

CODE OF ETHICS

SEAL-TEAM S.R.L.

Il presente Codice Etico è stato approvato dall'Organo di Governo in data 15/09/2025 ed è efficace a decorrere dalla medesima data.

INDICE

CODE OF ETHICS SEAL-TEAM S.R.L.	1
1. VALUES AND PURPOSE OF THE CODE OF ETHICS	3
2. RECIPIENTS	3
3. GENERAL PRINCIPLES	4
4. GIFTS, PRESENTS AND BENEFITS	5
5. CONFLICT OF INTEREST	5
6. PRIVACY AND CONFIDENTIALITY	6
7. ACCURACY AND TRANSPARENCY OF INFORMATION	6
9. INDUSTRIAL AND INTELLECTUAL PROPERTY	7
10. COMPETITION	8
11. ANTI-MONEY LAUNDERING	8
12. EXPORT CONTROLS AND COMPLIANCE WITH ECONOMIC SANCTIONS	8
INTERNAL PARTIES	9
13. PERSONNEL MANAGEMENT	9
14. PERSONNEL SELECTION	9
15. ESTABLISHMENT OF EMPLOYMENT RELATIONSHIP	9
16. ABUSE OF ALCOHOL, NARCOTIC SUBSTANCES AND SMOKING	9
17. HEALTH AND SAFETY	10
18. DUTIES OF EMPLOYEES AND COLLABORATORS	10
EXTERNAL PARTIES	10
19. RELATIONSHIPS WITH SUPPLIERS	10
20. RELATIONSHIPS WITH CUSTOMERS	11
21. RELATIONSHIPS WITH EXTERNAL COLLABORATORS	12
22. RELATIONSHIPS WITH PUBLIC ADMINISTRATIONS	12
23. PROTECTION AND HEALTH AND SAFETY AT WORK	13
24. ENVIRONMENT	13
TRASPARENZA CONTABILE	13
25. MANAGEMENT OF FINANCIAL RESOURCES	13
IMPLEMENTATION OF THE CODE	14
26. MONITORING AND UPDATING	14
27. OBLIGATION TO REPORT VIOLATIONS	14
28. OBLIGATION TO COMPLY WITH THE CODE	15

1. VALUES AND PURPOSE OF THE CODE OF ETHICS

This Code of Ethics (also called as the "Code" in this document) has been adopted by SEAL-TEAM S.r.l. (also called as "Company" in this document) following approval by the Governing Body on 15/09/2025.

The Code sets forth the ethical principles and fundamental values that must guide the choices, conduct and behaviour of all those who operate, in any capacity, on behalf of the Company, both within and outside its organisation. These principles apply independently of the obligations imposed by current legislation, and supplement their scope from an ethical and values-based perspective.

The objective of the Code is to ensure that anyone operating in the name and on behalf of the Company acts in compliance with the law and corporate values, promoting a work environment based on high standards of integrity, fairness and responsibility.

The provisions of the Code are binding on anyone who engages in relationships with the Company, in any form and at any level.

It is the responsibility of each recipient, as further specified below, to know, understand and comply with the Code, promoting its observance within their area of competence. No reason, not even the presumed benefit to the Company, can justify conduct contrary to the principles expressed.

Compliance with the Code represents an obligation for each recipient, and any violation thereof constitutes a source of individual responsibility, with the consequences provided for by the legal system and internal regulations.

The provisions contained in the Code prevail over any differing instructions issued by the company organisation.

2. RECIPIENTS

The provisions of this Code apply, without exception, to all parties who engage in relationships with the Company, in any capacity. In particular, they are addressed to directors, employees, collaborators, consultants, administrators, auditors, as well as to anyone who, directly or indirectly, on an ongoing or occasional basis, operates in the interest of the Company or cooperates in the pursuit of its objectives, including customers, suppliers and business partners. Such parties are hereinafter collectively referred to as "Recipients".

Each Recipient is required to conform their conduct, within their respective responsibilities and functions, to the principles and values contained in this Code, actively contributing to its effective implementation and dissemination.

The Company undertakes to ensure maximum dissemination of the Code of Ethics to all Recipients, adopting suitable and accessible communication tools and methods. In this regard, a copy of the

Code shall be made permanently available on the company notice board, where it shall remain posted for the entire duration of its validity.

Furthermore, a copy shall be provided individually to each new employee, collaborator or administrator upon establishment of the relationship with the Company.

