


AN		MG_ES_AN-05								
		CORPORATE ETHICS POLICY								
REV:	00	APLICA EN:	MSI	MSE	MPA	MPL		ELEMENTO	ES	ESTRATEGIA
								PROCESO	ES	ESTRATEGIA
			X	X	X	X		SUBPROCESO	ESTRATEGIA	
								PROPIETARIO:	DIRECCION	

## DESARROLLO

### 1. Purpose

The purpose of this Business Ethics Policy is to ensure the professional, ethical and responsible behaviour of METAL GROUP and all its employees in the performance of its activities anywhere in the world, as a basic element of its corporate culture, as well as to maintain and continue to develop a corporate culture aligned with the best standards of business ethics, socially responsible and respectful of the environment.

### 2. Scope of application

This Policy is mandatory and is applicable globally and directly to all the companies that make up the METAL GROUP - regardless of their geographical location - and is binding on all their personnel, regardless of the position and function they hold.

Compliance with this Policy is also obligatory for individuals and/or legal entities related to the METAL GROUP, insofar as applicable, who, where applicable, must undertake in writing to comply with it.

In accordance with the Policy, the METAL GROUP may develop procedures and instructions to implement and comply with the obligations assumed, as well as to adapt it to the various local legislations applicable to the Group.

### 3. Content of the Policy

#### 3.1. General principles

The purpose of this policy is to establish the principles, values and rules that should govern METAL GROUP's relations with its stakeholders (employees, customers, suppliers).

#### 3.2. Concept of Business Ethics

For the purposes of this policy, Business Ethics is understood as the study of what is right and wrong in terms of human behavior, as well as the behavior of the individual in the company, in relation to the established codes of conduct.

#### 3.3. Basic principles of action

- a) **Acting in accordance with ethics and legality.**
- b) **Respect for people:** a working environment free of harassment and discrimination.
- c) **Respect for Human Rights:** work-life balance, equal opportunities, modern slavery, child labour.
- d) **Customers:** all professional relationships established must be based on trust and mutual respect.

- e) **Society:** donations and projects with social content, respect for the environment, fight against smuggling.
- f) **Sector:** fair competition/no monopoly.
- g) **Health and Safety:** METAL GROUP is firmly committed to complying with the regulations and internal protocols established in matters of health and safety, ensuring the protection of all persons who may be affected by the Group's activity.
- h) **Relations with the Administration and third parties:** The professional relations established by METAL GROUP with any public or official body, authorities or their representatives must be governed by the principle of institutional respect, transparency, integrity, collaboration and ethical compliance.
- i) **Prevention of corruption and fraud:** METAL GROUP strictly prohibits any behaviour or practice of corruption, bribery or influence peddling in relation to clients, suppliers, business partners and civil servants or public, national or international institutions, including those related to money laundering.
- j) **Gifts and personal benefits:** Under no circumstances may monetary gifts or gifts in kind, loans, individual benefits or actions be accepted from natural or legal third parties related to the activities of the METAL GROUP that could lead to a loss of independence and fairness in relations with the different interest groups.
- k) **Conflicts of interest:** Professional decisions and actions must be based on the benefit of the METAL GROUP, and must not be motivated by personal considerations or relationships.
- l) **Suppliers:** Relations with METAL GROUP's supplier companies are based on mutual conditions of respect and equal opportunities.
- m) **Financiers:** METAL GROUP undertakes to negotiate the best conditions in accordance with investment needs and market conditions, with the financing and economic resources allocated to the projects being proportional and appropriate to the nature of the project, and will strictly comply with the conditions established in the financing contracts.
- n) **Transparency, integrity and confidentiality of information:** All the people who make up the METAL GROUP must act in a clear and transparent manner, and ensure the reliability and rigour of the financial and non-financial information, both for internal use and that supplied to the market, providing truthful, complete, comprehensible and timely information.
- o) **Tax obligations and use of public funds:** METAL GROUP ensures compliance with the tax and Social Security obligations applicable to it in accordance with the legislation in force.
- p) **Use of resources and assets:** All persons forming part of the METAL GROUP have the responsibility and commitment to protect the assets of the METAL GROUP against damage, loss, theft and improper use.
- q) **Disposal of assets:** The persons forming part of the METAL GROUP shall ensure the integrity of the METAL GROUP's assets in the performance of their duties, with a view to preserving them and not harming potential creditors.
- r) **Use of electronic media:** persons forming part of the METAL GROUP must make responsible use of the resources and IT resources made available to them, in accordance with criteria of security and efficiency, excluding any use, action or IT function that is unlawful or contrary to the rules or instructions of the METAL GROUP.
- s) **Protection of information:** The members of the METAL GROUP are obliged to maintain strict confidentiality in relation to the information obtained as a result of their professional practice.
- t) **Intellectual and industrial property:** All persons forming part of the METAL GROUP must respect and preserve the intellectual and industrial property rights, both their own (owned by METAL GROUP or the use of which has been granted by any title) and those of third parties.

u) **Commitment to comply with applicable economic sanctions and export controls:** We have policies and processes in place to ensure that none of our businesses or employees carry out any prohibited operations.

#### 4. Communication of the Policy

This Policy will be available on the website and App to all employees and will be made available to all of the Company's stakeholders. The Policy will also be the subject of appropriate communication, training and awareness-raising activities to ensure that it is properly understood and put into practice.

#### 5. Implementation of the Policy

METAL GROUP undertakes to allocate specific resources to ensure the effective implementation of the Policy.

#### 6. Updating and reviewing the Policy

The Policy will be reviewed and updated when appropriate, in order to adapt it to changes that may arise in the business model or in the context in which the Group operates, guaranteeing at all times its effective implementation.



Antonio Román Molina  
C.E.O

In Abadiano, 30th de March 2022

#### CUADRO DE REVISIONES

DETALLE DE REVISION	REVISION	FECHA	REVISADO	APROBADO
Edición inicial	00	30/03/2022	SISTEMAS	C.E.O.