

**Code of ethics for suppliers,  
subcontractors, distributors, and  
workers**



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## **Introduction**

The Supplier, Subcontractor, Distributor, and Worker Code of Conduct of Estudio Cerámico establishes the minimum standards of behavior required of suppliers, subcontractors, distributors, and all personnel of the group in the conduct of their activities, in line with the company's corporate culture, rooted in respect for human and labor rights as well as environmental respect.

The code applies to all personnel, suppliers, subcontractors, and distributors involved at all levels of the production process, storage, transportation, distribution, and advisory of our products.

Below are the main principles that shape the ethical behavior of Estudio Cerámico, S.L.

All activities will be conducted in an ethical, honest, responsible, and respectful manner, in accordance with current legislation, with the basic principles set forth in the United Nations Global Compact, and with the Fundamental Human Rights outlined in the Universal Declaration of Human Rights.

The company prohibits any action, negotiation, decision, or stance aimed at limiting, hindering, or distorting free competition in the market.

All individuals who have a relationship with Estudio Cerámico S.L., whether directly or indirectly, in labor, economic, industrial, or social terms, will receive respectful and fair treatment.

Activity performance will be carried out in the most environmentally respectful manner, promoting environmental responsibility and fostering the development of environmentally-friendly technologies.

All aforementioned individuals will fully adhere to the obligations and commitments, as well as ensure that the minimum ethical standards indicated are upheld.

## **Prohibition of forced labor**

Any form of forced or involuntary labor among workers and affiliated individuals will not be permitted. Any form of extortion to retain workers is strictly prohibited.

## **Prohibition of child labor**

Hiring minors is prohibited. In Spain, Article 6 of the Workers' Statute prohibits work for those under sixteen years of age. If the legislation of the country establishes a higher age limit, that limit will be respected. Employees between the ages of 16 and 18 shall not be allowed to work the night shift or in positions involving hazardous conditions.

## **Prohibition of discrimination**

Any form of discriminatory practice against an individual or group based on race, religion, physical differences, political beliefs, gender, age, physical or mental condition, sexual orientation, union affiliation, or political affiliation, etc., is strictly prohibited.

## **Freedom**

The rights of affiliation, association, and collective bargaining will be guaranteed without retaliation for users, and any act of extortion or bribery aimed at preventing the exercise of such rights will be condemned. Similarly, a collaborative stance will be adopted towards the activities of workers' associations for the defense and promotion of their interests.

Individuals representing workers will be protected against any form of discrimination and will have complete freedom to carry out their duties as representatives.

## **Prohibition of harassment**

All adherents to the code shall reject any form of harassment in the workplace, whether of a sexual nature or not. Relationships and interactions among employees must always be cordial, polite, and respectful.

Physical punishment, verbal abuse, abuse of power, and any form of harassment will not be tolerated in any way. It will be ensured that all individuals enjoy a work environment where their dignity, moral integrity, and freedom are respected.

Sexual harassment encompasses any behavior based on a person's sex, with the purpose or effect of undermining their dignity and creating an intimidating, degrading, or offensive environment.

Sexual harassment is any behavior, verbal or physical, of a sexual nature that has the purpose or effect of undermining a person's dignity, particularly when it creates an intimidating, degrading, or offensive environment.

Moral harassment refers to any conduct, practice, or behavior within a work relationship that directly or indirectly undermines or attacks the dignity of the worker, subjecting them to emotional and psychological violence or hostility, with the aim of nullifying their capacity, professional advancement, or their tenure in the workplace, negatively affecting the work environment.

Finally, this prohibition also applies to situations of pregnancy, childbirth, breastfeeding, or caring for a minor, as any attitude affecting their professional rights, undervaluation, or causing harm to the individual constitutes direct discrimination.

## **Work safety and hygiene**

Commitment to ensuring a safe and healthy work area, offering minimum conditions of light, ventilation, hygiene, fire protection, security measures, etc. Occupational safety and health must be an essential part. Preventive and corrective measures will be implemented to avoid accidents and damages that may affect the health of workers, minimizing, as far as possible, the inherent risks of the job, rectifying unsafe and/or unhealthy conditions.

Additionally, employees will receive training in occupational safety and health and maintain appropriate records of the training courses attended. Likewise, a safety and hygiene officer will be appointed if necessary.

## **Salary**

It will be ensured that all adherents to the code, directly or indirectly, enjoy a fair salary, at least equal to that established by collective agreement or the minimum wage, whichever is more beneficial to the worker.

All parties adhering to this code will ensure that wages and other benefits or allowances are paid in a timely manner in accordance with applicable legislation.

## **Safety and health**

Occupational safety and health is another fundamental aspect whose regulations must be strictly adhered to by all individuals involved in the production cycle. In this regard, compliance with regulations on Safety, Health, and Hygiene in the workplace is mandatory.

To this end, necessary technical equipment will be provided for the performance of their duties, and employees will be trained in occupational safety and health protection as required.

## **Environment**

Efforts will be made to carry out their usual activities in a manner that minimizes harm to the environment, seeking to reduce negative impacts on the surroundings as much as possible. Commitment to environmental protection and compliance with standards established in applicable national and international legislation.

## **Confidentiality**

There is an obligation to preserve and maintain the confidentiality of information handled as a result of tasks or relationships in the workplace. The confidentiality obligation will be upheld even after the employment relationship has ended. Additionally, any tangible property of the company or related to it in the possession of any personnel adhering to the ethical code must be returned.

## **Code implementation**

All parties must implement all available means to put this code into practice. Additionally, this code must be made known to all staff and to those who, in any way, are involved in the production and supply chain of the group.

## **Transparency**

Any practice involving the offering and subsequent acceptance of illicit advantages or incentives with the aim of influencing decision-making of any nature is prohibited. Personnel conduct must be honest and transparent in the performance of their activities, and any situation of bribery, extortion, or corruption that may occur will be punished. Suppliers and subcontractors must not offer, grant, solicit, or accept gifts or favors from buyers that contravene the provisions of the ethical code. There shall be no attempt to influence or manipulate the staff, and no falsification of documents, records, or files that may simulate or distort compliance verification processes of this code will be tolerated. It is strictly prohibited to accept any form of remuneration intended, whether deliberately or not, to interfere with the objectivity and impartiality of decisions to be made.

## **Minimum standard**

The obligations described in this code of ethical conduct constitute the minimum standards expected of all adherents. In cases where national legislation or collective agreements may contain any other applicable provisions or commitments that regulate the same issues, the regulation most favorable to the worker shall be applied.