



**MURTRA
NONWOVENS**

CODE of CONDUCT



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INTRODUCTION

From Murtra Nonwovens (hereinafter MNW) we want to lay the foundations so that integrity, honesty, fair treatment and compliance with all laws guide the practices of all our collaborators, in addition to informing all employees of the group about the guidelines by which we must behave to achieve a conduct in accordance with the values of MNW.

MNW's actions are based on the values of **Integrity, Excellence, Trust and Profitability**, considering these as the basis for generating shared value for all its stakeholders, as well as **sustainable and profitable growth for the organization**.



This code of conduct specifies the **corporate principles** and contributes to their continuous implementation through the establishment of certain non-negotiable minimum standards applicable to all areas and companies of the organization.

The nature of this code is not intended to cover all possible situations that may occur, but to establish a reference framework on how to act in the event of **detecting fraudulent or ethically reprehensible conduct**.

Since MNW operates in different locations, the regulation that prevails over this Code of Conduct is the local existing regulation that is stricter.

Employees and/or collaborators should ask for advice if they have any doubts about the action plan in a given situation, since the absolute responsibility of each employee is to **“do the right thing”**, a responsibility that cannot be delegated.

Employees should always be guided by the following basic principles::

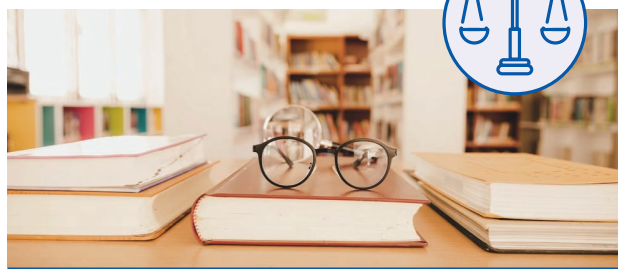
- Avoid any conduct that may damage or endanger MNW or its reputation
- Act legally and honestly
- Once the two previous ones are insured, prioritize the interests of the company over personal or other interests

COMPLIANCE WITH THE LEGISLATION

MNW and its employees are governed by law and must therefore **comply with current legislation** in the countries where they operate. Compliance with all applicable laws and regulations should never be compromised.

We do not tolerate non-compliance with the rules, especially rejecting cases that may have a criminal dimension. In no case should MNW personnel (regardless of its level) or its collaborators give in to non-compliance, even in the case of specific or economically insignificant cases.

In addition, **employees must abide by internal rules and regulations** as they are applicable in a given situation. Said internal rules are company specifications and may go beyond the requirements of the law itself, without infringing these in any case.



CONFLICT OF INTEREST

A conflict of interest occurs when the personal interests of an employee or the interests of a third party enter in conflict with the interests of MNW.



In this situation, it may be difficult for the employee **to act fully in the best interests of MNW.**

→ Whenever possible, MNW employees should avoid conflicts of interest.

In the event of a conflict of interest or if an employee is faced with a situation that may derive or give rise to a conflict of interest, **the employee must notify its immediate superior and/or the HR manager** in order to solve the situation fairly and transparently.

FIGHT AGAINST CORRUPTION

Employees, directly or through intermediaries, **must never offer, promise, or solicit an improper personal or financial favour or other types of favour** in order to obtain or gain a business or other advantage from any third party, whether public or private.

Likewise, employees must refrain from engaging in any activity or conduct that could give rise to the appearance or suspicion of such conduct or an attempt thereof.

For this reason:

SMALL GIFTS, MEALS AND ENTERTAINMENT

They are acceptable if they are reasonable, **proportionate**, made in good faith, and do not, in any way, compromise or affect the impartiality of the recipient or its commitment to the interests of MNW.

Although no two situations are the same, **logic must prevail** and acceptance should always be questioned in the event that it could lead to an uncomfortable situation.

FACILITATION PAYMENTS

Facilitation payments are not allowed, which are those of a relatively low amount, normally made, in order to ensure or expedite a necessary procedure or action.



→ In case of doubt, consult with the immediate superior or with the person in charge of the anti-corruption policy.



PURCHASING PROCESS

Supplier selection should never be based on the receipt of a gift, meal, or money. It is necessary to keep the documentation that supports the motivated purchase decision.

A bidding process includes an invitation to other parties for a proposal, with the understanding that any competition for the contract in question must be conducted in response to the offer. **The choice must be motivated based on price, quality, and the rest of the factors that cover the requested needs** (delivery times, technical characteristics, etc.).

POLITICAL DONATIONS AND DONATIONS

Political donations are not allowed.

The company's contributions to community or charitable projects must be made in good faith, following the guidelines of the parent company (Industrias Murtra), and in accordance with this Anti-Corruption Policy.

