



Code of Conduct 2025

Our commitment to legislation,
people and the environment.

EDITION	APPROVAL DATE	IMPLEMENTATION DATE	REMARKS
1	08/05/08	08/05/08	Approval of the Code
2	09/01/14	09/01/14	Incorporation section " 3.3 against corruption and bribery".
3	15/05/15	15/05/15	Incorporation section "3.4 Communication misconduct" and section "5.10 Forced and bonded labour"
4	21/09/16	21/09/16	Modifications in sections 2.1, 2.2., 2.4, 2.5 Removal of section 2.6 (contractual value of the code for consultants and suppliers) Modification in sections 3.1, 3.2, 3.3.1, 4.1, 5.12. Introduction of new section 5.15 (Safe, clean and healthy working place) Modification in section 8.1. y 10 (Suppliers pre- assessment) and removal of sections 10.1, 10.2 y 10.3
5	06/11/2017	06/11/2017	Modification of section 3.3.2: we add paragraph (harassment procedure). Modification, in section 3.4 of the mail account and add sentence (confidentiality guarantee).
6	03/11/2021	03/11/2021	Update of the list of Copreci plants on the last page.
7	11/04/2024	11/04/2024	Add 4.4. Free Competition and Fair Competition chapter
8	16/04/2025	16/04/2025	Adaptation to Law 2/2023 of February 20, 23 regulating the protection of persons who report regulatory infringements and the fight against corruption (LPI).



1. Introduccion

A strong commitment with the law

1.1 Aim

The objective of this Code of Conduct (hereinafter referred to as “Code”) is to remind all employees, members of the statutory boards of auditors (hereinafter referred to as “Relevant persons”), customers, suppliers and public & private institutions (hereinafter referred to as “third parties”) of Copreci Group, of the strong commitment of Copreci S.Coop to the full compliance with the applicable laws and regulations of the countries in which the Group operate, or if a local legal requirement is not as strict as the requirement included in this Code, to follow the requirement in this Code.

1.2 Professional Secrecy

This document and all of its activities are dependent upon cooperation, mutual trust, respect and confidential treatment of all observations, discussions and written information between third parties and all relevant person appointed by Copreci Group.



2. Scope of application

From 8 countries we reach the whole world

2.1 Persons to whom this Code applies

This Code is aimed at and is binding for all Copreci Group companies' employees, or anyone acting in the name and/or on behalf of any Copreci company.

2.2 Control structure in charge of monitoring

Monitoring compliance with the Code is the responsibility of the Compliance Committee, whose tasks are summarized as follows:

a) Ensuring the correct communication of the Code to everyone in the Copreci Group and to anyone to whom it may be of interest.

b) Reviewing the Code.

c) Keeping the information given totally confidential.

2.3 Communication of the Code

This code will be communicated to all the Copreci Group employees through the Welcome Handbook. This handbook must determine that it is compulsory to read and fulfil this code.

Every time that there are important changes or the Governing Council considers appropriate, the necessary communication will be made following these guidelines:

Responsible of elaboration and monitoring of the Code of Conduct	Compliance Committee
Responsible of approval of the Code of Conduct.	Governing Council

2.3.1 Copreci Aretxabaleta

	TASK	CHANNEL	RESPONSIBLE
1	Communication to the Social Council and the Supervisory Comission	Social Council meetings	President
2	Communication to all employees	Social meetings	Member of the Social Council

2.3.2 Outside plants

	TASK	CHANNEL	RESPONSIBLE
1	Communication to the Plant Manager.	Operational meetings	HR Director
2	Communication to managers and department heads.	Collaborators meeting	Plant Manager
3	Communication to all employees	Employees meeting	Head of department

2.3.3. Third parties

	TASK	CHANNEL	RESPONSIBLE
1	Communication to suppliers	General criteria	Purchasing Manager
2	Communication to consultants and auditors	Operational meetings	Contact's responsible

2.3.4 Internet and Intranet

A copy of this Code can be found on the Internet site of Copreci Group, as well as on the Intranet/Sharepoint.

2.4 Commitment to employees

All employees are required to read the Code and to behave in accordance with the principles contained therein.

2.5 Commitment for members of the Board of Directors, Governing Council and Social Council

Compliance with the Code is an obligation for the members of the Board of Directors and members of the Governing Council and Social Council.



3. General rules of conduct

Full compliance with the Legislation

3.1 Registration and factory license

Copreci Group and third parties should have a business license to operate, and to fulfil with their terms.

3.2 General Principle: full compliance with current legislation

While carrying out their professional duties on behalf of any Copreci company, every relevant Copreci person and third party must be aware and comply with the law of the country in which they live and normally work and those of all the countries in which they occasionally work. Furthermore, they will give dignified and

respectful treatment to their employees.

