ANNEX III

Code of Ethics

Scope: **SILAM Group** · Edition: **3**

PREPARATION	REVISION	APPROVAL
COMPLIANCE OFFICER	CONTROL BODY	MANAGEMENT

EDITION	DATE	AMENDMENT
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2	23-10-09	Alignment with regulations
3	26-04-29	Strengthening measures to prevent the risk of forced labour and economic dependency

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1. Preamble

This document draws on the United Nations Global Compact, the International Charter of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights.

2. External Relations

a. Gifts, benefits or other gratuities

In performing their functions, employees, supervisors and members of the senior management of the company must not, even for or in the interests of the company, offer or grant to third parties, nor accept or receive from third parties, directly or indirectly, and even on the occasion of festivities, any unauthorised gifts, benefits or other gratuities, even in the form of sums of money, nor goods or services of any kind, except for gifts of modest value forming part of standard practice (and specifically meals), which would lie within the scope of normal relations of commercial courtesy, and must in any event not give the impression to the other party or to unrelated or impartial persons, that they are intended to achieve or grant improper advantages, or could otherwise give the impression of unlawful or immoral conduct.

Any person belonging to the company who receives gifts or offers of gifts inconsistent with the terms thus far set out must immediately report this in writing to their manager, in the case of employees, and to the Supervisory Body, in the case of a senior manager at the company. The relevant measures can then be adopted, following which the committee may issue the corresponding final communiqué.

Persons belonging to the company are in any event prohibited from requesting that they be offered or granted gifts of any kind, even if of modest value, or asking that such gifts be accepted or received.

Any employee who, in the course of their duties, arranges contracts with third parties must ensure that such contracts do not indicate or entail any gifts that would be in breach of this Code.

b. Relations with clients

Customers constitute an integral part of the business assets of the company, which will maintain relations with customers that respect fundamental principles and the standards of this Code (in accordance with the relevant legal, social, economic and cultural structure).

In order to underpin customers' respect, and hence loyalty, relations with them must be established by all employees and members of the company in accordance with criteria of lawfulness and morality, abiding by principles of professionalism and decency.

To this end, those belonging to the company must conduct their activities vis-à-vis customers in an honest, dutiful and transparent manner.

They must in particular:

i. abide by the procedures established by the company with regard to customer relations;

ii. Make no malicious use of their data, which must be employed only for the purposes for which they were gathered, and in accordance with the level of access granted by the Entity. They must in particular not be sold or transferred to third parties. Unless otherwise authorised by management, a customer's data must not be accessed by a salesperson if the data accessed are not necessary for the inherent purposes of their actions, above all with regard to the corresponding end product formulae;

iii. provide rigorous and precise information to customers in connection with the goods and services provided by the company; particular care should be taken in passing on accurate measurements and details of products, in accordance with suitable instruments and appropriate scientific knowledge;

iv. make no false or deceitful statements when selling or marketing products and services. In particular, it should be ensured that sufficient viability data are available before offering to engage in any new product or process, while appropriate communication must be in place between the department marketing it and the department with the data required to verify its feasibility; and

v. Not offer benefits or any type of personal advantage unconnected with the product or service marketed to those who might decide or influence the arrangement of a new contract. Situations inherent to normal social or courtesy standards are excluded, such as meals or similar, provided that they lie within logical parameters, are at all times defined by the Organisation, and duly reported.

Company product and service promotions must be fair, rigorous, and consistent with the laws in force. If comparisons are made with competing products and services, these must be considered, rigorous and verifiable.

Customer data must be checked by accessing the corresponding legal resources to confirm their reality and legal compliance. In particular, specific checks should be performed in accordance with the

parameters in place at the time in question with regard to new customers, above all those that are based or registered outside the European Union, and in all cases involving the possible trade in products connected with arms or munitions of any kind.

c. Relations with suppliers

The company will maintain relations with suppliers that respect the fundamental principles and the standards of this Code, in accordance with the relevant legal, social, economic and cultural structure.

The company will likewise select its suppliers fairly and impartially, and in accordance with procedures drawn up internally for these purposes.

