



INDUSTRIAL
MOREYPI
WE ARE STEEL

**REGULATORY COMPLIANCE PLAN CODE
OF ETHICS AND CONDUCT**

April 2024

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1. Letter from the Administrator of Industrial Moreypi, S.A.

At **INDUSTRIAL MOREYPI, S.A.**, we consider that compliance with the law is a clear manifestation of our ethical culture.

We understand that strong ethics are crucial to avoid irregular behavior and to fulfill our responsibilities. Our commitment to this code reflects our dedication to following standards of conduct that we pledge to uphold. Through this code, we establish the **VALUES, PRINCIPLES and COMMITMENTS** that guide our actions and promote a culture of collaboration and teamwork. This culture enables to make decisions in difficult situations, based on professionalism, loyalty and diligence.

We recognize that our employees are our most asset, and our primary mission is to provide excellent service to our customers. The personal commitment of each other is essential to meet their expectations and needs. This is the goal that we share and that drives the development of our company and the industry in which we operate.

The content of this code reflects our commitment to meet the demands of our customers by respecting fundamental, labor and environmental rights, and by vigorously rejecting corrupt and fraudulent practices. This forms the basis of our social responsibility and our strategic vision, being a fundamental ally to face a complex and changing regulatory, economic and social environment, and to prevent the commission of crimes and the loss of opportunities.

We thank the entire **INDUSTRIAL MOREYPI, S.A.** team, as well as our suppliers, partners, customers and other stakeholders, for their collaboration, support and constant communication, which allows us to move towards good governance and integrity every day.



Anais del Carmen Gonçalves Salazar

In Gijón, on April 8, 2024

2. Objective

INDUSTRIAL MOREYPI, S.A. is a company founded in 1945, dedicated to the execution of industrial projects, design and manufacture of capital goods, metallic structures and all kinds of support services to the industry, with presence in different sectors.

Since its foundation, **INDUSTRIAL MOREYPI, S.A.** has carried out its operations based on ethical values and principles, in full respect of current legislation, human rights, public freedoms, international agreements and regulations derived from its own commitment to self-regulation. Through this Code, the company articulates and highlights the principles and values that guide our behavior and our interactions with the stakeholders, constituting the fundamental pillars of its corporate culture. This Code establishes a common frame of reference for all members of the organization.

INDUSTRIAL MOREYPI, S.A. will carry out all necessary controls to ensure that its activities are carried out in an ethical and legal manner, taking corrective measures and sanctioning any deviation or non-compliance that comes to its knowledge, in order to prevent its repetition. Any behavior contrary to the Code will be not justified or tolerated, even if it is carried out under the order of a superior, nor those who try to hide behind ignorance of The rules.

3. Scope

This Code of Ethics is addressed to all employees, managers and members of the Board of Directors of **INDUSTRIAL MOREYPI, S.A.**, who must know and accept its content, and are obliged to comply with it from the moment of their incorporation. As the only Code in the company, it applies to all the business and activities we carry out.

Employees, partners, shareholders, suppliers and any third parties that maintain legal relations with **INDUSTRIAL MOREYPI, S.A.** are bound by the Code in all matters that apply to them.

4. Values and principles

Among the principles and values that every organization should know, assume and respect are respect for equality, diversity and human dignity, social responsibility, teamwork, leadership, transparency, solidarity, employee health and safety, talent promotion and excellence. Some of these are included below, for instance.

HUMAN CAPITAL: For **INDUSTRIAL MOREYPI, S.A.**, excellence in the quality of our products and services is a priority. and this can only be achieved through high standards of professionalism in our team. For this reason, we promote continuous training to enable our employees to acquire the necessary skills and adapt effectively to changing technological, economic and social environments.

We deeply value your opinions and suggestions and strive to meet your needs. We recognize that the interests of **INDUSTRIAL MOREYPI, S.A.** are aligned with those of our employees, so we base our relationship on mutual loyalty and trust.

In the design, planning and implementation of our training activities, we seek not only to meet these interests, but also to promote respect for the environment and sustainability, minimizing any possible negative impact.

SOCIAL RESPONSIBILITY: For **INDUSTRIAL MOREYPI, S.A.**, social responsibility is an essential principle and an integral perspective that guides all our operations. We understand it as a tool to address the present needs of the company, our employees and our stakeholders, through specific actions that preserve the ability to address future demands and the requirements of society.

In this social context, we prioritize respect for the environment and the promotion of sustainability, through the implementation of integrated strategic plans that reflect an ethical commitment from top management. We are committed to protecting our environment, promoting sustainable services and actively working to mitigate the impact of climate change.

Our approach to Social Responsibility also encompasses the continuous improvement and excellence of our human capital, through training initiatives, promoting equality, diversity and the harmonization of work, personal and family life.

LEADERSHIP: Our managers play a key role in fostering a culture of

compliance and ethics in our business, inspiring trust and a spirit of achievement. Their leadership promotes accountability and shared success among all members of the organization. Only with their commitment is it possible to demonstrate the strong ethical tone that characterizes our company, where we work together as a team to face daily challenges.

