

ETHICAL CODE



MARÍN GIMÉNEZ

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Edition	Date	Nature	Pages
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2	24.02.2022	Update: - Change of name: the Word "conduct" is replaced by "ethical". - 5. Discrimination and harassment.	9
3	16.02.2024	Creation: - 14. Whistleblowing channel - Update due to the whistleblowing channel: <ul style="list-style-type: none"> o 1. Introduction o 5. Discrimination and harassment o 9. Conflict of interest o 12. Ethics committee 	13

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1. Introduction

This code (from now on ECMG, Ethical Code Marín Giménez) specifies the Corporate Business Principles of Marín Giménez and helps to implement them on an ongoing basis through the enactment of certain minimum standards of behavior.

The aim of this ECMG is to:

- Set an **ensemble of principles and rules of ethical and responsible action before the company's stakeholders**, so that all members of Marín Giménez know, respect and act coherently with the values, policies and purposes of the company, adapting their professional behavior to the principles here established,
- **Offer guidance** in the resolution of doubts regarding the behavior of the staff before conflicts or situations of corporate responsibility.
- **Provide and inform of the information channels** to facilitate the compliance of this ethical code.

The stakeholder of Marín Giménez that may be affected by it are:

- Partners.
- Costumers.
- Employees.
- Suppliers and subcontracting.
- Public administrations.
- Society.

2. Compliance with laws, rules and regulations

Marín Giménez and their employee are regulated by law. The compliance of all the rules and regulations must never be compromised. In addition, employees must adhere to the internal rules and regulations as they apply in a given situation. Such internal rules are company-specific and may go beyond the requirements of the law.

3. Labor requirements

Marín Giménez **does not discriminate** on the basis of ethnicity, race, color, physical or mental disability, illness, religion, sexual orientation, political origin, age, nationality or gender, nor does it employ anyone who is not at least 16 years old.

Employees have the right to unionization, **freedom of association** and collective bargaining.



Working hours and overtime are performed **according to the legislation and the industry agreement** applicable to Marín Giménez.

Employee payment is based on the function they made, the collective bargaining and other possible agreements established between the parts.

The work will be performed in safe and healthy places. The activities will be safe for both the staff and the work environment.

Prevention and occupational health are comprehensive part of the staff's way of working. It is mandatory to be careful to correct risk conditions detected during the manufacture of the product.

4. Environmental behavior

Marín Giménez Management Team has incorporated in its corporate culture the concept of “environmental protection”. It has involved the entire company in environmental management and the implementation of sustainable practices.

With this purpose, Marín Giménez, applies, keeps and verifies periodically its environmental management system according with ISO 14001.

Among its environmental aims, Marín Giménez tries to minimize the environmental impact throughout the production process, developing procedures at each stage of the process that reduce or minimize this impact.

The rational and sustainable use of the available resources and a more environmentally efficient technology allows to reduce **the CO₂ emissions** year after year.

Continuously, Marín Giménez implements measures to reduce water consumption that help with the environmental management.

5. Discrimination and harassment

Marín Giménez respects personal dignity, privacy and personal rights of every employee, and is determined to keep a workspace in which discrimination and harassment do not exists.

Marín Giménez will not tolerate any type of discrimination regarding the origin, nationality, religion, race, gender, age or sexual orientation, and no type of verbal or physical harassment.

When a discrimination or harassment situation is observed:

1. The Department of Prevention of Occupational Risks must be informed, which will inform the Workers Representative and the Service of Prevention.



2. The Ethics Committee, the Service of Prevention and the Worker Representative will work together to find a solution to the situation.
3. A report will be emitted with the conclusions and the actions to be taken. The interested parties will be informed.
4. The Health and Safety Committee will track the actions implemented to verify their effectiveness.

6. Subornation and corruption

The employees, directly or through intermediaries, must never offer nor promise an improper personal, financial or other favor in order to obtain an advantage from a third part. They must also not accept such an advantage in exchange for preferential treatment from a third party.

