

CODE OF ETHICS



Version control

VERSION	DATE	REASON FOR CHANGE
01	July 2019	Preparation of the Code of Ethics aligned with the Criminal Compliance Policy – Crime Prevention System - implemented in “ONA ELECTROEROSIÓN S.A.”
02	Jun 2023	The document has been updated with a new "How should we act?" diagram to clarify the behaviour expected of staff...

COMPLETED AND REVIEWED
 <p>Signed by: Javier González Barajas Date: 11/09/19</p>


APPROVED	APPROVED
<p>BOARD OF DIRECTORS</p>  <p>Signed by: Joseba Onandia Salazar Date: 12/11/19</p>	

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1. INTRODUCTION

The Board of Directors of “ONA ELECTROEROSIÓN S.A.” (hereinafter “ONA”) has established a Code of Ethics which is the set of basic principles of conduct and professional conduct practices for all employees and individuals who work for the organisation, aimed at ensuring ethical and responsible behaviour as they perform their work.

This Code of Ethics ascribes a critical meaning to the following forms of conduct:

- Respect for all employees' rights
- Sharing knowledge
- Occupational health and safety
- The principles of equal opportunities and non-discrimination
- Respecting and promoting good business and personal practices
- Commitment to ethical conduct which is reflected in smooth communication with all stakeholders, based on transparency, honesty, strict legal compliance and commitment.

Principles which, together with our commitment to quality, innovation and continuous improvement, good corporate governance, social responsibility, remaining true to the Organisation's mission and vision and creating value in the long term for all internal and external stakeholders, define the practices followed by “ONA”.

The values shared by an organisation are its best calling card, its identity, the profile that identifies its members. This Code, which is underpinned by the Organisation's values, was prepared based on its past experience and objectives. It is a result of an analysis and reflection and it should be habitually applied in our daily activities and make “ONA” stronger.

Implementing this Code will also give us a valuable competitive edge that will allow us to strengthen the roots established by the institution; continuing to grow in a changing environment in which greater cohesion is needed; building on the spirit of a team that feels united by the values with which it identifies, in which it believes and which make “ONA” strong.

The significance and importance now attributed to those principles of conduct in “ONA” make it necessary to define their scope and ensure that they are adhered to throughout the Organisation and make a record of the rules of conduct which should guide the professional activity of all employees.



How should we act?

- Our professional conduct, whether by action or omission, must be in strict compliance with this Code
- We must maintain a cooperative and responsible attitude in identifying situations of actual or potential non-compliance with the ethical principles and rules of conduct contained in this Code, and communicate them to the bodies responsible for resolving them.

2. PURPOSE

The purpose of this Code is to serve as a guide for the professional conduct of employees of “ONA”.

This Code of Ethics contains “ONA's” commitment to the principles of ethics and transparency in all areas of activity, establishing a set of principles and standards of conduct aimed at ensuring the ethical and responsible behaviour of all its employees as they perform their work.

The points included in the Code of Ethics are notwithstanding the obligation to strictly comply with any general and specific legislation that may be applicable.

3. SCOPE OF APPLICATION

This Code of Ethics is applicable to all of the managers and employees of “ONA”, in addition to any interns, trainees, subcontracted persons and, generally, anyone working or providing their services for the organisation. These rules must be followed by third parties acting on behalf of and representing the organisation.

In the case of individuals not linked to the entity through an employment relationship, the Compliance Committee will determine which obligations from the Code of Ethics are not applicable to them. In the case of individuals who provide their services to the organisation through a company, the latter must expressly warrant adherence to this Code by its staff in the respective contract.

By its very nature, the Code of Ethics does not cover all possible situations, it establishes criteria to guide the behaviour of “ONA's” professionals.

4. ORGANISATIONAL VALUES

The following values were established in the Organisation as a result of the latest strategic analysis:

Integrity and transparency: A strong commitment by everyone in ONA, while performing our daily activities, to behave in an ethical, honest and responsible manner. Professionalism should be a key characteristic of every person in ONA, behaving in an honest and open manner and always within the law, refraining from any poor practices.