At **INDUSTRIAL MOREYPI, S.A.**, no member, regardless of their level or position, is authorized to instruct behaviors that contradict the provisions of this Code.

SOLIDARIDAD: Altruism, generosity and commitment to those who need it most are fundamental pillars of our activity. These values are clearly reflected in the collaborative initiatives we promote or support.

We consider the situations of vulnerable people or those at risk of exclusion and work together to address the problems they face, seeking the active participation of our members in the search for solutions.

EXCELLENCE: Responding to the legitimate expectations of our clients and stakeholders is our primary commitment, which drives us to work collaboratively to exceed even initial expectations. Our responsibility towards excellence and quality motivates us to be proactive, efficient and service-oriented in all our actions.

Everyone in the organization understands that the success of our business depends on providing services in a correct, professional and respectful manner, and on the dedication and effort of those who carry them out.

5. General Rules of Conduct

a) IN RELATIONS WITH OUR MEMBERS AND EMPLOYEES

1. Occupational health and safety

INDUSTRIAL MOREYPI, S.A. has an Occupational Risk Prevention Plan tailored to the needs of its employees and the type of operations, which promotes the use of preventive measures and safety elements necessary in each case.

All employees are obliged to know, accept and comply with the rules included in this Plan and to observe and apply the measures for the prevention and protection of this type of risks that have been made available to them.

2. Career advancement and promotion of work-life balance

INDUSTRIAL MOREYPI, S.A. rejects any kind of discrimination or harassment in employment and occupation.

INDUSTRIAL MOREYPI, S.A. committed to the continuous training of its members as an appropriate way to strengthen their skills and competencies and thus enhance their professional development. All employees will know their evaluations and performance assessment. They must guarantee dedication and effort in the exercise of the competencies attributed to them in order to obtain the results assigned to them in each case.

This dedication will be adjusted to the most appropriate times, guidelines and planning to promote a balance between personal life, family care and professional practice. **INDUSTRIAL MOREYPI, S.A.** promotes work-life balance as part of its strategic objectives.

3. Gifts and other attentions

As a general rule, our members may not offer, promise or accept, either for themselves or for third parties, objects, cash payments, services, invitations or favors in order to obtain benefits or advantages in the context of their activities within the organization. This could compromise their objectivity and impartiality and have an undue impact on our business relationships. Any offer received in this sense must be communicated according to the terms and procedures established by our internal regulations.

4. Proper use of resources

INDUSTRIAL MOREYPI, S.A. provides its employees with the resources they require for the proper performance of their activities at all times.

and their use must be limited to these purposes and avoid personal exploitation. This rule must also apply to the management of financial resources entrusted to them.

5. Business integrity

The members of **INDUSTRIAL MOREYPI, S.A.** must act in permanent defense of the Company's interests and avoid situations that may generate conflict between their respective interests and interfere with the fulfillment of their duties and responsibilities and the proper conduct of business.

6. Confidentiality, truthfulness and ownership of information

Respect for the privacy of information is one of the keys to the reliability of our company. The communications to be issued by our employees must be based on truthful, complete and verifiable information. They will always ensure the protection of personal data and will keep secret everything they have access to in the performance of their activities, since it is the property of **INDUSTRIAL MOREYPI, S.A.** This duty will remain even after leaving the company.

They will not disclose information that could damage the image and reputation of our company, nor will they use for their own benefit privileged information, neither that defined as such in the law nor that which refers to our stakeholders when it has not been disclosed or when its disclosure could influence our competition.

INDUSTRIAL MOREYPI, S.A. will be able to access information directly related to the information that remains on devices that we have made available to you, always under the terms and circumstances established in the legislation in force at any given time.

7. Corporate image and reputation

INDUSTRIAL MOREYPI, S.A. considers its corporate image to be one of its main assets, so it will ensure that the use of its trademarks is correct and that the relationships established with third parties do not harm its reputation. The use of our trademark may only be transferred to third parties when so determined by an authorized person.

b) IN RELATIONS WITH OUR CUSTOMERS

1. Respect for our Code of Ethics and Conduct

INDUSTRIAL MOREYPI, S.A. refuses to maintain business relationships with those individuals or legal entities that are not in line with our ethical principles and values. **INDUSTRIAL MOREYPI, S.A.** also rejects those relationships that, even assuming such principles and values, may lead to conflicts between their interests and those of **INDUSTRIAL MOREYPI, S.A.** or its own employees. Our relationships with customers are always lawful, ethical and diligent.

2. Privacy, information and personal data protection

All our employees must maintain the confidentiality of the information to which they have access as a result of the performance of their activity and may not provide, either internally or externally, confidential data about people and/or activities carried out in the organization, even after leaving the company. When they have doubts about the treatment to be given to this information, they shall submit their assessment to their respective managers. It should be borne in mind that improper use of this information may lead to anti-competitive actions.

