Adestor
SELF-ADHESIVES

Code of Ethics

Adestor España

September 2026

1. INTRODUCTION

This Code of Ethics is an expression of the commitment of Adestor Group Companies (Adestor Sef-Adhesives España, S.L.U., Adestor Self-Adhesives Deutschland, GMBH, Adestor Self-Adhesives UK, Ltd., Adestor Self-Adhesives France, SAS.) -hereinafter Adestor- and their directors to the values that should inspire the good conduct of everyone who is employed or works in the sphere of influence of these companies, and its aim is to set out the rules and guidelines that must govern all relationships within the company as well as external relationships with third parties.

Our basic principles and values include the firm determination to comply with all legal and regulatory requirements, professionalism, quality, corporate social responsibility, transparency, honesty, loyalty and good faith.

The following values are deemed essential to the activity of Adestor Group Companies:

- results-oriented culture: aimed at efficiency and at generating profits
- customer-oriented service: to know, assess and meet customers' needs
- corporate social responsibility: environmental commitment, awareness and in-house training on environmental and corporate social responsibility
- innovation: to anticipate customers' needs, encouraging new initiatives and ideas
- communication: to convey necessary information to all concerned parties, establish mechanisms to facilitate communication
- identification with the company: create an exciting, inclusive work environment that values diversity and recognises individual and group contributions.

The complexity and diversity of the relationships in which Adestor Group Companies are involved makes it necessary to clearly define the company's professional and values standards in this Code of Ethics. Nonetheless, it is difficult to foresee and plan for every contingency that may arise, and each individual has the obligation to make independent, reasonable judgment calls whenever they are faced with unusual situations. In case of doubt, or when a situation not specifically addressed in the Code of Ethics arises, all employees of Adestor Group Companies shall address the matter to the Monitoring and Supervision Committee (see Section 4).

This Code of Ethics was written as an expression of the company's express desire to commit to a set of values and rules of conduct, and must therefore be respected by the directors, executives and employees (hereinafter employees) who work for Adestor Group Companies, as well as by all external associates (sales agents, subcontractors, suppliers, auditors, consultants, etc.) who provide their services within the abovementioned companies' sphere of influence.

Consequently, all of the above are required to strictly comply with this code and are obliged to respect the policies and stipulations contained herein, to refrain from engaging in conducts contrary to the code which may be detrimental to the reputation and interests of the company and/or its subsidiaries, to report any code violations that may come to their knowledge and to cooperate, with loyalty and all due discretion, with compliance

audits and investigations into potential violations.

Adestor Group Companies consider that the relationship of trust with their employees and associates is based on knowing and applying the disciplinary measures that govern their activities, respecting all applicable laws as well as the contents of the Code of Ethics and the company's internal rules and procedures.

Any violation of the code by directors or employees will constitute a failure to fulfil the primary obligations of their commercial or employment relationship, as the case may be, and will be considered a disciplinary breach with all the consequences that may apply under trade and labour law. The above will also apply to anyone who, without participating in the commission of an infringement, knows of its real or potential existence and fails to duly report it.

2. WORKING CONDITIONS AT ADESTOR GROUP COMPANIES

Within the framework defined in the preceding section, there are a number of issues related to working conditions, internal relations among employees, occupational health and safety and environmental policy.

Adestor Group Companies conduct their industrial activities using a variety of management systems. The purpose of these systems is to provide products and services of the highest quality, achieve the highest possible levels of energy efficiency, act as good stewards of the environment and protect the health and safety of employees, and to this end the company has been certified according to ISO 9001, ISO 50001, ISO 14001, ISO 45001 and EMAS. ADESTOR also has PEFC and FSC® C011032 Chain of Custody certifications.

Certain quality, environmental and energy policies are managed by means of an integrated multi-site management system called IMS (Integrated Management System), which is applied to all production sites operated by Adestor Group Companies and to the operational headquarters.