Client focus: Knowledge of the client's business, their real needs, motivations and expectations, both present and future. Our priority should be to establish relationships of mutual trust and to aim to be their foremost technological partner, always offering agile solutions and responses that bring added value and faithfully fulfilling every commitment that we make.

Flexibility: Promoting the active pursuit of new ideas and challenges that can define the market (key clients, target sectors, etc.), striving to find the best solution for the client. Generating the necessary mechanisms to maximise the innovative potential of each opportunity, avoiding any improvisation and channelling the needs between all stakeholders in a coordinated manner.

Teamwork: Active and pro-active cooperation between all members of ONA to achieve the company's overall objectives, sharing information, knowledge and experience. All with respect and empathy, assuming responsibilities, being disciplined and treating others as we would like to be treated ourselves.

Pursuit of excellence: Everyone's strong commitment to improving how we do things in our daily work, pursuing the satisfaction to be gained from a job well done, striving to exceed the expectations of internal and external clients. This commitment should apply to all areas of our work, to the quality of our product, to the improvement of our internal processes, to our costs, to our internal communication, to our people management, to our environmental awareness and management, to our service to clients... and with the understanding that financial results are a way to keep ONA moving forwards.

Pride in belonging: Full satisfaction from feeling like an important part of ONA, being ourselves, with authenticity and deep respect for others, whether they be other colleagues, clients, partners, competitors...

5. GENERAL PRINCIPLES

5.1. The manner in which each employee of “ONA” conducts themselves should be guided by our prevailing organisational values at all times.

And, in particular, internal conflicts between “ONA’s” employees must be avoided, with the interests of the collective group always put before the personal interests of each employee. And, in everyone’s interests, they must generously share their knowledge and professional experience with their other colleagues.

5.2. Enforcement of this Code of Ethics is the responsibility of the “Compliance Committee”, reporting directly to the Board of Directors, regularly informing it of its state of compliance.

5.3. All notifications and requests for authorisation described in the Code of Effects and any queries regarding its content should be sent to the respective manager (or the person designated by them for such purpose), according to the internal procedures established for that purpose.

All notifications, reports and authorisations referred to in this Code can be sent by email.

5.4. Guiding principles of conduct for all employees

All employees must always behave in an upright, honest and respectful manner and strictly comply with all current legislation, in addition to abiding by any internal protocols or procedures that may be established, especially relating to all areas of safety.

5.5. Cooperation in complying with the Code

Employees must not consent to or conceal any acts or situations of which they have direct knowledge and which occur in the organisation and are against the law or contrary to this Code of Ethics. They must report them to the Compliance Committee.

5.6. Transparency.

Through its information access channels, “ONA” will publish 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

“ONA” agrees to always act in accordance with the current legislation, in all countries in which it operates, and fully respecting human rights and civil liberties.



How should we act?

- We carry out our activities with full respect for the fundamental rights of individuals and public freedoms, in strict compliance with the law.
- We are responsible for ensuring that our professional relationships are based on respect for the dignity of others, collaboration, fairness and communication, so that there is a good professional environment.
- We avoid conduct that negatively affects the reputation or interests of the company.

6.2. Professional development. Equal opportunities and non-discrimination

“ONA” promotes equal opportunities with regard to access to employment, training and the promotion of all employees. It also promotes non-discrimination based on the personal, physical or social status of its employees (whether due to race, colour, nationality, social background, age, sex or sexual orientation, marital status, ideology or religion). For that purpose, “ONA” will implement the required equality plan within it.

The selection, recruitment and professional careers of each employee will be based on merit, ability and the performance of their duties, with an open attitude towards diversity and with the aim of identifying the individuals best suited to each profile and the needs of the position to be filled.

All employees, especially those performing management duties, should treat each other with respect and promote a comfortable, positive healthy and safe working environment.

