

# CODE OF CONDUCT



**BATZ**GROUP

02/2025

1. INTRODUCTION
2. SCOPE OF APPLICATION
3. APPLICATION OF THE CODE, COMMUNICATION AND MONITORING
4. OUR PROJECT, VALUES AND MISSION
5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT
  - 5.1. PEOPLE
  - 5.2. COMMITMENT TO THE ENVIRONMENT
  - 5.3. PUBLIC ADMINISTRATIONS AND ANTICORRUPTION POLICIES
  - 5.4. RELATIONS WITH THIRD PARTIES
  - 5.5. INFORMATION MANAGEMENT
  - 5.6. PROTECTION OF INDUSTRIAL / INTELLECTUAL PROPERTY. RESPONSIBLE USE OF THE COMPANY'S ASSETS AND RESOURCES
  - 5.7. PROMOTING THE IMAGE AND REPUTATION OF THE BATZ GROUP

## 1. INTRODUCTION

This Code of Conduct is part of the Organisation and Management Model (Compliance Programme) of the BATZ Group.

The Code of Conduct seeks to cement the business culture that already exists in the BATZ Group.

Compliance with this Code is based on cooperation, trust and respect, as well as on the confidential treatment of all communications between the people representing the BATZ Group and the third parties with whom it is in contact.

The BATZ Group has a number of rules, instructions and procedures that put this Code into practice and everyone who is part of the BATZ Group has the responsibility to know and comply with them.

The BATZ Group will ensure a true and effective application of the Values and Ethical Principles established in this Code of Conduct and any breaches or areas for improvement will be managed by the Compliance Committee.

## 2. SCOPE OF APPLICATION

The Code of Conduct applies throughout the BATZ Group at a GLOBAL level, without prejudice to the continued respect for any local legislation that may strengthen

the minimum and mandatory requirements described here.



For those companies in which the BATZ Group has a minority shareholding, a proposal will be put to the relevant management bodies for the approval of a Code of Conduct with identical or similar content to this one.

## People to whom the Code applies

Everyone in the BATZ Group, including the Companies Controlled by BATZ, S. Coop., and extending, as far as possible, to Suppliers, Associates and Clients.

## Communication of the Code

This Code of Conduct is communicated to all new recruits in the BATZ Group through the Induction Plan established for that purpose. For Personnel already employed on the date of approval or modification of the Code of Conduct, it will be promoted via the intranet or through the specific documentation provided for this purpose. With respect to third parties or interest groups, dissemination of the Code of Conduct will be made through the website or through specific publications. It will be the responsibility of the Management of each Controlled Company to ensure that there is effective dissemination of the Code of Conduct.

## Importance of the Code for people in the BATZ Group

Every person is required to know and comply with the Code of Conduct, as well as behaving in accordance with the Values and Ethical Principles included in the Code.

Knowledge of and compliance with the Code of Conduct is especially important for the members of the Board of Directors, the Governing Board, the Company Board, the Supervisory Committee and the Compliance Committee.

## Importance of the Code of Conduct for Suppliers

Compliance with the Code of Conduct is an obligation for BATZ Group suppliers. The BATZ Group reserves the right to terminate any contract with suppliers who do not comply with this Code of Conduct.

### 3. APPLICATION OF THE CODE, COMMUNICATION AND MONITORING

#### Entry into force

This Code of Conduct has been in force since its approval by the Governing Board of BATZ, S. Coop., i.e., from 29 March 2017, and will remain in force unless there is an express agreement for its abolition or another Code enters into force as a replacement.

Notwithstanding the above, this Code of Conduct is dynamic and is expected to be adapted, updated, modified and developed.

Any suggestions for improvement, questions or criticisms should be brought to the attention of the Compliance Committee, which is the competent body for ensuring compliance with the Code of Conduct and its correct application.

#### Interpretation of the Code of Conduct

In the case of discrepancy between this Code of Conduct and any component Protocol of the BATZ Group Compliance Programme, the Code of Conduct will prevail. Furthermore, the Protocols will be interpreted in accordance with the spirit and purpose of this Code of Conduct.