Respect and strict compliance with international standards of quality, energy, environment and occupational health and safety and maintaining the certifications integrated in the LIMS management system and its procedures are an essential part of the commitment made by Adestor Group Companies in this Code of Ethics and, as such, must be considered a complement to the same.

2.1. Protecting Employee's Health and Safety

Adestor Group Companies are committed to promoting, communicating and consolidating a culture of occupational safety, which calls for identifying and raising awareness about existing occupational hazards and ensuring compliance with all occupational health and safety regulations at every level within the company.

In the course of their daily activities, all directors and employees are responsible for keeping the workplace safe and must act in accordance with the principles of correct, careful management, enforcing and respecting all legal regulations and established

practices and procedures in the area of occupational health and safety.

2.2. Employer-Employee Relations and Co-worker Relations: Non-Discrimination and Anti-Harassment Policy

One of the core values in the workplace for Adestor Group Companies is the right of all employees to demand respect for their individual personality and personal dignity.

In this respect, all directors and employees must behave with decorum and refrain from any action that may be construed as harmful to the dignity, physical or emotional integrity, freedom and individual personality of the other employees with whom they interact while carrying out their professional duties.

Adestor Group Companies have prepared an Equal Opportunity Plan, which sets out initiatives designed to ensure real and effective equal opportunities for men and women and, above all, to integrate equality into the management system. This will be achieved by defining and applying a series of measures based on prior assessments with the aim of guaranteeing equal treatment and opportunities for men and women and non-discrimination by reason of gender.

Non-Discrimination

In accordance with the above, Adestor Group Companies undertake to create a work environment where individuals are not discriminated against by reason of race, religion, nationality, gender, age (child labour being specifically prohibited) disability, sexual orientation or preference, marital status or any other illegal criterion, which will apply to the processes of staff selection, hiring, salary, promotion and employment termination. Related to all the above, Adestor Group Companies also comply with the Modern Slavery Act. The statement foreseen in such legislation has been duly issued by Adestor Group Companies.

Zero Tolerance for Harassment and Violence in the Workplace

Any behaviour involving physical or psychological violence is strictly prohibited, as is any conduct that leads to the unwarranted exclusion or isolation of an employee. The company promotes working conditions that allow its employees to experience personal and professional growth.

Adestor Group Companies will not, under any circumstances, permit behaviours or actions that may create an intimidating, hostile or offensive working environment, either within the companies or during any related activities.
Workplace bullying, harassment and any kind of hostile, humiliating or otherwise denigrating treatment that may undermine the emotional wellbeing of employees is strictly forbidden.

The following actions are also prohibited:

- creating an intimidating, hostile and isolating working environment or discriminating against individual employees or groups of employees in any way;
- arbitrarily interfering with co-employees' ability to perform their job;

- preventing co-employees' access to job opportunities and/or promotion, merely because of individual rivalry or competition with other employees.

Anyone who maintains a professional relationship with Adestor Group Companies and has been a target of any form of workplace bullying or harassment or, though not a target, has observed or witnessed such behaviour towards a co-worker should report it through the Whistleblower and Query Service.

Zero Tolerance for Sexual Harassment

The Equal Opportunity Plan established by Adestor Group Companies has defined a protocol to prevent sexual or gender-based harassment.
Any act of sexual violence or harassment and any sexually motivated behaviour, whether direct or indirect, that may create an intimidating, hostile or humiliating situation for the victim is strictly prohibited.

Anyone who maintains a professional relationship with Adestor Group Companies and has been a target of any form of sexual discrimination or harassment or, though not a target, has observed or witnessed such behaviour towards a co-worker should report through the Whistleblower and Query Service established for this purpose in the Equal Opportunity Plan protocol. The Monitoring and Supervision Committee must also be notified of the informant's report.

2.3. Environmental Policy

In the course of their business activities, Adestor Group Companies strive to protect the environment and use management procedures and technology designed to prevent any harmful or hazardous environmental impact as a result of those activities.

Environmental stewardship is therefore a priority for the company, which materialises in:

- the establishment of specific management systems certified to ISO 14001 international standard and EMAS regulation, integrated in a comprehensive management system that monitors quality, energy efficiency, environmental impact and sustainable development;
- the use of resources and technology that do not harm the environment, based not only on compliance with legal requirements but also on the latest scientific research and best practices in this field;
- planning and making investments to achieve the best possible results in terms of environmental conservation and energy efficiency

In the course of performing their respective duties, all directors, employees and associates of Adestor Group Companies must undertake to exercise all due diligence and efficiency to avoid harming the environment and biodiversity.

3. CONDUCT IN BUSINESS DEALINGS AND THIRD-PARTY RELATIONS

3.1. Guiding principles: avoiding conflicts of interest and zero tolerance for bribery in business dealings

Another issue addressed in this code has to do with how directors and employees of Adestor Group Companies are expected to behave in their relationships with third parties, whether in the private or public sector. This encompasses a wide variety of topics, such as conflicts of interest, bribery in business dealings, bribery of government officials, corporate transparency regarding taxation and accounting matters, etc.

3.2. Avoiding Conflicts of Interest

A conflict of interest arises when an director, employee or associate has the potential to use the authority of his/her position in order to: a) influence the business decisions of Adestor Group companies in a manner that leads to personal gain or advantage for the individual, a family member or an acquaintance; b) obtain financial gain or advantage for him/herself, a family member or an acquaintance in addition to the compensation that the employee receives from Adestor Group Companies.

The relationship between Adestor Group Companies and their own directors, employees and associates is one of absolute trust, and every party to this relationship has an unavoidable duty to use the assets of the company and his/her position, authority and skills to support the interests of the company in accordance with the principles established in this Code of Ethics.

Consequently, the directors, employees and associates of Adestor Group Companies must avoid any situation and refrain from any action that might put their personal interests before those of the company or interfere with or hamper their ability to make impartial, objective decisions in the company's best interest. Tolerating conflicts of interest, in addition to illegal and contrary to the principles established in the Code of Ethics is prejudicial to the company's image and integrity.

Directors, employees and associates must actively avoid any situation that might result in an overlap or intersection, using work-related resources and/or authority, of economic activities motivated by personal and/or family interests with their responsibilities and duties for and on behalf of the company.

3.3. Zero Tolerance for Bribery and Illegal Payments among Individuals

The law prohibits gifts made with the intention of bribing recipients in a business context, and directors or employees who engage in such practices may incur criminal liability. Accepting gifts intended as a form of bribery, improper payments or other benefits is also prohibited by law and may imply individual and corporate criminal liability.

Specifically, promising, offering or giving directors, employees or associates of a company an unwarranted advantage or gain of any kind in exchange for unwarranted preferential treatment in the purchase or sale of goods or service contracts or in business relationships is strictly prohibited. In the same way, receiving, requesting or accepting an

unwarranted advantage or gain in exchange for giving another party unwarranted preferential treatment with regard to the purchases and service contracts over which a person has influence as a result of his/her position at Adestor Group Companies is also prohibited.

The abovementioned activities may constitute crimes, and their prohibition and prosecution extend to activities conducted anywhere in the world, whether in Spain or abroad.

Consequently, offering or accepting money, unwarranted advantages of any kind, gifts or other types of perks/bonuses (such as tickets to shows or leisure activities) is generally forbidden, unless expressly authorised by law or by the company's internal procedures within the specified limits and circumstances.

This issue is addressed in further detail in the Internal Regulations on Relations with Clients, Suppliers and External Collaborators adopted by Adestor Group Companies.

3.4. Customer Relations

Adestor Group Companies strive to achieve commercial success in their markets by offering high-quality products and services at competitive prices and complying with the regulations designed to safeguard free and fair competition. Adestor Group Companies have approved an Internal Regulation on Sales to Sanctioned Countries. Our commitment to quality and earning our customers' trust entails a series of obligations, which are specified in the company's Internal Regulations on Relations with Customers, Suppliers and Third-Party Associates.