Under no circumstances may they engage in behaviour that entails physical, sexual or psychological harassment, abuse of authority, causing offence, defamation or any other form of aggressiveness or hostility.

“ONA” is aware of the importance of promoting a good work-life balance, so it will support measures that help employees to achieve a balance between both.



How should we act?

- We provide equal opportunities in access to employment and career advancement, ensuring at all times the absence of discrimination.
- We will be guided by objectivity in our actions and decisions, with an open attitude to diversity, promoting equal opportunities.

6.3. Health and safety for people

“ONA” is committed to promoting and maintaining a safe and healthy work environment. It also promotes suitable training of all employees in this regard, and for any third parties who may perform activities on the Company's premises at any given time.



How should we act?

- Respecting the preventive measures applicable to health and safety at work.
- Using the resources established by the organisation and ensuring that the people participating in our teams carry out their activities in safe conditions and avoiding situations of gender discrimination.

6.4 Order and cleanliness at work

When working in shared environments, respect for other people is essential, so it is requested to keep the workstations tidy and clean, using the toilets and common areas in a hygienic and appropriate manner.

Likewise, the facilities must meet the same cleanliness criteria, with each worker collaborating in the recycling of materials in accordance with the procedures.



How should we act?

- We are responsible for maintaining the workplace in a clean and tidy condition at all times.

6.4. Commitment to excellence, innovation and continuous improvement

The innovative nature of our R&D+i staff, their ongoing desire to improve design, creation and production processes by incorporating the most advanced technologies, makes “ONA” a reliable company that is a leader in the sector.

Under this commitment, each of the Company's employees is expected to:

- Gear their activity towards meeting the client's needs, bringing them added value.
- Commit to the everyday practice of continuous improvement, being required to comply with the corresponding quality standards.
- Take measures to prevent operational errors and aim for faultless production as a way of maximising quality.
- Help to eliminate processes that do not add value.

6.5. Quality policy and personalised client service

"ONA's" Technology and Process Service (TPS), provided by our top experts in electrical discharge machining, aims to ensure the seamless integration of our products into the specific environment of each client. A guarantee that our clients will always get the best performance from their ONA machine.

20% of ONA's team is dedicated to helping clients to achieve greater productivity and providing them with a good technical service.

When you buy an ONA machine, you not only buy a high-quality product, you also qualify to receive technical support and training of the highest standard, provided by true experts in electrical discharge machining, which guarantees that our clients will always get the best performance from their machine.

6.6. Subcontracting

We will not subcontract companies with a record of not respecting workers' rights, the provisions regarding occupational health, safety and hygiene - including those related to occupational risk prevention - or companies which employ staff whose employment status does not meet the current legal requirements.

6.7. Commitment to sustainability and the environment

“ONA” has been participating in a number of projects to achieve sustainable technology and create production environments that cause the smallest possible environmental impact.

The approach that we follow is marked by our desire to manufacture machines that are more productive, more accurate and more environmentally friendly.



How should we act?

- We are actively and responsibly committed to environmental conservation, respecting legal requirements and following established procedures to reduce the environmental impact of our activities.

7. BEHAVIOUR EXPECTED IN RELATION TO COMPANY RESOURCES

7.1. Information management. Confidentiality.

All employees must protect “ONA's” interests with regard to the confidentiality of its strategy, business plans, technology, organisation, knowledge, drawings, designs, client databases, marketing, etc..., and guarantee to clients, suppliers and any third parties related to “ONA” that the information received from or about them will be treated as confidential.

This information is considered strictly confidential, subject to professional secrecy, and is considered a trade secret.

7.1.1. Information about clients and employees

- Information about our clients' operations is always confidential and must be handled with complete discretion; it cannot be used for any purpose unconnected to the organisation or provided to third parties unless there is a legal requirement or obligation to do so.
- Each employee's duty of secrecy applies to any relationships with other clients or third parties, and with other employees in the organisation, unless there are professional reasons that justify disclosing the information within the legal limits.
- The viewing of employee records, of any level, by other employees within the organisation whose duties and jobs do not require them to access such documents is an improper practice.

