



2021

CODE OF CONDUCT AND ETHICS Updated in October 2021



DISEÑO Y APLICACIONES DEL NO TEJIDO, S.L.
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1. Introduction

Diseño y Aplicaciones del No-Tejido, S.L (hereinafter, **Diseños NT**), as the parent company of **DISEÑOS NT Group**, has established a series of **principles and values** included in the following **Code of Conduct and Business Ethics** (hereinafter, the Code) which was revised and approved by the **Committee for the development and monitoring of Ethics, Corporate Social Responsibility and Corporate Environmental Responsibility** on the 25th of October of 2021.

Our relationships are based on said values, such as **mutual trust, respect, justice, honesty, integrity and continuous improvement**, maintaining the commitment with the ethical and sustainable principles.

This Code of Ethics is the framework for action that all the directives and all the staff must follow in the development of their professional and corporate activity, as it establishes the values and principles which define the corporate culture of **Diseños NT and all the companies of the Group**. In this way, doing the right thing means that everything we do to foster the growth and profitability of this Group is carried out following the **highest and strictest standards of ethics, honesty and integrity**, and at all times ensuring the compliance with this Code of Conduct and Business Ethics, as well as all the laws and regulations which may govern the development of our activity.

This Code of Ethics lays down the action criteria which must be observed by all the persons who are employees of Diseños NT Group in the performance of their professional duties in the context of the relationships of the company with the rest of employees, clients and suppliers, and other interest groups.

2. Scope of application

This Code of Conduct and Business Ethics applies to the following physical or legal persons, depending on the case:

- **Employees of Diseños NT Group**, irrespectively of the contractual agreement determined by their employment relationship, position held or geographic area in which their work is developed.
- **Members of the administrative board**, irrespectively of the composition, form, or operating mode of said board.
- **Clients, suppliers, stakeholders, and other Interest groups**, to the extent to which it may be of appliance for them.

Diseños NT shall ensure, to the extent possible, that all liable parties (employees and members of the administrative board) as well as the rest of addressees, commit to its compliance so that the ensemble of values, principles, and rules, together with the applicable law in each case, govern the development of their activities within the organization or their commercial, institutional or of any kind relationships with the organization.

It is not authorised for any addressee of the Code (whether liable party or not), irrespectively of the position held, to ask any other addressee subject to the Code of Conduct to disobey what is established therein. It shall not be accepted that any liable party justifies a conduct which contravenes the Code based on an order of a superior or the lack of knowledge of the same.

3. Our General Principles

These rules constitute therefore the basic guide to be followed by all those who belong to this **big family**, **being the demonstration of a series of principles inherent to our corporate culture**.

Diseños NT is aware that its **growth and success** has been based in the following principles, and that is the reason why the best behaviour of corporate ethics are required:

- **LEGALITY:** The compliance of the applicable legislation is a necessary presupposition of this Code, as the **Principle of Legal Compliance** is the first of the principles which must govern this Code.
- **ETHICS:** All the operations of Diseños NT shall be carried out **under an ethical and responsible framework**.
- The behaviour of the employees shall adjust to what is established in this code.
- **EQUALITY:** All the physical or legal persons maintaining, directly or indirectly, any kind of labour, economic, social and/or industrial relationship with the company shall receive a fair and humane treatment. Respect for human rights, equality of people and diversity.
- **CORPORATE RESPONSIBILITY:** All the activities of Diseños NT Group shall be developed in the most respectful manner for the environment, fostering the sustainable management of natural resources.
- **TRANSPARENCY** and responsible behaviour.
- **FIGHT AGAINST CORRUPTION AND BRIBERY.**

In order to ensure the compliance of the aforementioned fundamental ethical principles, not only a responsible behaviour will be required to any addressee of this Code, but also a responsible attitude, **with the consequent identification, immediate communication, report and resolution**, when applicable, of those processes, activities or situations questionable from the ethical point of view (**Whistleblowing Channel**).