The Code shall also be published on the company website, so as to ensure free consultation by all interested parties.

3. GENERAL PRINCIPLES

In carrying out its activities, the Company is inspired by a set of ethical principles that represent the pillars of its daily operations. These principles guide decisions, internal and external relations and the behaviour of all Recipients of this Code.

Legality and Honesty

The Company acts in strict compliance with constitutional principles, current legislation, customs and commercial practices, both nationally and internationally. All Recipients are required to maintain ethically correct, honest and transparent conduct, avoiding any unlawful activity or activity contrary to company interests, including conflicts of interest, even if only potential, aimed at obtaining undue personal advantages or advantages for third parties.

Protection of human rights

The Company recognises and promotes respect for Human Rights and the fundamental rights of workers. It rejects all forms of labour exploitation, including child and forced labour, and condemns any form of harassment, abuse, intimidation or discrimination in the workplace. It guarantees working conditions in compliance with current legislation and international conventions, in particular those provided for by the International Labour Organisation (ILO), including criteria on working hours and remuneration.

Impartiality and Non-Discrimination

The Company ensures compliance with the principle of equal treatment and undertakes to prevent all forms of discrimination, direct or indirect, based on gender, ethnicity, nationality, language, age, religious belief, disability, social status, sexual orientation or personal and political convictions.

Professional Diligence

All company activities must be carried out with seriousness, competence and responsibility. Recipients are called upon to guarantee a qualified professional contribution, consistent with their role and capable of protecting the Company's reputation and image. Projects, investments and actions must be oriented towards sustainable and lasting growth of company assets, technical knowledge and competitiveness, whilst respecting the interests of all stakeholders.

Effectiveness, Efficiency and Economy

The Company pursues performance and quality objectives through responsible and rational use of available resources, favouring the elimination of waste and promoting continuous improvement of production, logistics and management processes.

Protection of Health, Safety and the Environment

In compliance with current legislation, the Company undertakes to create safe and healthy work environments, safeguarding the physical and mental integrity of individuals. The safety of employees, suppliers, customers and visitors represents an essential value, as does environmental protection. These commitments are formalised within company Policies on quality, safety and the environment, in line with recognised international standards.

Transparency

Every action, operation and business relationship must be conducted with fairness, completeness of information, clarity and traceability. Accounting documents must faithfully reflect the operations carried out, in accordance with current legislation and internal procedures.

Confidentiality

The Company guarantees the protection and confidentiality of information and data which it comes into possession of in carrying out its activities, with particular attention to that relating to customers, suppliers, employees and other stakeholders. Any improper or unauthorised use of such information is prohibited.

4. GIFTS, PRESENTS AND BENEFITS

The Company adopts a zero-tolerance policy towards any form of corruption, unlawful favouritism or undue solicitation of personal advantages, whether direct or indirect.

Any offer, promise or granting of money, goods, services or other benefits, current or future – including gifts, services or favours – to third parties is expressly prohibited, with particular reference to public officials or parties connected to them (relatives, relations or acquaintances), where such acts may even indirectly be perceived as instruments for obtaining preferential treatment or undue advantages.

Any courtesy initiatives of a commercial nature are permitted exclusively if of modest value, clearly attributable to established and lawful practices of company representation, and solely if aimed at promoting the Company's image or specific institutional initiatives. In any case, they must be previously authorised by the Governing Body and supported by adequate supporting documentation

5. CONFLICT OF INTEREST

In carrying out their functions, administrators, employees and collaborators are required to act in full respect of the Company's interest, avoiding any situation – actual or potential – that may generate a conflict with their professional duties or compromise the impartiality of decisions.

To this end, it is specified that:

- Every activity or operation must be conducted exclusively in the interest of the Company, in compliance with the principles of legality, fairness and transparency;
- It is necessary to avoid any mixing of personal interests (one's own or those of family members) and the responsibilities connected to the role held in the company;
- It is expressly prohibited to undertake, even outside working hours, work or professional activities at customers, suppliers or competitors of the Company;
- Gifts, benefits, remuneration or other personal benefits must not be accepted from parties or companies that have or intend to establish business relationships with the Company;
- Any situation – even if only potential or apparent – of conflict of interest must be promptly communicated to the designated company party, so that appropriate evaluation and management measures may be adopted.