7.1.2. Information about competitors and institutions

- Relations with employees and/or the clients of other entities must be conducted with the utmost discretion, without revealing the confidential information of “ONA”, employees or clients or engaging in any activity that may constitute unfair competition.
- Employees must have a respectful and considerate attitude towards other entities in general and towards the authorities and public bodies, without making any comment or offering any analysis, disclosing information or spreading rumours that could damage the reputation of the sector, our competitors or the institutions.

7.1.3. Personal data protection

- The personal data of clients must be collected, used, processed and commercially exploited in a way that safeguards their right to privacy and ensures strict compliance with the legislation on personal data protection.
- Access to the personal data of “ONA's” employees, will only be authorised, to the extent necessary, to those employees of “ONA” whose duties so require it in order to meet the organisation's tax, employment or other legal obligations.
- employees expressly authorise the inclusion of their personal data in the organisation's files, including the data necessary to calculate income tax withholdings and to complete the paperwork for the insurance offered and covered by the organisation.
- The personal data of clients or employees must not ever be used for purposes other than those that are legally or contractually required.

7.1.4. Extension of the duties of confidentiality

- The duties of confidentiality set forth in this article will remain in effect indefinitely, even when the employee's employment relationship with the organisation has ended. At the end of the employment relationship, the employee cannot take away any of the organisation's information or documentation that was acquired in their capacity as an employee, including any contained in the files on their computer terminal. They must also not provide or use that information for their own benefit or that of another entity or company.



How should we act?

- The use of the information will be exclusively for the performance of our professional activity, and we can only provide it to those ONA professionals who need to know it for the same purpose and who are subject to the same duty of professional secrecy.
- Information relating to personal data, addresses, products, accounting, taxation, business and, in general, any other information that customers or suppliers provide to ONA, as well as information relating to remuneration, personal and family circumstances, professional skills, performance reports, medical examinations of professionals, must be treated in a confidential manner, to ensure its confidentiality in accordance with the laws and regulations governing these aspects.
- The information must never be used for personal gain or for the benefit of a third party.
- This obligation of confidentiality continues even after the termination of the relationship with ONA.

7.2. Programs, computer systems, devices and audiovisual equipment

7.2.1. Use of “ONA's” property

- Each and every employee of “ONA” agrees to use the Company's property in a responsible, secure and efficient way. This includes protecting it from any damage and/or illegal or improper use, in accordance with the internal policies and criteria approved by the Company.

7.2.2. Rights over devices, programs and systems and audiovisual equipment

- “ONA” owns the property and holds the rights to use and exploit the computer programs and systems, devices, manuals, videos, designs, studies, reports and other works and rights created, developed, improved or used by its employees as part of their work activity or based on the organisation's resources, equipment or systems.
- Employees must adhere to the principle of strict confidentiality with regard to the characteristics of the rights, licences, programs, systems and general technological knowledge that are the property of the organisation or over which it holds usage or exploitation rights.

- Employees must not use, reproduce, replicate or transfer the organisation's computer systems and applications for purposes unrelated to the latter.
- Any sharing or disclosure of information about the organisation's computer systems will require the prior and express authorisation of the General Management.

