving the Company's reputation in all their actions. They shall likewise monitor the respect and proper use of the corporate image by our business partners.

The personal use of electronic media such as phones and email is not permitted and shall be used consistently with applicable policies and laws. Personal use of company cars shall be defined from time to time through specific policies.

Expectations for employees:

- Use Neolith assets responsibly and appropriately.
- Respect the copyrights, trademarks and license agreements of others when dealing with printed or electronic materials, software or other media content.

## PROPER DELEGATION

Employees must act according to the delegation of authority matrix in place at any time. Employees shall abstain from acting on behalf of the Company, in any manner, without the adequate written delegation. Employees must be responsible and liable for any damage caused by unauthorized actions or misrepresentation.

Employees may have access to confidential or proprietary information about the Company, our customers, business partners or other third parties. Everybody must be vigilant to safeguard our sensitive information.

Intellectual Property ("IP") rights, even still under development, are considered as trade secret owned by the Company.

Expectations for employees:

- The employees are aware of the classification level of the information they manage in order to apply the appropriate security measures to safeguard its confidentiality. For instance, IP rights are trade secrets.
- Employees shall not exceed delegations when representing the Company.

# Responsibilities in the market

## ANTITRUST AND FAIR COMPETITION

The Neolith Group believes and encourages to operate in free and open competition and never engage in improper practices that may limit competition. We never look to gain competitive advantages through unethical or illegal business practices.

Antitrust laws are complex and compliance requirements can vary depending on the relevant jurisdiction, but in general, the following activities are examples of red flags and should be avoided and if detected, reported to the Compliance Officer (compliance@neolith.com):

Sharing the Company's competitively sensitive information with a competitor of the Company.

Sharing inside information of business partners or other third parties with their competitors.

Attempting to obtain non-public information about competitors from new hires or candidates for employment.

Expectations for employees:

Do not enter into agreements or understandings with competitors or counterparties to engage in any anti-competitive behavior, including, among others, setting prices or performing collusive market share.

Do not engage in conversations with competitors about competitively sensitive information.

## COMMUNICATIONS

Neolith has a consistent and accurate voice in the market. It is important that only authorized persons speak on behalf of Neolith as set out in Company policies.

We are committed to honest, professional and legal communications to business partners and the public. In all disclosures maintain the highest standards of ethics, objectivity and transparency. Inquiries from investors and financial analysts should be referred to the CEO. Inquiries from the media should be referred to the Marketing Department and specifically to the CMO.

Expectations for employees:

Never speak to reporters – even if asked to speak “off the record” – unless you are authorized to do so. If reached by the media, redirect them to the division responsible for media relations.

Never give the impression that you are speaking on behalf of the Company in any personal communication, including speeches and presentations or social media, unless you are authorized to do so.

# Corporate responsibility

## HUMAN RIGHTS

In addition to meeting the requirements of local laws, Neolith is committed to respecting internationally recognized human rights, which include the rights set forth in the International Bill of Human Rights, and the principles concerning fundamental rights in the eight International Labour Organization (ILO) core conventions as set out in the Declaration on Fundamental Principles and Rights at Work. Also, Neolith is part of the UN Global Compact, by honouring its principles end-to-end. The Code of Conduct for supplier shall contain, in any case, the expectations that the Neolith Group has for external stakeholders to do business.

Furthermore, we are committed to respecting the human rights of persons belonging to groups or populations which may be more vulnerable, everywhere we operate.

## ENVIRONMENTAL

We will do our best to prevent our actions from damaging the environment. We are committed to working with our customers, business partners, suppliers and other stakeholders to strengthen environmental stewardship and responsibility and we strive to implement industry environmental best practices whenever practical.

Neolith improves the environmental performance through monitoring, pollution prevention, waste minimization, water and energy efficiency, effective use of raw materials and by paying maximum attention to the efficient use of resources in all phases of the lifecycle, from business development to abandonment.

Expectations for Employees:

- | Take into account the operation which may entail environmental risk.
- | Identify and communicate any action affecting the environment.

## ANTI-BRIBERY

Bribery of public officials is prohibited worldwide. Our Code goes beyond these laws and prohibits improper payments in all of our activities, both with governmental entities and in the private sector.

We do not pay bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents the Company.

It is especially important that we carefully monitor third parties acting on our behalf. We must always be sure to perform due diligence and know our business partners, and all those through whom we conduct our business. We must know who they are and what they are doing on our behalf. Third parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

Expectations for Employees:

Never give anything of value inconsistent with local laws and regulations to any governmental official. If an employee is not sure what the local laws are, the safest course of action is to not give anything of value.

## ANTI-MONEY LAUNDERING

Money laundering is a global concern defined as converting illegal proceeds so that funds appear legitimate and are not limited to cash transactions.

- Report any suspicious financial transactions and activities to Legal and Tax and, if required, report to appropriate government agencies. Bear in mind that Neolith is committed to collaborating with the relevant Tax Authorities to detect and find solutions to fraudulent tax practices that may be occurring in the markets in which it is present
- Comply with all applicable anti-money laundering and anti-terrorism requirements.
- Cash payments appear to be unusual, considering the nature of the sintered stone sector. Also, payments made in currencies other than those specified in the contract or agreement or the invoice;
- Payments made to or by third persons not mentioned in or without contract or agreement;
- Payments or debits in an account which is not the usual account or when the destination of the transferred funds is not known;
- Payments to persons or entities resident in tax havens or to bank accounts open at bank branches located in tax havens;
- Payments to entities where due to their legal system, it is not possible to identify their stakeholders or end beneficiaries;
- Extraordinary payments not provided for in the agreements or contracts;
- Payments expedited by the use of emergency procedures.

Failure to comply with this Code could give rise to disciplinary measures by labour legislation and applicable legal liabilities. It is strictly forbidden to take any measures against a Group employee as retaliation for having reported an irregularity. However, appropriate disciplinary measures will be adopted when an internal investigation finds that an abnormality has been misreported and in bad faith.

The amendments of this Code shall be performed in written form, according to the Delegation of Authority matrix approved by the Board of Directors from time to time.

# NEOLITH

THESIZE SURFACES SL  
POL. IND. CAMÍ FONDO, SUP01 8. C/ IBERS 31  
12550 ALMASSORA (SPAIN)  
+34 964 652 233

INFO@NEOLITH.COM  
WWW.NEOLITH.COM