Those belonging to the company will abide by the supplier selection and contracting procedures established by company guidelines, as well as the applicable public transparency procedures in accordance with the regulations in force, except for tasks commissioned on an *intuitu personae* basis, which will be evaluated in each specific case, in relationships for the awarding of contracts, supplies, procurement or provision of goods and services for the company.

In the interests of greater clarity, those belonging to the company must abide by the following standards within their functional sphere:

i. each employee must inform their manager, and each of the managers or senior figures at the company must inform the Supervisory Body, of any personal interest in the course of their functions which could give rise to some conflict of interest.

ii. In the event of competing offers, no supplier must be favoured nor blocked, and in all cases suppliers must be compared in a proper and honest manner, adopting the necessary objective evaluation and selection criteria, and applying transparent formulae. No person belonging to the company must therefore prevent those suppliers that have presented a bid and that fulfil the required qualification requirements in each case from potentially being awarded the contract to provide the good or service in question; and

iii. invitations may be accepted from the other party only if the reason and scale thereof are appropriate, and where possible rejection would be a breach of the rules of courtesy, in which case the Organisation must be informed.

Likewise, suppliers must be called on to respect the legal provisions in their respective spheres of economic operations with regard to the services they provide to the company, and in particular in connection with offences related to the criminal liability of legal entities.

d. Relations with partners

The company may participate in business initiatives together with other agents, by establishing corporate associations to undertake a good or service, by purchasing shares in companies in which other partners have a stake, or simply through joint investments with third parties. If, on an exceptional basis, any such action is taken, the governing body of the Entity will be required to refer the decision to the Supervisory Body, which will draw up the required (non-binding) opinion, granting or refusing its approval. This opinion will be drawn up in accordance with the following parameters:

i. establish relations only with associates and partners that enjoy a commercially reliable reputation, are guided by ethical principles comparable to those of the Company, and operate in line with the Code;

ii. ensure the transparency of agreements and avoid the arrangement of secret and unlawful covenants or agreements;

iii. duly notify the corresponding company body of any conduct in breach of the Code by an investee company, an association of companies, an associate or a partner; and

iv. explicit ban on favouring executives/managers of the company, their companies or close associates, to the detriment of third parties that would be more beneficial for the activity which is to be undertaken jointly.

e. Relations with governments and public institutions

Relations with public institutions will be the responsibility of those members of the company authorised for this purpose, or otherwise those delegated by them, in fulfilment of the rules of this Code, as well as the Company's bylaws and special laws, with particular emphasis on principles of transparency and efficiency.

In any event, in order for any contract to be signed with Public Authorities (whether local, regional, national or international) in excess of an amount of 200,000 euros, the Supervisory Body must first analyse the operation, and issue the corresponding report as to whether it should be signed, which is required but not binding.

Likewise, in any relations maintained by members of the company with Public Authorities, even if through third parties, the following principles must be abided by:

i. Actions must at all times fully comply with the law and proper commercial practice. A specific ban applies to any conduct which would be liable to constitute a criminal offence, even if this is to benefit the Company or pursue its interests. Information offered to public bodies or

institutions must not be manipulated, in particular in the case of obtaining public funding or subsidies of any kind.

ii. When developments are being undertaken, requests submitted or relations conducted with Public Authorities, employees and other personnel operating on behalf of the Company must avoid any attempt to exert improper influence on decisions and must not try to induce any actions in breach of the professional duties of public officials (including those negotiating or reaching decisions in the name of Public Authorities), executives or employees of Public Authorities or their relatives, spouses or close associates, even if this would result in some benefit for the Company.

By way of example, without this description being intended as fully comprehensive, members of the company must not, directly or indirectly:

- consider or propose working or commercial opportunities that could benefit Public Authority employees personally;
- offer or in any way provide money, gifts or gratuities;
- exercise unlawful pressure or promise objects, services or benefits of any kind;
- make false statements to national or EU public bodies in order to obtain public funds, contributions or beneficial finance, or otherwise to obtain concessions, permits, licences or other administrative authorisations;
- alter the functioning of computer or electronic systems or manipulate the data they contain in order to obtain any unfair benefit, to the detriment of the Public Authority;
- assign monies received through public bodies by way of funds, contributions or finance to purposes other than those for which they were assigned; and
- demand or obtain inside information that could undermine the integrity or reputation of both parties.

> (For the purposes described here, gifts will not be deemed to include conventional courtesy items of modest value which are duly in proportion with the individual situation in question.)

The provisions in force regarding taxation must be fulfilled at all times, requesting the relevant advice for the purposes of any action other than simply the Entity's tax returns under the provisions in force. This would include any changes in the form of corporation associated with changes in taxation.

In particular, an obligatory report must be requested from the Supervisory Body as to any change of company structure, and any decision entailing a change in the strategy of the Group with regard to the allocation of profits.

Likewise, an obligatory report will also be requested from the supervisory body when reaching decisions as to what is known as transfer pricing among group companies (services that they provide to one another), as well as financial assistance and any other matters giving rise to taxation queries and lying within the scope of a potential tax evasion offence.

To this end, the supervisory body must draw on a report from a tax law expert so as to issue its opinion.

f. Relations with political and trade union organisations

Relations with political and trade union organisations will be handled by those members of the company authorised for this purpose, or otherwise those delegated by them, abiding by the rules of this Code, as well as the Company Bylaws and special laws, with a particular emphasis on principles of impartiality and independence, both nationally and internationally.

Any member of the company, when acting in the name or on behalf thereof, is likewise forbidden from giving donations or contributions intended for a political party, federation, coalition or grouping of voters, either directly or through an intermediary, whatever the amount thereof.

g. Relations with information bodies

Relations with the press, television and mass media in general, both domestic and foreign, will be handled by those members of the company authorised for this purpose, or otherwise those delegated by them.

All external communications must first be authorised in accordance with the corporate procedures in place at the time in question.

h. Competition

Each of the members of the company must respect the regulations regarding unfair competition and anti-trust matters.

In order to prevent any infringements of these regulations, employees are obliged to inform their manager, and managers are obliged to inform the Supervisory Body, of any conduct the purpose or effect of which would be to prevent free competition in the marketplace, which would include, without being confined to:

i. the establishment of relationships with the company's competitors to agree purchase or sale prices, amounts or other contractual conditions;

ii. the stipulation of non-competition agreements or covenants, including merely verbal arrangements, with the company's competitors; and

iii. agreements for participation in tenders or for the distribution of markets or sources of supply (including with reference to customers, territories or production schedules).

The company's products and services must be sold only on the basis of their own merits and the advantages they offer. This Code of Conduct does not permit any false denigration of competitors, nor of their products or services. The Company acknowledges that competition is a fundamental element for the development and the economic and social progress of the country.

In accordance with this conviction, in performing its activities it ensures respect for general free-trade conditions, allowing economic operators access to the market and competing on a level playing field, protecting customers, facilitating the price containment and improvements in the quality of service derived from the process of free competition.

The Company will not refuse, conceal or delay the transfer of any information required of it by the authorities overseeing free competition and regulatory bodies exercising their inspection tasks, and will collaborate actively in the development of investigation procedures.

Likewise, each member of the company undertakes not to access the devices of a competitor without consent in order to obtain its confidential data, nor will the company allow a new member to provide confidential data from a competing entity that they have left.

i. Sponsorships

The sponsorships used by the company for advertising purposes are not considered donations, nor are contributions to associations nor membership fees at organisations serving corporate interests.

Sponsorship means any contribution made by the company, in cash or in kind, to an event organised by third party in consideration for the opportunity to publicise the brand, for example by displaying the logo, being mentioned in opening or closing messages, involvement of a speaker in a debate, or tickets to an event.

All sponsorship contributions must be transparent, in accordance with a written agreement, for legitimate business purposes, and provided for the consideration offered by the organiser of the event. Contributions must not be promised, offered or made to secure unjustifiable competitive advantages for the company or for any other inappropriate purpose, and must not be made in the case of events organised by persons or organisations the purposes of which are incompatible with the corporate principles of the company or could harm its reputation.

3. Human Resources

a. Selection, appraisal and professional training

Human resources constitute an essential element on which the company bases the pursuit of its goals.

In its personnel selection and management, the company will adopt criteria of merit, competency and evaluation of individual capacities and potential with regard to the professional profiles and aptitudes required by the company.

Given the importance of appropriate personnel selection in shaping the will of the company (adoption and implementation of decisions), all such processes must guarantee high ethical standards, in particular in the hiring and promotion of executives, heads of department, and the appointment of new members of governing bodies.

Aside from the obligation to take into account the suitability criteria established by sectoral regulations, and in default of such criteria, the personnel responsible for hiring at the company must in particular give consideration to the professional track record of the candidate, and reject any whose background indicates that they are not properly suitable.

Personnel will be hired by means of any form of employment contract allowed for in the regulations in force, and where established, through the application of collective hiring.

No irregular employment conditions will be permitted, nor work for cash not declared to the Tax Office.

The company will foster and aim to develop the skills and capacities of each of its employees, including by means of organising professional training and refresher activities.

Each member of the company will diligently undertake such activities and indicate any possible requirement to complete subsequent or specific activities in order to allow the company to adopt the necessary initiatives in this regard.

b. Equal opportunities

One of the company's aims is to consolidate a working atmosphere characterised by the absence of racial, cultural, ideological, sexual, physical, moral, religious or other discrimination, and to offer equal opportunities to its employees and members.

All those belonging to the company must collaborate in pursuit of this aim.

c. Working environment

Members of the company will collaborate jointly in achieving shared results, and undertake to create a calm and respectful working atmosphere. Professional, orderly and decorous conduct will be maintained at work.

The company demands that there be no episodes of harassment or intolerance in internal working relations.

d. Compatible and incompatible activities

Members of the company are permitted to perform activities in parallel, provided that they do not undermine their performance in their occupational activities on behalf of the company.

Those belonging to the company must in any event refrain from engaging in parallel activities (including unremunerated acts) that are incompatible with the specific obligations incumbent on them vis-à-vis the company, wherever contractually specified in those cases where the Company deems this to be appropriate.

e. Use of company equipment and installations

Corporate assets, and in particular installations, vehicles and equipment located in the workplace, will be used for in-service purposes, in accordance with the regulations in force. Such assets will be properly administered and used, and stored in an orderly manner when not in use.

Resources owned by the company, including computer equipment, email accounts, communications networks made available to employees, remain under the sphere of vigilance of the employer, which may adopt any measures it sees fit to verify that workers are fulfilling their duties and obligations, although such oversight must respect due consideration for the worker's dignity.

Under no circumstances may company assets, and in particular computer and network resources, be used for any ends in breach of the legal regulations, public policy or proper practice, nor to commit or incite the commission of offences, or in any event acts of racial hatred, support for acts of violence, or any breaches of human rights.

Under no circumstances may company assets be used for purposes other than those corresponding to its operations. Any use other than as stated will require specific authorisation from the corresponding manager, within the parameters established in each case.

Under no circumstances may company assets be used nor premises entered on non-working days, without explicit authorisation from the corresponding manager, within the parameters established in each case.

No member of the company is permitted to make recordings nor audiovisual, electronic, paper or photographic reproductions of company documents, except in those cases where such operations lie within the normal performance of the tasks entrusted to them.

No member of the Entity is permitted to access a device not previously entrusted to them, unless they have the explicit authorisation of their superior or its designated user. Nor may the network (physical or Wi-Fi Internet access) be used for purposes that do not correspond to company operations and do not lie within the established rules, nor may user codes be given to persons outside the company, except by individual, justified authorisation, approved by a manager in each case. Access must be recovered once the need no longer exists.

Nor may personal devices be used during working hours without explicit approval.

An explicit prohibition applies to the manipulation of company measurement or calibration apparatus or any other machines or instruments serving to conduct tests to obtain a viable sample of the product which will be validated by the customer. The results of such tests must in particular not be directly or indirectly manipulated by any means in order to falsify the information received by the customer.

f. Alcoholic substances and narcotics; tobacco

The use of narcotics is forbidden, as is the abuse of alcoholic substances in the workplace. Notwithstanding the regulatory provisions regarding smoking in the workplace, the company will give particular consideration to the demands of those requesting that they be protected against contact with tobacco as "passive smokers" in the workplace.

g. Child labour

The company is committed to the eradication of child labour in order to prevent any minor from performing hazardous work or any that would interfere with their education or their physical, mental, moral and social development, and establishes in this regard that all its employees must be above the age stipulated for any type of work to be undertaken, or if there is no such regulation or it is in breach of the basic rights of the child, the age of 18 years.

h. Forced labour

The company is committed to the eradication of forced labour in order to prevent anyone from being forced to perform any work or service under threat of any penalty, and which they have not voluntarily chosen. In this regard, it prohibits any fraudulent, abusive or unlawful hiring of any person to provide any work or service for the company.

SILAM will ensure that any salary advance, loan or financial assistance granted to employees does not create situations of dependency or coercion, or restrict employees' labour rights.

i. Fair pay

All employees of the organisation will receive remuneration consistent with their work, their responsibility and their degree of dedication within the legal limits. Under no circumstances may any person be discriminated against on grounds of race, sex, religion, trade union affiliation or political beliefs, or any other condition distinguishing them from other employees.

j. Working hours

The Organisation will aim to facilitate work-life balance in terms of working hours for all employees, within the relevant legal limits and collective agreements.

4. Conflict of interest

The members of the company must avoid situations of conflict-of-interest in undertaking their functions.

By way of example, the following will be considered conflicts of interest:

i. the acceptance of corporate positions or performance of employment activities of any kind for customers or suppliers;

ii. the acceptance of economic and financial interests of the employee or their family in the activities of suppliers or customers (such as admission of direct or indirect holdings in the share capital of such persons or companies).

Any situation that could be liable to give rise to a conflict of interest, or in any event to undermine the capacity of the company member in reaching decisions for the benefit of the interests of the company, must be immediately reported by the employee to their manager, or otherwise by a manager to the Supervisory Body, establishing an obligation on the member of the company in question to refrain from taking any action connected or linked to such a situation.

5. Company Policies

a. Environmental Safeguarding

The safeguarding of the environment and the protection of natural resources are priority goals for the company.

Each of the members of the company must, in performing their functions and activities, contribute to the pursuit of exemplary results in this sphere. The company will in particular have appropriate personnel in place to comply with environmental regulations, and be properly familiar with the validity and applicability of such provisions.

The company will, in the course of its operations, help to facilitate scientific and technological development for the purpose of environmental protection and the safeguarding of resources.

In undertaking their activities, all members of the company will, in their respective sphere of action, demand that any third parties with whom they have dealings in their activities ensure that the actions performed on their instructions are undertaken in accordance with the required environmental and urban planning licences, ensuring that such company activities are performed in line with the current regulations applicable to them.

The company will respect the applicable environmental standards, and demand that third parties with which it has dealings respect these standards. All members of the company are obliged to comply with any instructions, recommendations or orders issued by those responsible for overseeing compliance with environmental regulations at the company.

b. Protection of health and safety in the workplace

The responsibility of each member of the company with regard to their colleagues imposes a moral demand to conduct themselves with the utmost rigour in preventing the risk of accident. To this end, the technical planning of workplaces, equipment and processes must be addressed with the utmost respect for the regulations in force in the sphere of health and safety at work.

Each member of the company must pay the greatest attention in performing their activities, strictly complying with all established safety and prevention measures to avoid any possible risk, both to their co-workers and colleagues, and to themselves.

c. Intellectual property and new product development

The safeguarding of the intellectual property of the company, including patents, industrial secrets, company secrets, trademarks, distinctive signs, technical and scientific knowledge, know-how and skills acquired in performing company activities, is fundamental in order to maintain the company's competitive edge. Employees must define, protect, maintain and defend the company's rights in all commercially relevant spheres of intellectual property, and must exercise such rights responsibly.

The tools provided by the company (including computer equipment, email addresses: xxx@silam.com and/or xxx@dicoinsa.com) are monitored, and are solely for professional use within the context of the company.

Aside from safeguarding the company's intellectual property rights, the intellectual property rights of other market players must also be respected. In particular, and especially in the development of new processes or products, the information used must not infringe the registered rights of third parties.

No employee may register or make use of the intellectual property of the company, nor conclude any agreement nor make independent use of such property without the explicit, written consent of the central specialist units at the company responsible for these matters.

The person responsible for intellectual property at the company must draw up reliable documentation of all registrations filed in the name of the company. This documentation must be fully available to the Board of Directors.

d. Copyright

The reproduction, distribution or amendment of materials subject to copyright without the consent of the rights holder is unlawful and is forbidden by this Code, save for certain legal exemptions protected by "fair use". Unauthorised copying of material subject to copyright may constitute a violation open to civil and/or criminal penalties.

Although copyright violation typically involves the unauthorised copying of publications or other printed materials, it may also include the unauthorised use of photographs and graphical images or designs.

Computer software programs are typically protected by copyright, and normally sold with licensing agreements limiting their use. No director, employee, worker or representative may copy software, nor use it on different computers, unless some licensing agreement allows for this, or it is permitted by some applicable legal exemption.

e. Social responsibility and solvency

The social responsibility of the company, whether operating domestically or abroad, is one of its recognised and shared values.

The company performs its operations with the utmost respect for its social and moral obligations, and aims to help enrich the economic, intellectual and social wealth of each country and community where it undertakes operations, by observing such principles.

In particular, the company will handle the deployment of all necessary resources and comply with the regulations in force in order to protect the health of consumers receiving the product or any part of the product resulting from the company's production process.

The members of the company responsible for accounting will likewise perform no act of manipulation intended to reflect data that do not present a true and fair image. Specifically, the inventory must not be manipulated.

No member of the company will perform any action intended to place it in a position of insolvency vis-à-vis its creditors. Cash must not be used in transactions, unless explicitly authorised.

6. Information and confidentiality

a. Information concerning the company

Inside information concerning the company, received or processed by any of its members in performing their activities in their dealings with the company, must not in whole or in part be used, communicated to third parties, nor distributed for non-institutional purposes.

Inside information is to be understood as all data, knowledge, minutes, documents, reports, notes, studies, plans, drawings, photographs and any other material concerning the organisation and assets of the company, its production methods, commercial and financial operations, research and development activities, and court and administrative proceedings concerning the company.

If a member of the company has any doubts as to the nature of the information they are dealing with, they must consult their line manager.

The obligation of confidentiality will remain applicable even after the relationship with the company ends, in accordance with the regulations in force.

All material containing confidential information must be kept in locations inaccessible to unauthorised persons.

Information must not be extracted, including by photography, from the devices or locations where it is stored, whether physical or virtual, without explicit authorisation.

b. Use of third-party confidential information

The company performs its business activities by ensuring that third parties (in particular customers) receive communication that is entirely lawful, aiming furthermore to provide all customers with information that is as comprehensive and timely as possible.

Members of the company are forbidden from making use of the confidential information of third parties received as a result of their task, whether for the benefit of others or for their own.

Members of the company will respect the confidentiality of the documents and information of third parties, both from the perspective of any non-disclosure agreements that may have been signed, and out of respect for the Law and any rules that might from time to time be established by the company.

Information must not be extracted, including by photography, from the devices or locations where confidential information is stored, whether physical or virtual, without explicit authorisation.

The codes of devices of third parties who have granted access to them for business reasons must not be shared or used, unless with explicit authorisation.

The Organisation may to this end ban the use of personal devices on company or third-party premises.

c. Personal data protection

In performing its activities, the company will process the personal data of its members and third parties in accordance with the provisions of Spanish Personal Data Protection and Guarantee of Digital Rights Act 3/2018, of 5 December 2018.

The company likewise demands that all its members undertake to manage any personal data to which they might have access in performing the functions in accordance with the regulations in force from time to time, in particular the Data Protection Act and documentation setting forth the application of these provisions at the Company.

To this end, the processing of personal data will be permitted only by authorised personnel, in compliance with internal company rules and procedures, as established in accordance with the regulations in force, and in particular Spanish Personal Data Protection and Guarantee of Digital Rights Act 3/2018, of 5 December 2018.