Employees should be aware that offering or giving improper benefits in order to influence the decision of the recipient, even if this person is not an official from the government, may result not only in disciplinary action but also in legal action or criminal penalties.

7. Fraud, assets protection, accounting

The employees must never get involved in fraudulent actions or have dishonest behaviors that affects the company property, assets, financial records or accounting or any third party related to Marín Giménez.

The financial records of Marín Giménez are the basis for managing the company's business and fulfilling its obligations to the stakeholders. Therefore, all financial records must be accurate and in accordance with the accounting principles.

The employees must protect the assets of Marín Giménez and use them only in a way that is accurate and efficient. The whole staff will try to protect the assets against any type of loss, harm, incorrect use, robbery, fraud, embezzlement or destruction. These obligations must concern tangible and intangible assets, including trademarks, know-how, confidential or privileged information and information systems.

Marín Giménez reserves the right to monitor and inspect the way employees use its assets, including the right to inspect all e-mails, data and files maintained on the company's network, when permitted by applicable law.



8. Insider trading and confidential information

The company's non-public information will be used and treated confidentially. It will only be used for the purpose for which is provided.

The internal and external information channels established will be transparent, allowing the staff to become involved and actively participate in achieving the objectives of Marín Giménez.

Marín Giménez employees **will record all the financial, labor, environmental, production and commercial information** according to the internal procedures established by the company in a complete, clear and accurate way.

The company's employees are expressly prohibited from using the company or third parties' **formulas, patents or distinctive signs of intellectual or industrial property** for purposes unrelated to the company.

All the information (from the company or from clients) given to the employees during the development of their professional work **will be treated with confidentiality**. This confidentiality shall be indefinitely, and the company shall retain the industrial or intellectual property rights to which they give rise.

Personal data generated in the company will be treated as said in the Organic Law 15/1999 of December 13 on Protection of Personal Data.

9. Conflict of interest

A conflict of interest takes place when the personal interests of an employee or a third party interferes with the interests of Marín Giménez.

Whenever possible, the staff has to avoid conflicts of interests.

10. Gift acceptance

The employees will not be influenced by **receiving favors** or attempt to influence third parties by **granting favors**.

No employee shall offer to third parties, nor accept from them, gifts such as money, loans, bribes or any other similar advantage, regardless of their value.

11. Defense of competition

The economic development of the company will be made in the context of loyal competition, and never with a misleading, fraudulent or malicious conduct.



Marín Giménez dialogues and collaborates with industry groups and companies, always sticking to the applicable antitrust, competition and fair-trade laws.

12. Ethics Committee

The Marín Giménez Ethics Committee is a **forum for dialogue and information on ethics, social responsibility and responsible practices**.

The Ethics Committee is formed by:

- Chief Executive Officer (CEO).
- Management Systems Manager.
- Human Resources Manager.

The employees and the stakeholders **may consult** any aspect related to this ECMG with any of the members of the Ethics Committee.

The communications regarding complaints, queries, clarifications, or improvements can be made in person to every member of the **Ethics Committee, in an informally or formally confidentially way** through any of the following channels:

- **E-mail:** rsc@maringimenez.com
- **Ethics mail box:** Located in the production canteen, so that workers can make any type of complaint or propose ideas and suggestions for improvement in a confidential or personalized manner. The Ethics Committee, in a confidential way and in collaboration with the affected managers, will analyze, investigate, deal and respond to any complaint made. Once an initial assessment of the complaint has been made, the Ethics Committee will inform the Management of Marín Giménez so that it can take the appropriate choices.

Marín Giménez forbids any type of reprisal against employees with respect to complaints filed in good faith.

The Ethics Committee has the following **purposes**:

- a) Supervise the compliance and communication of the ECMG among every member of the Marín Giménez staff.
- b) Control and supervise all the requests.
- c) Process all the requests related to the implementation of the ECMG.
- d) Interpreting all the doubts that may appear.



- e) Suggest improvements to Management for the adaptation, diffusion and appliance.
- f) Guarantee the confidentiality of the data, with the exception of any judicial or law requirement for which it may need to be disclosed.
- g) Ensure independent actions, with respect and the presumption of innocence of the affected person.
- h) Function as a board in response to complaints made by stakeholders and described in section 15 of this ECMG.

The choices of the Ethics Committee will be binding and, if needed, they will be taken to the company's Management Committee for subsequent decision.

13. Failure to fulfill

Every employee is responsible for fulfilling this Ethical Code and, if necessary, seeking for the assistance of the members of the Ethics Committee to clarify and interpret any situation related to this ECMG.

“Doing the right thing” and guaranteeing integrity is a personal responsibility that must be done and cannot be delegated.

14. Whistleblowing Channel

Marín Giménez has **policy and an internal strategy with a Whistleblowing Channel** based on:

- a) The **nimble and personalized management of complaints** for each situation.
- b) The **creation of a secure and confidential environment** for the whistleblower.
- c) The promotion of **trust between the interested parties**.
- d) The **performance in case of irregularities** and the communication with the whistleblowers.
- e) The **promotion of transparency at work**.

Under these premises, the company has a **Whistleblowing Channel** accessible for all the stakeholders, <https://maringimenez.com>. The aim of this channel is to build a coherent **complaint management framework** to provide adequate protection to **individuals who report actions or omissions that may constitute a serious or very serious criminal or administrative offense**.

Likewise, the channel will facilitate **compliance with the standards of conduct established in the Ethical Code**, without prejudice to other internal control mechanisms of the company.

This channel is the way through which the **staff hired by the company, as well as freelancers, contractors, subcontractors, suppliers and any other person working for or under the supervision and**



direction of contractors, subcontractors and suppliers of the organization, reports any type of conduct that may involve the commission of irregularities or acts contrary to the law or to the rules of conduct of the ECMG.

All this information is coordinated by the **Marín Giménez Ethics Committee**, which delegates the powers of management of the Internal Information System and the processing of investigation files (**Information System Manager - ISM**) to the Human Resources Manager or, in her absence, to the Head of Management Systems.

The communications directed to the Channel could also be made through the app available in the web www.maringimenez.com. **The committee has a specific procedure for the reception and communication, management and resolution of complaints.**

The Information System Manager will receive all the information presented, **within 7 natural days following its reception**. ISM must send the whistleblower an acknowledgement of receipt and if more information is needed, it shall be request using the same channels used by the whistleblower.

In addition to uncovering possible irregularities, the whistleblowing channel is an essential tool for the ECMG to be the model of conduct to be followed.

However, all these communications must follow **truthfulness and proportionality criteria**. This channel can never be used for purposes other than those that pursue compliance with CEMG rules or to report actions or omissions that may constitute a serious or very serious criminal or administrative offense.

Marín Giménez is pledge to treat all the personal data received through the Whistleblowing Channel as **confidential** and according to the finalities established in this code.

Marín Giménez **will not take any reprisal**, directly or indirectly, against anyone who has used the Whistleblowing Channel.

The procedure will be transparent and the right of information of the involved people guaranteed.

Once the investigation of the case has been completed and within the period established by law of 3 months from the receipt of the communication, the Ethics Committee shall resolve the case. However, depending on the complexity of the case or the seriousness of the same, the instructor of the complaint may extend the period for the resolution of the case for a maximum of 3 additional months, duly justifying its cause.

The Ethics Committee will work to **guarantee the principles** on which this channel is based: ***confidentiality, no-reprisal, objective, and assiduous processing, participation of the Managers, clear information, time-bound periodic review and respect for the presumption of innocence.***



15. Publicity

This Code has been approved by the Board of Directors from Marín Giménez. It is published in the website (www.maringimenez.com) and is passed on to all employees through the appropriate awareness, communication and dissemination actions, so that it is understood and implemented.

Moratalla, February 16, 2024

Signed by Francisco Marín García, Chief Executive

