

CODE OF CONDUCT FOR THE AIOSA WORKFORCE

This code of conduct sets out the ACEROS INOXIDABLES OLARRA S.A. (AIOSA) principles and requirements for its workforce.

Compliance of applicable legislation

Workers must abide by all local, regional, national and international legislation and regulations applicable to their activities. They must likewise comply with AIOSA requirements and standards, which may be higher than those required by law.

Equal opportunities, prohibition of discrimination and rejection of violence

AIOSA's Equality and Respect Policy has been approved by its Management and is applicable to the whole workforce.

Child labour and Forced labour

Child labour is forbidden. AIOSA does not contract anybody under 18 years old. Workers shall perform their work as the result of a paid and voluntary decision within the legal framework of each country and without any violence or intimidation being used.

Occupational Health and Safety and the Environment

AIOSA's Integrated Policy has been approved by its Management and is applicable to the whole workforce.

Freedom of association and the right to collective bargaining

All workers without distinction shall be entitled to join or set up the trade unions of their_choice, as well as having the right to bargain collectively.

AIOSA takes a tolerant view of the activities of the trade unions, along with their organisational activities.

The workers' representatives may not be discriminated against and may carry out their representative functions in the workplace.

Work and pay conditions

The work and pay conditions are set out in the company's collective agreement, negotiated and signed between the representatives of the company and of the workers. It has been approved and registered by the relevant competent authority.



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Protection of personal data, confidential information and use of the company's resources

AIOSA complies with current Personal Data Protection legislation. It also has a *"Staff Clause"* approved by Management and signed by the members of the workforce, where it sets out the internal rules regarding data protection, confidential information and use of the company's resources.

Conflict Minerals and Alloys

AIOSA does not purchase minerals and alloys from countries in conflict or at war.

Corruption and unethical and unlawful behaviour

Any type of corruption or bribery is forbidden at AIOSA.

Whenever possible, employees must avoid conflicts of interest. When there is any doubt, please check with your director, HR, General Coordination or by email to *compliance@olarra.com*

Only merchandising gifts, whose market price is under €30, can be accepted.

AIOSA workers are forbidden from having business lunches with suppliers. They are only allowed when AIOSA employees are visiting a supplier for work reasons and that visit is always outside the province of Bizkaia. If a worker believes that there are grounds to justify an exception to this rule, s/he shall so notify his/her Director in advance, with a copy to the General Coordinator's Office.

Any doubt regarding the application of this Code, or regarding the behaviour that are in breach of these rules, may be consulted or reported to <u>compliance@olarra.com</u>

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