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1. INTRODUCTION

At FYTISA we believe that the success and the safeguarding of our future development as a company depends on, amongst others factors, our sustainable business strategy.

In order to accomplish our corporate directives and commitments, we consider sustainability with regard to our suppliers, as a fundamental prerequisite for building successful business relationships. Therefore, we expect suppliers and subcontractors to meet our Supplier Code of Conduct principles on human rights and working conditions, environment and business ethics, and we encourage this through our qualified professionals.

Suppliers participating in every purchasing process, manufacturing and / or supplying products or services to FYTISA must be committed to improving sustainability within their supply chain. Compliance to our "Supplier Code of Conduct" is a must, and is a component of supplier selection and evaluation processes. We expect and encourage our suppliers to replicate this code through their own supply chain.

FYTISA intends to make the principles of the Supplier Code of Conduct detailed below, key elements of our purchasing policy.

In the event that the expectations of this Code are not met, the business relationship may be reviewed and corrective actions pursued subject to the terms of the related procurement contract(s).

2. HUMAN RIGHTS AND WORKING CONDITIONS

FYTISA is committed to respecting and complying with the Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights, international Labor Organization conventions (ILO conventions n° 29, 87, 98, 100, 105, 111, 138 or 182) and the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises, among other international standards and practices. We work to ensure that neither the company nor its employees abuse any of these principles.

Child labor and young workers conditions

Suppliers will not allow any form of child labor in their business activities and in the activities of their supply chain, as described in article 3(d) of Worst Forms of Child Labour Convention, 1999 (No. 182).

No forced labor, modern slavery or human trafficking.

- Suppliers must not use forced or compulsory labor.



- Suppliers should ensure that workers understand their rights with regard to payment of wages, overtime, retention of identification documents, etc.
- Suppliers shall ensure that migrant workers are treated fairly and their rights are respected.
- Suppliers shall pay particular attention that, in cases where workers are recruited by third parties, they have not been charged any fees or commission related to the recruitment and/or employment process.

Fair wages, Non-Discrimination and Equal Remuneration (Payment).

- Suppliers shall pay particular attention that, in cases where workers are recruited by third parties, they have not been charged any fees or commission related to the recruitment and/or employment process.
- Suppliers must comply with applicable regulations in all relevant territories and industries in terms of salary and legally mandated benefits for their employees.
- Suppliers must not discriminate against any worker under any circumstance.

Freedom of Association

- Suppliers must respect the right of workers to associate freely, form and join workers organizations of their own choice, seek representation, and to bargain collectively, as permitted by and in accordance with the applicable laws and regulations.
- Suppliers shall ensure that representatives of such personnel are not subject to discrimination.

Health & Safety

- Suppliers must have updated workplace risk assessments available for whole sites and all of its workplaces.
- Health and safety related information such as emergency procedures and potential safety hazards must be made known to the workforce and should be posted within the facility in a language well understood by all of the workforce.
- Suppliers shall be required to ensure that the workplaces, machinery, equipment and processes under their control are safe and without risk to health and provide adequate safety training to employees, and with suitable protective equipment.
- Suppliers shall be required to ensure that the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken.
- Suppliers must ensure that all required permits, licenses, inspection and testing reports are in place, up to date and available as required by law.
- Suppliers shall be required to provide information on measures to deal with emergencies and accidents, including adequate first-aid arrangements.
- Suppliers should define an alcohol and drug policy with the aim to prevent any incidents/accidents and to preserve employee health.

Non -Discrimination (Diversity and Inclusion)

- Suppliers shall guarantee equal treatment and provide an inclusive working environment to all of their employees.
- Suppliers must ensure that there is no distinction, exclusion, restriction or preference, according to characteristics of an employee: such as race, colour, national origin, gender, age, physical characteristics, social and cultural origin, disability, union membership, religion, family status,



pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law.

Harassment

- Companies should provide a work place free of any form of harassment.

3. ENVIRONMENT

FYTISA is committed not only to comply with all environment laws and regulations, but to also adapt sustainable and responsible practices that promote conservation of resources and raw materials, and to contribute to the protection of the environment.

FYTISA expects their suppliers and their whole supply chain to be committed with the same goals and aims.

Energy Consumption & Gas Emissions

- Suppliers are expected to track and document energy consumption and greenhouse gas emissions.
- Suppliers are also to look for cost-effective methods of improving energy efficiency by minimizing their energy consumption and greenhouse gas emissions, considering a life cycle perspective.

Water Reduction, Air Quality & Waste Management

Suppliers are expected to:

- Preserve water resources and reduce water consumption.
- Set targets for waste reduction and establish a waste management hierarchy in the following order of priority: prevention, reduction, reuse, recovery, recycling and finally waste disposal.
- Handle and dispose of all generated waste through safe and responsible methods that protect the environment and the health and safety of employees and local communities.

Natural Resource Management

- Suppliers are expected to encourage and support the use of sustainable, renewable and natural resources in an efficient manner over the product's life cycle.

Responsible Chemical Management

- Suppliers are expected to identify and manage chemicals to ensure their safe handling, storage, use, recycling and disposal.
- Suppliers are expected to collect data from their material manufacturers for all chemicals and components classified as hazardous substances.



4. BUSINESS ETHICS

FYTISA expects that its suppliers maintain the highest standards of corporate ethics and lawful conduct, and requires that these standards be passed through to the supply chain. All business relationships and transactions by the companies in the supply chain must conform to local laws and be conducted with the utmost integrity and honesty; including in particular:

Responsible sourcing of materials

- Suppliers are expected to not provide products containing materials that contribute to human rights abuses, bribery and violation of ethics, or negatively impact the environment. Therefore, we expect suppliers to conduct due diligence to understand the source of materials used in their products, identify risks and mitigate human rights breaches.
- Suppliers are expected to use validated conflict free smelters and refiners for procurement of Tin, Tungsten, Tantalum and Gold contained in the products they produce.

Anti-Corruption

- Suppliers must actively and consistently fight against any form of bribery, corruption, extortion or embezzlement, and comply with all applicable laws pertaining to these issues. Our policy goes beyond these laws and prohibits improper payments in all of our activities, both with governmental entities and in the private sector. Negotiations in which transactions are made using illicit means will not be tolerated.

Privacy and Confidentiality

- Suppliers are expected to comply with all applicable laws concerning data protection and information security, ensuring that privacy is safeguarded, personal data is protected, and all business information is kept secure. They are expected to ensure that they cascade these principles in relation to information security and data privacy to any subcontractors or Tier N suppliers.
- Suppliers must ensure that any confidential business information or trade secrets obtained under business activities with Grupo Antolin are held in strict confidence and not improperly used or revealed to third parties.

Financial Responsibility/Accurate Records

- All records and reports, whether internal or external, must be accurate and truthful. Suppliers are expected to act in accordance with applicable law and generally applicable accounting Principles, which require that data and other records always be complete, correct, up-to-date, and System-compliant.

Fair Competition/ Anti-Trust

- Suppliers will strictly comply with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing with unfair competition and restraints of trade.
- Suppliers will not enter into agreements with competitors or engage in other conducts that may unfairly impact competition, including, but not limited to, price fixing, bid rigging or improper market allocations.



Conflicts of Interest

- Suppliers shall avoid any situation or activity in which their personal or financial interests could come into conflict with those of the Company, and reveal an actual or potential risk of conflict of interests in association with FYTISA employees or their relatives.

Insider Trading

- Suppliers cannot purchase, sell or trade Grupo Antolin securities while in possession of non-public information regarding FYTISA.
- Suppliers and supplier employees must never directly or indirectly disclose non-public information acquired by conducting business with FYTISA.

Import/Export Controls and Economic Sanctions

- Suppliers shall ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import / export of parts, components and technical data.
- Suppliers shall provide truthful and accurate information for reporting purposes when requested, and obtain import and/or export licenses and/or consents where necessary.
- Suppliers shall comply with applicable restrictions on the export or import of goods, equipment/tools, software, services and technology, as well as with all applicable economic sanctions and restrictions on doing business with and trade involving certain countries, regions, companies or entities and individuals.

Whistle blower Protection and Non-Retaliation

- If the Supplier or employees of the Company have evidence, doubts or suspicions regarding any form of corruption, or other criminal or non-compliant conduct, they should immediately inform and report through the FYTISA whistleblowing line. FYTISA will not tolerate any form of retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this Code.

Approved By
Guillem Soler
FYTISA CEO