The Compliance Committee is responsible for its interpretation and for resolving any doubts about the content of the Code of Conduct. Its interpretive criteria are obligatory for all its recipients.

#### The Compliance Committee

The BATZ Group Compliance Committee, chaired by the Compliance Department (Compliance Officer), has jurisdiction in all aspects of the compliance function.

The Compliance Committee drafts and proposes the content of this Code of Conduct as well as the set of Protocols that make up the BATZ Group Compliance Programme which, once approved by the Governing Board of BATZ, S. Coop., are of obligatory compliance for all people.

#### Non-compliance and reporting to the Internal Information System

Failure to comply with this Code of Conduct constitutes an infringement of the Compliance Programme, and may lead to employment or company sanctions, without prejudice to the relevant administrative or criminal sanctions.

To facilitate compliance with the Code of Conduct, there is a confidential or anonymous Internal Information System Channel (SII), through which:

- Any possible questions about the interpretation or practical application of the Code of Conduct are managed.
- Any possible violations of this Code are reported.
- Any legal violations are reported.

Every Person belonging to BATZ S. Coop. who has knowledge of an Area for Improvement or Non-compliance with this Code of Conduct or the Protocols and Regulations developed therein, or actions against the legal legislation in force and applicable in each country, must notify this to the Compliance Officer immediately, through the Internal Information System. Failure to disclose any non-compliance of which you have knowledge will be considered an infringement of the Code of Conduct.

The concealment of a fact or incident concerning violation of the legislation, the Code of Conduct or the Protocols and Regulations developed therein or actions against the current legal system will not be understood as an action in the interest of the BATZ Group.

Notification to the Compliance Officer may be made in the following way:

- **Through the Internal Information System on the BATZ intranet.**

The person who makes the notification will be informed of the progress made by the Ethical Channel.

### 3. APPLICATION OF THE CODE, COMMUNICATION AND MONITORING

#### Confidentiality of communications and prohibition of retaliation

The BATZ Group guarantees confidentiality regarding the identity of any Person that notifies the Internal Ethical Information System or anonymity if the person has decided to make the communication anonymously.

All communications and procedures related to the Internal Information System will be managed in compliance with the regulatory requirements regarding the protection of personal data.

It is prohibited to take any action against a Person that constitutes retaliation or any kind of negative consequence for having made a notification. Any retaliation taken against the person making such a notification will be considered as an infraction of this Code of Conduct.

The prohibition of retaliation described in the previous paragraph shall not prevent the adoption of disciplinary measures, where applicable, if the internal investigation determines that the notification is false and has been formulated in bad faith.

#### Internal Information System Procedure

The Compliance Officer will keep a record of all communications received through the Internal Information System.

Upon receipt of a notification, the Compliance Officer will advise the Compliance Committee to initiate an internal investigation, unless, in the opinion of the Compliance Officer, the notification is clearly unfounded or refers to matters outside the Code of Conduct or, where applicable, the Protocols. In these cases, the Compliance Officer must record its receipt in the relevant communications register as well as the decision taken not to initiate an investigation. This decision shall not preclude the later initiation of an investigation if additional information is received.

During the internal investigation that is carried out, the Compliance Committee may collect all the information and documentation it deems appropriate from any areas or businesses of the BATZ Group.

Any procedure actually initiated will end with a decision by the Compliance Committee that will contain a proposal that, if appropriate, will be approved by the Governing Board of BATZ, S. Coop.

In the event that the notification affects a member of the Compliance Committee, that party will not be able to participate in the process and the rules on Conflict of Interest, described in section 5.3 of this Code of Conduct, will apply.

The above-mentioned proposal will establish the relevant measures pursuant to the employment legislation, as well as to the Internal Regulatory Regime and any other socio-employment standards applicable to the People, all of this being without prejudice to any administrative or criminal sanctions that may result.