This commitment to quality and customer service, along with our anti-bribery policy, requires us to insist that directors, employees and associates of Adestor Group Companies may not, under any circumstances, promise or offer payments or goods to promote or advance the interests of the company, except in cases where gifts or acts of hospitality are expressly and exceptionally permitted as their nature and value cannot be construed as designed to obtain preferential treatment.

3.5. Relations with Suppliers and Third-Party Associates

It is the policy of Adestor Group Companies to select suppliers based on their merits, considering price, quality, ability to deliver, general level of service, reputation and integrity, among other factors.

Adestor Group Companies are consistently committed to ensuring that their suppliers and outsourced personnel maintain a suitable level of professionalism and show their commitment to abide by the principles of the Code of Ethics, promoting the creation of long-term relationships to achieve continuous improvement in performance
.
With regard to tenders, procurement and the general supply of goods and/or services and outsourced personnel (including consultants, agents, etc.), the employees at Adestor Group Companies will source suppliers and outsourced personnel based on the criteria of quality of service and the company's best interests.

Consequently, no director or employee of Adestor Group Companies may accept gratuities, gifts or similar offers unless they can be considered a standard courtesy of ongoing business relations. If a supplier proposes to make any such gift, the employee to whom this proposal is addressed must immediately notify the Whistleblower and Query Service.

This issue is addressed in further detail in the Internal Regulations on Relations with Clients, Suppliers and External Collaborators adopted by Adestor Group Companies.

3.6. Relations with Agents and Representatives

Adestor Group Companies require all agents, consultants and third parties acting on behalf of the company to comply with applicable laws and the ethical standards set out in this Code of Ethics.

Within the limits permitted by applicable laws and specific terms of the applicable agreements, Adestor Group Companies reserve the right to terminate relationships with any third party who does business in a manner that contravenes the terms of this Code of Ethics.

3.7. Relations with the Public Sector

Las Sociedades del Grupo Adestor no toleran ningún tipo de corrupción ni tráfico de influencias con respecto a autoridades o funcionarios públicos o con cualquier persona física o jurídica relacionada, directa o indirectamente, con autoridades o funcionarios públicos.

Adestor Group Companies do not tolerate any form of bribery or influence peddling in its relations with public authorities, government officials or any individual or corporate entity related, whether directly or indirectly, to public authorities or government officials. Obligations to government agencies and public institutions may only be undertaken by employees who have been designated and authorised to do so. Public authorities, government officials, government employees or any person involved in the performance of public duties may not be promised or offered any payments, assets or pledges to promote the interests of Adestor Group Companies. In this regard, offering monetary payments and any other financial benefits or gifts, providing valuable objects, costly meals or entertainment, and covering inappropriate travel and/or accommodation expenses is strictly prohibited.

This prohibition applies to public authorities and officials of any country or international organisation and is binding for all agents, consultants and representatives acting for or on behalf of Adestor Group Companies, who have the obligation to observe this Code of Ethics and are not authorised to engage in any activity or conduct prohibited to the directors and employees of Adestor Group Companies.

In the event that, for any reason whatsoever, public resources may be managed, extreme precautions will be taken to prevent their use for purposes or intentions other than those for which they were delivered or granted.

Any director, employee or associate of Adestor Group Companies who is approached by

government officials with a request or proposal for special benefits must immediately notify through the Whistleblower and Query Service.

Employees of Adestor Group Companies who, in the course of their professional activity, maintain interact with government agencies or public institutions have a responsibility to verify, in advance and with all due diligence that everything declared and/or documented in the company's interest is accurate and true.

Directors, employees and associates of Adestor Group Companies are also prohibited from influencing or attempting to influence any government official or authority by taking advantage of their personal relationships with that person or with another official or authority to achieve an outcome that may lead to direct or indirect financial gain for themselves or for a third party. This prohibition also extends to the authorities and government officials of any country or international organisation and is binding for all agents, consultants and representatives acting for or on behalf of Adestor Group Companies.

3.8. Relations with Political Organisations and Trade Unions

As a general rule, Adestor Group Companies do not make any contribution to political parties, trade unions, works councils and/or employees' organisations. In the exceptional and hypothetical case that a contribution is deemed appropriate as a matter of public interest, the company will determine the legality of this action, and any contribution made will be duly registered and reported.

Employees of Adestor Group Companies who are involved in political activities will do so as private individuals, on their own time, at their own expense and in compliance with all applicable laws. Employees who are involved in political activities may not, under any circumstances, use their position within the company to attempt to influence the personal decisions of others, obtain contributions to political parties or candidates or secure support for them in any other way.

3.9. Fair Competition

One of the fundamental principles of Adestor Group Companies is respect for the laws governing fair competition, and the companies demand and expect total compliance with such legislation in every country where they operate.

In this regard, company employees and agents must:

- Be familiar with all applicable competition laws
- Refrain from entering into any agreement (whether formal or informal) with competitors whose purpose or effect is to reduce or eliminate competition in the market, including agreements with regard to prices, costs, customers, market sharing, participation in public or private tender processes or any other aspect of the company or group's competitive strategy

- Refrain from exchanging information on any of the abovementioned subjects with competitors; sharing any kind of information about the company pricing strategy is strictly prohibited.
- In the event they may have insider information refrain from revealing such information, even for market research purposes when carried out without complying with the requirements of EU regulations on markets; out of their ordinary working hours, position or duties, endangering the market integrity and the investors' confidence.
- Refrain from carrying out any unfair action that may place the companies in a situation of advantage within the market.
- Directors, employees or collaborators may not receive, request or accept, in person or through an intermediary, any benefits or advantages or offering or promise to obtain any such benefits or advantages for unduly favour another person in acquisition, sale, hiring of services or trade relationships.
- Refrain from directly or indirectly spreading, in the media, on the Internet or by using information and communication technologies or otherwise, news or rumours or providing fake or misleading indications on persons or companies, offering false economic details to distort or preserve the listing price of agreements on raw materials or manipulate the calculation of any benchmark index.
- Refrain from carrying out transactions, providing fake or misleading indications or giving orders that provide fake or misleading indications on supply and demand or which may ensure a dominant position in the market to set prices in abnormal or artificial levels.
- All such behaviours are deemed to refer to both financial instruments, contracts, operation and orders set forth in the EU and Spanish regulations on markets and financial instruments.
- Refrain from using violence, threats, deception or any other contrivance that may imply the alteration of prices which would result from the free competition of products, goods and spot contracts on raw materials.

It is important to bear in mind that activities which may violate the principle of fair trade and competition are governed not only by the laws of the country in which they are conducted (for example, where competitors meet or reach an agreement) but also by the laws of any country where such unfair competition agreements may have its effects. Pursuing the interests of Adestor Group Companies can never, under any circumstances, justify a violation of the principles and applicable laws governing fair competition. Employees and agents are encouraged to seek the advice of the company's Legal Service to clear up any doubts they may have in this area.

This issue is addressed in further detail in the Internal Regulations on Competition and the Guidelines on Dawn raid Verifications adopted by Adestor Group Companies.

3.10. Unfair Competition

If Adestor Group Companies decide to hire personnel and/or use contractors or consultants with experience in their line of business, they must first determine if the

candidates have contractual obligations with their current or past employers that would prohibit them from working for the competition, including Adestor Group Companies. This precaution must also be taken in dealings with consulting services that may be subject to similar restrictions (i.e. non-competition clauses) or with government officials. In any case, depending on the outcome of the preliminary assessment, every effort must be made to ensure that such individuals do not use illegally obtained confidential information or documentation while working for Adestor Group Companies.

3.11. Intellectual and Industrial Property Rights

In the course of their commercial activities, employees of Adestor Group Companies have access to information that is confidential or owned by third parties, including customers and suppliers. This information must be used only for the purpose for which it was obtained and, if protected by a confidentiality agreement, must be safeguarded and used only according to the terms of that agreement.

Adestor Group Companies undertake to respect intellectual property rights. Employees of Adestor Group Companies are not permitted to use the intellectual property of others without permission, and when such property is used, they must ensure that all pertinent contractual obligations are fulfilled.

Directors, employees and associates of Adestor Group Companies are required to protect the industrial property of said companies and to respect the industrial property rights of third parties with regard to patents, registered trademarks and, in general, all expressions of industrial property rights pertaining to the companies or to third parties, and generally to comply with all applicable industrial and intellectual property laws.

3.12. Financial Transparency

The information contained in periodic reports and/or accounts, whether general or specific, must comply with the principles of transparency, accuracy, completeness and precision, an obligation and a duty that applies to all directors, employees and associates of Adestor Group Companies.

All accounting actions and operations will be performed using the IT systems made available to employees by Adestor Group Companies.

To ensure the highest degree of transparency and traceability in financial statements, records of supporting documentation will be kept for each transaction. All employees of Adestor Group Companies are responsible for ensuring that this documentation is easy to locate and logically organised at every work site or, when applicable, the off-site companies where it is stored.

All ancillary contracts between vendors, customers, commercial partners or third parties must be fully documented and duly authorised. For example, if a customer's obligation to pay is subject to terms and conditions, these must be set down in writing. This issue is addressed in further detail in the Internal Regulations on Relations with Customers, Suppliers and Third-Party Associates adopted by Adestor Group Companies.

Employees and associates of Adestor Group Companies with knowledge of any omission, false information or negligence in the accounting records, statements or supporting documentation are required to report this fact through the Whistleblower and Query Service.

3.13. Compliance with Tax Regulations

Adestor Group Companies have a policy of strict compliance with EU and Spanish tax regulations in both substance and form. Nonetheless, the company's management will make a special effort to ensure that:

- their tax policies cannot be considered overly aggressive
- the general and concrete position of the companies with regard to specific operations is always reasonably defensible
- the reputation of the companies will never be harmed as a result of the tax policies adopted
- the companies are always in a position to defend the good faith of their decisions regarding tax policy before the authorities
- the companies will review the decisions and actions on tax issues, in such cases where legislative reforms may introduce questions or limits that require adjustments in the decisions

Moreover, the companies and all of their employees must be vigilant and take all necessary measures to ensure that customers and suppliers do not misuse their transactions with Adestor Group Companies and prevent unacceptable activities with regard to taxation as well as tax fraud and other illegal activities. If employees have knowledge of or suspect that something of this nature may be occurring or will occur, they are required to report it immediately through the Whistleblower and Query Service.

In particular, commercial transactions between Adestor Group Companies and other companies in the ADESTOR Group must be conducted under normal market conditions, with a transparent market-value assignment of the cost of goods and transport as well as administrative and financial costs, in accordance with the "Transfer Pricing Master File" which sets out the general pricing policy of Adestor Group Companies.

3.14. Fulfilment of Social Security Obligations

With regard to the presentation of Social Security documents, contribution payments, collections and requests for refunds and deductions, all applicable laws must be followed, avoiding any type of conduct or activity that could be construed as an attempt to defraud the Social Security system or as prejudicial to the rights of employees.

3.15. Prevention of Money Laundering

Adestor Group Companies and their directors, employees and associates may not, under any circumstances or for any reason, perform or be involved in activities that entail the laundering (acceptance or processing) of proceeds derived from criminal activity of any kind.

To this end, all available information (including financial information) on commercial counterparties and suppliers must be verified as a precaution to obtain a reasonable assurance of their respectability and the legitimacy of their activities before entering into a business relationship with them.

3.16. Use and Protection of IT Resources and Computer Security

The tools that Adestor Group Companies make available to employees to facilitate their jobs, such as computers, must be used for legitimate business-related purposes and activities.

For this reason, Adestor Group Companies reserve the right to monitor how employees use the tools placed at their disposal, to verify that they are being used in a legal and responsible way.

All employees of Adestor Group Companies, and specifically the IT Department on matters within its competence, must strictly comply with all company policies in this regard, defined as the specific set of procedures designed to optimise the IT security of the company's software and hardware.

This issue is addressed in further detail in the Internal Regulations on the Use of IT Resources adopted by Adestor Group Companies.

4. OBSERVANCE OF THIS CODE AND VIOLATIONS

4.1. Observance of the Code of Ethics

All employees of Adestor Group Companies must be familiar with the principles and contents of the Code of Ethics and the procedural guidelines governing the specific duties and responsibilities of their job position.

All company employees must:

- refrain from any conduct that violates those principles, contents and guidelines and act in an exemplary way, using their own behaviour as a model for fellow employees;
- carefully choose the people and companies they work with, offering guidance to help them comply fully with the Code of Ethics and ensure that they know and understand the form and substance of its contents;
- convey the Code of Ethics to third parties with which Adestor Group Companies maintain business relationships. Specifically, this means informing all suppliers and customers of Adestor Group Companies of the existence of this Code of Ethics and the need to observe it;
- immediately report any information they may have regarding possible cases of violation or orders to violate the Code of Ethics through the Whistleblower and Query Service. If employees of Adestor Group Companies have knowledge of a

violation of the terms of this Code of Ethics by another worker of Adestor Group Companies, or by third parties that do business with the company, they must immediately report said violation through the Whistleblower and Query Service. Failure to do so will be considered a serious infraction and will incur penalties similar to those applied in cases of violations of the Code of Ethics;

- cooperate with all requests for assistance in specific procedures to investigate possible violations;
- immediately take corrective measures when the situation requires it, and always strive to prevent any retaliation against whistleblowers.

4.2. Queries

Any queries or doubts regarding the contents and interpretation of the Code of Ethics and the internal regulations should be addressed to the Monitoring and Supervision Committee through the Whistleblower and Query Service.

4.3. Reporting Violations

Violations of the law, the Code of Ethics of the internal regulations must be reported through the through the Whistleblower and Query Service.

The worker may inform anonymously if he/she so wishes. Confidential treatment of all communications received through the Whistleblower and Query Service and the absence of retaliation of any kind against bona fide whistleblowers shall be ensured.

The Whistleblower and Query Service is available through the following means:

- Email: denuncias.adestor@adestor.com
- Intranet: Inquiries and complaints
- Website: Inquiries and complaints

The Whistleblower and Query Service is not an emergency service. If you are in this situation and immediate assistance is required, the local emergency service must be contacted or call 112.

Complaints of violations are handled by the Monitoring and Supervision Committee, which decides the investigation or corrective measures required in each case.

4.4. Responsibilities of the Monitoring and Supervision Committee

Adestor Group Companies have assigned the following responsibilities to the Monitoring and Supervision Committee:

- constantly monitor changes in legislation to ensure that the Code of Ethics is consistent with all applicable regulations, and in the event of discrepancies propose any changes it deems necessary in the Code of Ethics to the Managing Director and Board of Directors for a final decision;
- promote measures to ensure that the Code of Ethics is distributed, circulated and

observed;
- promote communication initiatives and specific training programmes for employees of Adestor Group Companies;
- submit weekly reports on observance and, if necessary, updated versions of the code to the Managing Director and Board of Directors.

4.5. Consequences for violating the Code

Any violation of the law, the Code of Ethics or the internal regulations may constitute a fundamental breach of the employment contract or an act of non-compliance subject to disciplinary measures, as well as all applicable legal consequences, and may even incur liability for damages.

Penalties shall not only be imposed on persons whose conduct has caused the violation but may also be applied to any other person who has not followed the applicable legislation for the prevention, detection and/or correction of the risk, which is considered in itself to be a violation of the ethical values and principles of this Code of Ethics.

4.6. Revision of the Code of Ethics

Based on the biannual reports submitted by the Monitoring and Supervision Committee and their own opinions or those of the Managing Director and its advisers, may make a request for amendment/addition to the Code of Ethics, which will then be evaluated and approved, when applicable, by the company's Board of Directors.