Any person of the Copreci Group or third party, who is forced or instigated to breach the law, shall immediately report the matter through the channels set out in chapter 11.4.

3.3. Anti-corruption and anti-bribery

It is strictly forbidden to receive or to offer any form of gift which could be regarded as having a value higher than could be expected out of normal courtesy, or with a view to obtaining personal favourable treatment or a favourable treatment for any Copreci Group company.

Any Copreci company cannot finance political parties, public organizations or political candidates.

It is also strictly forbidden to use any public funds or loans without Financial Department favourable authorisation.

3.3.1 Working with third parties

When dealing with third parties every relevant Copreci person must ensure that they ask suppliers to sign a form confirming that they have read this Code and that they agree to be bound by the rules contained in it. Or, otherwise, that they have their own certification in Social Responsibility or has its own code of conduct.

3.3.2 Prevention and monitoring

All the Group's plants have channels in place for the collection of complaints about bribery, corruption, abuse, discrimination, etc.

Additionally, Copreci S.Coop, has established a specific procedure, "Protocol of action against moral or gender-based harassment", in which is explained what it is understood as moral or gender-based harassment, which are the preventive measures Copreci is taking in order to avoid them and what steps should be followed if anyone detects a situation.

The Compliance Committee is the competent body to ensure compliance with this Code of Conduct and its correct application.

4. Recording of transactions and general control framework

In compliance with the law

4.1 General Principle: full compliance with current legislation

Every transaction which is carried out in the interest of any Copreci Group company must be fully compliant with the local legislation in force.

4.2 Authorization and copy of all transactions

All transactions must be properly recorded in the accounting system.

All transactions must be properly recorded in the accounting system, which could be used, at any time, to confirm the nature to identify the individuals, who have authorised, carried

4.3. Cooperation with control bodies

All the information given to anyone with a role in the internal control and auditing system of any of

the Copreci companies must be accurate and true.

Any information that has to be given to or registered with public authorities needs to be timely, accurate, made by the appropriate persons and in compliance with the law.

4.4. Free Competition and Fair Competition

We undertake to comply rigorously with antitrust legislation and to compete fairly in the markets, promoting free competition and complying, at all times, with the regulations in force.

For this reason, the Copreci Group will not participate in conversations, agreements, arrangements, projects or alliances with current or potential competitors regarding prices, commercial conditions, offers, market sharing or any other activity that restricts or could restrict free competition.



5. Human Resources

Commitment to people

5.1 General Principle:

The Copreci Group recognizes the fundamental principles of the Declaration of Human Rights, according to the UN definition (United Nations of 1.948).

5.2 Contracts: full compliance with current legislation

The employees and third parties of Copreci Group shall be employed according to applicable laws and regulations and there shall be a contract (or appointment letter) written accordingly.

5.3 Payrolls

The Copreci Group and third parties shall maintain

payroll and working hours for each employee, including temporary workers

5.4 Working hours and overtime

The Copreci Group and third parties' employees working time must not exceed the legal limit.

5.5 Regular payments

The Copreci Group and third parties shall pay its employees with no less than the legal applicable minimum wage. The minimum wage shall be paid as per local legal demands (based on legally stipulated standard working hours).

Wages shall be paid at regular intervals and on time with respect to work performed, according to local legislation.

5.6 Overtime Pay

The Copreci Group and third parties' employees shall be compensated for all overtime hours worked according to the legal requirements.

5.7 Leaves

The Copreci Group and third parties' employees shall have time off from their job according to applicable legislation, local traditions and standards (e.g. sick/medical leave, Annual/earned leave, maternity leave, national holidays etc.).

5.8 Benefits

The Copreci Group and third parties shall provide its employees with all legally mandated benefits to which they are entitled (these could be: medical insurance, social insurance, pensions etc).

5.9 Requirements for housing

If there is legislation within this area, the Copreci Group and third parties shall comply with legal requirements.

5.10 Child labor

The Copreci Group and its third parties shall not employ children (1) and shall keep a record of the date of birth of all employees.

In the event that the presence of a minor is detected in our plants, the Compliance Committee and/or HR department will be informed in order to terminate the contract and the causes will be analyzed and the relevant corrective and preventive actions will be defined.

Note 1: According to the International Labor Organization (ILO) Minimum Age Convention of 1973, a child is considered to be any person under 15 years of age, except in cases where local laws consider a higher age or compulsory schooling, in which case the higher age shall apply. Local laws may permit the employment of persons between 13 and 15 or 12 and 14 years of age in jobs that:

- a) Do not harm the health or development of the child; and*
- b) Do not harm school attendance, or training programs.*

5.11 Forced and Bonded labour

The Copreci Group and its third parties:

- Shall not use force (1)
- Shall not hire prisoners (2)
- May not force its employees to perform involuntary labor.

