
CODE OF CONDUCT

REVISED VERSION – V1.1

In accordance with UNE 19601 · ISO 37301 · Law 2/2023 · Art. 31 bis of the Criminal Code

Legal basis: Art. 31 bis of the Criminal Code · Art. 286 bis/ter of the Criminal Code · UNE 19601 · ISO 37301 · Law 2/2023

1. INTRODUCTION AND PURPOSE

The VISOBATH GROUP, comprising VISOBATH, S.L. (parent company), MODELSUR, S.L., TERMUCOR, S.L., CERLUR, S.L., PROVENZAL DEL SUR, S.L., and ACABADOS LUCENA, S.L., has implemented a Compliance Management System in accordance with the UNE 19601 and ISO 37301 standards, with the aim of preventing the commission of crimes within the organization and protecting all members of the Group.

In line with this commitment, GRUPO VISOBATH requires all its suppliers, subcontractors, and external partners to comply with the ethical, labor, environmental, and anti-corruption principles set forth in this Code of Conduct.

This Code applies to all GRUPO VISOBATH suppliers and their subcontractors.

2. HUMAN RIGHTS AND LABOR STANDARDS

All GRUPO VISOBATH suppliers must respect the principles of the Universal Declaration of Human Rights and international labor conventions. In particular, the supplier agrees to:

- Ensure equal opportunities and non-discrimination on the basis of ethnic origin, sex, gender identity, sexual orientation, disability, nationality, religion, age, or ideology.
- Prohibit child labor, complying with all applicable laws regarding the minimum working age.
- Prohibit forced labor or any form of coercion.
- Respect freedom of association and the right to collective bargaining.
- Provide safe and hygienic working conditions in accordance with applicable occupational safety and health regulations.
- Pay fair wages that are equal to or higher than the legally established minimum wage.
- Avoid imposing excessive working hours and promote a healthy work-life balance.
- Not subject any employee to physical or verbal abuse, or any other form of abuse, intimidation, or inhumane treatment.
- Comply with Regulation (EU) 2016/679 (GDPR) and applicable regulations regarding the protection of personal data.

3. ENVIRONMENT AND SUSTAINABILITY

VISOBATH GROUP expects its suppliers to be actively committed to environmental sustainability. The supplier agrees to:

- Minimize the use of substances hazardous to health and the environment, and manage hazardous waste responsibly.
- Use materials and resources efficiently, giving preference to reusable, recycled, and recyclable materials.
- Source materials from sustainable and local sources whenever possible.
- Use energy efficiently and minimize emissions harmful to the environment.
- Comply with all applicable environmental laws in every country in which they operate.

4. ANTI-CORRUPTION AND COMPLIANCE

VISOBATH GROUP maintains a zero-tolerance policy toward any form of corruption, bribery, or fraudulent conduct. In accordance with Article 286 bis of the Penal Code, corruption in the private sector may result in prison sentences of up to four years. The supplier agrees to:

- Refrain from any form of corruption, including extortion, bribery, facilitation payments, and any other undue advantage.

- Promote transparency in the conduct of its activities and in its business dealings with GRUPO VISOBATH.
- Comply with all tax and fiscal obligations established by law.
- Comply with its audit obligations and maintain accounting records in accordance with applicable law.
- Comply with anti-money laundering laws (Law 10/2010).
- Implement internal control measures to prevent the commission of crimes within your organization.
- Respect the principles of confidentiality regarding all GRUPO VISOBATH information to which you have access within the framework of the business relationship.
- Do not offer, promise, or give gifts, favors, or other benefits to GRUPO VISOBATH employees that could influence business decisions.

5. ETHICS HOTLINE AND REPORTING OF VIOLATIONS

GRUPO VISOBATH has a mandatory Ethics Channel, established in accordance with Law 2/2023 of February 20, which regulates the protection of individuals who report regulatory violations.

If a supplier identifies any irregular conduct, breach of this Code, or situation that may pose a legal risk to GRUPO VISOBATH, they must report it to the Compliance Officer:

Isabel Muñoz Moreno – Compliance Officer –
LEGANTIAisabel.mm@legantia.com | Tel. 692 062 443

All communications are strictly confidential and protected by Law 2/2023.

6. CONSEQUENCES OF NON-COMPLIANCE

Any failure by the supplier to comply with the principles set forth in this Code may result in the following consequences for the contractual relationship with GRUPO VISOBATH:

- A formal warning and a requirement to take immediate corrective measures.
- Precautionary suspension of the business relationship for the time necessary to investigate the breach.
- Disqualification as an approved supplier of GRUPO VISOBATH.
- Termination of the contract for material breach, without prejudice to any applicable legal or administrative actions.

GRUPO VISOBATH reserves the right to request audits to verify its suppliers' compliance with this Code.

7. APPLICABLE LAW

VISOBATH GROUP suppliers must comply with the applicable laws in each country where they operate. In particular, they must comply with:

- The Workers' Statute (Royal Legislative Decree 2/2015) and applicable Spanish labor regulations.
- Law 31/1995 on Occupational Risk Prevention and its implementing regulations.
- Regulation (EU) 2016/679 (GDPR) and Organic Law 3/2018 (LOPDGDD).
- Law 10/2010 on the Prevention of Money Laundering and Terrorist Financing.
- Law 2/2023, of February 20, regulating the protection of whistleblowers.
- Articles 286-bis, 286-ter, and 31-bis of the Criminal Code.

- All environmental, tax, and sector-specific regulations applicable to its activities.

8. ACCEPTANCE AND SIGNATURE

By accepting and signing this Supplier Code of Conduct, the supplier agrees to comply with and enforce all the principles set forth herein. Furthermore, the supplier agrees to actively promote these principles among its direct suppliers, including equivalent clauses in its contractual relationships and conducting a proportionate risk assessment in its immediate supply chain, in accordance with internationally recognized best practices for due diligence.

First and Last Name:

Title:

Company / Business Name:

Tax ID:

Date:

Signature:
