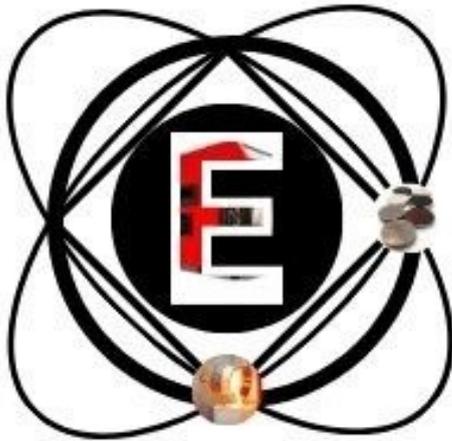


Equilab S.A. Code of Conduct



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Introduction

Since the very beginning of **Equilab S.A.**, our business operations have been built on integrity, transparency, and strict compliance with current regulations. We firmly believe that maintaining ethical conduct and fair, transparent business practices is the key to success in today's dynamic and challenging market.

We have developed a **Code of Conduct** that reflects these core values and sets out the standards to be followed in our daily operations. This code is essential to strengthening our reputation as a trustworthy and transparent company.

We also recognize the importance of the social responsibility shared by everyone who forms part of Equilab S.A. As a small company, it is vital that each of us safeguards our values and our corporate image. I encourage all employees to embrace these principles and the company's philosophy in their everyday work. By working together, we will achieve the excellence and transparency that will lead us to success as a company.

Sincerely,

Pedro Velloso Postigo
CEO

Employees of EQUILAB S.A. should always be guided by the following basic principles:

- Avoid any behavior that could harm or compromise EQUILAB S.A. or its reputation.
- Place the interests of the company above personal or other interests.
- Maintain a constant commitment to transparency and open communication, both within and outside the workplace.



1.1. Ethical Principles

We consistently comply with the law.

At **EQUILAB S.A.**, respect for the law is a fundamental and non-negotiable value. All our team members strictly adhere to current legislation and regulations. We ensure full compliance with all applicable laws and standards — a steadfast commitment that underpins everything we do.

In addition, our employees follow a set of internal rules and guidelines designed to guide their conduct in any given situation. We place particular emphasis on fostering a culture of innovation and adaptability, which is essential in a company like ours, where collaboration and creative thinking are key to delivering unique and effective solutions to our clients. In doing so, we reinforce our commitment to both excellence and business ethics.

1.2. Conflicts of interest

We always act in the best interests of EQUILAB S.A.

A **conflict of interest** arises when an employee's personal interests — or those of a third party — compete with the interests of EQUILAB S.A. In such cases, it may be difficult for the employee to act fully in the company's best interests.

Whenever possible, employees should avoid conflicts of interest. If a conflict of interest has occurred, or if an employee faces a situation that might involve or lead to one, it must be reported immediately to our manager. Given the size of our company, this direct communication allows such matters to be resolved fairly and transparently.

Employees must not directly or indirectly accept gifts, cash, or anything of value from any company or individual doing business — or seeking to do business — with EQUILAB S.A., except for non-monetary promotional items or customary courtesy gifts of nominal value.

1.3. Non-Discrimination and Harassment

Equity and Respect in the Workplace.



At **EQUILAB S.A.**, we maintain an unwavering commitment to fairness and respect, ensuring a work environment where discrimination and harassment have no place. Any form of discriminatory behavior toward employees, suppliers, or clients that violates our ethical principles will result in appropriate disciplinary action.

One example of unacceptable behavior in our workplace is sexual harassment. This includes any conduct by a member of the organization, regardless of gender or position, that involves requesting or implying sexual favors in exchange for professional advantages such as continued employment, promotion, or other benefits.

Sexual harassment not only violates the rights and dignity of the person affected, but also damages the integrity of our workplace and undermines equal opportunities for everyone.

We urge all members of **EQUILAB S.A.** to remain vigilant and immediately report any signs or incidents of discrimination, harassment, or any behavior that could be interpreted as such. By doing so, we help ensure the mutual respect and protection that form the foundation of our company culture.

1.4. Commitment to the Environment

EQUILAB S.A.'s Commitment to Sustainability and Environmental Responsibility.

