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1. INTRODUCTION

The Governing Body of AMOPACK, S.L. (hereinafter, AMOPACK) establishes this Code of Ethics as a set of basic principles of action and professional conduct for everyone who works for the organisation, in order to ensure ethical and responsible behaviour in their activity.

This Code gives special importance to the following behaviours:

- Respect for the rights of all employees.
- Sharing knowledge.
- Occupational health and safety.
- The principles of equal opportunities and non-discrimination.
- Respecting and promoting good business and personal practices.
- The commitment to ethical conduct, reflected in open communication with all stakeholders, based on transparency, truthfulness, strict compliance with the law and commitment.

These principles, together with the commitment to quality, innovation and continual improvement, good corporate governance, social responsibility, loyalty to the organisation's mission and vision and the creation of long-term value for all stakeholders, define AMOPACK's path. Shared values are the organisation's identity; this Code, based on them, must become an everyday habit.

2. PURPOSE

This Code guides the professional conduct of AMOPACK's people and sets out the company's commitment to ethics and transparency in all its areas of activity, through principles and guidelines of conduct that ensure ethical and responsible behaviour. It is without prejudice to strict compliance with the applicable general and specific legislation.

3. SCOPE

This Code applies to all managers and employees of AMOPACK, as well as to interns, trainees, subcontracted staff and, in general, to everyone who works for or provides services to the organisation. Third parties acting on behalf of AMOPACK must also respect it.

For people who do not have an employment relationship, the Compliance Officer determines which obligations of the Code do not apply to them. When a person provides services through a company, that company must ensure in the contract that its staff observe the Code. The Code does not cover every possible situation; it sets out the criteria that guide conduct.

4. ORGANISATIONAL VALUES

As a result of its strategic reflection, AMOPACK has established the following values:

- **Customer focus:** placing the customer at the centre of the strategy, with care and service that exceed their expectations through warmth and quality, tailoring the solution and making their concern our own.
- **Professionalism:** personal development of the skills needed to understand the customer's needs and look after the relationship with them and with other colleagues, together with the development of competences to acquire, maintain and update technical and technological knowledge, and to adapt to change.
- **Honesty:** putting sincerity before any other consideration, even when it is commercially unfavourable; honesty generates more benefits in the long term than short-term agreements without full sincerity towards customers.
- **Adaptability:** values must not be confused with intransigence; companies cannot turn their backs on changes in their environment.

- **Innovation:** developing new products, business models and services and improving processes, so that these advances reach those who need them.
- **Commitment and trust:** trusting that each team member will fulfil their role, building a relationship of mutual trust through consistency, achievements, honest communication and everyone's work to reach common goals.

5. GENERAL PRINCIPLES

5.1. The conduct of everyone at AMOPACK must be guided by the organisation's values. Internal conflicts must be avoided, putting the interests of the whole before individual ones, and knowledge and professional experience must be shared generously.

5.2. Monitoring the application of this Code is the responsibility of the Compliance Officer, appointed by the Governing Body, who reports directly to it and informs it periodically of the state of compliance.

5.3. Communications, requests for authorisation and queries about this Code are addressed to the Compliance Officer or to the person designated by her, and may be made by email.

5.4. Guiding principles of conduct. Everyone must act with integrity, honesty and respect, in strict compliance with the law and internal protocols and procedures, especially in all matters of safety.

5.5. Cooperation in complying with the Code. No one should allow or conceal facts contrary to the law or to this Code of which they are aware, and they must report them to the Compliance Officer or through the whistleblowing channel (section 12).

5.6. Transparency. AMOPACK makes public, through its information channels, its values, this Code and the composition of its governing and management bodies.

6. CORPORATE COMMITMENTS

6.1. Respect for the law and human rights

AMOPACK undertakes to act at all times in accordance with the legislation in force and with full respect for human rights and public freedoms.

6.2. Professional development, equal opportunities and non-discrimination

AMOPACK promotes equal opportunities in access to employment, training and promotion, and non-discrimination on grounds of sex, origin, nationality, religion, ideology, sexual orientation or identity, disability or any other personal or social condition. Selection, recruitment and career development are based on merit, ability and performance, with an attitude open to diversity.

Everyone, and especially those who lead teams, must treat others with respect and foster a positive, healthy and safe working environment. No conduct of physical, sexual or psychological harassment, abuse of authority, offence, defamation or any other form of aggression or hostility is tolerated (section 11). AMOPACK supports work-life balance through flexibility and digital disconnection measures.

6.3. Health and safety of people

AMOPACK undertakes to promote and maintain a safe and healthy working environment and adequate training in this area for all employees and for third parties carrying out activities at its premises, in accordance with its Occupational Risk Prevention Plan (chapter 11 of the Integrated Management System Manual).

6.4. Commitment to excellence, reliability, innovation and continual improvement

Everyone at AMOPACK is expected to:

- Focus their activity on meeting the customer's needs and expectations, adding value.
- Commit to innovation and continual improvement, complying with quality standards and procedures.
- Prevent operational errors and aim for defect-free production.
- Help eliminate processes that do not add value.

6.5. Quality and personalised customer service

The conduct of everyone at AMOPACK is aimed at providing quality service and personalised attention to the customer, adapting to each situation.

6.6. Subcontracting

AMOPACK will not subcontract to companies known not to respect workers' rights or occupational health and safety regulations, including occupational risk prevention, or that have staff in an irregular employment situation.

6.7. Sustainability and the environment

AMOPACK takes part in projects to achieve sustainable technology and production environments with minimal environmental impact.

7. EXPECTED CONDUCT REGARDING CORPORATE RESOURCES

7.1. Information management and confidentiality

Everyone must protect the confidentiality of AMOPACK's strategy, business plans, technology, organisation, know-how, drawings, designs, customer databases and marketing, and ensure the confidential treatment of information received from customers, suppliers and third parties. This information is a professional and trade secret.

- **Customer and employee information:** information on customers' transactions is confidential and may not be used for purposes unrelated to the organisation or disclosed to third parties unless legally required. The duty of secrecy also applies towards other customers, third parties and colleagues, except for justified professional reasons. Consulting other employees' files without one's role requiring it is an irregular practice.
- **Information on competitors and institutions:** relations with people from other entities are conducted with discretion, without disclosing confidential information or engaging in unfair competition. Competitors, authorities and public bodies must be treated with respect, without spreading information or rumours that damage their image.
- **Personal data protection:** the personal data of customers and employees are processed guaranteeing their privacy and strict compliance with Regulation (EU) 2016/679 and Spanish Organic Law 3/2018. Only persons authorised by their duties have access to them, and only to the extent strictly necessary. Employees' data are processed to manage the employment relationship and to comply with legal obligations (tax, employment and social security), in accordance with the information provided to each person. They are never processed for purposes other than those provided for by law or contract.
- **Extent of the duty of confidentiality:** it continues indefinitely after the end of the employment relationship. On leaving, the person may not take or use any information or documentation of the organisation, including that on their computer equipment.

7.2. Software, IT systems, equipment and audiovisual media

- Everyone must make responsible, safe and efficient use of AMOPACK's assets and protect them from any damage or illegal or improper use.
- AMOPACK owns the software, systems, equipment, manuals, projects, studies, reports and other works created or used in the course of work. They must be kept confidential and may not be exploited, reproduced or transferred for unrelated purposes; their disclosure requires the authorisation of the Management.
- Computers, software, mobile phones, tablets, cameras, memory devices, Internet access and corporate email are provided for professional use, in line with security and efficiency criteria. Illegal software, or software that damages the systems or the interests of AMOPACK, its customers or third parties, may not be installed.
- AMOPACK may monitor the use of its resources, respecting privacy in accordance with the law, when necessary to protect its interests or those of its staff, for security reasons, to verify compliance with the law or to exercise its disciplinary powers, including when teleworking.
- Security, control and access measures and the personal, non-transferable use of passwords must be respected. Giving a password to another person is contrary to basic security rules. Compliance with internal security protocols is mandatory.

7.3. Expenses on behalf of the company

Expenses on behalf of AMOPACK must be related to work activity and supported by documents. Corporate cards are used in accordance with internal guidelines.

7.4. Use of the brand

The brand is one of the most valuable assets and must be looked after in all written communications and activities. Destructive criticism or negative comments that could damage the reputation of AMOPACK, its customers, suppliers or

partners are not permitted. Distinctive signs (trade names, trademarks, domains) belong to AMOPACK and may not be used without its authorisation.

8. CONFLICTS OF INTEREST AND RELATIONS WITH STAKEHOLDERS

8.1. Conflicts of interest

- No one may abuse the organisation's trust or use their work for their own benefit or that of family members or related third parties.
- AMOPACK's assets and resources may not be used for personal interest without the prior authorisation of the Management, nor may anyone take advantage of their position or of business opportunities known through their work, unless the company has previously waived them.
- Any business relationship with AMOPACK outside the employment relationship requires the prior authorisation of the Management, and the person concerned must refrain from taking part in or influencing the decision.
- At the request of the Management, people must report possible conflicts of interest arising from their personal, family, professional or financial relationships. This information is treated confidentially.

8.2. Dedication and incompatibilities

People must devote to AMOPACK the capacity and effort required for their duties and must not carry out activities that harm its interests or image or affect their independence. Before accepting an activity that could conflict with the organisation's interests, they must consult the Management.

8.3. Relations with customers and suppliers

- Any influence by customers, suppliers or third parties that alters professional impartiality must be avoided, especially in purchasing decisions and in the financial terms of transactions.
- Receiving any remuneration, financing, gift or favour from customers or suppliers, or any outside remuneration for services arising from professional activity, is prohibited.
- Exclusive relationships tying a customer to one person must be avoided. Customer incidents and complaints are handled through the established channels.
- All transactions must be documented (contract, invoice, proof of payment) and comply with transparency and data protection regulations.
- Particular attention must be paid to the regulations on smuggling, export control of defence and dual-use items, and the prevention of money laundering and terrorist financing: identifying customers, refraining from acting when there are indications of wrongdoing, reporting suspicious transactions and cooperating with supervisory bodies and the authorities.

8.4. Relations with competitors

AMOPACK competes fairly in the market and does not engage in misleading or disparaging advertising about its competitors or third parties.

8.5. Relations with public bodies and public officials

- Requests from authorities, courts and public administrations are handled through the established internal channels.
- People must cooperate in good faith with the judicial, administrative, tax and supervisory authorities.
- Offering or promising, directly or indirectly, gifts, favours or contributions to authorities, officials, public administrations, political parties or institutions, and making contributions at the company's expense, is prohibited. At any sign of corruption, favouritism, extortion or bribery, the relationship is suspended.

9. PERSONAL TRANSACTIONS BY EMPLOYEES

Transactions based on inside or relevant information obtained from customers, suppliers or AMOPACK staff are contrary to professional ethics. In case of doubt, the Compliance Officer must be consulted beforehand.

These obligations extend to related persons: spouse or stable partner (except for transactions on their own separate assets without the employee's involvement), minor or financially dependent children, other relatives or persons when the transaction is carried out with the employee's involvement or advice, companies controlled by the employee and those acting as their attorneys or trustees. Allowing or concealing transactions by these persons that are contrary to this Code breaches the duty of loyalty to AMOPACK.

10. RESPONSIBLE USE OF SOCIAL MEDIA

AMOPACK attaches great importance to its image and reputation, including on social media. Any use of social media, including private use, may be attributed to the organisation, so it must be responsible and consistent with this Code.

11. PREVENTION OF HARASSMENT AND VIOLENCE AT WORK

Everyone has the right to be treated with dignity and respect. AMOPACK does not permit or tolerate sexual harassment, sex-based harassment, psychological harassment or any form of violence at any of its sites or in any work-related relationship. All staff, and especially the Management and process managers, must help create an environment in which such conduct is unacceptable.

Such conduct is expressly prohibited and is considered a very serious disciplinary offence, sanctioned under the applicable disciplinary rules. Support for the person affected is guaranteed and measures are taken to prevent it from happening again. Its prevention and the response to it are governed by procedure PR-11-09 “Prevention of and response to violence and harassment at work”.

12. REPORTING BREACHES

Anyone may report, with their name or anonymously, breaches of this Code or of the law through the whistleblowing channel (https://centinela-canal.lefebvre.es/canal-denuncias/amopack, also accessible from the AMOPACK website), managed by Vadillo Asesores, or contact the Compliance Officer or the Management. Reports are handled in accordance with:

- Cases of harassment and violence at work: procedure PR-11-09, with guarantees of confidentiality, diligence, the right to be heard, protection of the victim's health and prohibition of retaliation.
- All other matters: procedure PR-05-01 “Internal reporting system” and the Crime Prevention Manual.

No retaliation is taken against anyone who reports in good faith, appears as a witness or cooperates in an investigation. Where a report is found to be deliberately false, the corresponding disciplinary proceedings will be initiated.

13. BREACHES AND DISCIPLINARY REGIME

Everyone is required to attend training on this Code. No one may justify improper conduct by claiming they were following a superior's order or were unaware of these rules. Everyone must inform the Compliance Officer or the Management of any breach as soon as they become aware of it. When the Compliance Officer determines that the Code has been breached, she proposes to the Management the appropriate disciplinary measures under the collective agreement and applicable legislation, without prejudice to any administrative or criminal liability.

14. VERIFICATION AND AMENDMENT

The Compliance Officer proposes to the Governing Body the guidelines and procedures for developing this Code, verifying compliance with it and improving it, in the light of her annual report. Any amendment to the Code must be approved by the Governing Body.

15. RELATED DOCUMENTS

- PO-06 Crime Prevention Manual.
- PR-05-01 Internal reporting system (whistleblowing channel).
- PR-11-09 Prevention of and response to violence and harassment at work.
- D-08-04.01 Catalogue of good practices for suppliers (document under PR-08-04 Supplier evaluation and approval).
- Integrated Management System Manual.

16. DISTRIBUTION

The Code is given to everyone at AMOPACK when they join and is published on the website.

Revision 01. Approved by the Governing Body of AMOPACK, S.L. on 6 October 2026.

Vitoria-Gasteiz, 6 October 2026

Teresa Moreno Itoiz
Sole Director of AMOPACK, S.L.