6. PRIVACY AND CONFIDENTIALITY

SEAL-TEAM S.r.l. recognises the strategic value and sensitive nature of information in its possession and adopts all necessary measures to guarantee maximum confidentiality, in compliance with current legislation and the highest ethical and professional standards.

All recipients of this Code — with particular reference to the Company's employees and collaborators — are required not to disclose or use, for purposes unrelated to the exercise of their duties or in any case outside the limits established by law, company information that may be classified as "confidential". This commitment is aimed at safeguarding not only the company's information assets, but also the trust of the parties that interact with it.

With regard to the protection of personal data, SEAL-TEAM S.r.l. undertakes to ensure that every processing takes place in compliance with current legislation, in a lawful, fair and transparent manner, preventing any improper, unlawful or unauthorised use. Personal data is collected exclusively for specific, explicit and legitimate purposes, and is kept for a period of time not exceeding that strictly necessary to achieve such purposes.

Particular attention is reserved for the protection of the dignity, image and private sphere of each individual, so that no processing may cause prejudice to the rights and fundamental freedoms of data subjects.

7. ACCURACY AND TRANSPARENCY OF INFORMATION

Every operation or transaction carried out within the scope of company activity must be conducted in a legitimate, consistent, appropriate and documentable manner, as well as duly authorised and recorded according to criteria of accuracy and transparency.

In order for company accounts to faithfully reflect management reality, each operation must be supported by suitable documentation that allows, at any time, verification of its substantial characteristics and reasons, as well as identification of the parties responsible for the authorisation, execution, recording and control phases.

The management of information and accounting data, in particular that used for the preparation of financial statements and related information documents, must strictly comply with the principles of truthfulness, completeness, clarity and transparency, in accordance with current legislation and internal procedures.

8. PROTECTION OF ASSETS AND USE OF COMPANY PROPERTY

All employees and collaborators are required to act with diligence and a sense of responsibility in safeguarding company assets, which includes movable and immovable property, technological resources, IT systems, equipment, products, confidential information and technical and commercial know-how.

In particular, each party must:

- use company assets in accordance with internal policies, strictly complying with the security measures prepared to prevent theft, unauthorised access or improper use;
- refrain from conduct that may compromise the efficiency, functionality or integrity of company assets, causing damage to the Company or hindering its proper functioning;
- maintain the utmost discretion regarding confidential information relating to company activity or business partners, avoiding any form of unauthorised disclosure;
- scrupulously observe company provisions on IT security, contributing to the protection of data and digital systems;
- not use software, equipment and company tools for personal purposes or purposes unrelated to work activity.

Each employee or collaborator is personally responsible for the correct management and conservation of the resources entrusted to them, and is required to promptly report to their superiors any anomalies, faults, thefts or improper use that may cause damage to the Company's assets.

9. INDUSTRIAL AND INTELLECTUAL PROPERTY

The Company operates in full respect of third-party industrial and intellectual property rights, complying with national, Community and international legislation, as well as applicable regulations and conventions on the matter.

All Recipients of this Code are required to respect such rights and to refrain from unauthorised use of trademarks, patents, models, industrial designs, works of ingenuity or other protected assets.

In particular, in carrying out their functions, employees and collaborators must:

- avoid any conduct that may be configured as usurpation of industrial property rights, alteration or counterfeiting of distinctive signs, trademarks, patents, designs or industrial models, both nationally and internationally;
- not import, market, distribute or otherwise put into circulation products bearing counterfeit or altered trademarks or that violate industrial ownership rights of others;

- not use, for their own or company purposes, works of ingenuity protected by copyright (or parts thereof) in the absence of the necessary authorisations or in a manner contrary to law.

Compliance with these principles is essential to guarantee the legality and fairness of company activities and to protect the Company's reputation with respect to customers, partners and institutions.

10. COMPETITION

The Company recognises that fair and transparent competition represents an essential prerequisite for sustainable and responsible growth of business activity.

In this perspective, it bases its competitiveness on distinctive elements such as: the quality of products and processes, technological and organisational innovation, and the high professional competence of its human resources. All commercial activities are conducted in full compliance with antitrust legislation and the rules governing fair competition.

The Company rejects any conduct that may constitute a violation of market freedoms, including corrupt practices, unlawful agreements, abuse of dominant position or any other form of alteration of free market rules.

11. ANTI-MONEY LAUNDERING

The Company adopts a rigorous approach to preventing money laundering, terrorist financing and, more generally, the use of its economic-financial system for unlawful or criminal purposes.

