



CODE OF ETHICS

SAMCA Group

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PURPOSE AND SCOPE OF APPLICATION

This Code of Ethics is applicable to SA Minero Catalano Aragonesa (“**SAMCA**”) and to all the subsidiary countries that at every moment form part of its commercial group (hereinafter all of them are referred to jointly as “**SAMCA Group**” or the “**Group**”).

This document is a statement of the ethical culture and of regulatory compliance of the group, formalised through the Compliance Policy and promoted from SAMCA’s Board of Directors, constituting in turn one of the essential elements of the Group’s Criminal Compliance Management System.

The purpose of this Code is to regulate the ethical principles that inspire the actions of SAMCA Group, including the conduct guidelines that must guide the behaviour of the “**Subject Persons**” in that in which it is applicable. for such purpose, the following are considered Subject Persons:

- ✓ The members of SAMCA’s Board of Directors.
- ✓ The members of SAMCA’s Management Committee.
- ✓ The members of the administrative bodies of the companies that comprise the Group.
- ✓ SAMCA’s General Director.
- ✓ The General Directors of the different companies of the Group, also called Business Directors.
- ✓ The Directors of the Central Departments of the Group.
- ✓ The Financial, Administrative and/or Management Control Directors of the Group’s companies.
- ✓ The Area Directors and the Coordinators.
- ✓ The Plant, Factory, Mine, Agricultural Property and Refrigeration Directors -all comprise the Management of the Installations.¹
- ✓ Agents of any of the companies of the Group.
- ✓ Employees not considered in previous points, regardless of the modality or duration of their contracts.

All of them are SAMCA’s “**Subject Persons**”.

- ✓ Companies and professionals outside the Group contracted to provide services, occasionally or periodically, to SAMCA Group.

¹ All of those referred to in the previous points shall also be referred to as the Executives of SAMCA Group.

- ✓ External companies and professionals of the Group contracted to carry out construction works for SAMCA Group.
- ✓ The suppliers of SAMCA Group.
- ✓ The customers of SAMCA Group.

All of these are the “**Subject Persons Related to SAMCA**”.

SAMCA Group will provide appropriate knowledge to its Subject Persons on the principles and action guidelines included in this Code of Ethics.

This Code of Ethics will be accessible through SAMCA Group’s website: ([www.https://gruposamca.com/cumplimiento-normativo](https://gruposamca.com/cumplimiento-normativo)), as well as through SAMCA Group’s intranet for its Subject Persons that have access to it.

Consequently, the Subject Persons must comply with and respect what is presented here.

Regarding the Subject Persons Related to SAMCA, a reference to the mandatory compliance with this Code of Ethics will be included in the contracts signed with them.

GENERAL PRINCIPLES

RESPECT FOR THE LAW

SAMCA Group has always carried out its activity guided by the corporate policy of absolute rejection and zero tolerance towards the commission of unlawful conduct or contrary to the principles included in this Code of Ethics, which is, therefore, the updated written expression of this corporate policy.

In particular, the Executives of SAMCA Group must promote compliance with the law and internal regulations among their subordinates, setting an example with their actions and ensuring they have the information and training necessary for the correct performance of their occupational or professional work.

EXCELLENCE AND INTEGRITY

SAMCA Group aspires to excellence in the implementation of each of its activities.

To accomplish this, all Subject Persons must maintain honest, transparent, upright and responsible conduct in all their actions, assumed commitments and interpersonal relations that take place during the performance of their activity with or related to SAMCA Group.

Subject Persons must particularly avoid any action or behaviour that could harm the Group's image, reputation or interests. For this reason, being linked, belonging or making contributions to political parties or other type of entities with political or ideological connotations must always be made, when applicable, in a private capacity, avoiding any connection to the Group.

In this regard, only the persons expressly authorised by the Group may disseminate information or express opinions on behalf of SAMCA Group in the media, public forums or social networks.

SUSTAINABILITY

For SAMCA Group, sustainability involves its commitment to achieve economic success with the objective of creating and maintaining a high number of jobs, from protecting the environment to protecting people, by means of efficient productive processes that minimise energy and water consumption, emissions and waste, and that protect health and safety in the workplace.