The supervision of the transactions will be the responsibility of the Administration Department.

PERSONNEL EXPENSES

A follow-up and control of travel and entertainment expenses is made, and the appropriate proof of **the expense must be presented.**

All workers must be responsible with respect to corruption and bribery.



→ In the event of any question, concern or complaint, employees should contact their immediate superior, who should forward it by email to the HR manager.

RESPECT OF HUMAN RIGHTS

MNW adheres to the **United Nations Global Compact**, which is why MNW is committed to complying with the following principles:

WE SUPPORT



- Support and respect the **protection of human rights**
- Ensure that the company is not complicit in human rights abuses
- Defend **freedom of association** and recognition of the right to collective bargaining.
- Eliminate all forms of forced and compulsory labour.
- **Do not allow child labour.**
- Eliminate any type of **discrimination** in terms of employment and occupation.
- Face **environmental challenges.**
- Undertake initiatives to promote greater environmental responsibility.
- Promote the development and diffusion of **environmentally friendly technologies.**
- **Work against corruption** in all its forms, including extortion and bribery.



NON-DISCRIMINATION. HARASSMENT/VIOLENCE

MNW respects at all levels of the organization, the personal dignity, privacy and rights of each employee and is committed **to maintaining a workplace in which there are no discriminatory or harassing behaviours** regarding the origin, nationality, religion, race, gender, age or orientation, nor must engage in any type of verbal or physical harassing conduct or for any other reason.

For this reason, MNW will ensure a proactive attitude towards harassing and/or violent behaviours at work. Accordingly, a series of instruments and strategies are adopted to deal with these risks:

→ Culture of **zero tolerance towards harassing and/or violent behaviours** and offensive, discriminatory and/or abusive attitudes. This line is reflected in the document “Corporate Social Responsibility”.

→ Declaration of individual commitment to the prevention of harassment and/or violence and with the involvement in creating **healthy work environments** by the company’s workers.

→ **Protocol for the prevention and approach of harassment** and/or violence at work (can be consulted in the blue folder that is in the planning department in Tefisa).

→ Carrying out **actions to raise awareness**, information and training regarding harassment and/or violence.

→ Monitoring and **evaluation of the protocol** for the prevention and approach of harassment and/or violence.

→ **Verification** of the existence of signs of harassment and/or violence through:

- o **Follow-up by the management** of recurring or long-term sick leave, the increase in complaints in certain jobs, the increase in absenteeism and staff turnover and situations of breakdown or crisis in relations between workers, customers or with the management.

- o **Direct observation of the dynamics and behaviours and regular conversations** between management and managers with the workers.



→ In the event of experiencing a situation of harassment or witnessing harassing behaviour towards a colleague, please contact the reference persons of this protocol: Marisa Barbado (HR Manager) and Iñaki Moreno (Committee Representative) in Tefisa.

EQUALITY, EQUITY AND INCLUSION POLICY



The Management of MURTRA NONWOVENS declares its Commitment to the establishment and development of policies that integrate **equal treatment and opportunities**, as well as equity of resources and inclusion, without discriminating directly or indirectly based on sex, gender, race, age, marital status, religion, culture, social group, sexual orientation or any other personal, physical or social characteristic. In turn, it promotes measures to achieve **real equality, equity and inclusion** within our organization, establishing equal opportunities, equity of resources and inclusion as a **strategic principle of our Corporate and Human Resources Policy** and a lever for attracting and retaining talent.

In each and every one of the areas in which we carry out our activity, from access, selection, hiring, promotion, salary policy, labour development, training, working conditions, occupational health, management of working time and conciliation, we assume the principle of **equal opportunities and equity among the people of our organization**, understanding this as the “situation in which an apparently neutral provision, criterion or practice places a person in a disadvantaged position due to its origin, be it racial, sex, gender, age, religion, culture, social group, sexual orientation or any other personal, physical or social characteristic”.

Regarding this policy, all the people in the organization will be informed of the decisions, plans and measures that are adopted and a policy of awareness and creation of **a company culture will be launched in accordance with the principle of equal opportunities, equity and inclusion**.



The enunciated principles will be put into practice through equality measures and the implementation of an Equality Plan in order to advance in the achievement of real equality in the company and, by extension, in society as a whole.

To achieve this purpose, we will have the **legal representation of the workers**, not only in the collective bargaining process, but in the entire development and evaluation process of the aforementioned equality measures or the Equality Plan. Likewise, we urge all the workers of the company to be an active part of the entire process.

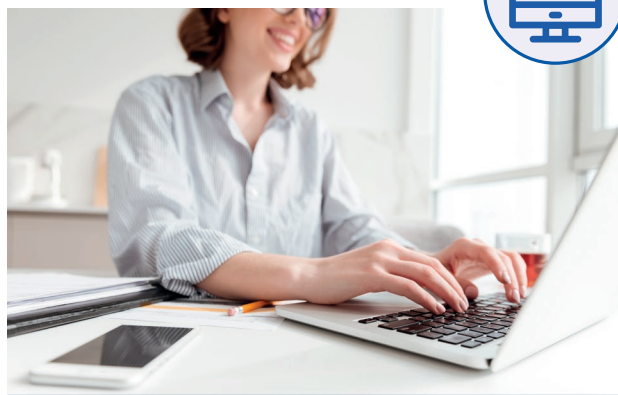
We face the implementation of the Equality, Equity and Inclusion Plan as a **modernization of our business management system** that will undoubtedly give rise to an internal structure and relations with society in which our actions are free of discrimination, thus contributing to progress towards a society in which **equality and equity, with its ethical and integral dimensions, are real and effective**.



USE OF RESOURCES AND EQUIPMENT

We make available to our employees and collaborators the **necessary resources for the performance of their professional activity**.

They must be used responsibly, following all safety regulations, appropriately and efficiently in the context of professional activity, protecting and preserving them from loss, damage, theft or any other illegal, dishonest, or different use for its purpose.



SECURITY AND ENVIRONMENT

The safety and health of our staff and collaborators is a strategic pillar at MNW, and also of our suppliers, contractors and collaborating companies. For this purpose, **we promote a safe and stable environment**, updating occupational risk prevention measures and scrupulous respect for applicable regulations in this area.



MNW will ensure that the most demanding occupational health and safety standards are applied, setting itself the goal of achieving zero accidents.

All MNW employees and collaborators, whatever their level, **are responsible for rigorously complying with and enforcing occupational health and safety regulations**.

We must always be responsible and make an appropriate use of the equipment that has been assigned to us to carry out risky activities and disseminate the appropriate knowledge to our colleagues and subordinates, **promoting compliance with practices that prevent incidents in the indicated areas**.

As the safety of workers prevails, the use of electronic equipment (headphones...) is prohibited **to avoid distractions that may cause safety problems**, as well as quality problems in production.

Mobile phone use is restricted to avoid distractions that could cause production or security issues.

There will be **zero tolerance for any consumption of substances** that may endanger the safety of the worker himself, as well as that of his colleagues.

Given the evidence that a worker is under the influence of the consumption of substances that may endanger his safety and/or that of a colleague, he will be penalized as stipulated in current regulations.

HANDLING OF CONFIDENTIAL INFORMATION

Confidential information is the **information that is not or not yet of public knowledge**. It includes, among others, sales secrets, business plans, marketing, product formulation, designs, databases, records, personnel, financial, customer and supplier information, or other non-public information.



The continued success of MNW depends on the use of confidential information and its non-disclosure to third parties.

Unless required by law or authorized by the Company's Management, **employees will not reveal confidential information or allow its disclosure** as stipulated in the confidentiality document that is delivered at the beginning of their employment relationship with the company.

Employees must make every effort to **prevent unintentional disclosure of information** by taking special care when storing or transmitting confidential information.

MNW respects the fact that third parties such as **partners, suppliers or customers** share confidential information with MNW. **Such information will be treated in the same way as MNW's confidential information.**



SUSTAINABILITY

MNW's activities only make sense to the extent that they are sustainable, prioritizing a long-term strategic vision. For this reason, we maintain a **constant commitment to sustainable development**, serving society in an efficient and ethically responsible manner, contributing with our ability to generate value both internally and for all interested parties. For this, **we demand the highest standards of integrity** among our collaborators and also from the third parties with which we are linked.

We strive to remain in the territories where we operate, actively contributing to their economic and social development, promoting the hiring of local workers and executives.

At MNW we have assumed the commitment to act at all times in accordance with the ten

principles of the **United Nations Global Compact**, to which we have adhered since its inception, and whose objective is to promote **Social Responsibility, including Human and Labour Rights, as well as environmental protection.**

Likewise, we are committed to acting responsibly and diligently in order to identify, prevent, mitigate and respond to the negative consequences that our activities may cause.

MNW companies must carry out rigorous management of both financial and non-financial risks, **promoting a balance between expected profitability and the risk assumed**, following the principle of prudence and proportionality, and having mechanisms that guarantee the **veracity and integrity of the information** that is made public in both areas.





COMMUNICATION OF ILLEGAL CONDUCT, UNDER THIS CODE

Any practice that contravenes this code of conduct may be reported through the official complaints channel, which can be accessed as follows:



- **Downloading the Co-resol App**
- **Through the website <https://co-resol.bcnresol.com/es/webclick>**
- **Or through the Murtra Nonwoven website: www.murtranonwovens.com**

In order to issue the corresponding complaint, **the employee must detail the events that occurred**, having the possibility of sending files as evidence of the complaint.

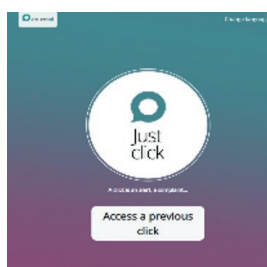
The complaint issued by the complainant will arrive by email to the **HR manager, who will be responsible for internally investigating** what happened. The communication between the company and the complainant will be carried out through the **chat** of the App.

All complaints must be properly investigated and **will be treated with the strictest confidentiality, guaranteeing the anonymity** of people who report conduct that contravenes this code of conduct.

MNW prohibits retaliation against any employee for complaints made in good faith, while **protecting the rights of the accused**.

HOW TO SEND A COMPLAINT?

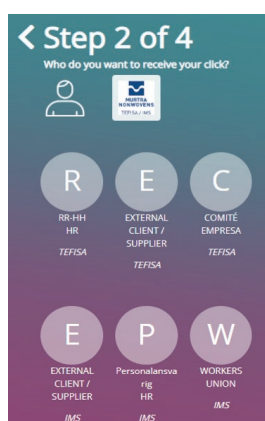
Once you have accessed to the link, you'll find the following screen:



01/ Once you have accessed the app, you'll click in the icon "Just click" to start the complaint process and access the next screen.



02/ Step 1 of 4, you will have to enter the code **MNW** to access step 2.



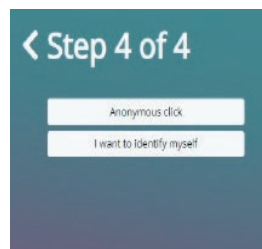
03/ In the step 2 of 4, **you must select who will manage the complaint** that you are sending. You can select between different options:

- **HR:** For those internal personnel complaints which will be managed by HR department.
- **External:** Complaints received from suppliers or customers and affecting any MNW employee.
- **Workers Union:** For those complaints which will be managed by the Workers Union selected person.

→ This platform is intended for both Tefisa and IMS personnel, being identified every icon by the name of the company.



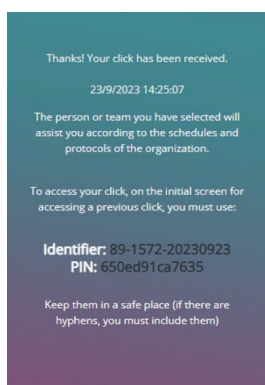
04/ In the step 3 of 4, it will be necessary **to explain the event** that is being reported, having the possibility to enclose pictures, document or any file as evidence of what happened.



05/ Step 4 of 4, you must inform if you want **to identify yourself or be anonymous**.

To be able to send the complaint you must first read and accept the company's **privacy policy**.

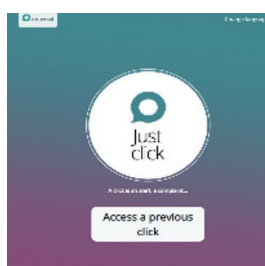
→ **IMPORTANT NOTE:** making a false report has legal consequences.



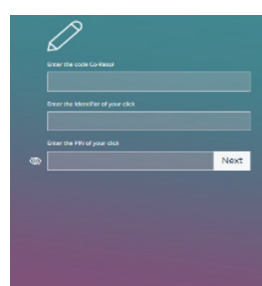
06/ Once all the steps have been completed and the report sent, the platform will provide an **identifier and a pin**, which must be saved since this information will be necessary to review the status of the report, as well as to communicate with the company's interlocutor, who will be carrying out the investigation of the claim.

If the complaint is made through the app, you will only need to go to your last chat.

If you are **connected at the same time** as your interlocutor through the App, you will be able to chat via messages as if it were a CHAT. If you and your interlocutor are **not connected at the same time**, you will have to connect to the web or the App and check new messages in the CHAT icon.



01/ To be able **to review the status of the complaint or communicate with the interlocutor**, you can access the main screen, go to the icon **"Access a previous click"**



02/ Once the icon is clicked, the screen will appear where you must **enter the identifier and the PIN** that has been provided once the report has been sent.

→ **IMPORTANT:** in order for your interlocutor to investigate your case, you must answer the questions with complete sincerity.

→ **REMEMBER:** if you do not provide the information requested, your interlocutor will not be able to help you and your report or click will be closed.



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NONWOVENS**