Protected information to which access is gained shall have the guarantees provided for in the current regulations on Personal Data Protection. The entire organization must comply with these regulations, follow the rules that are determined to harmonize the different treatments and facilitate the exercise of the rights that correspond to those affected.

3. Quality of our services

The satisfaction of our customers is the primary objective of our management. All employees must be aware that the success of the company lies in offering excellent and quality services, for which **INDUSTRIAL MOREYPI, S.A.** provides the appropriate resources. We only offer, promote and advertise activities that are legal and respectful of our principles, values, rules and policies and the purposes that are inherent to us. We do not engage in misleading or deceptive advertising.

1. Gifts

As a general rule, employees and officers of **INDUSTRIAL MOREYPI, S.A.** may not accept gifts from our customers. Exceptionally, the exchange of symbolic or promotional gifts of low value and the attendance to meals whose cost is not excessive are allowed,

We refrain from offering them in circumstances in which they may be inappropriate.

c) IN RELATIONS WITH OUR SUPPLIERS

1. Supplier selection and relationship policy

The selection of suppliers of goods, products and services shall be carried out in accordance with criteria of transparency, objectivity and free competition in such a way as to guarantee quality and efficiency, reconciling the interests of the company with obtaining the best economic conditions and guarantees of reputation, technical and financial solvency. The results of possible previous contracts will be considered.

We will only maintain commercial relations with those third parties that have been able to demonstrate ethical and responsible behavior, that guarantee safe and healthy working environments and that are bound by sustainable policies and committed to the environment. In any case, our suppliers must express their acceptance or recognition of the values, principles and standards contained in our Code of Ethics and Conduct.

INDUSTRIAL MOREYPI, S.A. will take the necessary measures to prevent the personal interests of its members from influencing in any way the contracting process. To this end, no member of **INDUSTRIAL MOREYPI, S.A.** shall offer, request or accept gifts, invitations, favors, hospitality or benefits that could compromise them and question our independence and objectivity.

2. Confidentiality

The knowledge or access to protected information or personal data by us as a result of our relationship with suppliers will have the guarantees provided for in the current regulations on the Protection of Personal Data, from the moment it is collected. We will respect the duty of information in the collection of data and we will faithfully comply with the principles relating to their treatment.

d) RELATIONSHIP WITH OUR STAKEHOLDERS

INDUSTRIAL MOREYPI, S.A. acts under the principles of legality, ethics, loyalty, diligence and transparency in all our relationships, in order to provide value to society and build trust. Our dedication to service drives us to establish permanent communication channels with our stakeholders, attending to their needs and expectations.

our stakeholders, attending to their needs and responding to their expectations, with the utmost respect for criteria of equality and independence.

6. Acceptance and Compliance with the Code

This Code is mandatory for all members of **INDUSTRIAL MOREYPI, S.A.**, who expressly agree to comply with it. It will also be binding for third parties who maintain a relationship with us and who voluntarily agree to abide by it, being necessary documentary support for their adherence.

INDUSTRIAL MOREYPI, S.A. will inform its employees about the content of the Code and will make it public through transparent and accessible channels. In addition, it will periodically seek explicit confirmation of knowledge and formal acceptance by its members, as well as conduct training sessions on its content. These sessions will be held every time the Code is modified or replaced by new versions.

Non-compliance with the Code will be assessed in accordance with the company's bylaws, its internal policies and the legal provisions in force, applying the corresponding sanctions as necessary. The company may establish an incentive scheme to recognize the dedication and rigorous compliance of its employees.

Any doubts about the interpretation or application of the Code should be consulted with the hierarchical superior or with the body responsible for the compliance function, or communicated through the channels established for this purpose.

7. Implementation

This Code of Ethics and Conduct is a public and open document, available on the website <https://www.moreypi.com/>. It is subject to constant updating and continuous improvement, for which we will rely on the comments, suggestions and opinions of our stakeholders, which can be transmitted through the communications channel established for this purpose administracion@moreypi.com. This channel will also allow **INDUSTRIAL MOREYPI, S.A.** to address and respond to any doubts and queries that may arise within the framework of the Criminal Compliance Model that is specific to INDUSTRIAL MOREYPI, S.A. and that are related to business ethics.

INDUSTRIAL MOREYPI, S.A. has also established an appropriate channel to communicate all types of violations and breaches of the same, of the law in force and other applicable internal regulations. Through this channel administracion@moreypi.com will be attended, with guarantees of privacy and confidentiality, the complaints that may arise at any time. The reports may refer to conduct, suspicions or facts that are considered relevant for the purposes of the application and effectiveness of the Criminal Risk Prevention Model of our organization.

The authors of the reports will be protected from any potential retaliation, without prejudice to the legal obligations and protection of the rights of companies or third parties.

The person who finds himself in a situation of conflict with the principles of this Code of Ethics and Conduct is obliged to report it and proceed to the appropriate communication.