7.2.3. Requirements for using devices, programs and systems and audiovisual equipment

- The use of devices and audiovisual equipment such as mobile phones, tablets, photo or video cameras, computer systems and programs that the organisation makes available to employees to perform their work, including the ability to access and operate on the internet, must meet the security and efficiency requirements, excluding any use, action or computer function that is against the organisation's instructions.
- Employees must not install or use any programs or applications on the computers and audiovisual equipment provided by the organisation if they are illegal or may damage the systems or harm the reputation or interests of “ONA”, its clients or third parties.
- Employees must not use the resources, equipment or systems provided by the organisation for illegal purposes or for any other purpose that may harm the reputation or interests of “ONA”, its clients or third parties, affect the employee's service or commitment or impair the operation of the organisation's computer resources.
- The corporate infrastructure and the computer resources, hardware, software, laptops, tablets, corporate mobile telephones, photo cameras and video equipment, files, computer programs and documents and information installed or contained on the corporate network and locally on devices, and any other computer tool (e.g. USB memory sticks, DVDs), are provided to be used for professional purposes.
- Similarly, the email account provided to “ONA” employees is a basic tool, intended solely for the provision of professional services and, therefore, it cannot be used for private purposes.
- Use of the aforementioned resources, equipment and systems may be monitored by “ONA”, with personal privacy respected in accordance with the law, whenever they are computer systems or other resources owned by “ONA”, whether they are used within the company or in the course of remote working or through any other form of access, when this is deemed necessary in order to protect the interests of “ONA” and/or its staff, or when it is advisable for specific security or service-related reasons, or when it is necessary to verify due compliance with the law and/or to properly exercise disciplinary authority.

7.2.4. Security protocols

- Employees must adhere to the measures put in place by “ONA” for the security, control, access and use of the systems and resources and the personal and non-transferable use of security passwords for each user profile and the rights of access and use assigned by the organisation to each employee.
- Making a personal access system or password available to another employee or to a third party is a practice contrary to the basic principles of security in the use of computer resources.
- It is compulsory to comply with the internal security protocols established by “ONA”.



How should we act?

- We must make proper use of the company's assets, paying special attention to the measures of use and control of the production processes in order to ensure the quality demanded by our customers.
- We must refrain from using the company's IT and communication resources to view or download illegal content that damages the company's image and security, both during and outside working hours. We must not access social networks, streaming content or any website unrelated to our job duties during working hours.

7.3.- Expenses on behalf of the Company

- Any expenses incurred by an employee on behalf of the organisation must be strictly related to work activity and supported by documentary evidence.
- The use of any corporate card must always be in accordance with the internal practices and guidelines established for such purpose.

7.4. Use of the Trademark

- One of our most valuable assets is the “ONA” trademark. Therefore, all employees must take the utmost care when using it in any documents, reports, etc., and in the manner in which the professional and business activities of “ONA” are conducted.
- “ONA” employees must not engage in destructive criticism or make negative remarks about the Company, its clients, suppliers, shareholders or any other partners when this could have a negative impact on the organisation's reputation.
- The distinctive signs (trade names, trademarks, domain names, etc.) used to distinguish “ONA” belong to the Company, so they cannot be used by “ONA” employees, third parties or clients without the authorisation of “ONA”. When permission is given to use them, such use must be in accordance with the strictest business practices and any applicable legal, regulatory and professional ethical requirements.

8. CONFLICTS OF INTEREST AND RELATIONSHIP WITH STAKEHOLDERS

8.1. Conflicts of interest

- Employees must not ever abuse the organisation's trust or take advantage of working for it for their own benefit or that of family members or third parties connected to the employee.
- Employees must not use “ONA's” property, equipment or resources for their own ends or benefit.
- Employees must also not take advantage of their position in the Company for financial gain or take advantage of business opportunities of which they become aware as a result of their work activities, unless the Company has first declined them.
- Prior authorisation is required from “ONA” for an employee to maintain any business relationship with the Organisation or carry out any transactions unrelated to their employment relationship.
- Any employee with an interest in any of the transactions referred to in the previous paragraph must also refrain from taking part in or influencing the organisation's decision.
- At “ONA's” request, employees must provide information about any conflicts of interest with the Company that may affect them because of their personal, family or professional relations, their personal assets or any other justified grounds. This information will be treated as confidential and for the sole purpose of complying with the Code of Ethics.



How should we act?

- We must avoid, identify and report both potential and actual conflicts of interest, never putting personal interests before those of clients or the interests of the company, including those arising from family or related relationships.