- 1.- The activity of **EQUILAB S.A.**, focused on providing innovative services and solutions, inherently contributes to sustainable development. This is reflected in our ongoing efforts to optimize resource use and promote sustainability in all our processes.
- 2.- Despite the inherent benefits of our activity, **EQUILAB S.A.** is committed to exercising the utmost respect for the environment. We strive to minimize any potential adverse impact by implementing appropriate measures and providing the necessary information to reduce or eliminate negative effects on the natural environment. All of this is carried out in line with current environmental legislation and using the best available techniques.
- 3.- **EQUILAB S.A.** is committed to obtaining and maintaining the most recognized and rigorous environmental certifications, appropriate to our geographical and sectoral context.
- 4.- We pledge to comply with all applicable urban planning and land-use regulations relevant to our location, in full accordance with local laws and guidelines.
- 5.- At **EQUILAB S.A.**, we recognize that all our employees play a crucial role in minimizing the environmental impact of our operations. Every team member is expected to comply with the company's environmental policies, procedures, and controls. Depending on their role, they must ensure the accuracy of all environmental information communicated both internally and externally.



1.5. Confidential and Proprietary Information

Protection and Confidentiality of Information at EQUILAB S.A.

1.- EQUILAB S.A. is committed to protecting and safeguarding confidential information related to its employees, clients, and suppliers, always acting in accordance with current legislation and the specific agreements established to ensure confidentiality.

2.- All EQUILAB S.A. personnel, regardless of rank or position, must respect and protect the confidentiality of all non-public information related to industrial, financial, commercial, or legal matters, as well as personal data, specialized knowledge, and business practices linked to the company, its employees, clients, or suppliers. Necessary measures must be taken to prevent unauthorized disclosure, and such information should be used exclusively for legitimate company purposes and shared only with duly authorized individuals or in compliance with a legal obligation.

3.- If any suspicion or evidence of unauthorized disclosure of confidential information is detected, the situation must be reported immediately to a supervisor, to the Internal Audit Department, or through the reporting channels provided by **EQUILAB S.A.** for such cases.

4.- The responsibility to protect confidential information continues even after an employee's or collaborator's relationship with EQUILAB S.A. has ended. Upon leaving the company, any confidential documents or information in the individual's possession must be returned to the company, regardless of the format in which they exist.

1.6. Workplace Safety and Conduct

A Safe Work Environment at EQUILAB S.A.

At **EQUILAB S.A.**, we promote a work environment that is safe, respectful, and free from any form of violence or intimidation. We are fully committed to a zero-tolerance policy toward behaviors that endanger the physical or emotional well-being of our employees or visitors.

Unacceptable actions in our workplace include, but are not limited to:

- Behaviors or attitudes that could be perceived as dangerous, threatening, or aggressive.
- Threats of any kind, whether verbal or written.
- Acts of physical violence.
- Any form of harassment, stalking, or intimidation.

We encourage anyone who feels threatened or perceives a risk to their own safety or that of others to report it immediately. **EQUILAB S.A.** is committed to thoroughly investigating all reports of threats or acts of violence and to taking the appropriate disciplinary action, which may include termination of employment and, when necessary, legal proceedings.



We also reaffirm our commitment to ensuring that anyone who reports such incidents will not face retaliation, intimidation, or disciplinary action. Our priority is to maintain a workplace that is respectful, safe, and supportive for everyone.

Article 2.

2.1. Occupational Health and Safety

EQUILAB S.A.'s Commitment to Workplace Health and Safety.

1.- EQUILAB S.A. is committed to ensuring a safe and healthy work environment in full compliance with all applicable laws and regulations. Adhering to occupational safety and risk prevention standards is regarded not only as a legal requirement but also as an ethical responsibility.

2.- To uphold these principles, we promote a culture of prevention based on occupational health and safety policies that aim to minimize the risks inherent in our activities. This effort encourages continuous improvement and active participation from all employees, contractors, and suppliers.

3.- We provide our teams with the necessary resources and training to carry out their duties safely, and we actively promote awareness and compliance with occupational health and safety standards. Every employee is expected to take responsibility for their own safety and that of others by diligently following established guidelines.

4.- EQUILAB S.A. strictly prohibits the use of any substances that may impair an employee's ability to perform their duties safely and effectively, thereby preserving both physical integrity and workplace productivity.