INNOVATION

SAMCA Group orients innovation towards an increasingly more efficient management of available resources and knowledge, ensuring at the same time that the most appropriate technologies are introduced efficiently, providing competitive advantages to the Group, as well as benefits to customers, employees and other stakeholders of the Group.

Innovation is the main tool of SAMCA Group to ensure sustainability, efficiency and competitiveness and a strategic variable that affects all its businesses and all the activities it carries out. This R&D&I Policy intends to

define and disseminate the strategy that permits the Group to be a leader in innovation within the sectors in which it operates, heading the transition towards a more sustainable, healthy and accessible model.

In this regard, the cornerstones of SAMCA Group's R&D&I strategy are research and development of industrial minerals, plastic polymers, biopolymers, synthetic fibres, new ceramic materials, nanotechnology, plant varieties and plant nutrition.

The R&D&I Department coordinates the different research groups of all the business areas and drives the development of new products and technologies. It also promotes the improvement of processes and implementation of new business lines, always clearly market-oriented.

Promoting science and innovation in the environment is one of the Group's maxims. To do this, SAMCA Group sponsors and collaborates with Universities and Technological Centres of prestige with the objective of driving advanced research in the fields in which it works, as well as training new specialised professionals.

REINVESTMENT

SAMCA Group has implemented an Investment Plan of the Group that, through the reinvestment of practically all of the profits obtained in its business activities, has allowed the diversification of the Group and planning the development and application of its activities, with a very high level of self-financing, which contributes to the Group's solid financial structure.

ACTION GUIDELINES

RELATIONS WITH THE PUBLIC ADMINISTRATION

Relations with officials and public authorities

A large part of the activities carried out by SAMCA Group -for instance, mining, energy, real estate promotion, etc.- are conducive to reiterated relations with the Public Administration and their officials.

All the relations of SAMCA Group with the Public Administrations must be based on the principles of collaboration, loyalty, institutional respect and honesty.

The Subject Persons, in the scope of their functions, must provide their collaboration and diligence in an inspection or requirement of the Administration or of the regulatory and supervisory organisations.

From SAMCA Group, any type of practice susceptible to be considered as bribery or influence-peddling is expressly rejected. For this reason, Subject Persons are completely prohibited from trying to benefit from a personal relationship with any member of the Public Administration with the objective of influencing them in order to obtain favourable treatment for themselves or for the Group.

Subject Persons are also prohibited from delivering or, even merely offering, any gift, gratuity or benefit to a public official or to any member or collaborator of the Public Administration, beyond that permitted by standard, social or courteous practices.

Subsidies and public aids

SAMCA Group complies with everything demanded by the general subsidy legislation and the tender bases, both in requesting and in justifying the subsidies that it may receive from the Public Administrations, whether national or European. For this reason, the Subject Persons who intervene in their request are prohibited from falsifying data, information or conditions for their award. Likewise, it is not permitted to falsify the documentation needed for their justification or to use the subsidy for a purpose other than that for which it was granted.

Relations with the Public Treasury and Social Security

SAMCA Group is committed to the fulfilment of the tax and Social Security obligations that are applicable to it.

Therefore, it is strictly prohibited to carry out any practice intended for evasion of tax payments or contributions required by the current legislation or the obtaining of undue benefits detrimental to the Public Treasury and Social Security.

Subject Persons, in the scope of their functions, must comply with all the legal obligations provided in the current legislation.

RELATIONS WITH WORKERS

Equality of opportunities and fair treatment

SAMCA Group is firmly committed to respecting the dignity of its workers and to the labour rights recognised in the current legislation. Thus, all Subject Persons, in the scope of their functions, must act with full adherence to the applicable labour regulations and legally recognised rights in their relationships with the workers under their responsibility or with other workers.

In the selection, hiring and internal promotion processes of the personnel, SAMCA Group is governed by objective criteria (professional qualification, skills, experience, ethical behaviour...), always observing the regulations applicable to hiring, especially in the case of foreigners.