4. Our commitments with the Interest groups

1.1. Committed to people

Diseños NT considers people as a corporate key factor, defends the compliance of human and labour rights, and commits to the observance of the legislation and best practices with regard to employment conditions, health and security in the workplace.

The staff of the Company shall collaborate in the strict compliance of the applicable labour regulations and the prevention of occupational risks. All the employees are obliged to act, in their labour relationships with other employees, in accordance with criteria of respect, dignity and justice, not allowing any kind of violence, harassment or abuse in the workplace, nor discrimination on personal reasons different from the conditions of achievement and capacity.

All the employees are responsible for firmly complying with the health and security rules in the workplace and for protecting their own security as well as that of the persons affected by their activities.

1.1.1. Principle of Equal Opportunities

We firmly believe in the creation of opportunities for everyone, which is why we only support the creation of quality employment. In all of them, we promote a health and safe work environment, based in cooperative, innovative and equal work. We promote the inclusion of all kinds of workers irrespectively of their age, gender, origin or whether they are in a situation of disability.

1. The company shall not practise any kind of discrimination in the recruitment, remuneration, access to training, promotion, dismissal, or retirement based on race, social origin, place of birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political affiliation, age, or any other condition of the worker.
2. The company shall not interfere in the exercise of the rights of the staff to observe their religious beliefs or of any other kind.
3. The company shall not tolerate any kind of threatening, intimidating, abusive or exploitative behaviour, including gestures, language and/or physical contact in the workplace.
4. In compliance with the security and health regulations, the company shall not force their employees, under no circumstance, to carry out health tests that they do not wish to take.

1.1.2. Right to association and collective bargaining

1. All the staff has the right to association to trade unions of their choice, and to bargain collectively with the company or its representatives. The company respects this right and informs its employees of their right of unionisation and that doing so shall not imply for them any negative consequence or reprisal on the part of the company. The company shall not interfere in any way in the establishment, functioning or administration of said workers' organizations, as well as in the collective bargaining.

2. The company guarantees that the representatives of the workers or any staff involved in the workers' organization shall not be subject to discrimination, harassment, intimidation or reprisal for being members of a trade union or taking part in union activities and shall also guarantee that said representatives have access to their affiliates in the workplace.

1.1.3. Occupational risk prevention

1. The company commits to provide a safe and healthy workplace and to adopt effective measures to prevent potential accidents and injuries to the health of its workers, caused by the work or related to it, or originating in the same, trying to minimise as much as possible the causes of the risks inherent to the job performance.
2. The company commits to designate a person responsible for guaranteeing a safe and healthy workplace for all the staff and for implementing the security and health measures.
3. The company offers the staff, on a regular basis, an effective training on security and health.
4. The company sets in place systems to detect, avoid, and respond to possible threats for the health and security of the staff. The company keeps written records of any accident which occurs place in the workplace.
5. The company annually carries out the vigilance of the health of its workers, by means of a medical examination which is voluntary and confidential.
6. The company supplies personal protective equipment suitable for its workers.
7. The company assesses for new mums and pregnant women all the risks which can originate from the development of their work activities and ensures that reasonable measures are taken to eliminate or reduce the risk for the security and health of mums.
8. The company provides, for the use of all workers, access to clean sanitary facilities, drinking water and hygienic facilities for the storage of food.

1.1.4. Wages and Benefits

In **Diseños NT** we comply with all the labour legislations applicable to wages, including the dispositions for minimum wage, working hours, overtime, and social security benefits.

1.1.5. No child labour or human trafficking

The manufacturers and suppliers shall not employ minors and shall observe the compliance of the relating regulations on the protection of minors in accordance with the local applicable legislation and the Conventions No. 138 and 182 of the ILO. **Diseños NT** defines minors as those persons who have not yet reached their 16th birthday. In cases where local legislation stipulates a higher minimum age, the higher limit shall apply.

The persons with the ages of between 16 and 18 years will be considered young workers. Young workers shall not work during night hours or in hazardous conditions.

The participation on human trafficking is strictly forbidden, as well as hiring victims of human trafficking and retaining the originals of the personal identity documents of the employees. The restriction of

movement is strictly forbidden (except for when determined by the local regulations) and also the collection of deposits as a condition for the employment.

1.2. Committed to our clients

All the employees are obliged to act, in their relationships with the clients, according to criteria of consideration, respect and dignity, not allowing discriminations based on any kind of personal or social condition.

Diseños NT protects its clients by establishing criteria of mandatory compliance for all suppliers with regards to health and safety of the products and raw materials, in order to ensure that the items commercialised do not imply any risk for health or any security risk in their use.

In the relationship with the client, the sale and production terms of the orders shall be respected to fulfil their expectations.

Workers shall ensure that the aforementioned standards are observed, as well as the rest of rules and procedures established by the company.

In the contractual relationships with the clients, we shall contribute to transparency and inform of the different existing alternatives, especially, with respect to the services, products, and price lists in force. At the same time, Diseños NT Group expects from its clients an impartial treatment in compliance with the rules of healthy and fair competition.

1.3. Committed to our suppliers

The employees of **Diseños NT** shall relate to its suppliers of goods and services in a legal, ethical, and respectful way.

The selection of suppliers shall be based on principles of objectivity and transparency, aligning the interest of the company in obtaining the best conditions, with the interest in maintaining stable relationships with ethic and responsible suppliers, applying to this aim the Responsible Purchasing Policy of **Diseños NT**.

The activities in terms of purchasing and procurement shall be developed in strict compliance with the rules and procedures currently in force. All decisions taken in this field shall be justified and be demonstrable and verifiable.

The staff of **Diseños NT** has the obligation of protecting the commercially sensible information related to its supply chain. Likewise, no information shall be required to suppliers, nor shall it be accepted, related to the conditions established with other clients.

Our suppliers must keep a preventive approach oriented to the environmental protection challenge, adopt methods to foster higher environmental responsibility and promote the development and diffusion of environmentally friendly technologies.

1.4. Committed to the environment

Our commitment is focused in ensuring that our industrial activity is carried out respecting and taking care of our environment. We work to satisfy the needs of our clients; but developing our activity in a sustainable way and contributing to the development of a more equitable and humane society are also an integral part of our work.

For this reason, we require the maximum involvement of all the addressees of this Code in taking on the firm commitment of preserving and respecting the environment, on the basis of the following principles:

- Reducing waste generation, properly managing them and promoting their reuse.
- Providing the staff with training and information on environmental aspects.
- Accepting from suppliers those alternatives which benefit the environment.
- Contributing to the preservation of natural resources, which will be in any case consumed following criteria of reasonableness, efficacy, and savings.

1.5. Committed with the activity of Diseños NT

1.5.1. *Fight against corruption, bribery, and fraud*

We reject any kind of act of corruption, fraud, or bribery, as well as to possible advantages, favours or omissions which are consider illegal, immoral, or a breach of trust.

Giving or receiving bribes is illegal, highly unethical and can cause severe consequences for all the persons involved, including the deprivation of freedom of people and heavy penalties for the company. We are committed to conduct our operations in a transparent and honest manner, therefore all our transactions comply with the anticorruption legislations, including the requirements to keep complete and precise accounting books and registries.

Diseños NT rejects any kind of fraud to the different public finances and social security organisms, including the fraud related to the granting of public funds and public subsidies.

Therefore, the employees of **Diseños NT** shall never offer, give, or accept, directly or indirectly, presents, favours or compensations for themselves or third parties, which could influence the decision making related to the development of the functions derived from their position or which could generate any kind of non-authorized commitment.

1.5.2. *Fight against money laundering, irregular payments, and financing of terrorism*

Diseños NT does not conduct any transaction in cash and all the staff of the Group must always follow the established payment and collection procedures:

The organization shall pay special attention to those payments made in metallic which seem unusual according to the nature of the operation, to those executed by means of a bearer check or to those executed in currencies different from the currency previously agreed, and must always respect the applicable legislation.

