

CORPORATE SOCIAL RESPONSIBILITY AND CODE OF CONDUCT

TORNILLERIA DEBA S.A.L.'s corporate social responsibility and code of conduct is linked to the ethical position that our organisation has in the areas of human rights, labour standards, environmental protection and safety in the areas where we operate; we take into account the impact that our business has on our customers, employees, shareholders, suppliers, competitors, local communities, administrations, the environment and society in general.

This responsibility goes far beyond following mandatory domestic and international regulations and laws. Social responsibility is a value that **TORNILLERIA DEBA S.A.L.** takes to heart, rather than simply being an action to be carried out only to obtain other associated advantages.

TORNILLERIA DEBA S.A.L.'s corporate social responsibility is based on codes of good practice, including:

- SERVING SOCIETY WITH USEFUL PRODUCTS IN GOOD CONDITION
- COMPLIANCE WITH CURRENT LEGISLATION, CARRYING OUT OUR BUSINESS IN AN HONEST AND ETHICAL MANNER.
- RESPECT FOR PEOPLE, WITH DECENT WORKING CONDITIONS THAT PROMOTE OCCUPATIONAL HEALTH AND SAFETY, AND WORKERS' PERSONAL AND PROFESSIONAL DEVELOPMENT IN AN ENVIRONMENT FREE OF HARASSMENT AND DISCRIMINATION OF ANY KIND (CULTURAL, SEXUAL ETC.)
- SEEKING THE COMPANY'S CONTINUITY AND, IF POSSIBLE, ACHIEVING REASONABLE GROWTH.
- RESPECTING THE ENVIRONMENT, AVOIDING ANY KIND OF POLLUTION WHERE POSSIBLE, MINIMISING THE WASTE GENERATED AND RATIONALISING THE USE OF NATURAL AND ENERGY RESOURCES.
- TRANSPARENCY, DISCLOSING ALL THE RELEVANT INFORMATION ON OUR BUSINESS.
- WHISTLEBLOWING POLICY.
- CONTINUAL DIALOGUE WITH STAKEHOLDERS.
- GOOD FAITH TOWARDS CUSTOMERS, WORKERS, SHAREHOLDERS, SUPPLIERS, ADMINISTRATIONS ETC. AND SOCIETY IN GENERAL.

- BALANCE BETWEEN PRODUCTIVITY AND SOCIAL DEVELOPMENT.
- MAINTENANCE OF BUSINESS ETHICS, CONFIDENTIALITY IN THE INFORMATION PROCESSED, FIGHT AGAINST CORRUPTION AND DEFENCE OF AN ANTI-BRIBERY POLICY.

This code of conduct establishes the basic principles that have to guide the company's actions and applies to all employees, regardless of their position at the company.

TORNILLERIA DEBA S.A.L. believes that relationships should be based on mutual trust, respect and a clear recognition of the dignity of all.

The following tools are used to put the above into practice:

- **OCCUPATIONAL HEALTH AND SAFETY:** Collaboration with a third-party risk prevention company that continuously reviews our production process to establish the necessary protection measures in each position and the application of the measures required to maintain a safe working environment.

At the same time, all staff have a health monitoring service that includes medical examinations each year and checks the fitness of all employees for doing their work in adequate physical condition.

- **TRAINING:** Presentation on company notice boards of the training course schedules linked to the work so that workers can use the available templates to request to take a training course and, after being assessed by management, include it in the TRAINING PLAN.

- **WHISTLEBLOWING:** **TORNILLERIA DEBA S.A.L.** makes it possible for all the organisation's staff to report concerns, irregularities or non-compliance as respects ethics and integrity, or conduct that breaches the guidelines established in the codes of conduct, through the SUGGESTION BOX, by filling in a template designed for this, which will then be studied and treated confidentially. Reprisals against any who have made use of this channel in good faith to report possible irregularities will not be tolerated.

· **TRANSPARENCY OF INFORMATION:** Briefings are held quarterly for the entire company group in order to be transparent in relation to the results and policies followed by the company in achieving business results that allow the continuity of its operations. Areas are also discussed related to improvements in occupational, environmental and technological risks.

The data is presented each year to shareholders at the Annual General Meeting and published in the Companies Register to make it available to any people or entities interested in the same.

· **RESPECT FOR THE ENVIRONMENT;** we work with companies authorised by the Basque Government for the appropriate management of industrial waste (plastic, cardboard, scrap metal, used oil, oily emulsions etc.) in strict compliance with current legislation backed by our ISO 14001 certification.

· **ETHICAL CONDUCT AND ANTI-BRIBERY POLICY:** On becoming part of the TORNILLERIA DEBA S.A.L. team, each worker takes on the commitment by signing a document in which they undertake to follow good practices and ethical conduct, and reject any behaviour or practice involving corruption, bribery or influence peddling.

· **HUMAN RIGHTS:** Internationally recognised human rights will be respected and enforced:

Abolition of child labour:

Avoiding the employment of people under the age at which school obligations cease or in any case under fifteen years of age for light work and eighteen years of age for work that is dangerous or harmful to health.

Eradication of forced labour and modern slavery:

Workers will be free to terminate their employment at any time in accordance with the agreed notice period, without any penalties or salary deductions.

Freedom of association and the right to collective bargaining:

The right of workers to freely associate with or join unions and seek someone to represent them in the workplace is respected, without reprisals or discrimination of any kind.

Working conditions:

Fair remuneration will be established that allows its workers and their families to meet their needs. Likewise, applicable industry legislation and regulations must be respected, in all cases avoiding working hours exceeding 48 hours a week and ensuring one day of rest per week.

·**PENALTIES FOR BREACHING THE CODE OF ETHICS:** Each employee is responsible for ensuring that their conduct, and that of those under their responsibility, is fully in compliance with current legislation, this code of conduct and company policies.

Zero tolerance in the event of a breach of any of the aforementioned, which will give rise to disciplinary actions in line with the applicable Labour Agreement that may lead to dismissal in the event of breach of legislation, the code of conduct or the organisation's policies.

·**CONFLICT RESOLUTION:** All complaints, claims, suggestions etc. made through the SUGGESTION BOX or verbally through those responsible will be collected and brought to the attention of MANAGEMENT with the aim of assessing and promptly resolving them.