In this regard, any discriminatory practice for reasons of sex, orientation or sexual identity, ideology, beliefs, religion, nationality or any other circumstance is completely prohibited.

Moreover, all Subject Persons have the obligation to respect and support SAMCA Group's commitment to equality of opportunities and to respectful, decent and fair treatment, fostering a positive and pleasant work environment.

Therefore, any offensive, discriminatory behaviour or sexual, psychological or moral harassment, abuse of authority, offense or any other form of aggressiveness and hostility that fosters a climate of intimidation or grievance is prohibited.

Professional development

An objective of SAMCA Group is to have appropriate persons for the job, who are committed to their performance, constantly adapting to the technological and social advances.

For this reason, talent management is supported, among other measures, by the continued training of the employees, with the objective of having at every moment the skills that are required to respond to global challenges, both in the present and in the future.

SAMCA Group maintains the firm commitment of investing in the professional and personal development of its employees by meeting their training demands; therefore, all of SAMCA's Subject Persons must see to their own training and strengthen their own personal and professional learning and that of the workers under them.

Safety and health in the workplace

A safe and healthy work environment is the cornerstone of the sustainability initiatives through their integration in the general organisation of SAMCA Group.

SAMCA Group states its firm commitment to providing its workers with a safe and healthy environment. Likewise, the Subject Persons Related to SAMCA must provide it to their workers when the latter work in the Group's installations.

Consequently, all Subject Persons are required to adopt a proactive and responsible attitude, thereby presenting, in the framework of their competences, timely compliance with the occupational risk prevention legislation and, in particular, the following is required:

- ✓ The Installation Management shall adopt all the decisions necessary to materialise the duty to protect the workers incumbent on the employer in the area of the installation that they manage, providing the human and/or material means that may be necessary to ensure the mentioned duty of protection.
- ✓ All Subject Persons:
 - Shall supervise their own safety and that of the persons under them, by means of rigorous compliance with the occupational health safety rules.
 - Shall not put the safety of their co-workers at risk, and shall promote the application of these norms among the other workers and maintain an attitude of co-responsibility.
 - Shall make responsible use of the assigned protection equipment.
 - Shall inform the Installation Management of any situation that might entail a risk for the workers' health and safety, as well as the ineffectiveness or inadequacy of the applied preventive measures.

Conflicts of interest

SAMCA's Subject Persons must act with loyalty in carrying out their professional tasks and preserving the interests of the Group, avoiding any action that could mean a conflict with their personal interests.

For the effects of this Code, a conflict of interest is considered any situation in which the objectivity and impartiality of one of SAMCA's Subject Persons could be considered affected as a consequence of the direct or indirect clash of their personal interests with the interests of the Group.

The existence of conflicts of interest can imply that corporate interests are influenced or compromised, especially when the person involved in this type of situation has the power to make decisions.

Consequently, SAMCA's Subject Persons have the obligation to communicate immediately (and, in any case, before taking any action in which their objectivity could be compromised) to the Compliance Committee any current or potential situation of conflict of interest in which they might be involved.

The Compliance Committee shall determine, in view of the concurrent circumstances, the effective existence of a conflict of interest and, where applicable, the necessary measures to safeguard the interests of the Group (abstaining from making decisions, denial of access to confidential information...). The Compliance Committee shall communicate the resolution adopted to the involved Subject Person, who will be required to abide by it.

RELATIONS WITH THE MARKET

Relations with customers

SAMCA Group has a solid commitment to provide products and services to its customers, respecting at all times the commitments assumed under contracts and generating reciprocal trust.

For this reason, in the relations with the customers of SAMCA Group, Subject Persons have to provide true, accurate and pertinent information on the characteristics of the products and services, not presenting false allegations on them or illicit or deceiving advertising, and always supplying products and services that meet the commercial and technical specifications contracted by the customer.

In particular, it is prohibited to change or manipulate any electronic device that may serve to quantify the price of the products supplied by the Group, such as scales or meters.

When these customers are also consumers, the Subject Persons that intervene in the transactions with consumer-customers must strictly comply with the laws on the subject of consumption in these transactions.

Furthermore, Subject Persons must act with absolute confidentiality with respect to any information or documentation they may have obtained from the customer in the framework of the commercial relations.

SAMCA Group strongly rejects any type of practice that may be considered as a form of corruption or bribery. For this reason, the Subject Persons are totally forbidden to offer and/or deliver payments in cash, in kind or any other unjustified benefit to customers or potential customers for the purpose of influencing their purchasing decision regarding SAMCA Group products.

In this regard, SAMCA Group does not make gifts or gratuities to its current or potential customers as means to achieve new contracts or to maintain the current ones. Only the delivery of generally accepted business courtesies are permitted, which have a symbolic or economically irrelevant value.

Relations with competitors and other third parties

SAMCA Group strictly complies with the competition regulations, by which it is prohibited to be involved in unfair competition or practices against free competition, thus Subject Persons must act by respecting at all times the rights of their competitors and these principles.

Subject Persons must also respect the intellectual and industrial property rights owned by third parties. Similarly, they must abstain from obtaining and/or using any information or documentation susceptible to being considered a business or industrial secret.

Relations with Subject Persons Related to SAMCA

SAMCA Group promotes stable relations with the Subject Persons Related to SAMCA, encouraging reciprocal trust, seriousness and clarity in commercial agreements. The selection and official approval of suppliers is always done according to impartial and objective criteria defined by the Purchasing Department.

Subject Persons Related to SAMCA, in their relations with SAMCA Group, must provide true, accurate and pertinent information on the characteristics of the products and services that they supply to the Group, not

presenting illicit or deceitful advertising, and always supplying products and services that comply with the commercial and technical specifications contracted with the group.

Pursuant to the corporate policy of zero tolerance for any corrupt practice, Subject Persons are absolutely prohibited to request or accept personally any gifts, gratuities, considerations or any other type of favour that may mean contracting from a certain supplier with respect to the purchase or supply in detriment to another. The generally accepted courtesies, which have a symbolic or economically irrelevant value are excluded from this prohibition.

RELATIONS WITH THE SOCIETY

Environmental commitment

SAMCA Group shows a decided social commitment and constant effort so that all its activities are sustainable and respectful of the environment. Research, development and innovation put within reach increasingly better techniques to minimise environmental impacts and to integrate the restored areas in their natural habitats.

Consequently, SAMCA Group is committed to implementing its activities with the highest respect for the environment and, according to the applicable laws at every moment, minimising the negative effects they might cause, compensating those that are inevitable with adequate complementary and compensatory measures. SAMCA Group also promotes applying the best available techniques for the rational use of resources and improvement of its installations' efficiency.

Subject Persons must be aware of the environmental impact of the activities they carry out and be actively and responsibly committed to contributing to minimise these impacts.

Strict compliance with environmental legislation is the basis for the commitment with the environment supported in the identification, updating and regular review of the applicable legal requirements of each installation, as well as the commitments of an environmental nature that, through its own initiative, can be advocated.

In line with the above, SAMCA Group identifies and controls the potential repercussions that the industrial activities, products and services and products being developed might cause in the environment with the objective of acting preventively, providing the means to prevent and avoid pollution or damage to the environment in general.

The materialisation of the above is shown by the fact that all the installations in which SAMCA Group implements its business activities and urban activities that it promotes or executes must have at all times the licences, permits, authorisations or declarations of compliance required by the legislation and in their operations they comply with the requirements of the laws and the conditions of administrative resolutions.

For this reason, the following is required:

- ✓ The Installation Management shall adopt all the decisions necessary to materialise the duty of complying with the environmental legislation that are incumbent on the employer in the scope of the installation they manage, providing the human and/or material means necessary to ensure the aforementioned duty of protection.
- ✓ All Subject Persons
 - Shall strictly observe the orders or instructions they receive from the Installation Management in complying with this obligation.
 - Shall make the Installation Manager of the aware of any situation that might involve an environmental risk, as well as the ineffectiveness or inappropriateness of the applied preventive measures.
 - Always comply with the legal provisions and the internal regulations on the environment, acting with utmost diligence.