In case of doubt about the origin or the irregular character of payments, this information shall be transmitted to the Management of the company. Those payments in which the ordering party or the beneficiary is a third party not previously mentioned in the corresponding contracts shall also be notified, as well as those executed in accounts which are not the usual in the relationships with a certain entity, company, or person.

1.5.3. Conflicts of interest

It is defined as those situations in which the executive management or an employee of **Diseños NT** must make a decision or carry out or omit an action as a result of the development of their functions, having the possibility of choosing between the benefit of the respective entity and their personal interest (of their own, of their family or of third parties), in a way that by choosing the latter would be materially beneficial, for them or for a third party, not recognising an ethical or legal duty or obtaining any kind of benefit that they would not receive in any other way.

The following practices are considered prohibitive for the staff of **Diseños NT**:

- Receiving or giving any kind of remuneration, gift or any other kind of benefit or compensation in money or in kind from or to any legal or natural person, due to the work or service provided to the interest groups.
- Granting compensations which in accordance with the applicable rules are non-authorised.
- Inappropriately using privileged or confidential information to obtain a benefit or to safeguard individual interests, personal or of third parties.
- The employees of **Diseños NT** have as duties those expressed in the contract and the internal regulation (Duty of confidentiality) and especially the contents of the Code of Ethics -without prejudice to the prohibitions relating to the conflicts of interest contained in the Constitution- as well as applying the following rules in their daily behaviour.
- Abstaining from inappropriately using privileged or confidential information against the interests of **Diseños NT** and from carrying out activities which attempt against the interest of the organization.
- Abstaining from managing, either in person or through another interposed person, businesses which generate advantages which, according to the constitutional, legal, and normative rules and the Code of Ethics, can be considered as infringement of the interests of the company.
- Abstaining from using the position held in the company or the name of the company to obtain, for themselves or a third party, special treatments in particular businesses with any legal or natural person.

1.5.4. Use of the goods and services of the company

The employees of **Diseños NT** shall secure an efficient use of the goods and services that the company provides and shall not use them for their own benefit.

1.5.5. Information confidentiality and protection of personal data

The staff of the company has the duty to protect the information and the know-how generated within the organization. Employees shall abstain from using for their own benefit any data, information or document obtained in the course of their professional activities.

Likewise, they shall not use confidential data, information or documents originating in any third party without authorisation from this third party, undertaking to keep confidentiality and make an appropriate use of them.

All this in compliance with the Law 15/1999 on Personal Data Protection and the subsequent Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regards to the processing of personal data and on the free movement of such data (hereinafter, the GDPR), as well as other applicable legislation.

Thus, **Diseños NT** declares that it complies with the following measures:

1. Has a policy in matters of data protection adapted to the GDPR and other applicable legislation concerning data protection.
2. Provides training in data protection for its employees.
3. Its employees are subject to (contractually or by means of the corresponding policies) the strictest confidentiality in relation to the processing of personal data.
4. Has and applies a methodology for carrying out an assessment and management of the risk related to data protection, applying the relevant technical and organizational measures to ensure the level of security sufficient for the risk.
5. In the event that Diseños NT acts as the responsible party of the processing, the client has an internal procedure to manage the request for the exercise of the rights of the interested parties and/or communicate the same to the party responsible of the processing without undue delay.
6. Has an action procedure as regards to informing the party responsible of the processing without undue delay, as well as to apply the appropriate measures for action, mitigation, or remediation.
7. In the event that the service provided to the responsible party of the processing (client) is to be outsourced to a third party, partially or in its entirety, there is a revision and control procedure on the subcontracted third party with the objective of verifying its adequacy to the GDPR and other applicable regulation on data protection.
8. Diseños NT shall process the personal data (even the backup copies) in countries of the European Economic Area or in any of the following countries: Andorra, Argentina, Canada (private sector), Switzerland, Faroe Islands, Guernsey, Israel, Japan, Island of Man, Jersey, New Zealand, and Uruguay. In the event that Diseños NT processes the personal data outside the previously mentioned countries, it will implement the necessary guarantees to carry out

said international transfers of data in compliance with the requirements established in the GDPR and other applicable regulation on data protection.