## 4. OUR PROJECT. PURPOSE, MISSION AND VALUES

### NUESTROS VALORES







## SON LA BASE DE



**NUESTRA MISIÓN**

Como empresa industrial global, nuestra misión es liderar la transformación hacia una movilidad sostenible, generando valor compartido para nuestros clientes. Conectados a nuestras raíces en Arratia y Bizkaia, impulsamos la cooperación industrial, ofreciendo soluciones innovadoras basadas en el conocimiento y la tecnología. Nuestro crecimiento sostenible y colaborativo nos permite llevar bienestar a todas las regiones donde operamos, fortaleciendo nuestro vínculo con los ecosistemas locales de innovación y emprendimiento.

### VALUES

The People who make up the BATZ Group share the following values:

#### Customer Benchmark

At BATZ, we believe in the value of relationships. Therefore, we strive to make ourselves aware of each customer's needs in depth, to offer customised and adapted solutions that go beyond their expectations. Our pro-activity and commitment allow us to build lasting relationships based on trust and mutual satisfaction, always safeguarding the interests of BATZ.

#### Efficiency

Efficiency is the result of our passion for engineering, teamwork and innovation. We combine our ability to find creative solutions with the skill of working closely together as a team. We work in a coordinated manner to achieve our goals effectively and efficiently. Our openness to change and willingness to adopt new ideas enable us to adapt quickly to the needs of the market and overcome any challenges we may face.

#### Ingenuity

The ability to combine achievement orientation with innovation. It involves setting challenging goals and acting quickly and flexibly to achieve them, adapting to new trends in the sector. This value drives us to continuously improve and add value to the organisation, anticipating market needs and exceeding our customers' expectations.

#### Pride

Pride is the force that drives us to build a company where we all feel valued and committed. We foster a culture of positivity and personal development, all in an atmosphere of mutual respect and trust, developing a strong sense of belonging that motivates us to give the very best of ourselves.

#### Strongly rooted

At BATZ, being rooted is more than just a place of origin. It is a deep commitment to the development of Arratia and Bizkaia, and a sense of belonging to a shared business project. We are proud of our roots and work passionately to ensure a prosperous future for our region and all those in which we are present.



#### 4. OUR PROJECT. VALUES, MISSION AND VISION

---



**In relation to these Values, the Cooperative Values developed within the MONDRAGON CORPORATION also form part of the BATZ GROUP identity.**

**Also, based on our Purpose, Mission and Values, we align our initiatives with the 2030 Agenda and the achievement of the Sustainable Development Goals outlined therein.**



## 5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT

### 5.1. PEOPLE

The BATZ Group recognises the fundamental principles of the Declaration of Human Rights, as defined by the United Nations in 1984.

#### **Occupational Health & Safety**

We are committed to offering the People who make up the BATZ Group, as well as Suppliers, Associates and Clients, a safe and healthy work environment with regard to the processes as well as the installations and the services.

All the people who perform their duties at the BATZ Group centres are obliged to know and comply with the rules and to use the resources established by the BATZ Group, relating to occupational health and safety, in a safe and responsible manner, with the objective of preventing and minimising occupational hazards

#### **Prohibition of forced labour and recruitment policy**

The BATZ Group does not tolerate forced or compulsory labour of any kind in accordance with ILO Core Labour Standards.

The BATZ Group rejects and does not use nor directly or indirectly resort to work obtained against People's free will through the use of threats, punishments, deprivations, the application of systems of slavery or semi-slavery or through any other human rights violations.

The BATZ Group opposes the use of forced or illegal labour of any kind in its business activities.

The BATZ Group:

- Will not use force<sup>(1)</sup>.
- Will not force its employees to perform forced or bonded labour.

The BATZ Group pursues a recruitment policy in accordance with the legislation in force, including, in conformity with this, anything that gives entitlement to social protection, which demonstrates a commitment to stable and quality employment, and establishes a remuneration policy that provides a decent standard of living.

The BATZ Group addresses the expectations and needs of the People with the aim of achieving an

adequate balance between their private and their professional life, with a view to ensuring that these measures do not detract from the competitiveness of the organisation, paying special attention to the obligations of those people who must care for dependents.

#### **Prohibition of trafficking in human beings and protection of foreign nationals**

The BATZ Group assumes responsibility for the protection of foreign nationals by complying with the applicable immigration regulations.

Persons within the BATZ Group will not assist a person who is not a national of a State of the European Union to enter, stay or transit in the State in a manner that violates the applicable laws on the entry or transit of aliens.

In the case of detecting any incident related to this section, it shall be reported to the Compliance Committee to analyse the causes and define the pertinent corrective and preventive actions.

#### **Prohibition of child labour and protection of minors**

The protection of minors is an Ethical Principle of the BATZ Group that implies not resorting to child labour, understood as work that deprives minors of their childhood, their potential and their dignity, and that is detrimental to their physical and psychological development.

Child labour also means that it is prohibited to employ minors below the minimum legal age for employment. The BATZ Group will ensure that legally young workers who have not reached the age of 18 do not work at night or work overtime and that they are protected from working conditions that are harmful to their health, safety or development, in accordance with the Minimum Age Convention, 1973 (No. 138), and in accordance with the Charter of Fundamental Rights of the European Union 2012/C 326/02

The BATZ Group will not employ minors<sup>(2)</sup> and will keep a register of the date of birth of all employees.

*(1) Forced labour is work that is carried out under threat of punishment or confiscation of belongings (such as ID cards, passports, etc.) and for which the person has not volunteered.*

## 5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT

---

In the event that the presence of a minor is detected in our plants, the Compliance Committee will be informed in order to terminate the corresponding contract and, in addition, the causes will be analysed and the relevant corrective and preventive actions will be defined.

The BATZ Group shall ensure that the work of young employees does not interfere with their school attendance and shall respect that the total working and schooling time of young employees shall not exceed 10 hours.

### **Use of security forces**

The BATZ Group does not tolerate any type of unlawful conduct by security personnel towards employees or third parties.

The BATZ Group therefore makes every effort to ensure that security service providers are contractually bound to respect human rights and receive appropriate guidance and training whenever necessary.

### **Equality and a respectful work environment**

The BATZ Group aims to create a work environment in which trust and mutual respect prevail, so that everybody will pursue, at all professional levels, relationships based on mutual respect, integrity, cordiality, trust and collaboration and effort in teamwork, fostering a respectful work environment among colleagues, line managers and people in charge, in order to achieve a positive working atmosphere.

A lack of respect or consideration, causing offence, defamation, intimidation, abuse, harassment or any kind of psychological, physical or sexual aggression, as well as abuse on the basis of gender, sex or sexual identity, are unacceptable and will not be permitted or tolerated at work.

We adhere to a rigorous and objective selection policy, paying attention exclusively to the academic, personal and professional merits of the candidates and to the needs of the BATZ Group.

The BATZ Group training programmes guarantee equal opportunities and career development and contribute actively to the achievement of the Group's objectives. Also, promotion is based on the merit, ability and individual performance of the People.

Accordingly, we expressly undertake not to discriminate on the basis of race, religion, sex, age, nationality, sexual orientation, gender identity, marital status, disability or any other circumstance likely to be a source of discrimination.

### **Freedom of association, collective bargaining and outside activities**

The BATZ Group respects the performance of social and public activities by its Members, provided that they do not interfere with their professional activity.

The BATZ Group respects the right to organise, the freedom of association and collective bargaining in the workplace.

The linking of persons with political parties or other types of entities, institutions or associations with public purposes will be carried out in such a way that their personal nature is made clear, thus avoiding any relationship with the BATZ Group.

### **Privacy, use of personal data and confidentiality**

The BATZ Group respects people's right to privacy, in all its forms, as well as the personal communications of people via the Internet and other means of communication. In particular, the privacy and confidentiality of personal data will be respected. Access to personal data is limited to certain, duly authorised company personnel, who will be required to sign a Confidentiality Agreement.

Accordingly, the BATZ Group undertakes not to disclose personal data unless the interested parties consent or in cases of legal obligation or compliance with judicial or administrative rulings. Under no circumstances may personal data be processed for purposes other than those provided for either legally or contractually.

*(2) According to the International Labour Organisation (ILO) Minimum Age Convention of 1973, a child is defined as a person under the age of 15 years, except in cases where local law provides for a higher age or compulsory schooling, in which case the higher age applies. Local legislation may permit the employment of persons between 13 and 15 or 12 and 14 years of age in tasks that: Do not harm the health or development of the child; and do not adversely affect school attendance or training programmes.*



## 5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT

---

### 5.2. COMMITMENT TO THE ENVIRONMENT

#### **Environment**

The BATZ Group is committed to minimising the environmental impact of its activity. For this purpose, we have environmental management systems and the ISO 14001 certificate that ensure compliance with the legislation and the continuous improvement in processes.

The people, within their area of responsibilities, should strive to minimise the environmental impact derived from the use of the installations, assets and resources made available to them by the BATZ Group and must actively and responsibly commit themselves to the conservation of the environment. In particular, (i) they

must be aware of and comply with the Environmental rules, instructions and procedures in force in their workplace, and (ii) within their area of responsibility and in accordance with the policies of the BATZ Group, they must endeavour to improve the conditions of the installations from the environmental point of view and to apply an efficient management of environmental considerations.

#### **Healthy life**

The BATZ Group promotes a healthy life among its People, in particular, through the occupational risk prevention service and the ISO 45001 certification.





## 5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT

---

### 5.3. PUBLIC ADMINISTRATIONS AND ANTICORRUPTION POLICIES

The relationships with the Authorities, Regulatory Bodies and Public Administrations will be considered under the principles of cooperation and transparency.

The BATZ Group will fulfil its duties before the various Public Administrations, in particular, with the Tax Office, Social Security and those in respect of any subsidies received.

#### **Corruption**

The BATZ Group is against corruption, in all its forms, as well as unlawfully influencing the will of people outside of the BATZ Group in order to obtain some form of benefit or advantage. Extortion and bribery are expressly prohibited, including the direct or indirect offer or promise of any kind of illicit advantage, as well as influence peddling.

Thus, the People of the Batz Group must behave in a way that does not induce a private individual, authority or public official to violate their duties of impartiality or any legal provision during all their dealings with their own and other countries Public Administrations and international organisations.

No payments may be made to facilitate or expedite any processes which involve the delivery of money or anything of value, whatever the amount, in exchange for securing or expediting the course of a procedure or action before any judicial body, public administration or official organisation.

The prohibitions established in this section also extend to persons closely related by family ties or friendship to the private individual, authority or public official concerned.

#### **Gifts policy**

Gifts or freebies are intended to promote the image of the BATZ Group brand. Neither the management nor any other member of the BATZ Group may offer, grant, request or accept, directly or indirectly, gifts, invitations, favours or compensation in cash or in kind, whatever their nature, for non-legal purposes or those

contrary to this Code of Conduct. Gifts or freebies of limited economic value are permitted, provided that they are not in cash, such as propaganda objects of low value, courtesy gifts or occasional social favours such as Christmas gifts.

Any invitation, gift or courtesy which, due to its frequency, characteristics or circumstances may be interpreted as an intention to influence the objectivity of the recipient, will be rejected or returned, and brought to the knowledge of the person in charge and of the Compliance Committee as soon as possible. If it is not reasonably practicable to return the item, it will be delivered to the Department of Human Resources who, after issuing the corresponding receipt and including it in the inventory of gifts to the BATZ Group, will allocate it for purposes of social interest.

#### **Exports**

In the context of export control, the cross-border exchange of goods is subject to prohibitions, restrictions, approvals by authorities or other supervisory measures.

In its import and export activities, the BATZ Group complies with all regulations concerning the import and export of goods, services and information imposed by the applicable legislation as well as by the internal regulations of the BATZ Group and the external regulations imposed by other operators, and all its suppliers are obliged to comply with such regulations.

It is absolutely forbidden to do business with persons or companies on official sanctions lists of the countries concerned, regardless of the delivery process. Actions that may be related to smuggling are expressly prohibited.

When making decisions regarding the import and export of goods and services, due consideration is given to whether this decision may be subject to export control. In case of doubt, advice is sought from the Operations Department.

## 5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT

---

### **Prevention of counterfeit parts**

The BATZ Group develops, implements and maintains effective methods and appropriate processes in its products to minimise the risk of introducing counterfeit parts and materials into the products it delivers.

### **Subsidies**

The request for subsidies by any of the companies of the BATZ Group will always be supervised by the Group's Financial Corporate Area, which will ensure the correct application of the relevant regulations, with external advice for their management and ensuring their correct justification through external audits.

It will ensure that the subsidies requested or received from the Public Administrations receive the appropriate use, avoiding any falsification of the conditions for receiving them or giving them a different use to the one for which they were awarded.

### **Prevention of money laundering and the financing of terrorism**

The BATZ Group will comply with the national and international provisions that apply to them for money laundering and the financing of terrorism.

Customer identification, information and internal control measures will be applied and maximum cooperation will be given to the competent authorities.

In order to prevent and avoid money laundering or the financing of terrorist operations arising from criminal or illicit activities, employees should pay particular attention to the prevention of conduct that may be related to such illicit behaviour.

### **Conflicts of Interest**

The BATZ Group believes that the relationship with the People who form the Group must be based on loyalty derived from common interests. Consequently, people should avoid any situation which produces a Conflict of Interest.

A Conflict of Interest shall be deemed to exist in situations where the personal interest of a Person and the interest of the BATZ Group collide or are influenced or distorted. There will be personal interest when the matter directly affects the Person or another party related to the Person.

People related to the Person will include: the Person's spouse or a person with an analogous relationship; ascendants, descendants and siblings of the Person or of the spouse (or person with an analogous relationship); and companies or businesses in which the Person or related people are in control or exercise an administrative or management position or, either directly or indirectly, have a significant influence<sup>(1)</sup> on the financial and operating decisions of such companies or businesses.

The Person facing a Conflict of Interest will, as soon as possible, inform their line manager of the Conflict of Interest in which the Person is involved. If there is any doubt about whether there is a Conflict of Interest, it will be submitted for interpretation to the Compliance Committee. Also, the Person affected by the Conflict of Interest shall refrain from intervening or influencing any decisions affected by the Conflict of Interest, participating in the meetings in which those decisions arise and accessing the Confidential Information that affects this Conflict of Interest.

### **Political activity**

Any Person from the BATZ Group has the right to participate on an individual basis in political matters but their participation in politics will not be related to the Group.

No BATZ Group company may illegally fund candidates or political parties.

It is strictly prohibited to access funds or credits of public origin without the prior authorisation of the Financial Director of the BATZ Group.

## 5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT

---

### 5.4 RELATIONS WITH THIRD PARTIES

The BATZ Group uses criteria based on sustainability and social responsibility in its supplier selection processes, promoting the application of socially responsible practices throughout the organisation's supply chain. Everybody should apply criteria of quality, opportunity, cost and sustainability in the processes of selecting suppliers and customers, always acting in the interests of the BATZ Group. This obligation particularly affects those who have to make decisions on contracting supplies and services and those who decide the financial conditions of transactions with Clients.

The BATZ Group has a Supplier Sustainability Policy which contains the minimum requirements that suppliers of the BATZ Group must have with regard to corporate ethics, environmental protection, resource conservation, human rights and social standards, and states that compliance with this Code of Conduct is mandatory for all suppliers of the BATZ Group.

The Anti-Corruption Policy established in section 5.3 of this Code applies to all relationships with Suppliers,

Associated Persons and Clients. Consequently, no form of bribery or commission in relation to the Suppliers, Associated Persons or Clients may be given or received, equally, no kind of illegal advantage may be given to or received from people belonging to other companies who are responsible for the acquisition or contracting of goods or services, in order that, in breach of their duties and the legislation, they are influenced in the acquisition of services or products from the BATZ Group.

#### **Protection of free competition, market and consumer protection**

The BATZ Group undertakes not to interfere with free competition. The BATZ Group shall comply with the antitrust regulations, avoiding any conduct that constitutes or may constitute collusion, abuse or restriction of competition or price distortion.

No unfair or misleading advertising or advertising that denigrates the activity of the BATZ Group or its competitors or third parties shall be carried out.



## 5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT

---

### 5.5 INFORMATION MANAGEMENT

The information generated in the course of the professional activity of the People who make up the BATZ Group (technical, financial, commercial, legal, etc.) is the property of the BATZ Group and must therefore be protected. Any information that is not the property of the BATZ Group will be used in accordance with the legal provisions and commitments entered into by BATZ.

Non-public information held by the BATZ Group, whether in computerised or any other format, will, in general, be considered as Confidential Information. Consequently, the People who make up the BATZ Group must keep Confidential Information secret.

Every member of the BATZ Group is required to ensure the confidentiality of all Confidential Information that they handle while carrying out their activities, and comply with the same objectives of the BATZ Group's Information Security Policy and Regulations, including protecting the information against loss of availability, confidentiality and integrity, as well as properly communicating and handling any security concerns in relation to Confidential Information.

The People will, therefore, use the Confidential Information with the utmost caution and provide the necessary means to protect it, guaranteeing legal, contractual and regulatory compliance that applies to the security of the information, without its contents

being disclosed to third parties, unless expressly authorised by the Person or body of the BATZ Group that is competent in each case or unless required to do so by law, court order or an administrative authority.

When the Confidential Information belongs to third parties outside the BATZ Group, the People must comply with the confidentiality agreements that the BATZ Group has with such third parties.

In the event of termination of the employment or corporate relationship with the BATZ Group, the duty of confidentiality of the People will be maintained and the documents and storage medium or devices will be returned, as well as the information stored in their computer terminal related to the Confidential Information, without keeping any copies.

All information shared with the Public Administrations, Clients and any other third parties must be up to date, truthful, accurate, prepared by suitable personnel and must comply with current legislation.

Financial reports, accounts, balance sheets, management and strategic plans and other financial and strategic information, will be the responsibility of the BATZ Group Financial Director. Its publication or dissemination must be with the Financial Director's knowledge and approval, as set out in the BATZ Group's Financial Policy.

## 5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT

---

### 5.6. PROTECTION OF INDUSTRIAL – INTELLECTUAL PROPERTY. RESPONSIBLE USE OF THE COMPANY'S ASSETS AND RESOURCES

Industrial or intellectual property developed by Personnel of the BATZ Group is an asset that must be protected and used well.

The rights of exploitation of intellectual property, industrial property and business secrets generated by the People during the performance of their professional activity in the BATZ Group, will be owned by the Group.

The erroneous or reckless use of the assets and resources that are made available to People entails a serious risk for the BATZ Group and the People who comprise it. Consequently, the BATZ Group seeks to protect IT security and prohibits the use of unauthorised software. People in the BATZ Group must not install or use on the computer equipment of the BATZ Group any malicious software or any other

illegal software or application that is not covered by the appropriate official license or which carries the risk of introducing any element dangerous to the security of the computer systems of the BATZ Group or of third parties.

The BATZ Group provides its workers with the assets and resources necessary for the performance of their activity. The custody and management of their access passwords will be the responsibility of each Person, applying the Protocols developed in this respect. It is also the responsibility of the People who are part of the BATZ Group to make good use of the computerised resources received in order to avoid causing damage to external properties, such as disabling or deleting data, programmes or computer documents.

### 5.7. PROMOTING THE IMAGE AND REPUTATION OF THE BATZ GROUP

The BATZ Group has a solid reputation due to its extensive experience and to its reliable and loyal technical team who are committed to the Values, Ethical Principles and know-how that make up the culture of the BATZ Group.

All employees must take the utmost care in preserving the image and reputation of the BATZ Group in all its professional activities. They must also safeguard the respect for and the correct and appropriate use of the corporate image and reputation insofar as the Suppliers, Associates and Clients are concerned.

# BATZGROUP

Torrea, 2 - 48140 IGORRE  
(+34) 946 305 000  
[WWW.BATZ.COM](http://WWW.BATZ.COM)