8.2. Commitment and conflicts of interest

- Employees must devote to “ONA” all of the professional capacity and personal effort necessary to perform the duties assigned to them by the Organisation.
- They must not carry out any activities, paid or unpaid, that may harm the interests or reputation of “ONA” or impair the independence, impartiality and professional commitment of the employee.
- Before accepting or performing any activity or work that may be in conflict with the organisation's interests, the employee must consult with “ONA”.

8.3. Relations with clients and suppliers

- Any kind of interference or influence of clients, supervisors or managers, suppliers or third parties that may impair the impartiality and professional objectivity of employees must be avoided. This obligation applies especially to employees who have to make decisions on the contracting of works

and procurement of supplies and services and those who decide on the financial conditions for transactions with clients.

- Employees are forbidden from receiving any form of remuneration or funding from the organisation's clients or suppliers and, generally, accepting any form of external remuneration for services arising from their activity as an employee.
- In their dealings with clients, employees must avoid any exclusive relations that tie certain clients to a single employee or hamper the clients' relations with other employees.
- Any incidents and complaints from clients must be channelled exclusively through the customer services departments established by the Company.
- The corresponding supporting documentation (contract, invoice, receipt of payment, etc.) is required for all transactions with clients/suppliers. In any event, in their dealings with clients/suppliers, employees must adhere to transparency, reporting and protection standards and respect the rights of clients that are recognised in the legislation on personal data protection, information society services and all other applicable provisions.
- Special care must be taken to fulfil the obligations imposed by the legislation on smuggling and the prevention of money laundering and terrorist financing: identify all clients, abstain from any transaction where there is evidence or signs that they are linked to money laundering and/or the financing of terrorism, report any suspicious transactions and also inform the respective internal body, do not reveal to the client or third parties the control and investigation actions being taken and fully cooperate with the internal control bodies and public authorities.



How should we act?

- We must ensure that all relationships are conducted in a fair manner and in accordance with internally established rules.
- The customer is our raison d'être; therefore, we will be professional and respectful people.
- If we intervene in the selection and/or decision on the procurement of supplies or services, or the negotiation of tariffs or other conditions, we will avoid any kind of interference that could affect the transparency and objectivity of the process.
- In the processes of approval, selection and contracting of suppliers for the procurement of goods and services, we will ensure concurrence and diversification of offers.

8.4.- Relations with competitors

- “ONA” agrees to compete fairly in the market and not to advertise in a way that is misleading or denigrates its competitors or third parties.

8.5. Relations with public bodies and/or officials

- Requests received from authorities, legal bodies and public administrations must be dealt with through the internal channels implemented by “ONA” at any given time.
- Employees must cooperate faithfully with legal, administrative, tax and supervisory authorities.
- In their capacity as such, employees must not directly or indirectly offer and/or promise gifts, favours, contributions or cash payments to authorities, public officials, bodies or public administrations, political parties or institutions in general, or make contributions to the aforesaid entities or any other entities at the expense of the Company. In particular, they will abstain from or suspend any relationship if there is any evidence of corruption that may lead to preferential treatment or engender influence or favourable treatment, or is linked to extortion or bribery of any kind.



How should we act?

- We will maintain an attitude of respect and cooperation with the representatives of the authorities within the framework of their competences.
- We do not offer, request or accept anything in exchange for favourable treatment from any authority.

9. EMPLOYEES' PERSONAL TRANSACTIONS

9.1. Transactions deemed to be contrary to professional ethics

The following transactions are considered to be contrary to professional ethics:

- Those carried out on the basis of insider information or significant information obtained from clients, suppliers or any other employee of “ONA”

In the event of doubt as to whether or not a given transaction is speculative in nature, whether insider or significant information is involved or with regard to interpretation of this paragraph, the employee must contact the H.R. Department or Compliance Committee in advance.

9.2.- Family members and related persons

The obligations set out in this Code also apply to the following persons related to employees:

- The spouse, unless legally separated, with the exception of transactions that only involve the private assets of the spouse and are conducted without the involvement of the employee.
- The employee's de facto stable partner, with the same exceptions indicated in the previous point.