1.5.6. Protection of intellectual and industrial property

Diseños NT is committed toward protecting intellectual and industrial property, whether of its own or of others. This covers, among others, copyrights, patents, trademarks, domain names, design rights and rights on technical expertise knowledge.

1.5.7. Record of transactions

All the operations carried out by the company which may have an economic impact shall be clearly and accurately shown on the appropriate records of accounts, as a true representation of the transaction carried out, and they shall be made available to the internal and external auditors.

The employees shall enter the financial information on the company's systems in a full, clear, and accurate manner, so that they would show, as at the relevant date, their rights and obligations in accordance with the applicable regulations.

Diseños NT undertakes to implement and maintain an appropriate internal control system on financial reporting, ensuring the regular supervision of the effectiveness of such system. Accounting records shall be at all times made available to the internal and external auditors.

1.5.8. Relationship with competitors

Diseños NT commits towards the most absolute respect for free competence, as it does not carry out any practice which incurs in unfair competition, and therefore asks its competitors for fair competition.

5. How can I know if I am acting correctly?

As it has been explained at the end of the previous section (“Our General Principles”) of this Code of Conduct, it is very important to adopt a responsible attitude towards identification. Therefore, in order to know if we are acting ethically, either personally or by a third party, in the face of a doubt or certain situation, we can ask ourselves the following:

- Is it legal?
- Is it correct?
- Is it in line with this Code of Conduct?
- Am I following the policies and manuals established by the company?
- Is it giving a good example?
- Is it showing an ethical behaviour?
- Can other persons be affected?
- Can this involve a negative impact for myself or for the reputation of the company?

If, in face of any of these situations, you have reasonable doubts, you can send your questions to the email available for this aim, rrhh@grupodisenosnt.com.

6. Whistleblowing channel

Diseños NT has an open tool for all the persons who in any way belong to the organization and who have the knowledge on any breach or violation of the Code of Ethics, the applicable Legislation or on any kind of illegal act, so that they can inform the company in a confidential manner with full guarantees and without the fear of reprisals. Additionally, this channel is also suitable to ask questions or provide constructive suggestions in pursuance of continuous improvement.

The communications to this Channel are received and processed by Human Resources (HR) **guaranteeing their confidentiality**.

Investigation

HR shall investigate the complaints diligently and promptly and will implement the measures for their resolution. The information shall be analysed objectively and impartially.

Anti-reprisals measures

It is strictly forbidden to adopt any measure against an employee of the Group which would constitute a reprisal for having reported a complaint.

False complaints

When evidence exists that a complaint received is false and has been made in bad faith, the disciplinary measures considered appropriate and applicable shall be adopted, it may be even possible that they are considered serious misconduct and even the rescission of the contract may proceed.

The following channels are available to report any possible breach of the Code of Ethics and Conduct or of the regulations contained therein:

1. Electronic form which allows to write anonymously and confidentially through a link which has been sent to all the staff.
2. Physical anonymous complaint box located in the eating area of our production centre at the disposal of all the staff.
3. Email: rrhh@grupodisenosnt.com
4. Post: **Diseño y Aplicaciones del No Tejido, S.A, Polígono Industrial el Chaparral, SN. Santa Ana, Alcalá la Real.**

7. Publicity of the Code

This Code shall be made available to all the employees, and shall be subject to the appropriate disclosure, training, and awareness-raising actions to be properly understood and implemented within the whole organization.

8. Validity of the Code

This Code of Conduct is an update of the current Code of Conduct signed in January of 2018 and shall be complemented, revised, and updated **annually** with what is established in the procedure to notify, process and resolve complaints (Whistleblowing and Suggestions Channel), and with the other regulatory norms of the conducts, processes and operations carried out by the persons included in the section related to the subjective scope of application.



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