To this end, it undertakes to exercise maximum diligence in collecting and verifying information relating to parties with whom it engages in relationships – customers, suppliers, consultants, employees and other partners – in order to assess their reputation, reliability and the legitimacy of the activities carried out.

The Company refrains from initiating or maintaining business relationships with parties for whom there are even indicative elements of involvement in suspicious operations or criminal activities.

12. EXPORT CONTROLS AND COMPLIANCE WITH ECONOMIC SANCTIONS

The Company undertakes to operate in full compliance with current legislation on international trade, including provisions relating to export controls, customs regulations and economic sanctions imposed by national and supranational authorities.

It is absolutely prohibited to carry out sales, transfer or export operations of goods, services or technologies in violation of the restrictions provided for by laws, regulations, commercial embargoes or sanctioning measures adopted by international organisations, including the European Union, the United Nations and other competent authorities.

All Recipients involved in commercial operations with foreign countries are required to verify with the utmost attention the lawfulness of transactions, assuming conduct based on maximum diligence

and promptly reporting any critical issues to company parties designated for monitoring regulatory compliance.

INTERNAL PARTIES

13. PERSONNEL MANAGEMENT

The Company recognises that the success and sustainability of its activity are based on the value of the people who work there. The professional contribution of employees and collaborators represents an essential element for achieving company objectives. In this sense, the Company promotes a work environment based on principles of loyalty, mutual respect, collaboration and trust, in full respect of individual dignity and workers' rights enshrined in national and Community legislation, as well as by applicable collective agreements.

14. PERSONNEL SELECTION

Personnel recruitment and selection processes are based on criteria of transparency, impartiality and equal opportunities. Candidate evaluation is based exclusively on the correspondence between possessed skills and organisational needs, with particular attention to consistency between the profile sought and technical and professional capabilities.

Information requested during selection is strictly functional to verification of professional suitability and is collected in compliance with the candidate's private sphere and current legislation on privacy and personal data protection.

15. ESTABLISHMENT OF EMPLOYMENT RELATIONSHIP

Personnel recruitment takes place through the stipulation of a regular employment contract, in full compliance with the provisions of Italian legislation and Community law.

The Company condemns all forms of irregular work and does not allow the establishment of employment relationships with parties below the minimum age provided for by law or by international conventions, undertaking to guarantee correct and transparent contractual and regulatory conditions.

16. ABUSE OF ALCOHOL, NARCOTIC SUBSTANCES AND SMOKING

The Company absolutely prohibits the use of alcoholic, narcotic, hallucinogenic substances or any other substance that may compromise psychophysical capacities, during working hours or immediately before the start of work activity.

The intake of such substances is incompatible with the duty of diligence, protection of safety at work and respect for contractual and deontological obligations.

The Company requires all employees, collaborators and parties present in the company to strictly comply with current legislation on the prohibition of smoking in workplaces, including enclosed spaces and common areas.

17. HEALTH AND SAFETY

SEAL-TEAM undertakes to disseminate and consolidate a culture of safety by developing risk awareness and promoting responsible conduct on the part of all employees and collaborators. The Company also operates to preserve, above all with preventive actions, the health and safety of workers.

18. DUTIES OF EMPLOYEES AND COLLABORATORS

Every employee and collaborator is required to act with loyalty, good faith and a sense of responsibility, respecting the contractual obligations assumed towards the Company and operating in line with company directives. Active, constant commitment consistent with the organisation's objectives is required.

Each party is also required to know, respect and apply the provisions contained in this Code of Ethics, basing their conduct on criteria of fairness, collaboration, mutual respect and transparency.

All work activities, operations, negotiations and relationships with internal and external parties must take place in compliance with the principles of honesty, integrity, legality, clarity and traceability, and always be available for any verification and control according to internal rules and procedures.

Employees and collaborators must avoid any situation that may generate a conflict between personal interests and company interests, or that may compromise the ability to act impartially and in the best interest of the Company, in accordance with the values of the Code of Ethics.

They are also responsible for protecting company assets, including movable and immovable property, IT tools, technological resources, products, confidential documentation and company know-how. They must adopt diligent and proactive conduct to prevent their improper, fraudulent or unauthorised use.