- Children who are unemancipated minors or not of the age of majority, who are financially dependent on the employee.
- Other family members or, generally, other individuals when the transaction is completed with the involvement, handling or advice of the employee.
- Companies in which the employee has a significant direct or indirect holding which confers control to them, meaning holding the majority of the company's voting rights or majority control of the Board of Directors or the executive management of the company.
- Persons acting as legal representatives, agents or trustees of the employee, their family members or the companies under their control, or who do so in concert with any of the foregoing.

Allowing or failing to disclose the existence of transactions carried out by the aforesaid related persons and which may contravene the rules contained in this Code of Ethics is a breach of the employee's duty of loyalty to "ONA".

10. RESPONSIBLE USE OF SOCIAL MEDIA

"ONA" attaches great importance to protecting its image and reputation. This includes the use of new media on the internet, so-called "social media", whether professionally or privately.

Any use of those social media by any "ONA" employee, even private, could be attributed to the organisation and have a negative impact on its image and reputation. Therefore, any employee who may participate in any such social media at any time must do so in a responsible manner and in strict compliance with this Code of Ethics.



How should we act?

- We have a responsibility to ensure that our actions and decisions are guided by the best interests of the company and its customers and are not motivated by personal or third party considerations or interests.
- We must refrain from using ONA's image, name or brands to open internet accounts or register in forums and networks. The creation, membership, participation or collaboration in social networks, forums or blogs and the opinions or statements that we make in them, will be done in a way that makes our personal identity clear.

11. PREVENTING SEXUAL HARASSMENT, HARASSMENT ON THE BASIS OF GENDER AND MOBBING

Every person has the right to be treated with dignity and respect. Under this right “ONA” assumes that attitudes and acts of sexual harassment are an affront to the dignity of workers. Therefore, sexual harassment and harassment on the basis of gender will not be tolerated in any of our work centres, or in any work-related relationships.

“ONA” and all of its employees have the responsibility to help ensure a work environment in which sexual harassment or harassment on the basis of gender and mobbing are unacceptable and undesirable. Specifically, the process owners and Company Management are obliged to use all available means to prevent any sexual harassment and harassment on the basis of gender and any mobbing in the units under their responsibility.

Therefore, any action or behaviour of this kind is expressly forbidden and is considered extremely serious professional misconduct which will result in the respective penalties, as defined in the applicable disciplinary rules.

If it occurs, it must be ensured that assistance is given to the affected person and all possible steps must be taken to prevent any recurrence of the situation.



How should we act?

- As employees of ONA, we must know that respect is the basis of all our actions in the organisation, and this is always demanded, in any circumstance and in any activity.
- We are responsible for ensuring that our professional relationships are based on respect for the dignity of others, collaboration, fairness and communication, so that there is a good professional environment.

12. RESPONSE PROTOCOL WHEN A COMPLAINT IS RECEIVED

12.1. Procedure to follow for cases of harassment in the workplace

Follow the instructions herein; and, insofar as they are compatible, the instructions in the crime prevention manual and regarding the handling of complaints will also apply.

12.1.1. General principles to which the performance and safeguards of the procedure must conform

Note the following:

- Respecting and protecting people: it is necessary to act with the necessary discretion to protect the privacy and dignity of the people concerned. Any actions or procedures must be carried out with extreme caution and with due respect for all people involved, who must never receive unfavourable treatment for this reason. The parties involved may be assisted by a health and safety officer or advisor at any time during the procedure, if they so require.
- Confidentiality: the people involved in the procedure are obliged to maintain the strictest confidentiality and privacy and not to reveal or disclose information about the content of any communications presented or the investigation process.
- Diligence: the reported behaviour must be investigated and a decision must be issued without undue delay, to allow the procedure to be completed as quickly as possible while still following due process.
- Contested complaint: the procedure must ensure that there is an impartial hearing and fair treatment of all people concerned. All parties involved must, in good faith, seek the truth and clarification of the facts reported.
- Protecting the victims' health: the Company must take any steps it considers necessary to safeguard the right to health protection of the workers concerned.
- Prohibition of retaliation: it must be expressly forbidden to retaliate against the people reporting the facts, appearing as witnesses or assisting or participating in the investigation into harassment.