Note 1: Forced labor is any work that is performed under threat of punishment, confiscation of belongings (such as ID card, passport, etc.) and for which the person has not volunteered.

Note 2: The use of civilian or military prisoners in the supplier is prohibited.

5.12 Discrimination

Copreci Group recognizes the cultural differences and different standards that applies in each country. The employment conditions must obey to the individual profile to fulfil the position, never to personal characteristics or beliefs.

Therefore, Copreci Group will never discriminate in hiring processes, retribution, benefits, promotion, discipline and ending contracts on the basis of race, religion, gender, civil status, age, political affiliation, birthplace, sexual orientation or any other reason prohibited by law.

5.13 Labour union

The Copreci Group and its third parties shall ensure that its employees have the possibility to associate freely.

5.14 Collective Bargaining

The Copreci Group and its third parties shall enable their employees to take part in collective bargaining (1).

Note 1: Collective bargaining is defined as free negotiation between the employer and employee representatives (independently and freely chosen by the employees).

5.15 Safe, clean and healthy workplace

Copreci Group shall provide its employees and workers with a safe, clean and healthy workplace, in compliance with applicable legislation; it will assure, at least, the access to safe water, sanitary facilities, fire- fighting equipment, medical facilities, emergency exits, safety equipment and appropriate ventilation and lighting.

Ensuring that employees are sufficiently trained to perform their work safely.



6. Environmental Contamination

Water, Atmosphere, Noise, Soil, Chemicals and Waste

Commitment to environment

6.1 General Principle:

Copreci Group and their third parties shall have valid environmental permits and comply with the provisions of the law on environmental matters. In particular:

- Air Pollution
- Noise Pollution
- Water Pollution
- Soil Contamination
- Chemical
- Hazardous and non-hazardous Waste

6.2 Requirements

Copreci Group and its third parties shall comply with:

- Inspections by environmental authorities: ensure compliance with the results from inspections by

environmental authorities. The required corrective actions must be documented and completed in stipulated time.

6.3 Continuous improvement

Copreci Group and its third parties shall demonstrate their involvement in continuous improvement in environmental aspects:

- Emissions to air
- Emissions to soil and water
- Noise
- Hazardous and non-hazardous waste
- The use of natural resources, e.g. energy, raw materials, chemical agents, etc. as well as the reduction of fossil fuel use.
- The supplier shall continue to work on the substitution of hazardous waste with non-hazardous waste.

7. Occupational health and safety

Our people, our priority

7.1 General Principle

The Copreci Group and its third parties shall comply with the provisions of the law on occupational health and safety.

- Fire prevention
- Accident and incident management
- Occupational health and safety training
- Safety elements of machinery
- Safety instructions
- Selection and use of Personal Protective Equipment (PPE)
- First aid equipment and training of personnel

7.2 Requirements

Copreci Group and its third parties shall comply with: Inspections by occupational health and safety authorities: ensure compliance with the results

from inspections. The required corrective actions must be documented and completed in stipulated time.

7.3. Continuous improvement:

Copreci Group and its third parties shall ensure and demonstrate continuous improvement in areas related to health and safety, in order to go:

- Reducing the number of accidents and incidents
- Increasing the workforce's commitment to improving their work environment.





8. Confidentiality

Trust our people

8.1 General Principle:

All relevant Copreci persons have an obligation to make sure that all the sensitive information with which they come across while performing their duties is treated with the appropriate level of confidentiality, both within and outside the working environment.

All Copreci companies are committed to protecting the information regarding to their employees or third parties, in compliance with the applicable Data Protection legislation.

Any relevant Copreci person receiving a request of confidential information from third parties should never, directly or indirectly, give that information but should instead forward the request to their responsible.

9. Sanctions for non-compliance with the Code

For a better performance

9.1 Sanctions

If employees do not comply with any prescription of this Code they will be subject to a sanction that vary according to the degree of non-compliance and which will be consistent with the company internal rules

10. Pre-evaluation of suppliers

Our suppliers, our collaborators

In the supplier pre-evaluation document, we request Quality, Environmental, Occupational Health and Safety and Social Responsibility certificates.

In case the supplier is not certified in any of the Social Responsibility Standards, it may attach its own Code of Conduct or commit to comply with this Code.



11. Application of the code, communications and monitoring

11.1.- Entry into force

1.- This Code of Conduct shall come into force upon approval by the Governing Council of COPRECI S.COOP. and shall remain in force unless expressly agreed to repeal, revise, update or bring into force a new one to replace it.

2.-Any breach of the Code of Conduct must be reported to the Compliance Committee, which is the body responsible for ensuring compliance with this Code of Conduct and its correct application.

11.2.- Interpretation of the Code of Conduct

1.- In the event of any discrepancy between this Code of Conduct and any Control that is part of

the Compliance Program, the Code of Conduct shall prevail.

Likewise, the interpretation of the Controls shall be carried out in accordance with the spirit and purpose of this Code of Conduct.

2.-The Compliance Committee is responsible for the interpretation of the contents of the Code of Conduct. Its interpretative criteria are mandatory for all its addressees.

Any doubts that may arise regarding the interpretation of the Code of Conduct shall be resolved by the Compliance Committee, through communication with the person in charge of the internal information system (RSII).

11.3.- Compliance Committee

1.-The Compliance Committee is the body in charge of ensuring that the Persons that make up Copreci comply with the provisions of the Code of Conduct.

2.- The Compliance Committee has competence in all matters pertaining to the Compliance Function. The composition, operation, functions and other aspects related to the Compliance Committee are regulated in the Regulations of this Compliance Committee.

The Compliance Committee prepares and proposes the set of Controls that make up the Copreci Compliance Program, which are mandatory for any person in the Copreci Group or third party.

11.4.- Non-compliance and communication through the authorized channels

1.- Non-compliance with this Code of Conduct may give rise to labor or corporate sanctions, without prejudice to the administrative or criminal sanctions that, if applicable, may also result from the non-compliance.

2.- Any person who becomes aware of a Non-Compliance must communicate it through the following established channels:

- Electronic channel located on the website [www. copreci.com](http://www.copreci.com) ([Internal Information System](#)) applicable to communications referring to the following entities: COPRECI, S. COOP; COPRECI CZ, S.R.O.; COPRECI SYSTEMS SRL; MAEL COCCION S.L.U.; MAELITZ S.L.U.; SOLUCIONES TECNOLOGICAS INT Y AUTOM SLU.
- E-mail:socialresponsibility@copreci.es (ethical channel) applicable to communications concerning the following entities: (ethical channel) applicable to communications

concerning the following entities: COPRECI DE MEXICO, SA DE CV; COPRECI TR.LTD.STI; COPRECI CHINA; COPRECI USA; COPRECI EGYPT FOR MANUFACTURING.

3.- The confidentiality of the communications received shall be guaranteed.

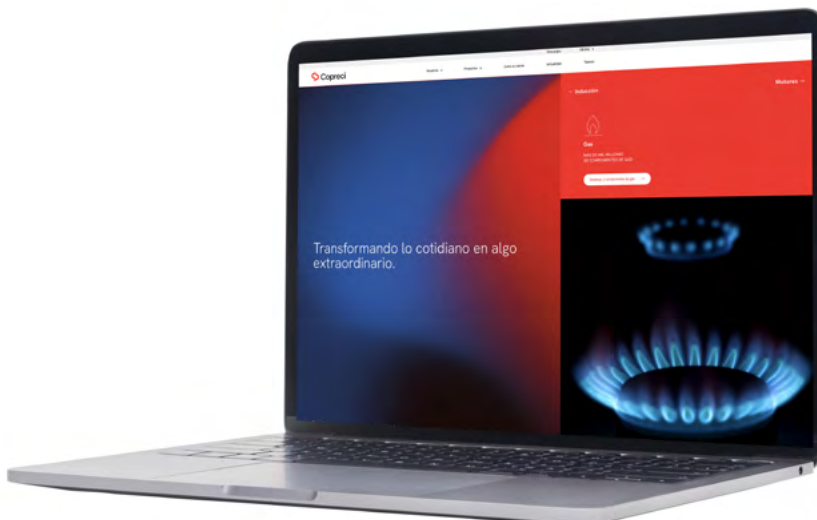
11.5.- Operational management of the authorized channels and processing of the communications received.

The operational management and processing of communications received through the means enabled by Copreci shall be carried out in the following manner:

- Ethical Channel: The communications received in the E-Mail socialresponsibility@copreci.es will be received and processed by the Copreci Group's Corporate HR Department.
- Internal Information System: The communications received through the electronic channel located at the web page www.copreci.com ([Internal System Information](#)) will be received by the individual designated as the person responsible for the management and processing of Communications (RSII), and the provisions of the following documents will apply to their processing:
 - Copreci Communications Management Procedure.
 - Copreci's Internal Information System General Principles Policy.
 - COPRECI's ORSII Statute.

11.6.- Presumption of innocence and right to honor

The presumption of innocence and the right to honor of the persons referred to by the communications.



Code of conduct (Edition 8)

SECTION TO BE COMPLETED BY THE SUPPLIER

FROM:

(supplier name)

TO: COPRECI GROUP

DATE:

We confirm full compliance with the Copreci Group Code of Conduct.

Responsible
NAME:

POSITION/POST:

SIGNATURE:

Making the usual
things extraordinary.



Headquarters

Copreci S.Coop.

Araba Ibilbidea
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