The use of company assets must be exclusively aimed at carrying out company activities or other purposes expressly authorised by the competent functions

EXTERNAL PARTIES

19. RELATIONSHIPS WITH SUPPLIERS

The Company bases its relationships with suppliers on the principles of transparency, impartiality, fairness, fair competition and equal treatment. Such relationships are based on mutual respect and adherence to shared ethical standards.

The selection of suppliers and the definition of contractual conditions for the purchase of goods and services take place according to objective and verifiable criteria, such as: quality, reliability, economic convenience, technical competence and compliance with applicable company procedures. In the selection, companies committed to respecting current legislation relating to the protection and safeguarding of the environment, safety in the workplace, protection of the right to confidentiality, and compliance with tax and social security regulations will also be given preference. In particular, for new suppliers outside the European Union, a dedicated procedure will be prepared that requires a signed self-certification to guarantee compliance with ethical principles, human rights and safety.

Contracts with suppliers must be drawn up in writing, in compliance with company procedures and reference legislation. The fees recognised must be fair and proportionate to the quality and quantity of services rendered.

Employees and company managers involved in managing relationships with suppliers are required to:

- strictly comply with internal procedures on procurement and supplier management;
- guarantee compliance with current legislation and contractual clauses in all phases of the commercial relationship;
- ensure transparency and completeness of information shared with suppliers;
- not hinder access to tenders or commercial opportunities to parties in possession of the required requisites;
- refrain from accepting money, benefits or personal advantages from suppliers or third parties, directly or indirectly;
- avoid the exchange of gifts, favours or forms of hospitality that exceed normal commercial courtesy practices and are not justified by special occasions or established customs.

Where an employee receives offers of gifts or other benefits not in accordance with the principles described above, they are required to firmly refuse them and promptly inform their superior.

20. RELATIONSHIPS WITH CUSTOMERS

The Company orients its conduct in relationships with customers according to principles of legality, fairness, transparency, reliability, responsibility and quality of products and services offered. The objective is to build lasting relationships based on mutual trust and full satisfaction of customer needs, whilst respecting legislation and company standards.

In this context, all employees and collaborators, in carrying out their functions, are required to:

- strictly comply with current legislation, the provisions of this Code of Ethics and internal procedures governing the management of relationships with customers;
- provide clearly, completely and transparently all necessary information on products and services offered, so that the customer can make informed and aware choices;

- refrain from misleading or deceptive statements in commercial or promotional communication;
- maintain an attitude of availability, courtesy, respect and utmost professionalism in relationships with customers;
- guarantee their independence and objectivity, avoiding undue pressure or influences of an internal or external nature.

In establishing new commercial relationships, as well as in managing existing ones, it is proper – based on available information – to refrain from engaging in relationships with parties:

- involved, even indirectly, in unlawful activities, such as arms or drug trafficking, money laundering, terrorism, use of illegal labour or other forms of crime;
- operating in sectors that produce or market goods highly harmful to the environment or public health;
- belonging to economic supply chains that hinder human development or that are involved in the violation of fundamental rights of the person, including cases of child labour exploitation.

21. RELATIONSHIPS WITH EXTERNAL COLLABORATORS

Relationships with external collaborators, consultants and professionals must be governed by contracts drawn up in written form, as provided for by company procedures.

The selection of collaborators must take place in compliance with internal procedures, on the basis of criteria of professional competence, reliability and moral integrity. Collaborations with parties, natural or legal entities, who lack the requisites of respectability or are involved in conduct contrary to the Company's ethical values must be avoided.

The agreed remuneration must be fair, proportionate to the activity actually carried out and consistent with the professional skills of the collaborator, avoiding any form of undue or unjustified disbursement.

In case of suspicious conduct or conduct clearly in contrast with company values on the part of external collaborators, employees are required to give prompt communication thereof to their superior. All collaborators, regardless of contractual form, are required to fully comply with the provisions of this Code of Ethics, in the awareness that adherence to ethical principles represents an essential condition for maintaining the relationship with the Company.

22. RELATIONSHIPS WITH PUBLIC ADMINISTRATIONS

The Company's relationships with Public Administration must be based on the utmost fairness, transparency and compliance with current legislation, avoiding any conduct that may harm corporate integrity or reputation.

Only expressly authorised personnel may engage in relations with public bodies or institutional representatives.

It is absolutely prohibited to offer or promise, directly or indirectly, money, benefits, gifts or services to public officials or parties connected to them, for the purpose of influencing decisions or obtaining undue advantages.

Similarly, requests for benefits from public officials that configure unlawful conduct or contrary to official duties must be refused.

It is also prohibited to acquire or use confidential information improperly, or to resort to indirect forms of disbursement (assignments, sponsorships, consultancies, etc.) aimed at circumventing the prohibitions mentioned above.

23. PROTECTION AND HEALTH AND SAFETY AT WORK

The Company actively promotes safe and healthy working conditions, aimed at protecting the psychophysical integrity of employees, collaborators and all parties who operate, in any capacity, in company workplaces. All employees and collaborators are required to scrupulously comply with current legislation on safety and health in workplaces, as well as the Company's internal policies and procedures, even where these provide for higher standards than those required by law.

The promotion of a culture of safety is a shared ethical principle, which also extends to suppliers, contractors and external collaborators. The Company expressly requires that all companies operating on its behalf sign a formal commitment to comply with safety regulations and to protect the working conditions of their personnel, regardless of the place where the activity is carried out.

24. ENVIRONMENT

The Company recognises in environmental protection and responsible management of natural resources a fundamental principle of its industrial strategy.

In this context, it undertakes to promote initiatives in the short and medium term aimed at reducing the environmental impact of its activities, containing energy consumption and adopting innovative technologies oriented towards sustainability.

To guarantee compliance with requirements, the Company adopts and maintains a System for monitoring company energy consumption and conforms to international reference standards, including ISO 9001 (Quality) standards.

TRASPARENZA CONTABILE

25. MANAGEMENT OF FINANCIAL RESOURCES

The Company's financial management must take place in compliance with the delegations conferred and the authorisations provided, guaranteeing that every operation is legitimate, traceable, authorised and correctly recorded.

Accounting records must be based on complete, accurate and verifiable information, supported by adequate documentation that allows traceability of operations and attribution of responsibilities.

All parties involved, including administrators, employees and collaborators, are required to guarantee the truthfulness and transparency of accounting data and to promptly report any anomalies, omissions or irregularities.

It is prohibited to adopt conduct that may cause damage, even potential, to company assets or to creditors' rights.

IMPLEMENTATION OF THE CODE

26. MONITORING AND UPDATING

The Company undertakes to keep the Code of Ethics constantly updated, in function of regulatory, organisational and operational evolution. Each proposed amendment is subject to approval by the company Governing Body. Revisions shall be adequately available for consultation and possibly communicated to all Recipients.

The Manager of the Internal Reporting Channel as well as communications management is identified as the company Administrative Manager – Diana Fadini. The manager shall have the task of:

- Guaranteeing reception, recording and preliminary evaluation of reports received;
- Adopting all useful measures to protect the confidentiality of the reporter, the persons involved and the contents of the report;
- Managing the channel impartially, avoiding conflicts of interest;
- Collaborating with company management or with any supervisory bodies for any consequent actions;
- Keeping track of reports.

27. OBLIGATION TO REPORT VIOLATIONS

All Recipients are required to promptly report any violations of the Code or current legislation. The Company guarantees confidential, written and digital channels for sending reports.

In particular, reports on violations must be communicated through:

- Internal channel: by ordinary mail, express courier or registered mail, addressing the communication to the Manager responsible for managing the internal reporting channel, at the following address: Via S. Francesco d'Assisi no. 20-22, 24060 Vigolo (BG). The envelope must bear the following statement: "Confidential, Personal". It is possible to send the report without indicating the sender.
- External channel: It is also possible to make the report through the external channel provided for by current legislation. In this case, the competent body to receive it is ANAC – National

Anti-Corruption Authority, according to the methods and procedures indicated at the following link: <https://www.anticorruzione.it/-/whistleblowing>

The SEAL-TEAM evaluates the reports received and decides, on a case-by-case basis, whether it is necessary to undertake corrective actions.

The confidentiality of the reported contents and protection of the reporter's identity are guaranteed, without prejudice to legal obligations and company rights.

Measures of protection against any form of retaliation, discrimination or penalisation towards the reporter are also ensured.

28. OBLIGATION TO COMPLY WITH THE CODE

Observance of the Code constitutes a contractual obligation for employees and collaborators. Violations are subject to proportionate disciplinary sanctions in accordance with current legislation, the Workers' Statute and the applied collective bargaining.

With regard to external collaborators and suppliers, violation of the Code may result in termination of the contract and compensation for any damage caused to the Company, as provided for by contractual clauses.