



**Pekos**  
Group

**CODE OF CONDUCT**  
PEKOS EUROPE GROUP, S.L.U.

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## 1. Introduction

### 1.1 Purpose of the Code of Conduct

The PEKOS GROUP Code of Conduct is a reflection of our commitment to integrity, business ethics and excellence in all our operations. It has been created to guide and orientate the actions and behaviours of our employees, managers and collaborators.

The fundamental objectives of this Code of Conduct are to promote integrity and business ethics; to foster a respectful and diverse work environment; to ensure legal and ethical compliance; and to protect the reputation of Group companies.

### 1.2 Scope and applicability

This PEKOS GROUP Code of Conduct is applicable to all the companies that form part of the Group, which are the following: Pekos Europe Group SL, Pekos Valves SL, Inductec Soluciones Técnicas SL, Válvulas Nacional SA, Pekos Fabricación SL, Pekos Mecanización SL y Quintanarraya Real Estate SL.

Its scope and applicability extends to any person who may be understood to represent or be involved in the activities of any of the aforementioned Group companies, including full and part-time employees, contractors, consultants and suppliers.

I. Employees: This code is of compulsory application to all PEKOS GROUP employees, regardless of their hierarchical level or functional area. Every employee should familiarise themselves with its contents and comply with its principles and guidelines in all their work activities.

II. Management and Leaders: Company leaders and management have an additional responsibility to be examples of business ethics and integrity. They should ensure that their teams understand and follow the Code of Conduct and should actively promote compliance. The company's senior management is committed to complying with and enforcing all applicable rules and to promoting ethical values and good behaviour.

III. External Collaborators: External collaborators, including contractors, consultants and suppliers who maintain business relationships with PEKOS GROUP, must respect the principles set out in this code while they are involved in activities related to our company.

PEKOS GROUP operates in a global environment, and this Code of Conduct applies to all countries and jurisdictions in which we do business. Regardless of geographic location, the ethical and behavioural standards set forth herein are standardised and do not admit of exceptions.

This Code remains in force for the duration of the employment or business relationship with the PEKOS GROUP and continues to apply after its termination with regard to any action or omission observed during that relationship.

## 2. Business Values and Principles

The PEKOS GROUP Code of Conduct is based on a series of fundamental values that define our corporate identity. These values guide our daily actions and decisions at all levels of the company.

I. Integrity: Integrity is the cornerstone of our company. We are committed to acting with honesty, transparency and sincerity in all our business and personal interactions.

II. Respect: Respect for all individuals is essential at PEKOS GROUP. We treat our colleagues, customers, business partners and the wider community with dignity and consideration. We value differences and promote an inclusive and respectful environment.

III. Responsibility: We take responsibility for our actions and decisions. We understand that our choices can have a significant impact on the company and society at large. We always act consciously and ethically.

IV. Excellence: We seek excellence in everything we do. We strive to exceed expectations and continuously improve our processes and results. We seek innovation and constant improvement in the pursuit of perfection.

V. Teamwork: We recognise the value of teamwork and collaboration. We encourage open communication and collaboration between departments and colleagues to achieve our common goals.

VI. Social and Environmental Responsibility: We are committed to social and environmental responsibility. We seek to make a positive contribution to the community and minimise our impact on the environment. We comply with all applicable laws and regulations in these areas.

These values are the essence of our identity at PEKOS GROUP and form an integral part of our Code of Conduct. We expect every team member to internalise them and reflect them in their daily work, thus ensuring the long-term success of our organisation and strengthening our reputation and credibility in the marketplace. We all play a crucial role in upholding and promoting these principles of ethics and integrity

### 3. Compliance with Laws and Regulations

#### 3.1 Legal and ethical compliance

At PEKOS GROUP, legal compliance and adherence to the highest ethical standards are the cornerstones behind all our operations and business relationships.

I. Legal Compliance: We are committed to complying with all applicable laws and regulations in all jurisdictions in which we operate. This includes, but is not limited to, laws relating to competition, taxation, the environment, data privacy, workplace safety and labour rights.

II. Ethical Behaviour: Beyond legal compliance, we promote ethical behaviour in all our business activities. We expect every employee and partner to act with integrity, honesty and ethics in all interactions, both inside and outside the company.

III. Avoidance of Conflicts of Interest: We recognise the importance of avoiding conflicts of interest that may compromise our integrity and objectivity in decision-making.

We expect all employees to disclose and manage any potential conflicts of interest in a transparent manner.

#### 3.2 Preventing Corruption and Bribery

At PEKOS GROUP, we are fully committed to the prevention of corruption and bribery in all our operations, maintaining integrity and transparency as key foundations to sustain the trust of our employees, customers, business partners and society.

I. "Zero Tolerance" for Corruption: PEKOS GROUP adopts a zero tolerance policy towards corruption in all its forms. We do not engage in or permit corrupt practices in any part of our operations.

II. Legal Compliance: We comply with all applicable anti-corruption laws and regulations in all jurisdictions in which we operate.

III. Prohibition of Bribery: We strictly prohibit bribery in any form (whether offering, giving, soliciting or receiving bribes). The use of company funds to bribe public officials, customers or anyone else who may be involved will not be tolerated.

IV. Third Party Due Diligence: We observe thorough due diligence to ensure that our business partners, contractors and suppliers are not involved in corrupt activities. We expect everyone who does business with us to share our ethical values.

V. Gifts and Hospitality: While we recognise that gifts and hospitality are a legitimate part of business relationships, they must be in accordance with applicable laws and regulations and may not be used to gain undue advantage or influence business decisions.

VII. Training and Awareness: We provide regular training to our employees on the legal and ethical implications of corruption and bribery. We want everyone in our organisation to understand and actively avoid these practices.

### 3.3 Confidentiality and Protection of Information

At PEKOS GROUP we recognise the vital importance of confidentiality and the protection of information in the management of our business. We understand that they are fundamental to maintaining the trust of customers and business partners.

I. Confidential Information: Confidential information includes, but is not limited to, financial, strategic, technical, customer, employee and any other information that is not in the public domain. All employees have an obligation to treat this information with the utmost confidentiality.

II. Limited Access: Confidential information should be shared only with those employees or collaborators who need access to it in the performance of their job. Each employee must protect their access to the information and not share it with unauthorised persons.

III. Appropriate Use: Confidential information must be used only for legitimate business purposes. Use of confidential information for personal gain or for illegitimate or unauthorised purposes is not permitted.

IV. Secure Storage and Transmission: Confidential information must be securely stored and protected from unauthorised access. When it is necessary to transmit confidential information, secure methods of communication and encryption must be used.

V. Legal Compliance: We comply with all laws and regulations relating to data protection and data privacy.

VI. Privacy Policy: We maintain a privacy policy that includes a detailed protocol on how we collect, use and protect the personal information of our employees, customers and other stakeholders. This protocol is available to all employees and stakeholders.

VII. Individual Responsibility: Each employee is responsible for the protection of confidential information to which they have access. This includes the obligation to report any security incident or potential breach of confidentiality.

At PEKOS GROUP, we are dedicated to fostering a diverse, respectful, and safe work environment where equal opportunities are actively promoted. We strive to eliminate all forms of discrimination, ensuring that all employees and managers are valued and treated fairly.

I. Equal Opportunities: All employees, regardless of their origin, gender, sexual orientation, race, ethnicity, religion, disability, marital status, age or other personal characteristics, are entitled to equal opportunities in all phases of employment, including hiring, training, promotion and career development.

II. Discrimination Prohibited: PEKOS GROUP strictly prohibits any form of discrimination in the workplace.

III. Harassment and Bullying: We do not tolerate harassment or bullying under any circumstances. All employees have the right to work in an environment free from bullying and must report any incidents of harassment to designated company resources.

IV. Inclusive Policies: We encourage the adoption of inclusive policies and practices that reflect our commitment to equal opportunities. These policies apply to all areas of human resources, including recruitment, promotion, compensation and training.

V. Reasonable Accommodation: We recognise the importance of making reasonable accommodations to accommodate the needs of employees with disabilities. We work proactively to provide support and ensure that all employees can perform their jobs effectively.

## 4. Environmental Responsibility and Sustainability

At PEKOS GROUP, we are firmly committed to the conservation of natural resources and the protection of the environment. We understand the relevance of using these resources responsibly and believe that this conservation is a shared responsibility essential to our sustainable success.

I. Resource Conservation: We actively seek to reduce our environmental footprint through the conservation and efficient use of natural resources such as water, energy and materials. Every employee has a responsibility to contribute to this effort.

II. Energy Efficiency: We promote energy efficiency practices in our facilities and operations. This includes adopting technologies and practices that reduce energy consumption and greenhouse gas emissions.

III. Waste Management: We strive to minimise waste generation and promote responsible waste management. We encourage recycling and waste reduction in all our activities. When we work with hazardous materials or substances, we do so responsibly and comply with all regulations related to the safe management of these materials. We implement safe storage and disposal practices.

IV. Use of Renewable Resources: Where possible and feasible, we use renewable energy sources and sustainable materials in our operations. We seek opportunities to invest in solutions that contribute to environmental protection.

V. Environmental Compliance: We comply with all applicable environmental laws and regulations in all jurisdictions in which we operate.

VI. Education and Awareness: We provide education and awareness to our employees on the importance of natural resource conservation and sustainability.

VII. Individual Responsibility: Each employee has a responsibility to use natural resources responsibly in their daily work.

VIII. Measurement and Continuous Improvement: We regularly measure and evaluate our environmental performance and look for opportunities to improve our sustainability practices.

IX. Corporate Social Responsibility: We actively participate in corporate social responsibility initiatives related to environmental conservation and sustainability.

## 5. Sanctions and Consequences

At PEKOS GROUP, compliance with our Code of Conduct is fundamental to preserving the integrity and reputation of our organisation. We expect all employees and collaborators to follow the highest ethical and legal standards. To ensure this compliance, we have established policies for sanctions and consequences for violations.

I. Individual Responsibility: Each employee and contributor is accountable for their behaviour and actions. If an employee is found to have violated the Code of Conduct, they will be held accountable for their actions.

II. Complaints Channel: We foster an environment in which employees can report any regulatory or ethical breaches of the Code of Conduct in a confidential manner without fear of retaliation.

III. Investigation of Violations: Any actual or suspected violation of the Code of Conduct will be investigated in a full, fair and confidential manner. The investigation will be conducted by competent personnel and appropriate procedures will be followed.

IV. Disciplinary Sanctions: Disciplinary sanctions for violations of the Code of Conduct may vary in severity depending on the nature and extent of the violation. Sanctions may include, but are not limited to, warnings, suspensions, corrective actions, demotion and, in severe cases, termination of employment.

V. Legal Compliance: In addition to internal sanctions, violations of the Code of Conduct may result in legal action under applicable laws and regulations. PEKOS GROUP will fully cooperate with the competent authorities in such cases.

VI. Recovery of Damages: In cases where a violation of the Code of Conduct results in financial or reputational damage to the company or third parties, damage recovery measures may be sought.

VII. Fair Process and Due Process: PEKOS GROUP is committed to ensuring a fair process for any employee or collaborator who is the subject of an investigation and possible sanction. The rights of defence will be respected, and opportunities will be provided to present evidence and arguments in their favour.

VIII. False Allegations: The making of false or malicious allegations against another employee or collaborator may result in disciplinary sanctions.



## 6. Review and Update of the Code of Conduct

At PEKOS GROUP, we recognise that the business environment and circumstances change over time. That is why we are committed to regularly reviewing and updating our Code of Conduct to ensure that it remains relevant, effective and aligned with the highest ethical and legal standards.

I. Ongoing Assessment: We conduct periodic assessments of our Code of Conduct to ensure that it continues to meet its original objectives and purposes. These assessments include reviewing current policies, procedures and practices.

II. Changes in Legislation: We closely monitor laws and regulations affecting our industry and operations. Whenever necessary, we update the Code of Conduct to reflect changes in applicable legislation.

III. Continuous improvement: We value the suggestions of our employees, partners and external third parties. We recognise the value of such feedback in identifying areas where the Code of Conduct can be improved and strengthened.

IV. Training and Awareness: We provide regular training and awareness-raising to our employees on any major changes or updates to the Code of Conduct.

V. Communication of Changes: We effectively communicate any changes or updates to the Code of Conduct to all relevant employees and partners. This is done in a clear and accessible manner to ensure understanding of the new policies and procedures.

VI. Senior Management Responsibility: The senior management of PEKOS GROUP is responsible for overseeing the process of reviewing and updating the Code of Conduct and ensuring that the necessary changes are implemented.