



## 3 Principles

### Implementation of the Code of conduct

- Respect for the Law
- Ethics
- Respect for the individual

### Purpose of this Code of Conduct

All Intermas Group's members must have exemplary conduct and promote awareness and respect of the behaviour outlined in this Code.

## Rules of conduct

### Organisation

- Respect for the Law, individual rights and moral values
- Occupational risk prevention
- Information and knowledge management
- Company's image and reputation
- Conflict of interests
- Reporting channels

### Individuals

- Respect for individuals
- Professional development and equal opportunities
- Accepting and offering gifts
- Corruption and bri-

Organisation

Individuals

Market & environment

### Relation with market and environment

- Relations with business partners and suppliers
- Relations with clients and sharehol-
- Respect for the environ-

### Communication

This Code will be easily available to all its recipients to comply with the principles and commitments contained herein.

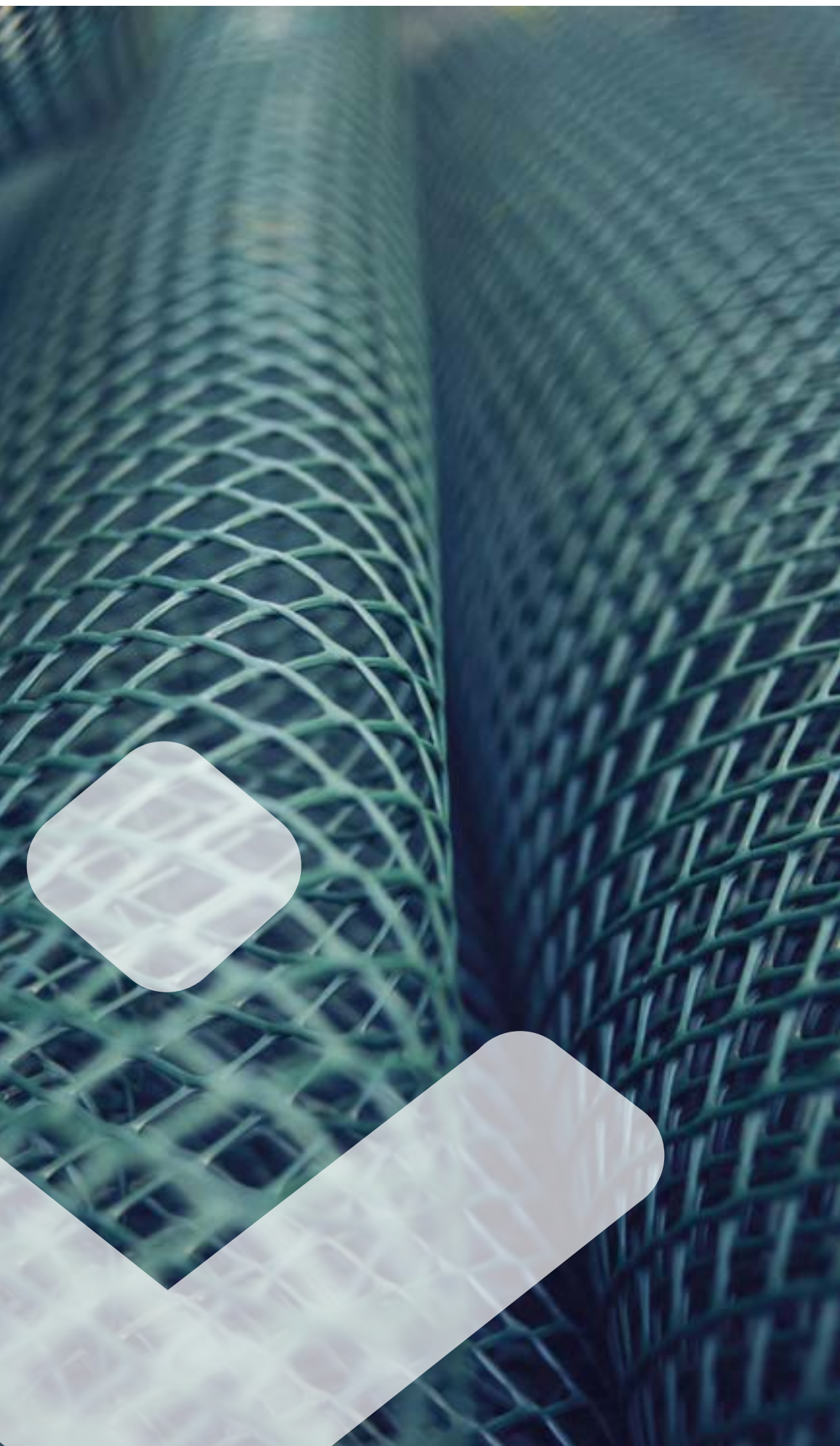
### Updates and Follow-up

The Ethics and Compliance Committee shall ensure compliance with this Code

The entire Group has access to the Ethical Channel

[ethicalchannel@intermasgroup.com](mailto:ethicalchannel@intermasgroup.com)

# Code of Conduct



 **intermas group**

# Document Revisions

Author Ethics and Compliance Committee

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Description od changes -

Version 001

Approval François Mouchet

Author Ethics and Compliance Committee

Date 28.06.2022

Description od changes -- Page 6-7, additional texts

Version 002

Approval François Mouchet

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Changes

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# Implementation of the Code of Conduct

This Code of Conduct is applicable to all members of Intermas Group (also hereinafter referred to as 'the Group'), both those who have a permanent contract and those who have a temporary contract, regardless of their roles and/or hierarchical level.

**The following Code of Conduct is based on three principles:**

- Respect for the applicable Law in each of the countries where Intermas Group operates
- Ethics
- Respect for the individual



# Purpose of this Code of Conduct

This Code of Conduct is not meant to replace the applicable laws or regulations in each of the countries where Intermas Group operates, but rather to define attitudes and provide employees with applicable benchmarks at all times in order to abide by the Law. In the event of a conflict between the Code of Conduct and any applicable legal provision, the latter shall prevail.

This policy is intended to provide guidance on exemplary personal and professional behaviours that must be carried out within Intermas Group.

The Code of Conduct will be a frame of reference that will complete or substantiate, depending on the case, new or existing specific policies or rules applicable to each subsidiary of Intermas Group, with the aim of better adapting to the laws, regulations and applicable standards when carrying out their activities, especially in terms of occupational risk prevention.

As previously stated, all members of Intermas Group must comply with this Code of Conduct and therefore everyone must be aware of it, **regardless of the country where they are located**. You must also ensure that the individuals you work or collaborate with comply with this Code of Conduct: all employees, business partners, suppliers, consultants, agents, etc. that interact with Intermas Group.

Tous les responsables du Groupe Intermas doivent adopter un comportement All Intermas Group managers must have exemplary conduct and promote awareness and respect of the behaviour outlined in this Code.

A breach of this Code may constitute professional misconduct, which may be sanctioned in accordance with the legal provisions applicable in each country where Intermas Group operates.



# Rules of Conduct

## Respect for the Law, individual rights and moral values

Intermas Group undertakes to behave respecting the legislation in force and promotes ethical behaviour that respects internationally established individual rights and freedoms.

Intermas Group values and policies are based on ethical conduct that promotes diversity.

Specifically, the group shall pay special attention to all regulations regarding competition, work, occupational risk prevention, health, the environment and the prohibition of clandestine or forced labour and work performed by children.

None of the Group companies shall use child labour, defined as work performed by minors under the minimum age stipulated in the national or local laws or regulations where our companies are located, which is currently 16 years.

Likewise, the Group respects all legislation that applies directly to employee representation and expression, regarding freedom of association and the right to collective bargaining.

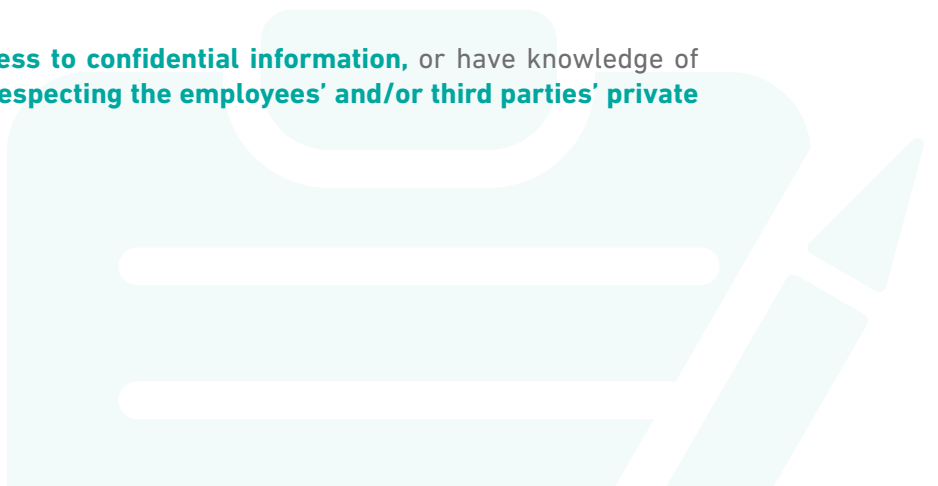
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## Respect for individuals

Intermas Group rejects any type of conduct that could be interpreted as physical or sexual harassment or abuse of authority.

Likewise, Intermas Group stands against any conduct that could create intimidating, offensive or discriminatory environments of any kind within the company, both physical and verbal.

**All persons who have access to confidential information**, or have knowledge of it, undertake to process it **respecting the employees' and/or third parties' private lives** and **confidentiality**.



## Épanouissement professionnel et égalité des chances

Intermas Group promotes the professional and personal development of all its employees, ensuring equal opportunities and promoting a work-life balance through its policies.

Employees are recruited without discrimination based on their race, skin colour, religion or belief, age, gender (sex), political affiliation, disability, etc.

Intermas Group promotes and encourages both local and international collaboration amongst team members to ensure employees are able to work to the best of their abilities.

Likewise, Intermas Group provides its employees with the necessary resources to perform their professional activity and undertakes to provide them with the appropriate means of protection and occupational risk prevention. No person under 18 years of age shall be employed in hazardous or heavy work, except for the purpose of training and within national laws or approved regulations.

Finally, all team managers shall conduct their duties in a way that is fair and impartial in order to encourage good working relationships within the Group.

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## Occupational risk prevention

Intermas Group promotes the adoption of occupational risk prevention and workplace health policies that will provide its employees with a safe environment, and adopts all the prevention measures established by existing legislation in each of the countries where the Group operates, always ensuring compliance with the Law.

It is up to the employee to comply with rules relating to occupational risk prevention and workplace health. This is both in their own interest and in that of their colleagues and third parties.





## Information and knowledge management

**Professional, technical and any other type of secrecy that makes up Inter-  
mas Group's know-how and goodwill,** is one of the foundations of Inter-  
mas Group.

Consequently, **these must be protected to avoid their disclosure and must be treated by all employees with discretion,** in a professional manner and only when performing their duties within the Group. In no case may information related to the Group and the companies that comprise it be transferred or transmitted as an exchange of personal or professional benefits for the employees themselves or for third parties.

The reliability of information is a basic principle of both internal and external communications. It is prohibited to intentionally spread false, inaccurate or erroneous information, as well as information that may mislead or confuse the recipient.

Sharing information is key, and all employees who have knowledge of the information necessary for the proper functioning of the company must share it. If information is withheld, the employee may be sanctioned.



## Conflict of interests

Intermas Group takes the view that its relationship with employees should be based on certain common interests. **Any situations in which employees' personal interests are directly or indirectly in conflict or are contrary to those of Intermas Group should be avoided,** as this could hinder the normal performance of their professional duties and responsibilities.

Consequently, Intermas Group prohibits any action or omission that could be considered an illegal practice or unfair competition.

## Accepting and offering gifts

**Employees may not accept gifts from third parties** with which Intermas Group has a professional, working, commercial, service relationship or any other type of financial relationship **if the gift is worth more than 25 Euros**. Likewise, employees may not offer such gifts in order to obtain a personal benefit or deal.

The definition of gifts includes tickets for Intermas employees to attend music and/or sports events and/or any recreational or leisure activities.

In no case may cash be accepted or offered as a gift.

## Company's image and reputation

All employees are required to protect Intermas Group's Image when conducting their professional activities and any activities related to them.

In addition, Intermas Group undertakes to behave in a socially responsible manner, in compliance with the Law of the countries where the Group works and respecting the diverse cultures, customs and principles of the people and communities linked to the company's activity.

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## Relations with business partners and suppliers

Intermas Group considers its suppliers and business partners indispensable factors in the achievement of its growth and improvement goals. Accordingly, **the Group is committed to forging and/or maintaining relations with its partners and suppliers based on mutual trust and interest.**

On the other hand, **Intermas Group will ensure that these companies and organisations respect the fundamental principles of good practices and conduct**, and will also ensure that in no case do they use products or services that come from companies that do not uphold the abolition of child labour.



## Relations with clients and shareholders

Intermas Group guarantees respect for the confidentiality of data held by third parties and bases its relationships with them under the principles of integrity, professionalism and transparency.

The company's activities and strategic decisions are geared towards creating value for its shareholders.

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Intermas Group establishes the pursuit of quality products as one of its business guidelines.

For this reason, the company provides its employees with the necessary means to perform their activity within a framework of quality and excellence, making every effort to satisfy clients by trying to anticipate their needs.

## Corruption and bribery

Intermas Group requires its employees to abide by all applicable laws and adopt appropriate conduct in order to ensure professional integrity and prevent fraud.

Corruption, as well as any behaviour that involves bribery, money laundering, irregular payments, etc., are completely prohibited within Intermas Group. The Group also has policies in place intended to prevent this type of conduct.

Companies, individuals and third parties who report to Group employees are also strictly prohibited from taking part in such practices.

## Respect for the environment

**Intermas Group undertakes to respect the applicable environmental legislation within its activities and to promote environmental preservation** by encouraging green behaviour. In this way, the Group will contribute to the conservation of natural resources and reduce the negative ecological, landscape, scientific or cultural impacts that any of its activities may cause.

## Reporting channels

Employees can contact their manager when in doubt or if they become aware of behaviour that goes against the rules laid out in this document.

Potential witnesses or victims of an unethical situation or discrimination should contact the human resources teams directly, who will treat the situation with complete confidentiality.



# Communication

This Code (and future updates) will be sent or made readily available to all recipients and will form part of Intermas' training plans.

It will also be sent to business partners and stakeholders when necessary to comply with the principles and commitments set forth herein.



## Updates and Follow-up

The Ethics and Compliance Committee shall ensure compliance with this Code, resolve issues or doubts about its interpretation and adopt the appropriate measures for better compliance.

The entire Group has access to the Ethical Channel, through which it is possible to confidentially or even anonymously report behaviours or events that go against ethics, current legislation, this Code, with special emphasis on those that may have criminal significance:

[ethicalchannel@intermasgroup.com](mailto:ethicalchannel@intermasgroup.com)

Likewise, the entire Group has access to the Ethics Channel Regulations, which set forth all the matters related to the Ethics Channel that are necessary for its proper implementation and operation.





Netting a sustainable future together



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