12.1.2. Phases

Start.

The procedure starts with the submission of a written complaint, possibly anonymously, to the H.R. Department or via the whistleblower channel implemented for that purpose by the Organisation.

The following are entitled to initiate the procedure: the person concerned or their legal representative; the employees' representatives and/or trade union representatives, in the area where the party concerned provides their service; any person who is aware of possible harassment in the workplace may ask their direct superior to initiate the procedure described herein of their own accord.

Investigation launch.

The complaint will lead to an investigation being launched, with an investigating official being appointed for this purpose, with the aim of determining the facts, with all necessary parties being heard separately in order to clarify the reported facts.

The confidentiality of the proceedings must be maintained throughout the involvement of the different parties in the investigation, with due respect being encouraged for both the plaintiff and the person or persons accused.

The necessary steps must be taken to protect the identity and ensure the confidentiality of the information provided with regard to the parties concerned, especially that of the person who reported the facts to the Company, if they provided their identity.

Decision-making phase.

In no more than two months, the investigating official will issue a report, which will be submitted to the General Management, indicating whether or not there is sufficient evidence of harassment and the proposed measures to resolve any problems that were detected.

The investigating official may propose that the request for action be dismissed, in cases such as the withdrawal of the complaint (except when it is legally required to continue the investigation of the complaint); unfounded or a lack of sufficient evidence; or with the preliminary proceedings, the subject matter of the request for action can be deemed to be resolved.

Confirmation of harassment in the workplace will give rise to disciplinary or criminal liability, as applicable.

When it is impossible to determine the facts, there must be no retaliation against the employee who filed the complaint.

When it is irrefutably confirmed that the accusations are false, the corresponding disciplinary proceedings will be initiated.

12.2. Procedure to follow for all other matters that are the subject of complaints

Follow the relevant instructions in the crime prevention manual.

13. NON-COMPLIANCE AND DISCIPLINARY RULES

All “ONA” employees are obliged to attend and participate in all of the related training activities that are arranged.

No “ONA” employee may justify improper or unlawful behaviour based on an order being given by their superior or ignorance of these regulations.

All “ONA” employees must report any breach of this Code that they may observe to the Compliance Committee or H.R. Department as soon as they become aware of such acts.

When the Compliance Body establishes that an employee of “ONA” has breached this Code of Ethics, it will instruct the General Management to enforce the respective disciplinary measures in accordance with the rules on offences and penalties in the applicable disciplinary rules or in the applicable legislation, notwithstanding any administrative or criminal actions that may also apply.



How should we act?

- We are responsible for our actions and accountable for all breaches of this Code and applicable laws.
- We must reject any conduct, practice or form of corruption and any such actions are expressly prohibited.
- We must comply with the policies, procedures and controls that the organisation makes available to us to ensure and comply with international requirements and good practice.

14. VERIFICATION AND CHANGES

The Compliance Committee will submit recommendations to the Board of Directors regarding any guidelines and procedures that may be appropriate to enforce this Code, to verify effective enforcement hereof and to ensure its continuous improvement and in consideration of the content of the Annual Report that it is required to submit to said Board.

Any changes to this Code of Ethics must be approved by the Board of Directors of “ONA”.

15. ANNEXES TO BE TAKEN INTO CONSIDERATION

- List of Prohibited Behaviours.

16. DISTRIBUTION AND ACKNOWLEDGEMENT OF RECEIPT

I, [Name here]....., with ID no. declare that I have read and fully understood the contents of this document, composed of pages, and I agree to comply with the provisions established herein.

[Name here]

ID no.

Date: