



DANIMA ENGINEERING

ETHICAL CONDUCT

Introduction

Management at Danima Engineering is fully aware of the importance of the company's conduct, image, and reputation. For this reason, it has established management principles based on ethical and moral conduct guidelines across the company's various areas and processes.

These guidelines govern the criteria that all our employees, as well as any individuals acting on our behalf, must meet, alongside the established disciplinary measures to be imposed in the event of any violations.

For the company, compliance with internal procedures, instructions, and protocols—as well as applicable international, national, and local regulations—constitutes a fundamental objective that we must convey to our clients and other stakeholders.

Scope

These corporate action guidelines shall apply to all individuals belonging to Danima Engineering, or who represent it in any way, and shall be developed in conjunction with our **CSR (Corporate Social Responsibility) Principles**.

Whenever internal regulations, legal requirements, or business practices are unclear, employees shall rely on the sound judgment and guidance of company management.

Communication

The communication of these ethical conduct guidelines to all our stakeholders shall be governed by the basic principles of transparency and veracity. Consequently, they shall be available to all Danima Engineering personnel through the HR department and corporate management tools.

Externally, the conduct guidelines shall be communicated to clients, suppliers, subcontractors, and other stakeholders via the company's official website.

Any reasonable indication of deviation, infraction, or legal non-compliance regarding the guidelines detailed below shall be immediately reported to company management so that appropriate measures can be taken to rectify the situation.

Compliance with Regulations

Management, department managers, and area supervisors at Danima Engineering shall uphold strict compliance with internal codes of conduct and current regulations.

Each of them shall ensure that the following are maintained at all times:

- a) Ethical and moral standards in the attitudes and behaviors of employees.
- b) Professional, correct, and impartial conduct, consistently avoiding participation in activities that are contrary to established rules, illegal, or immoral.

Respect and Dignity

All employees forming part of our company shall be treated with dignity and respect.

A labor framework shall be promoted where equal opportunities extend to all personnel, ensuring non-discrimination on the grounds of sex, race, ideology, religion, or any other personal or social condition or circumstance.

Any form of harassment, action, or conduct that promotes an intimidating or offensive environment and violates the personal rights of professionals shall be entirely rejected.

Professionalism

It shall be ensured that our employees act in a professional manner. Likewise, it shall be ensured that the resources necessary to perform the activity, made available to personnel, are adequately protected and cared for, and used solely for the proper exercise of their functions.

Each employee shall commit to understanding the products they handle and the potential effects that improper use could have on their colleagues and facilities, as well as the processes involved in their professional work, paying special attention to aspects related to safety and the environment.

Employees shall actively collaborate in the maintenance of the facilities, focusing particularly on their workstation and the equipment used.

Daily tasks, such as maintaining order and cleanliness at the workstation and its surroundings, form part of individual responsibility; each person, guided by good judgment, shall ensure that these standards are maintained and potential improvements are identified.

Confidential Information

Employees may occasionally use external or client information or documents that are subject to certain levels of confidentiality.

For this reason, they shall be responsible for ensuring that the information handled under their control is treated in a faithful, accurate, and truthful manner, without disclosing it or making improper use of it.

Health and Wellbeing

For company management, preventing, improving, and maintaining the health and wellbeing of its employees is a priority objective, ensuring the conditions that allow them to properly perform their duties.

Specifically, we are aware that the consumption of tobacco, alcohol, and illicit drugs generates harmful and damaging effects on the safety and health of our workers.

These substances can interfere with productivity and efficiency, compromising both their professional performance and that of the company. For this reason, we adopt the following guidelines as our policy of action:

SMOKING

- Pursuant to current legislation and as internal policy, smoking is prohibited inside our facilities, as well as at our own and our clients' workplaces.

ALCOHOL

- The consumption, possession, distribution, and sale of alcoholic beverages within our facilities, or at those of clients and suppliers during working hours, are strictly prohibited. Non-compliance will result in the adoption of disciplinary measures in accordance with our internal regulations.
- In the case of external personnel (clients, suppliers, subcontractors, etc.), they shall be removed from the workplace immediately and reported to their company, and shall not be permitted to provide services to our company again.
- It is prohibited to report to the workplace, as well as to any other location where services are provided on behalf of the company, under the influence of alcohol.

DROGAS

- The consumption, possession, distribution, and sale of drugs within our facilities, or at those of our clients and suppliers during working hours, are strictly prohibited.
- It is prohibited to report to the workplace, as well as to any other location where services are provided on behalf of the company, under the influence of narcotic substances or drugs.

Management assumes the commitment to ensure that workplaces are managed in accordance with the aforementioned guidelines, and also recommends that all personnel ensure compliance therewith as a positive and healthy attitude in both the professional and personal spheres.

Health and Safety

Management has defined and undertaken the following commitments in this area, which it promotes and encourages as a policy across all its workplaces:

1. Employees shall report to work in optimal conditions and remain alert at all times, detecting and reporting any incidents that may affect both personal safety and the safety of equipment and facilities.
2. Employees shall ensure their own personal safety as well as that of their colleagues and any third parties present at the facility.
3. Employees shall respect the rules for handling suspended loads at all times, never remaining underneath them or within their operating radius.
4. Employees shall ensure that all auxiliary load-lifting equipment they use is in a good state of repair and appropriate for the work to be performed.
5. Employees shall avoid making improper physical efforts; to this end, they shall make use of available mechanical means and, when this is not possible, request the assistance of their colleagues.
6. Employees shall not deactivate or modify the safety devices of machinery, equipment, and tools made available to them by the company, and shall also ensure that no one else does so.

7. Employees undertake to always use eye and face personal protective equipment, regardless of the duration of the tasks to be performed.
8. Employees shall use fall prevention and protection means in all work where necessary and where their use has been established.
9. Employees shall use hearing protection equipment as a preventative measure when exposed to noise.
10. Employees shall contribute to the proper order and cleanliness of the facilities and workstation, properly segregating the waste they generate into their corresponding containers and thus complying with the obligations assigned to the workstation and the environmental surroundings where it is carried out.
11. Employees shall respect existing safety rules and signage in the facilities, and shall correctly use the PPE (Personal Protective Equipment) specific to each workstation.

In the event of any doubt regarding the points described above, employees may consult their direct supervisors, the Health and Safety technicians at their workplace, or employee representatives.

Road Safety

We are a company committed to road traffic safety, aiming for the total reduction of accident rates associated with this cause. To this end, we have established a series of principles whose compliance shall be the responsibility of all company employees, contractors, and subcontractors.

All of them shall participate in the activities programmed and developed by the company, with the objective of reducing the probability of accidents occurring that may affect the physical, mental, and social integrity not only of internal and external personnel, but also of the community and the environment.

- We shall promote a culture of road safety among all road users (employees, contractors, and subcontractors), fostering safe mobility initiatives and understanding road safety within the workplace as an aspect of continuous improvement
- We shall foster awareness among our personnel, contractors, and subcontractors through strategies aimed at guiding them toward the prevention of traffic accidents, such as obeying traffic signs and adopting proactive defensive driving behaviors, while providing the necessary information to ensure safe travel.
- We shall promote compliance with legal requirements regarding occupational road safety, ensuring particular respect for current traffic regulations, road safety, and occupational health and safety legislation applicable at any given time.
- We shall allocate the financial, human, and technical resources necessary to fulfill the commitments of this policy.
- We shall include road safety within occupational risk prevention, ensuring that every employee, contractor, and subcontractor assumes the obligation to comply with the requirements and rules established by the company.
- We shall monitor the responsibility of our personnel and contractors in carrying out preventive and corrective maintenance on vehicles provided for the performance of their work, with the aim of maintaining optimal vehicle performance.
- We shall consider the continuous improvement of road safety as a fundamental element in the management of work processes.
- We shall maintain and foster direct and fluid contact with stakeholders, ensuring communication on the matter and collaborating with organizations and entities in the sector to promote the exchange of knowledge and best practices.

Violations

Any person within the company who detects a breach of the rules of conduct or a violation of current legal requirements shall have the obligation to immediately report it to their direct supervisor, who in turn shall forward it to company management.

An investigation team shall be formed, comprising Management, the employee's direct supervisor, and the manager of the affected area. This team shall examine the facts and, upon verifying the detected breach, shall identify the type of violation in accordance with applicable regulations and the sectoral collective bargaining agreement.

NOTES:

- 1) Under no circumstances shall the penalty consist of a reduction in vacation duration, any other minimization of the employee's rest rights, or a fine on earnings.
- 2) In the case of penalties for serious and very serious misconduct, written notice to the employee shall be required, clearly stating the date and the facts that motivated it. Management shall notify the legal employee representatives of any penalties imposed, in accordance with current legislation.

Management may discipline employees in accordance with the classification of offenses and penalties established in legal provisions and the applicable collective bargaining agreement.

As a general rule, offenses are classified according to their importance, significance, and intent into:

- a. Minor offenses
- b. Serious offenses
- c. Very serious offenses

Below is **ANNEX I**, which sets out the indicative classification of offenses and the disciplinary measures to be adopted in each case in accordance with the applicable labor framework.

ANNEX I

Classification of Offenses

In Spain, the company's disciplinary authority regarding employment breaches is based on the following foundations:

- Article 58 of Royal Legislative Decree 2/2015, approving the revised text of the Workers' Statute Law.
- The Collective Bargaining Agreement for the Metal Industry of the Principality of Asturias applicable at any given time.
- Article 29 of Law 31/1995 of November 8, on the Prevention of Occupational Risks.

Especially in relation to the third precept, it is recalled that:

1. It is the duty of every worker to ensure, in accordance with their possibilities and through the fulfillment of the preventive measures adopted in each case, their own safety and health at work, as well as that of other persons who may be affected by their professional activity due to their acts and omissions at work, in accordance with their training and the employer's instructions.
2. Workers, in accordance with their training and following the employer's instructions, shall in particular:
 - Properly use, in accordance with their nature and foreseeable risks, machines, apparatus, tools, dangerous substances, transport equipment, and, in general, any other means used to carry out their activity.
 - Correctly use the means and protective equipment provided by the employer, in accordance with the instructions received from them.
 - Not put out of operation and correctly use the existing safety devices or those installed in the means related to their activity or in the workplaces where it takes place.
 - Immediately inform their direct hierarchical superior, the workers designated to perform protection and prevention activities, or, where applicable, the prevention service, of any situation which, in their view, reasonably entails a risk to the safety and health of workers.
 - Contribute to the compliance with the obligations established by the competent authority in order to protect the safety and health of workers at work.
 - Cooperate with the employer to enable them to guarantee working conditions that are safe and do not pose risks to the safety and health of workers.

Minor Offenses

They shall prescribe within 10 days from the date on which the company becomes aware of their commission and, in any case, within 6 months of having been committed. The maximum penalties that may be imposed on workers who incur minor offenses shall be as follows:

- **Verbal reprimand.**
- **Written reprimand.**

List of Minor Offenses

1. From one to three unjustified instances of lateness within a one-month period.
2. Failure to notify in advance or, where applicable, within 24 hours following the absence—except in cases of force majeure—the reason for work absenteeism, unless the impossibility of doing so is proven.
3. Abandonment of duty without justified cause, even for a brief period. If this results in significant harm to the company or causes an accident to co-workers, this offense may be considered serious or very serious, depending on the circumstances.
4. Minor oversights or carelessness in the maintenance of materials.
5. Lack of personal hygiene or cleanliness.
6. Failure to attend to the public with due correctness and diligence.
7. Failure to notify the company of changes in residence or home address.
8. Engaging in violent arguments with co-workers during working hours.
9. Being absent from work for one day a month without justified cause.
10. Non-use or improper use of Personal Protective Equipment deemed mandatory in the risk assessment for the workstation, provided it concerns trivial and tolerable risks.
11. Loss or deterioration of Personal Protective Equipment due to improper use.
12. Use of Personal Protective Equipment other than those approved by the company, and intentional modification thereof in such a way as to alter their characteristics.
13. Contributing to a lack of order and cleanliness.
14. Making graffiti on tools, machinery, equipment, and other installations, including PPE.
15. Failure to manage the waste generated within the facilities in accordance with established requirements.
16. Failure to attend or arriving late to the 5-minute safety talks.
17. Failure to inform visitors of the risks they will be exposed to, the rules they must comply with, and emergency procedures.
18. Permitting visitors to access the plant without the established Personal Protective Equipment and failing to accompany them at all times during the visit.
19. Obstructing and/or failing to collaborate in the conduct of safety inspections, environmental inspections, and Preventive Observations.
20. Failure to report in writing any type of accident or incident suffered during the working day, even if minor.
21. Eating outside the areas designated for that purpose.
22. Using materials or products previously identified or marked as rejected.
23. Failing to heed or refusing to carry out the instructions of manufacturing process control inspectors or designated persons.
24. Breaching procedures, work instructions, guidelines, and any other minor legal or regulatory requirement.

Serious Offenses

Serious offenses shall prescribe within 20 days from the date on which the company becomes aware of their commission and, in any case, within six months of having been committed. The maximum penalties that may be imposed on those who incur serious offenses shall be as follows:

- **Written reprimand.**
- **Suspension of employment and salary from 2 to 20 days.**

List of Serious Offenses

1. More than three unjustified instances of lateness in reporting to work committed within a 30-day period.
2. Absence from work for one to three days during a 30-day period without justified cause. A single absence shall suffice when the employee was required to relieve a co-worker or when the absence causes significant harm to the company.
3. Failure to report with due promptness any changes in family circumstances that may affect Social Security. Falsifying such data shall be considered a very serious offense.
4. Engaging in games or gambling during working hours.
5. Insubordination to superiors in any work-related matter, including resistance and obstruction to new methods of work rationalization. If it involves a manifest breach of discipline or results in notable harm to the company, it may be considered a very serious offense.
6. Simulating the presence of another employee at work by signing or clocking in/out for them.
7. Negligence or apathy at work affecting the proper progress thereof.
8. Non-use of mandatory safety garments and devices.
9. Performing private work during working hours without proper authorization, as well as using company tools for personal use.
10. Non-use or improper use of Personal Protective Equipment deemed mandatory in the risk assessment for the workstation, provided it concerns moderate risks.
11. Repeated loss or deterioration of Personal Protective Equipment due to improper use.
12. Promoting a lack of order and cleanliness by contributing to disorder and dirtiness not only in the work areas but also in common areas (dining hall, locker rooms, restrooms, etc.).
13. Abandoning work without prior notice, leaving machinery, equipment, and/or installations running unattended, provided it involves a serious incident due to recklessness or negligence, even if it does not pose a danger to persons and/or work equipment.
14. Bypassing or disabling safety devices of machinery, equipment, and installations on a voluntary basis, even if it does not pose a danger to persons and/or work equipment.
15. Using emergency equipment and fire extinguishing means without justified cause.
16. General non-compliance with established safety rules and safe practices, provided it entails a risk of accident for the worker.
17. Disobeying a superior when warned about the use of mandatory PPE or compliance with an established safety rule for the performance of an activity, or failing to report a detected risk situation to a superior when it entails a risk of accident or danger of breakdown for the installations.
18. Permitting a worker to perform a series of jobs without having received the corresponding training and information on prevention regarding the risks to which they will be exposed, the personal protective equipment they must use, as well as established safety rules and safe practices.
19. Using machinery, equipment, and installations for which the corresponding training and operation authorization are not held, especially overhead cranes, elevating platforms, and forklifts.
20. Simultaneous operation of two overhead cranes by a single worker.
21. Walking or passing underneath suspended loads.

22. Using earphones to listen to the radio, music, and/or talk on the phone during working hours.
23. Obstructing and/or failing to collaborate in accident investigations in order to clarify the facts and enable the adoption of corrective/preventive measures to prevent their recurrence, or issuing work orders that go against established safety rules and safe practices.
24. Recidivism in a minor offense, even if of a different nature, within a quarter, provided that a penalty other than a verbal reprimand has been imposed.

Very Serious Offenses

Very serious offenses shall prescribe within 60 days from the date on which the company becomes aware of their commission and, in any case, within six months of having been committed. The maximum penalties that may be imposed on those who incur VERY SERIOUS offenses shall be as follows:

- **Written reprimand.**
- **Suspension of employment and salary from 20 to 60 days.**
- **Dismissal.**

List of Very Serious Offenses

1. More than 10 unjustified instances of lateness committed within a six-month period, or twenty within a year.
2. Unjustified absences from work for three consecutive days or five alternating days within a one-month period.
3. Fraud, disloyalty, or breach of trust in entrusted tasks, and theft or robbery committed against co-workers, the company, or any other person within the company's premises or during work in any other location.
4. Crimes of robbery, fraud, or embezzlement committed outside the company, or any other type of common crime that may imply a loss of trust toward the perpetrator on the part of the company, unless they have been acquitted.
5. Simulation of illness or accident. It shall always be understood that an offense exists when an employee on sick leave for such reasons performs work of any kind on their own account or for others. This section shall also include any manipulation carried out to prolong sick leave due to an occupational accident or illness.
6. The continued and habitual lack of personal hygiene and cleanliness of such a nature as to produce justified complaints from co-workers.
7. Intoxication and the state resulting from drug consumption during work.
8. Violating the secrecy of correspondence or reserved documents of the company, or disclosing data of mandatory confidentiality to outsiders.
9. Engaging in activities that imply unfair competition against the company.
10. Physical or verbal abuse, abuse of authority, or a serious lack of respect and consideration toward superiors or their family members, as well as toward co-workers and subordinates.
11. Causing serious accidents due to recklessness or negligence.
12. Abandoning a job in a position of responsibility without prior notice.
13. Unjustified decrease in work performance.
14. Recidivism in a serious offense, even if of a different nature, provided it is committed within a quarter and has been sanctioned.
15. Non-use or improper use of Personal Protective Equipment deemed mandatory in the risk assessment for the workstation, provided it concerns significant risks.

16. Abandoning work without prior notice, leaving machinery, equipment, and/or installations running unattended, provided it involves serious accidents due to recklessness or negligence that pose a danger to third parties and/or work equipment.
17. Bypassing or disabling safety devices of machinery, equipment, and installations on a voluntary basis when they pose a danger to persons and/or work equipment.
18. General non-compliance with established safety rules and safe practices, provided it entails a risk of accident to third parties or danger of breakdown for the installations.
19. Failing to previously clear a passageway through which a suspended load is to pass, and carrying out the transport of said load over third parties without halting the maneuver.
20. Permitting work to be performed by external companies without the correct application of the Business Activity Coordination Regulations.
21. Making available to workers machinery, equipment, and installations that do not comply with the minimum safety requirements established for them.