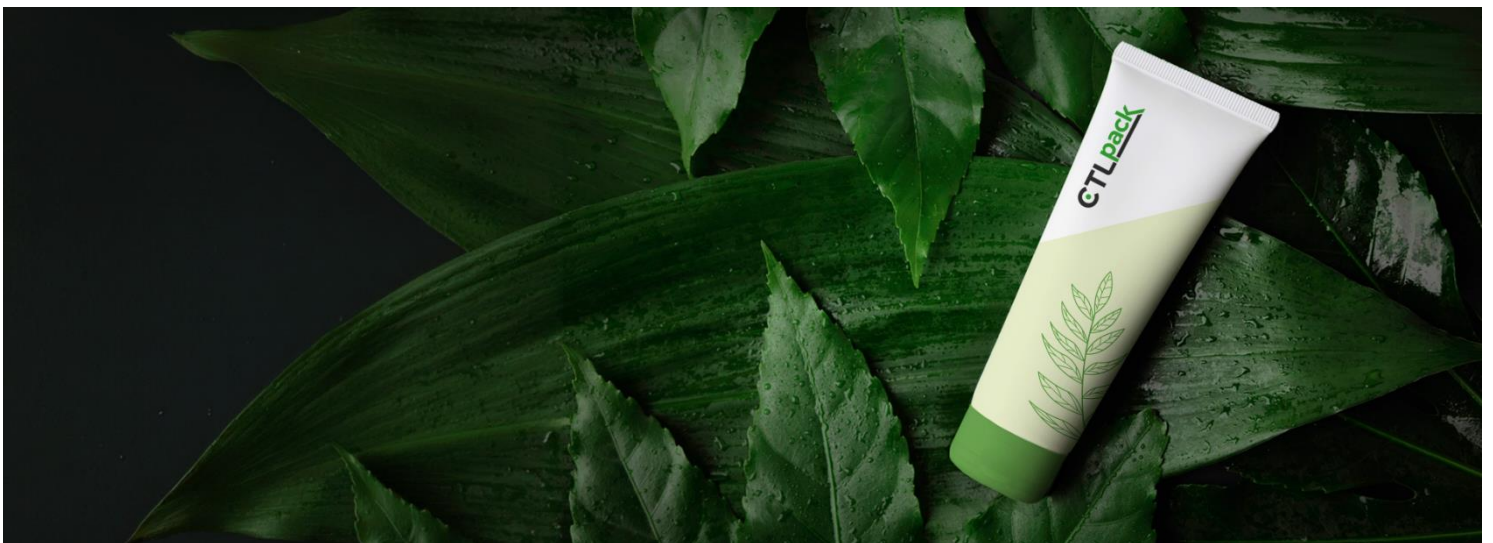




# CODE OF **ETHICS** AND **CONDUCT**

**CTLpack Group**



M.00.00012  
Version 03

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## Introduction

The CTLpack Group is committed to integrity and honesty towards all stakeholders in our environment, including our people, customers, suppliers and shareholders, so that our Code of Ethics and Conduct is the inspiration that teaches us how to act in all situations in the life of the company.

By means of this document, we are going to express our guide of conduct as a company, so that we are easily recognisable to our stakeholders that CTLpack Group is an entity with a spirit of fair and honest behaviour.

In this context, we encourage the people who work in and with our company to make this Code of Ethics and Conduct a guide of conduct that will inspire us in the decisions and behaviours that we will develop in our professional life.

The CTLpack Group expresses its willingness and interest to continue working and promoting Corporate Social Responsibility policies and actions, collaborating with our Stakeholders in order to continue advancing and contributing within our capabilities to the dissemination and implementation of the principles of the United Nations Declaration and the Sustainable Development Goals.

- **Human Rights:** We support and respect the protection of human rights and do not become complicit in human rights abuses.

- **Labour Standards:** We support freedom of association and collective bargaining, the elimination of all forms of forced and compulsory labour, the elimination of child labour and the abolition of discriminatory practices.

- **Environment:** We maintain a precautionary approach that favours the environment, encourage initiatives that promote greater environmental responsibility and favour the development and diffusion of sustainable technologies.

- **Fight against corruption** Work against corruption in all its forms.

We measure our CSR progress in order to meet market and best practice requirements for the challenges set by the SDGs in which CTLpack impacts on the following 15 SDGs.



<https://www.unglobalcompact.org/what-is-gc/participants/41671#cop>

Based on these commitments, in 2011, the CTLpack Group defined and implemented a Code of Ethics and Business Conduct that has helped us during this decade to make ethical decisions consistent with the principles outlined above.

This Code of Ethics and Conduct was updated and revised in 2019, adapting it to greater participation by employee representation.

This renewal of the Code of Ethics and Conduct demonstrates our ongoing commitment to further improve CSR aspects. In this latest phase, we have focused on the well-being of people, data protection of our stakeholders to address a sustainable future for the company.

## 2. Who are we?

The CTLpack Group, since its foundation in 1964, has been characterised as a company concerned with the promotion and development of human values. These values have been combined with a drive for the professional development of people who, in a stable way in their daily work, have been able to reach high levels of excellence in the world of packaging to which we are dedicated.

The CTLpack Group designs, develops, produces and markets flexible plastic and metalloplastic tubular packaging, closures and packaging components.

We are active in several countries such as France, Spain, USA, Italy, Germany, United Kingdom, Northern Ireland, Belgium, the Netherlands, Sweden, Denmark, Portugal, Peru... Therefore, we also consider ourselves to be small bearers of these values in these countries.

Today, the challenge for our company is to maintain the strengths of the past, assuming that we must increase our business area in Europe by reaching more clients without losing the sensitivity to serve our clients in a personalised manner within the requirements of our Code of Ethics.

<https://www.ctlpack.com/>

## 3. Policy

The Code of Ethics and Conduct of the CTLpack Group has the firm objective of establishing the guidelines, values and principles by which the behaviour of the people in the organisation must be governed, with regard to the company's relations with stakeholders, both in terms of the company's work activity with the staff and its relations with clients, suppliers and external collaborators, shareholders, public and private institutions and society in general.

This Code of Ethics and Conduct is based on the definition of a Policy integrating the Mission, Vision, Values and Principles defined by CTLpack Group, and constitutes an action guide to ensure an adequate behaviour with the expectations of our stakeholders in terms of ethical, social and environmental responsibility.

<https://www.ctlpack.com/politica-sig>

**The CTLpack group project is aligned with the following Mission:**






A reliable partner for our customers, from the process of defining the most appropriate tube packaging solution for their functional and sustainability needs, to its delivery with high levels of service, acting in an ethically responsible manner with each and every one of our stakeholders.

**CTLpack is also building its future with the following Vision:**

Partner of reference in the definition and deployment of sustainable packaging roadmaps for our clients, with a team fully identified with the Mission, Vision and Values of the company.

To be a benchmark in the development of new sustainable packaging projects.

**At CTLpack Group, the Values that define our way of acting are the foundations on which our entire policy is based.** Involving and involving people in these values seems to us to be a key factor.

	<b>Creación de valor</b>	Efficiency in operations so that the whole company works to maximise value for shareholders.
	<b>Agilidad</b>	Ability to provide excellent customer service; this implies the ability to listen to customers, to understand their needs and to satisfy them with excellence.
	<b>Liderazgo</b>	Ability to lead, guide, align, inspire and direct people.
	<b>One team</b>	Achieving an aligned and cohesive team in which all parties strive to achieve a common goal.
	<b>Compromiso</b>	A bond of loyalty whereby the employee acquires responsibility for each other's objectives and for the objectives of the company.

#### 4. Scope of application

All persons belonging to the CTLpack Group undertake to respect in all their activities the fundamental rights of individuals and public freedoms recognised by national and international agreements, establishing the obligation to carry out all their activities with full respect for human dignity.

This Code of Ethics and Conduct is addressed to the General Management, to the people who are part of the Management Team and in general to all CTLpack Group staff regardless of the position they hold or the place where they work. On the other hand, CTLpack Group shall promote and encourage among its suppliers and collaborating companies the adoption of behavioural guidelines consistent with those defined in this Code of Ethics. The Management of CTLpack Group shall use all the means at its disposal to disseminate the Mission, Vision, Values and Principles of the Company and to enforce compliance with the guidelines set out in this Code of Ethics.

The criteria of conduct set out in this Code of Ethics and Conduct are not intended to regulate each and every possible behaviour, but rather to establish guidelines to guide them in the way they act during the performance of their professional activity.

All employees of the CTLpack Group may consult their manager or the Committee for the Application and Monitoring of the Code of Ethics if they have any doubts about the interpretation of the guidelines for conduct set out in the Code of Ethics.

The CTLpack Group's Business Principles have been defined for each of its stakeholders in order to meet their expectations and formalise the company's commitments to each of them.

Consequently, the contents of this Code of Ethics and Conduct and its procedures are mandatory for all persons in the company. It should also serve as a guide for the behaviour of customers, suppliers and external collaborators, as well as a guide for the company itself with respect to them and shareholders, public and private institutions and society in general.

The Committee for the application and monitoring of the Code of Ethics is in charge of ensuring compliance, resolving incidents or doubts about its interpretation and adopting the appropriate measures for better compliance. The mission of this committee is to promote the dissemination and application of ethical principles in all activities carried out by the organisation. The Application and Monitoring Committee is made up of the General Management, the HR and MIS departments of each company in the CTLpack Group and a representative of the staff.

The channels for consultation and information on everything related to this Code of Ethics and Conduct are:

Personally, to any of the members of the Ethics Committee or by filling in the "Complaint - Code of Ethics" form and depositing it in the mailbox provided for this purpose.

Anonymously: by means of the "Complaint - Code of Ethics" form and depositing it in the mailbox provided for this purpose.

Or on our website through the complaints channel:

 <https://www.ctlpack.com>

#### 5. Behavioural patterns

##### Fundamental Rights

All persons belonging to the CTLpack Group undertake to respect in all their activities the fundamental rights of individuals and public freedoms recognised by national and international agreements, establishing the obligation to carry out all their activities with full respect for human dignity. Personal beliefs or ideas relating to religious, political or sporting affinities, sex or gender choices, etc., must be framed within the framework of respect for the privacy of each person.

CTLpack Group shall not employ persons under the age of 18. Furthermore, it respects freedom of association and the effective recognition of the right to collective bargaining as well as the elimination of all forms of forced or compulsory labour.

All CTLpack Group employees must avoid any conduct that, even if not in violation of the law, may damage the reputation of the company in the eyes of the community, the country's government or other bodies, and adversely affect its interests.

All employees must be aware of the laws that affect their work, requesting, where appropriate, the necessary information through their

manager or the corresponding bodies. No CTLpack employee shall knowingly collaborate with third parties in the violation of any law, or participate in any action that compromises respect for the principle of legality or that could damage the reputation of the company. In any situation of doubt or observation of cases of lack of respect for the law, human rights or ethical values, employees must inform the company through their manager or the committee for the application and monitoring of the Code of Ethics and Conduct.

It will also require suppliers and external companies with which it does business to respect these principles, and will establish this requirement as a further criterion for their selection and for the maintenance of business relations.

## 5.2. Respect for persons

CTLpack Group rejects any manifestation of physical, psychological, sexual or moral harassment or abuse of authority, as well as any other conduct that may generate an intimidating or offensive environment with the rights of individuals. Employees of the company should treat each other with respect, fostering cordial relations and a pleasant, healthy and safe working environment. All employees have an obligation to treat colleagues, superiors and subordinates fairly and respectfully.

In the same way, relations between employees and those of external collaborating companies or entities shall be based on professional respect and mutual collaboration. The CTLpack Group considers the integral development of the individual to be important and will therefore facilitate the necessary balance between professional and personal life.

Under this Code of Ethics, management is committed to investigating all complaints of harassment and a procedure is established for the resolution of such disputes. This procedure guarantees objectivity, the right to privacy and the confidentiality of the issues dealt with and the persons involved.

All persons have the right to invoke these procedures with guarantees that they will not be subjected to intimidation, unfair, discriminatory or unfavourable treatment. Such protection shall extend to all persons involved in such proceedings. Furthermore, all persons have the right to the presumption of innocence, to their right to honour and to their image, and false allegations will not be tolerated.

Conduct constituting harassment is considered very serious misconduct, and any such conduct will be punished, depending on the seriousness of the facts, with suspension of employment and salary or even disciplinary dismissal.

## Privacy and data protection

At CTLpack Group, we clearly promote respect for the privacy and security of the personal data we process, in order to comply with the relevant regulations and to generate confidence in all those groups whose personal information we handle (employees, clients, suppliers, users of our website, etc.).

CTLpack Group undertakes to handle personal data honestly and in a lawful, fair and transparent manner in relation to its stakeholders. Personal data will only be processed for the purpose for which it was collected and not for any other purpose.

By default, we will process only the minimum data necessary for the purposes for which they are collected, both in terms of quantity, extent of processing and accessibility, limiting the storage period, so that they are not kept longer than necessary for the purposes for which they were collected, they will be treated confidentially and protected by appropriate organisational and technical measures. All our staff have signed up to confidentiality and security policies and have received training in this respect.

We have appointed a privacy committee composed of people from the areas of HR, IT and communication, as well as an external data protection officer. If you have any questions about data protection, you can contact any of them.

## 5.4. Access to confidential information

Certain people in the organisation have access to confidential and sensitive information, which must be managed with the greatest possible caution, establishing opening controls to avoid improper access or leakage of information. In the event of a leakage of sensitive or confidential information, the Ethics Committee, and specifically the CTLpack Group's Human Resources Department, must be informed immediately.

These persons are obliged to maintain the confidentiality of such information for the duration of the employment relationship with CTLpack, as well as after the termination of the employment relationship.

Confidential matters shall not be discussed with unauthorised persons, whether they are CTLpack staff or external persons.

## 5.5. Equal opportunity and non-discrimination

It is a basic principle for CTLpack Group to comply with the principle of equal treatment and opportunities at work to all effects and in all areas. The company is committed to the fight against discrimination in any form, direct or indirect, and therefore does not accept discrimination on grounds of sex, marital status, age within the limits set by the law, race, social status, religious or political ideas, membership or not of a trade union, etc.

The company is committed to the professional and personal development of its staff, guaranteeing equal opportunities through its policies.

We adopt a recruitment policy that favours values of support for people with disabilities, diversity and equality.

The selection and promotion of employees is based on the performance of professional duties and on the criteria of merit and ability defined by the company for each job.

CTLpack Group shall encourage all employees to actively participate in the training plans designed for each professional level in order to promote their professional progress.

Those who hold management positions must also facilitate the professional development of their employees in a way that encourages their professional and technical growth in the company.

## 5.6. Health and Safety

The CTLpack Group is interested in the prevention of work-related incidents and occupational diseases, as well as in the improvement of Health and Safety at Work conditions.

At CTLpack Group, we base our health and safety policy on an organisational culture and working environment where prevention and safety are the first consideration and condition of all activities, reducing risks in all our processes and providing safe and healthy working conditions, with the aim of eliminating hazards, preventing injuries and work-related health deterioration.

All employees working for the CTLpack Group are obliged to comply with the rules of Occupational Risk Prevention established in each centre and job and must actively collaborate in the integration of Prevention in all activities carried out in the company, in accordance with the functions and responsibilities assigned to them in the Occupational Risk Prevention Plan.

Likewise, all personnel must encourage the increase of the Preventive Culture in the organisation, promoting compliance with good Health and Safety practices, and reporting any irregularity or situation that may pose a risk, both for workers and for the facilities.

They shall also make responsible use of the equipment assigned to them when carrying out risky activities, and shall disseminate knowledge among their colleagues and subordinates, promoting compliance with risk prevention practices.

With regard to our clientele and consumers, the health and safety of the products we manufacture and supply, CTLpack maintains and constantly updates procedures that include all the regulations applicable to the raw materials/components used in the manufacture of the products, and which are completed by the companies supplying raw materials/components for their approval by requesting them to comply with the legal requirements applicable to the raw materials/components.

## 5.7. Protection and care of the brand, corporate image and reputation

The CTLpack Group considers that one of the basic elements that contribute to its corporate image and reputation is the establishment of responsible citizenship relations in the environment in which it operates. All persons employed in the exercise of their activity must consider the interests of the local communities.

The CTLpack Group considers its corporate image and reputation as one of its most valuable assets in order to preserve the trust of its shareholders, customers, employees, suppliers, authorities and society in general.

The CTLpack Group uses in the marketing of its products, promotions or advertising respectful of human dignity, health and safety, not being

misleading, nor inciting illegal, dangerous or contrary to the principles of sustainability and social responsibility of the Group.

All employees must take the utmost care to preserve the image and reputation of the company in all their professional activities. Likewise, they shall ensure that the corporate image and reputation is respected and used correctly by employees of contractors and collaborating companies.

Furthermore, corporate social networks may only be used by authorised employees in connection with their duties and only for the purposes of the CTLpack Group. CTLpack staff undertake not to publish information that damages the reputation of the company, other people or other stakeholders.

## 5.8. Respect for the Environment

The CTLpack Group is committed to ensuring the greatest respect for the environment in the development of its activities, as well as to minimising the negative effects that these may eventually cause.

The CTLpack Group is committed to protecting the environment by reducing environmental impacts. All of this together with our customers, suppliers and stakeholders.

The CTLpack Group has management procedures that regulate the control of atmospheric emissions generated as a result of its activities and operations. The sources of systematic emissions into the atmosphere are identified in each of them for their control and compliance with their limits.

As a company, we take on the task of monitoring the application of and compliance with specific legislation in this area, and at the same time, we work to involve our suppliers in carrying out sustainable and assessable activities to check their environmental impact.

Our innovation and technology activities are fully aware of the need to develop and use raw materials, products and processes that are increasingly respectful of the environment.

Every person in the company shall be actively and responsibly committed to the conservation of the environment by complying with the legal requirements and procedures stipulated for each job position, committing to the environmental programmes implemented in the company and acting with the utmost diligence in rectifying any error that damages the environment.

Likewise, people in the company must strive to minimise the environmental impact of their activities and the use of the facilities, equipment and means of work placed at their disposal, making efficient use of them.

In their relations with supplier companies, employees shall convey these principles and demand compliance with the environmental procedures and requirements applicable in each case.

## 5.9. Use of alcohol, drugs and tobacco.

CTLpack Group expressly prohibits the possession and consumption of drugs and alcoholic beverages, as well as working under the influence of drugs and alcoholic beverages in any of the company's workplaces.



Likewise, smoking is strictly forbidden inside the industrial and service facilities, canteens, bathrooms, changing rooms...

All of this in order to avoid situations of risk for the worker, his/her colleagues, as well as other people, or the company's goods and equipment.

#### **5.10. Order and cleanliness at work**

When working in shared environments, respect for colleagues is essential, which is why it is required to keep work stations tidy and clean, using the toilets and common areas in a hygienic and appropriate manner. Likewise, the facilities and factories must meet the same criteria of cleanliness, with each worker collaborating in the recycling of materials according to the procedures established for this purpose.

#### **5.11. Patents and copyrights**

The CTLpack Group encourages creativity among the people in the organisation, and considers openness to new ways of doing things to be essential, as the knowledge and experience gained in relation to innovative systems, products and production processes has been and will be a competitive advantage of the CTLpack Group in its sector.

Consequently, the company considers it necessary to protect the rights that may apply to patentable inventions susceptible of industrial application, distinctive signs, such as trademarks, trade names or processes.

In turn, by these same principles, CTLpack is committed to respecting the intellectual property and ideas of our suppliers.

#### **5.12. Money laundering and payment irregularities**

The CTLpack Group has adequate procedures and measures in place to prevent irregular payments or money laundering from illicit or criminal activities in the course of its activities.

The company carries out specific controls on all transactions of an economic nature, both collections and payments, and especially on those which, due to their nature or amount, may be considered unusual, avoiding or controlling especially those carried out in cash, with bearer cheques or to bank accounts located in tax havens.

CTLpack staff shall pay special attention to those cases in which there may be indications of lack of integrity of the persons or companies with which the company maintains relations, and shall immediately inform the company of any payment about which there are doubts. Special attention shall also be paid to extraordinary payments, which are not provided for in the relevant agreements or contracts.

Under no circumstances shall cooperation be provided for activities that could serve as a cover for terrorist or criminal activities.

#### **5.13. Anti-corruption policy**

CTLpack shall not allow any practice of offering or accepting bribes, corruption, fraud or situations that cause, as a consequence of the performance of work duties, personal gain or enrichment, whether monetary or not, of any person in the company, or of favouring such gain or enrichment to other persons, whether or not they are family members.

CTLpack prohibits any improper payments in all our activities, both to public authorities and civil servants, as well as to individuals or companies in the public sector.

If any person, directly or indirectly, unlawfully solicits or demands or attempts to obtain by extortion any money, service or anything of value from any CTLpack employee, such CTLpack employee shall refuse such request and shall immediately report this fact to the CTLpack Ethics Committee.

Likewise, CTLpack persons may not solicit, directly or indirectly, a bribe or other illegitimate benefit or advantage in connection with an activity for which he or she is responsible, or without being responsible, which influences the decision on the activity.

#### **5.14. Gifts and hospitality**

It is forbidden to offer or accept gifts that are disproportionate or out of line with customs and practices, both in our company and in the surrounding area.

However, gifts or presents not exceeding an estimated value of €100 may be accepted. In the event that this amount is exceeded, it must be brought to the attention of your line manager, who will decide whether or not to accept the gift and will, in any case, inform the Ethics Committee of this decision.

In the case of gifts or details given by the company to clients, suppliers or third parties, this must be communicated to the person in charge, and if the estimated cost exceeds €100, the ethics committee must be informed, stating the reason for the gift.

Contributions or gifts that are intended to support a charity, foundation or community social event are exempt from these limits, although all social projects in which the company participates must be consistent with the company's CSR policy and behaviour.

#### **5.15. Expenditure**

At CTLpack, everyone is responsible for the efficient management of expenses. No expenditure may be used or authorised without the necessary approval of your manager. Such expenditure must be related to the achievement of CTLpack's business objectives.

#### **5.16. Use of company assets**

It is the wish of the CTLpack Group Management that its human team makes appropriate use of the means made available to them by the company, and therefore the company will not permit the improper use of its computer resources for purposes other than those of work, as well as access to the public Internet network through the aforementioned means of the company to enter web pages (www), newsgroups and other sources of FTP information, etc., which have no relation to the activity of the company or the performance of the functions of the job, being understood as such, by way of example, access to the public network of Internet through the aforementioned means of the company, which have no connection with the company's activities or with the performance of the duties of the job, including but not limited to: access to real-time discussion sites (Chat/IRC), downloading sites (Download), as well as those related to games and entertainment.

We prohibit the use of our computer facilities to generate or transmit any offensive, sexual, obscene or inappropriate information or communication.

The company monitors the correct use of the IT resources made available to employees.

CTLpack's assets and resources made available to employees must be used for the professional activity related to the company.

Any misuse of the company's means and resources, without due authorisation, will be sanctioned under the disciplinary regime.

### 5.17. Conflict of Interest .

A conflict of interest is any circumstance where the personal interests of employees directly or indirectly interfere with the responsible and ethical performance of their professional duties and responsibilities, or involve them personally in any transaction or economic operation of the company, its customers or its suppliers.

The relationship between the CTLpack Group and its employees must be based on loyalty and trust, which is why any situation in which the personal interests of CTLpack personnel, directly or indirectly through family members or friends, may conflict with those of the company must be avoided.

Conflicts of interest may include, but are not limited to, situations where a CTLpack employee has an influence over actions that may involve family members, cohabitants or a relationship of affection, whether temporary or permanent. By way of example:

- Decisions on recruitment, remuneration or disciplinary measures.
- Award, renewal or modification of commercial or service contracts or influence on their terms and conditions.
- Financial or accounting situations where a family member reviews the work of a person with one of the relationships outlined in this point.

The CTLpack Group understands and respects the participation of its employees in other financial and business activities as long as they are legal and do not constitute unfair competition and do not collide or interfere with the responsibilities, obligations and due dedication to their work.

Situations in which one of our employees becomes a client of the CTLpack Group, either directly or indirectly, must be reported to the Ethics Committee. In any case, in case of doubt regarding the provisions of this section, it is advisable to consult the Ethics Committee in writing.

Also subject to approval by the Ethics Committee are activities that involve working simultaneously for competitors, clients or suppliers of CTLpack, either directly, as a consultant or advisor or as a member of their management bodies.

CTLpack staff members who may have a conflict of interest are required to report it to the Ethics Committee immediately.

### 5.18. Customer relations

The CTLpack Group promotes a commitment to quality in its relationship with its customers, one of the characteristics that distinguishes us from our competitors, and will establish the necessary measures to ensure that the quality policy is practised by all employees.

All CTLpack personnel shall act with integrity towards the company's clients with the objective of achieving the highest levels of quality and excellence in the development of relationships based on trust and mutual respect.

In this regard, all customers will be treated in a respectful, fair and honest manner and in accordance with the company's core values and principles.

The relationship with customers must be based on efficiency, professionalism, service mentality and collaboration, seeking to satisfy their needs, providing them with competitive and quality solutions.

The CTLpack Group manages its own information as well as that of its clients, so guaranteeing confidentiality and professional secrecy are essential aspects of our normal working dynamics, and are of the utmost importance.

For all these reasons, the staff of our company must maintain absolute secrecy and confidentiality regarding information received from our customers.

### 5.19. Relations with supplier companies

The CTLpack Group will promote the establishment of stable relationships with its suppliers and collaborating companies based on trust, the demand for maximum quality, transparency, the search for continuous improvement and mutual benefit, promoting innovation and development activities.

To this end, relations with supplier companies must be based on a framework of mutual collaboration that facilitates the achievement of the objectives pursued by both parties, so that treatment must be on an equal footing and always within the legal framework.

CTLpack Group shall ensure that the companies supplying products/services carry out their activities within the framework of a proven Corporate Social Responsibility. The agreements established between CTLpack Group and its external suppliers or collaborators shall include clauses regarding compliance with certain ethical, social and environmental standards. Being committed to the respect of Human Rights, the non-use of forced labour or coercion, the eradication of child labour, respect for the Environment and the eradication of discrimination in the workplace.

The selection of supplier companies shall be carried out in accordance with the company's Purchasing Process in force at any given time, guaranteeing transparency, equal treatment and the use of objective criteria.

All employees involved in the procurement of services or purchase of goods are obliged to act with complete independence, impartiality and objectivity, applying the company's procurement criteria and avoiding the collision of their personal interests with those of the company.



Purchasing practices that are not included in the Purchasing Process, or situations that result in a benefit or enrichment of any person of the company, the supplier or third parties will not be allowed. Likewise, it is forbidden to offer, give, request or receive any type of payment or payment outside of a contract or order.

## 6. Compliance with the Code of Ethics and Conduct

This Code of Ethics and Conduct sets out the ethical principles and commitments that the CTLpack Group and its professionals must respect and comply with when carrying out their activities.

The contents of this Code of Ethics and Conduct shall be periodically disseminated to all employees. All persons joining the CTLpack Group must expressly accept the ethical principles contained in this Code of Ethics.

In order to ensure compliance with this Code of Ethics, resolve incidents or doubts about its interpretation and adopt the appropriate measures for its better compliance, the Committee for the application and monitoring of the Code of Ethics has been created. The mission of this committee is to promote the dissemination and application of ethical principles in all activities carried out by the company. It will be made up of the General Management, the HR and MIS departments and one person representing the staff of each Group company.

If you wish to do so in person, to any of the persons forming part of the Ethics Committee or with the "Complaint - Code of Ethics" form and deposit it in the mailbox provided for this purpose directly or by e-mail to one of the persons forming part of the Ethics Committee.

A whistleblower channel is also available on the CTLpack Group website to report any breach or complaint related to the Code of Ethics or Code of Conduct.

In order to ensure compliance with this Code of Ethics, resolve incidents or doubts about its interpretation and adopt the appropriate measures for its better compliance, the Committee for the application and monitoring of the Code of Ethics has been created. The mission of this committee is to promote the dissemination and application of ethical principles in all activities carried out by the company. It will be made up of the General Management, the HR and MIS departments and a representative of the staff of each Group company.

If any stakeholder detects behaviour that could constitute a breach of the Code of Ethics and Conduct, he/she should immediately consult or report it through the channels defined below:

- Non-compliance with the principles set out in this Code will be analysed in accordance with internal procedures, legal regulations and agreements in force. Any doubts that may arise in the interpretation and/or application of this Code of Ethics and Conduct should be brought to the attention of the person in charge or the Ethics Committee itself.
- No one, regardless of their hierarchical level, may ask a member of staff to breach the company's Code of Ethics and Conduct. Likewise, no employee may invoke the existence of

an order from a manager or ignorance of the Code of Ethics as grounds for such non-compliance.

All employees are obliged to report to their manager or to the Ethics Committee any non-compliance or misconduct observed in the performance of their duties.

The company guarantees that the submission of a report through the channels established for this purpose will not result in any retaliation against the person making the report. Likewise, all persons have the right to the presumption of innocence and to their honour and image, and therefore false allegations aimed at causing harm to another person will not be tolerated.

Any violation or breach of this Code of Ethics and Conduct that constitutes a labour misconduct will be sanctioned in accordance with the regulations in force, without prejudice to any other responsibilities that the person in breach may have incurred.

## Validity

This Code has been approved by the General Management of CTLpack Group.

The Code of Ethics and Conduct comes into force on the day of its publication and internal dissemination to all CTLpack staff and shall remain in force until its modification or repeal is communicated.

This Code shall be reviewed and updated at the proposal of the Ethics Committee. Date of publication: 01/06/2025

## RELATED DOCUMENTS

	ACUSE DE RECIBO	Código	MOD.00.00012
		Versión	02
		Página	1 de 1

Acuso recibo del documento titulado "Código Ético y de Conducta". Confirmando que he leído y que comprendo los términos de este documento y me comprometo a cumplir lo dispuesto en el mismo en el desarrollo de las actividades del Grupo CTLpack.



1. Datos	
Nombre y Apellido	
Departamento	
Fecha y lugar de firma	
Firma	

Rellene este formulario y remítalo al Departamento de Recursos Humanos de su centro de trabajo. Este documento se incluirá en su ficha laboral.

	Denuncia Código Ético	Código	MOD.00.00012
		Versión	02
		Página	1 de 1

### 1. Datos (No rellenar en caso de querer mantener el anonimato)

Nombre y Apellido	
Departamento	
Puesto trabajo	

### 2. Descripción de los hechos relevantes

Qué ha ocurrido	
Cómo ha ocurrido	
Dónde ha sucedido	
Durante cuanto tiempo ha sucedido	
Continúa existiendo en la actualidad	
Quien puede estar involucrado (Departamento, puesto trabajo y personas)	

### 3. Conocimiento de los hechos

Como se ha enterado	
Si hay otras personas que conocen lo sucedido	
Documentos que prueban el hecho. (Anexar)	

### 4. Aceptación de la denuncia (A rellenar por el receptor)

Si <input type="checkbox"/>	Si "No", indicar el motivo		
No <input type="checkbox"/>			
Fecha		Firma	