
CODE OF CONDUCT

REVISED VERSION – V1.1

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

Legal basis: Article 31 bis of the Criminal Code · Article 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 offences within the organisation 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, labour, environmental and anti-corruption principles set out in this Code of Conduct.

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

2. HUMAN RIGHTS AND LABOUR STANDARDS

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

- Ensure equal opportunities and non-discrimination on the grounds of ethnic origin, sex, gender identity, sexual orientation, disability, nationality, religion, age or ideology.
- Prohibit child labour, complying with all applicable legislation regarding the minimum working age.
- Prohibit forced labour or any form of coercion.
- Respect freedom of association and the right to collective bargaining.
- To provide safe and hygienic working conditions, in accordance with the applicable regulations on occupational health and safety.
- Pay fair wages, equal to or higher than the statutory 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 on the protection of personal data.

3. ENVIRONMENT AND SUSTAINABILITY

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

- Minimise 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 wherever possible.
- Use energy efficiently and minimise emissions harmful to the environment.
- To comply with all applicable environmental legislation in every country in which they operate.

4. ANTI-CORRUPTION AND COMPLIANCE

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

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

- Promote transparency in the conduct of their business and in their commercial dealings with GRUPO VISOBATH.
- Comply with all tax and fiscal obligations established by law.
- To comply with its audit obligations and maintain accounting records in accordance with applicable legislation.
- Comply with legislation on the prevention of money laundering (Law 10/2010).
- Implement internal control measures to prevent the commission of offences within your organisation.
- Respect the principles of confidentiality regarding all GRUPO VISOBATH information to which they have access within the framework of the commercial relationship.
- Not to offer, promise or grant gifts, hospitality or other benefits to GRUPO VISOBATH employees that may influence business decisions.

5. ETHICS CHANNEL AND REPORTING OF BREACHES

GRUPO VISOBATH has a mandatory Ethics Channel, established in accordance with Law 2/2023 of 20 February, regulating the protection of persons who report regulatory breaches.

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 out 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 action.
- Provisional suspension of the commercial relationship for the time necessary to investigate the breach.
- Disqualification as an approved supplier of GRUPO VISOBATH.
- Termination of the contract for serious breach, without prejudice to any legal or administrative actions that may be applicable.

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

7. APPLICABLE LEGISLATION

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

- The Workers' Statute (Royal Legislative Decree 2/2015) and applicable Spanish labour regulations.
- Law 31/1995 on the Prevention of Occupational Risks 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 20 February on the protection of persons reporting regulatory breaches.
- Sections 286 bis, 286 ter and 31 bis of the Criminal Code.

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

8. ACCEPTANCE AND SIGNATURE

By accepting and signing this Supplier Code of Conduct, the supplier undertakes to comply with and enforce all the principles set out herein. Furthermore, the supplier undertakes to actively promote these principles amongst its direct suppliers, including equivalent clauses in its contractual relationships and carrying out a proportionate risk assessment within its immediate supply chain, in accordance with internationally recognised best practices in due diligence.

**First name and
surname:**

Position:

**Company / Business
name:**

VAT number:

Date:

Signature:
