



## CODE OF ETHICS

VITRINOR, VITRIFICADOS DEL NORTE, S.A.L

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VITRINOR, VITRIFICADOS DEL NORTE, S.A.L

## CODE OF ETHICS

### Introduction

This Code of Ethics and Conduct applies to VITRINOR, VITRIFICADOS DEL NORTE, S.A.L., to all its employees, managers and directors, as well as to its Suppliers and Subcontractors throughout the world (unless the legislation applicable at any time and in each country establishes higher standards).

The objective of this Code is to achieve compliance with certain social and environmental standards in accordance with the regulatory framework on which it is articulated, and which refers to:

- Convention and Recommendations of the International Labour Organisation (ILO)
  - UN Convention on the Rights of the Child (CRC)
  - UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
  - UN Global Compact
  - UN Guiding Principles on Business and Human Rights
  - OECD Guidelines
  - Locally applicable labour laws
- Local environmental legislation, and in the absence of such legislation, related international legislation in force.

This code is articulated in 12 points:

### Right to Freedom of Association and Collective Bargaining

The right of workers to form, organize and join trade unions of their choice and to bargain collectively on their behalf with the company without reprisals and/or being subject to any form of discrimination, harassment or intimidation, shall be respected.

Where the rights to freedom of association and collective bargaining are restricted by law, the company should allow workers to freely choose their representatives and design appropriate channels to ensure their reasonable independent exercise.

## Prohibition of Discrimination

The company shall not discriminate in hiring, remuneration, access to training, promotion, termination or retirement based on sex, age, religion, race, caste, birth, social origin, physical or mental disability, ethnic and national origin, nationality, sexual orientation, marital status, trade union or political affiliation or any other condition that may give rise to discrimination.

## Wages

The company must ensure that the wages paid to its workers are at least equal to the legal minimum wage or to the minimum wage established by collective agreement, whichever is higher. In any case, the salary must always be sufficient to cover at least the reasonable additional needs of workers and their families.

No deductions and/or withholdings shall be made from workers' wages for disciplinary reasons or for any other reason other than those established in the applicable legislation, without their express authorisation.

Employees shall be provided with clear, detailed and written information on their wage conditions both at the time of recruitment and at the time of the regular salary settlement. The company shall ensure that wages and other allowances or benefits are paid in a timely manner in accordance with applicable law and, specifically, that payments are made in the most convenient manner for the workforce.

## Non-excessive Working Hours

The company shall adjust the length of the working day to the provisions of the applicable legislation or to the provisions of the collective agreement for the sector in question, if this is more favorable to the staff.

Overtime shall, except in cases of force majeure, be voluntary, shall not be required on a regular basis and shall be paid within the established period. They shall not involve a significantly increased likelihood of occupational hazard.

Exceptions to this rule shall only apply when the following conditions are met:

- a. National law allows working hours to exceed this limit.
- b. A freely agreed collective agreement in force allows for average working hours, including adequate rest periods.

Priority shall be given to subsequent entitlement to overtime worked, unless otherwise agreed with the workforce.

## Health & Safety at Work

The company shall provide a safe and healthy working environment and take effective measures to prevent accidents or potential harm to the health of personnel that may arise from, be associated with, or occur during work, minimizing, as far as reasonably practicable, the causes of risk inherent in the working environment, bearing in mind current knowledge of the industry and any specific hazards.

A clear set of occupational health and safety rules and procedures should be established and followed, especially in relation to the provision and use of protective equipment, access to clean toilets and access to drinking water.

Adequate food storage facilities shall also be provided, where appropriate, that comply in all cases with applicable health and safety legislation.

All personnel shall have the right to move away from serious and imminent danger without obtaining permission from the company.

Any practices and conditions in the workplace that represent a violation of fundamental human rights are prohibited. In particular, young staff shall not be exposed to hazardous, unsafe or unhealthy situations.

The company shall designate a management representative who is responsible for the health and safety of staff and for the maintenance and implementation of the rules and documents that ensure it.

All personnel shall receive regular and documented health and safety training. This training shall also be provided prior to the induction of newly recruited and/or reassigned staff.

Systems shall be in place to detect, prevent or respond to potential threats to the health and safety of all staff.

## Prohibition of Child Labor

Child labor is prohibited, as set out in ILO Conventions and UN Conventions and/or the laws of the country. Of all these regulations, the strictest must be followed. Exploitation of children in any form is prohibited.

Working conditions that resemble slavery or are harmful to children's health are prohibited. The rights of the young workforce must be protected.

The company may employ young people, but where they are subject to compulsory education laws, they may only work outside school hours.

Young staff (under the age of 18) should not work at night or under hazardous conditions in accordance with ILO Recommendation 190.

## Prohibition of Forced Labor and Compulsory Disciplinary Measures

Any form of forced or involuntary labor is prohibited, as well as requiring staff to make any deposit or withholding their identity documents at the beginning of their employment relationship in order to force any person to continue working for the company.

Work by prisoners in violation of fundamental human rights is also prohibited.

Staff shall have the right to leave the work premises after the end of the standard working day and shall be free to terminate their employment provided they give reasonable notice to the company.

Neither the company nor any entity providing services to the company shall engage in or support human trafficking.

The company will treat all employees with dignity and respect. The company will not engage in or tolerate the use of corporal punishment, physical or mental coercion or verbal abuse against staff.

## Environmental Commitment

The company shall maintain an ongoing commitment to environmental protection and shall comply with the standards and requirements set out in applicable local and international legislation, and procedures shall be in place for waste management, handling and disposal of chemicals and other hazardous materials and the treatment of emissions and discharges.

## Ethical Business Conduct

No member of VITRINOR's staff, management or any of its Suppliers and Subcontractors may be involved in any act of corruption, extortion, embezzlement, or bribery.

VITRINOR must be informed of any situation that could be considered as a conflict of interest and disclose if any person belonging to VITRINOR's staff or any professional contracted by VITRINOR has an interest of any kind in the supplier's business or any kind of economic link with the supplier.

The supplier must have systems in place that allow complaints and claims from customers, suppliers, and the public to be complained about, reported or managed, designating a person in charge to supervise the complaint mechanism on an ongoing basis.

All personal information collected in the handling of complaints (including that of staff, business partners, customers and consumers in their sphere of influence) should be handled in a manner that complies with privacy and information security legislation and regulatory requirements.

## Rules of conduct

The company's employees are aware of, committed to and responsible for complying with the company's internal rules.

- They must cooperate with the managers and members of the company's management to ensure safe working conditions, in order to avoid situations that may involve personal or collective risk or may cause an accident, as well as to immediately inform their superior of any situation that, in their opinion, involves a risk to health and safety.

They shall make appropriate use, according to the instructions received and the nature and foreseeable risks, of machinery, work equipment, tools, hazardous substances and, in general, all the means provided for the development of their activity.

Safety devices shall be used properly and shall not be put out of operation without the relevant authorization and signaling.

- The equipment and means of personal protection required at each workstation shall be used and maintained correctly, ensuring that they are adequate and in perfect conditions of use.
- The entire area, equipment, tools and other elements in their charge must be kept in a correct state of conservation, order and cleanliness, immediately informing the person in charge of any defects or anomalies observed.
- Inappropriate, disrespectful, and obscene behavior is expressly forbidden, as well as the consumption of alcohol or any type of drug, as well as working under the effects of the same.
- It is required to attend training activities of a general or specific nature on Risk Prevention established by the company and to commit to the application of the teachings received.
- The collaboration of all personnel is required to deal with possible emergency situations.

## Complaint Channel

The company has an instrument for channeling any reports of actions or omissions that involve breaches of the law in accordance with Directive (EU) 2019/1987 of the European Parliament or constitute fraud, corruption or crime.

Through the whistleblowing channel, members of the company, suppliers, customers or any person wishing to communicate or report conduct or acts contrary to the law may be whistleblowers or whistleblowers.

The aim of this mechanism is to enable reporting of breaches of EU laws in relation to financial services, environmental protection, procurement, public health, etc. The protection will be effective whether irregularities are reported when they have already occurred, when they have not yet materialized or when they are intended to conceal irregularities.

The protection will be effective whether irregularities that have already been committed are reported, or whether irregularities that have not yet materialized or conduct intended to conceal irregularities are reported.



This channel provides for the protection of the persons making the complaint, guaranteeing the confidentiality of personal data in accordance with Organic Law 15/1999 on Data Protection. Data Protection Act 15/1999.

Likewise, the company undertakes not to adopt any act of reprisal against persons who have made a complaint, provided that the complaint has been made in good faith and based on any act or conduct that involves a violation of the Code of Ethics.

Otherwise, if the complaint is made through false or manipulated accusations, the company will take the appropriate measures by opening disciplinary or legal proceedings in order to ensure that this channel is used as an effective tool.

If the complaint is made about any member of the Ethics and Conduct Committee, as a conflict of interest is contemplated, an urgent action protocol will be activated and the Committee will be convened so that these functions can be assumed by other members, in order to ensure that the actions taken are appropriate.

Complaints may be made through different channels of communication:

- By post to the company's address

VITRINOR, VITRIFICADOS DEL NORTE S.A.L.  
To the attention of Ethics and conduct Committee  
Barrio Rioseco S/N  
39788 Guriezo  
Cantabria-SPAIN

- Through E-mail [canaldenuncias@vitrinor.es](mailto:canaldenuncias@vitrinor.es)

In order for a complaint to be considered valid, it must be formulated containing at least certain information. This must include the clear identification of the person or persons complained of, a description of the facts, circumstances or situation that are the subject of the complaint and, as far as possible, the provision of evidence or proof that supports the facts stated.

If the complaint is not formulated with the minimum content, it will be rejected in writing and the file will be archived as appropriate.

Those responsible for processing the corresponding complaint shall be the Ethics and Conduct Committee, composed of:

- Human Resources Management
- Head of Human Resources Management
- President of the Board
- Secretary of the Board
- One member of the Board

In any investigation, the rights to privacy, to defense and to the presumption of innocence of the persons under investigation shall be guaranteed.

## Code of Ethics Implementation

VITRINOR undertakes to communicate and disseminate the contents of this Code of Ethics and Conduct to the entire workforce. New recruits joining the staff will be informed of the existence and content of the Code, as well as of their obligatory compliance.

VITRINOR expects from all the staff a high level of commitment in the fulfilment of its Code of Ethics and Conduct.

VITRINOR undertakes to communicate and disseminate the Code of Ethics and Conduct among its Suppliers, Customers, Business Partners, Subcontractors and other interested parties.

No one, regardless of level or position, is authorized to ask a member of staff to contravene the provisions of this Code. No one may justify improper conduct on the basis of a superior order or ignorance of this Code.