Article 3.

3.1. Clients

EQUILAB S.A.'s Commitment to Quality and Client Relations.

1.- EQUILAB S.A. is dedicated to ensuring that the delivery of its services meets all required quality standards and performance criteria.

2.- Our company seeks to build strong, long-term business relationships with our clients based on mutual benefit, trust, and attentive service. We always act with honesty, professional responsibility, and a commitment to excellence in everything we do.

3.- EQUILAB S.A. also strives to maintain effective communication with clients, improving customer service processes and reducing unnecessary procedures to streamline and enhance the client experience.

4.- We are committed to respecting all confidentiality agreements established with our clients, protecting their information, and fostering a relationship built on trust and security.



4.1 Suppliers

Supplier Selection Policy at EQUILAB S.A.

- 1.- **EQUILAB S.A.** is committed to making sure that the selection of suppliers for goods and services is carried out objectively and impartially, ensuring that there are no conflicts of interest or favoritism.
- 2.- Our internal policy promotes fair competition among suppliers and includes controls to guarantee that no one with a personal or financial interest in current or potential suppliers takes part, directly or indirectly, in the selection process.
- 3.- We handle all information and financial proposals received from suppliers with the utmost confidentiality. **EQUILAB S.A.** will not share this information with third parties without the supplier's written consent, except where disclosure is legally required or necessary as part of a competitive process.
- 4.- Contracts established by **EQUILAB S.A.** will include clauses that prevent maintaining commercial relationships with suppliers who consistently fail to uphold respect for human and labor rights in accordance with internationally recognized standards.

5.1. Competitors

EQUILAB S.A.'s Commitment to Fair Competition Principles.

- 1.- **EQUILAB S.A.** is firmly committed to adhering to the principles of fair competition, acting in the marketplace with integrity, and avoiding any conduct that could be interpreted as collusive, abusive, or restrictive of competition.
- 2.- The company explicitly condemns the use of misleading advertising or any practice that unfairly discredits competitors' products or services.
- 3.- The management bodies of **EQUILAB S.A.** will exercise ongoing oversight in this area to ensure that both executives and employees engaged in commercial activities—whether in the procurement or sale of goods and services—are fully informed of, and consistently comply with, the regulations designed to protect fair competition and prevent unfair market practices.



6.1. Implementation, Acceptance, and Compliance

Implementation and Adherence to the Code of Conduct at EQUILAB S.A.

- 1.- **EQUILAB S.A.** is committed to communicating and promoting among all its employees the understanding and awareness of this Code of Conduct, including its standards, commitments, and related procedures.
- 2.- All employees are required to acknowledge and adhere to the principles and rules of conduct set forth in this Code.
- 3.- This Code of Conduct is mandatory for every member of **EQUILAB S.A.** Any breach will be evaluated and sanctioned in accordance with applicable labor legislation and collective agreements, and may be considered a serious offense.
- 4.- **EQUILAB S.A.** expects every member of the organization, without exception, to respect and comply with all internal and external regulations governing their professional activities. This requirement equally applies to contractors, suppliers, and any third parties who interact with or act on behalf of the company.
- 5.- Employees of **EQUILAB S.A.** must also follow the ethical and compliance procedures and controls established by the company. Each individual is responsible for helping maintain an ethical environment within the organization and for regularly ensuring that their behavior aligns with this Code and its provisions.
- 6.- Any person associated with **EQUILAB S.A.** who becomes aware of or reasonably suspects a violation of this Code must report it to a supervisor, to the Internal Audit Department, or through the official reporting channels established by the company.
- 7.- Under no circumstances, and regardless of hierarchical level, may any employee be instructed to act against the provisions of this Code. No member of **EQUILAB S.A.** may justify misconduct by claiming to have followed orders or to have been unaware of the Code.

Article 7.

7.1. Disciplinary System

Consequences of Non-Compliance with the Code of Conduct.

Failure to comply with the guidelines set forth in the **EQUILAB S.A. Code of Conduct** may result in the imposition of disciplinary measures in accordance with applicable labor regulations. Such actions are without prejudice to any administrative or criminal sanctions that may also apply, depending on the nature of the violation. All disciplinary actions will be carried out in accordance with the legislation in force in the jurisdiction where the infraction is identified.

