

1. OBJECTIVE

The ethical code of PAMPOLS aims to establish binding values, principles, and guidelines for conduct that must guide the behavior and actions of WORKERS AND COLLABORATORS in their commercial relationships with the companies that are part of the PAMPOLS group. By signing this ethical code, they commit to respecting these principles. The ethical values that should guide relationships with PAMPOLS, in addition to respecting human rights and current laws, are as follows:

- Honesty: Maintain an upright, honest, and ethical behavior.
- Impartiality and Good Faith: Act with impartiality and good faith.
- Transparency: Provide adequate, truthful, accurate, and verifiable information about management.
- Responsibility: Act responsibly always.
- Care and Diligence: Act in accordance with contractual agreements and regulations. Assume the principle of diligence to prevent, detect, and eradicate irregularities related to violations of this Ethical Code, as well as comply with the criminal responsibility of the legal entity.
- Safety: Guarantee optimal health and safety conditions for employees in facilities, processes, and services provided.

2. SCOPE OF APPLICATION

For the purposes of this Ethical Code, COLLABORATORS include any supplier, contractor, or external collaborator, whether a natural or legal person, involved in business relations with PAMPOLS.

This Ethical Code is mandatory for all PAMPOLS MEMBERS and COLLABORATORS.

3. COMMITMENT

All COMPANY MEMBERS AND COLLABORATORS join PAMPOLS' ethical and good governance commitment and strongly reject any criminal behavior. Any signs of a crime that they become aware of will be investigated, and if confirmed, will result in disciplinary action.

4. CONDUCT GUIDELINES

All COMPANY WORKERS AND COLLABORATORS formally commit to respecting the following conduct guidelines:

1. Compliance with current legislation and ethical values.

They commit to developing their professional activities in accordance with current legislation and ethical conduct. Furthermore, they must avoid any behavior that could harm the reputation of PAMPOLS.

2. Respect for the dignity of individuals in the workplace.

Reject any form of physical, psychological, moral harassment or abuse of authority. Any behavior that could create a threatening, intimidating, or offensive environment with respect to the rights of individuals is prohibited.

They must prevent behaviors that infringe on the dignity, equality, and sexual freedom of the company's workers or third parties, and avoid any form of discrimination based on gender, color, age, religion, political or union affiliation, sexual orientation, race, culture, education, marital status, or nationality.

3. Safety and health at work and respect for workers' rights.

Implement workplace health and safety policies in compliance with current legislation to reduce labor risks. These risks should be reviewed whenever working conditions change. Furthermore, the safety of all employees, collaborators, and agents carrying out activities on their premises must be guaranteed.

To achieve health and safety objectives, the following behaviors will be promoted:

- Do not hire minors.
- Do not hire immigrants without a work permit.
- Implement measures to eliminate any form of forced labor.
- Comply with laws and agreements on working hours.
- Pay in accordance with regulations, including minimum wages and overtime.
- Respect labor rights of freedom of association and collective bargaining.
- Protect employees from occupational hazards and overexposure to risks.
- Establish emergency plans and response procedures.
- Training and Responsibility: Provide adequate training and take responsibility for damage caused by lack of preventive measures.

4. Loyalty and conflicts of interest.

PAMPOLS employees must avoid conflicts of interest between their private interests and those of the company. If there is a potential conflict, they must inform management.

Employees **must not**:

- Accept private benefits from collaborators.
- Use PAMPOLS time or resources for personal purposes improperly.
- Abuse their position to gain personal benefits or benefits for family/friends.
- Engage in external activities that negatively affect their work performance.
- Work for or have connections with competitors that harm PAMPOLS.

5. Protection of personal data.

All PAMPOLS MEMBERS AND COLLABORATORS commit to complying with national data protection regulations at all times, using such data confidentially. They will be held accountable for any damage caused by non-compliance with legal obligations.

6. Transparency of Information, Confidentiality, Protection of trade secrets.

Information is one of PAMPOLS' main assets and is therefore specially protected. PAMPOLS' employees and COLLABORATORS who input information into PAMPOLS' computer systems or files must ensure that it is truthful, accurate, and reliable. Furthermore, when advising clients, they must do so without deceptive conduct. Confidential information may only be used for contracted services and cannot be disclosed without written authorization from PAMPOLS.

7. Use and protection of PAMPOLS' assets and resources.

All PAMPOLS MEMBERS AND COLLABORATORS must protect and responsibly use the resources provided to them, both tangible and intangible, including confidential information and the company's reputation.

PAMPOLS does not allow the use of equipment to download or use illegal software or applications. Intellectual property rights of the company and third parties must also be respected, and the name, logo, or trademarks of PAMPOLS cannot be used without prior written authorization.

8. Anti-corruption measures.

PAMPOLS strictly prohibits any form of corruption or bribery, such as extortion or embezzlement. Offering unauthorized gifts or advantages to public officials or employees in order to obtain benefits or favors is prohibited. Bribery acts, such as influence peddling, are also forbidden.

9. Respect for free competition and market behavior.

PAMPOLS and its COLLABORATORS commit to respecting free competition and complying with applicable laws. They will avoid unfair practices, misleading advertising, and illegal behavior that affects competition. In case of participating in tenders, prices will be set freely, without agreements with competitors to fix prices or assign sales zones or clients.

10. Environmental protection.

PAMPOLS is committed to protecting the environment through sustainable practices, using renewable raw materials, minimizing its environmental impact, and promoting recycling. Employees must recycle properly and use energy efficiently.

11. Public Treasury and Social Security.

PAMPOLS and COLLABORATORS must comply with their fiscal and Social Security obligations, and commit to:

- Managing accounting to faithfully reflect the company's situation.
- Acting honestly in their obligations towards third parties.
- Being alert to potential fraud from third parties that may affect collections or seizures.
- Not using intermediaries to evade taxes.
- Not falsifying, hiding, or simulating operations or documents that harm the Public Treasury or Social Security.
- Not participating in smuggling activities or allowing the entry or exit of prohibited goods without the necessary authorizations.

5. WHISTLEBLOWING CHANNEL

PAMPOLS provides all employees, collaborators, and third parties with a communication and whistleblower channel to report any behavior or actions that are not aligned with PAMPOLS' ethical code. The organization guarantees the confidentiality and protection of the whistleblower. Access to the channel is available at the bottom of PAMPOLS' corporate website.

Change Control

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