Mining

We understand mining as a necessary activity in our society, an engine of economic and social development of the territories, generating employment in areas normally with very low population density and that have important repercussions on the landscape and natural environment, although these footprints are not, and should not be, indelible.

Correct management of the projects and adoption of the necessary measures in each case to rehabilitate the land and its complete integration in the environment in the medium and long term are the hallmark of SAMCA Group.

Mining today contributes to the improvement of the environment in which it is carried out. The promotion of preservation of the biodiversity, of the intrinsic values of the natural environment, the reduction of the impacts of the companies' activities on the territory in which they are located and the responsible resource management constitute SAMCA Group's commitment to sustainable development.

Public health and food safety

In the agricultural and agro-food activities and others related to products destined to human food, SAMCA Group promotes food safety policies, as well as strict controls in the entire supply chain, with the aim of providing products of the highest quality, completely safe for consumers' health.

For this reason, the following are required:

- ✓ The Installation Management shall adopt all the decisions that may be necessary to materialise the compliance with the legislation on food safety and public health incumbent on the employer in the scope of the installation they manage, providing the human and/or material means necessary to ensure the aforementioned protective duty.

✓ All Subject Persons

- Shall strictly observe the orders or instructions they receive from the Installation Management to comply with this obligation.
- Make the Installation Manager aware of any situation that might involve a risk to the consumers, as well as the ineffectiveness or inappropriateness of the applied preventive measures.
- Comply at all times with the legal provisions and the internal regulations on the subject of food safety and public health, acting with utmost diligence.

USE OF CORPORATE ASSETS

Resources and financial information

SAMCA Group states its commitment to sustainable financial behaviour of the organisation and the creation of value for all its stakeholders.

SAMCA Group is committed to total transparency, reliability, precision and integrity in its financial information, ensuring that it reflects the reality of the Group's economic situation.

For all of the above, Subject Persons must always observe in the scope of their tasks, the applicable accounting rules, being prohibited to falsify, hide or simulate accounting data, entries or transactions, fail to record transactions carried out, have double accounting procedures or any other activity whose objective is to provide a financial image of the Group that does not correspond faithfully to reality.

In addition, Subject Persons must observe the internal procedures and due diligence measures established by the Group to prevent the commission of any activity that could be related with money laundering, financing of terrorism, illegal financing of political parties or other unlawful activities.

Information assets

SAMCA Group ensures the safety and confidentiality of all the personal data to which it has access, according to the current data protection laws and pursuant to the Privacy Policy of SAMCA Group.

Consequently, Subject Persons who have access to personal data of other persons, whether they are Subject Persons or other third parties, must respect at all times the Privacy Policy of SAMCA Group and, therefore, make use of them abiding at all times by this Policy.

Furthermore, Subject Persons must not reveal confidential information of SAMCA Group to third parties, including friends and family members or make use of it for their own benefit. This obligation will continue being applicable even when the relationship of the Subject Person with SAMCA Group is finalised.

Moreover, the industrial secrets of the Group must be safeguarded, not revealing them to third parties under any circumstance, except under legally established circumstances. This obligation will continue being applicable even when the relationship of the Subject Person with SAMCA Group is finalised.

Use of equipment

SAMCA Group undertakes to provide the work equipment and computer means necessary so that its Subject Persons can carry out their activities effectively and safety.

The equipment and devices must be used exclusively for professional, not personal, uses, unless otherwise authorised in writing by SAMCA Group.

All of SAMCA's Subject Persons must protect and make good use of the means delivered by the Group and to use them responsibly, efficiently and appropriately, preserving them from any loss, damage, theft or inappropriate use.

Regarding the use of computer equipment, any behaviour prone to harm the security and integrity of the computer systems of their own or of third parties is completely prohibited, as well as downloading and use of software that does not have the pertinent licences and usage rights.

APPLICATION OF THE CODE OF ETHICS

The Compliance Committee, as the body responsible for the control and supervision of the Criminal Compliance Management System of SAMCA Group, will be in charge of supervising the fulfilment of the provisions of this document, as well as solving any doubts that might arise in its application.

Furthermore, it will conduct a periodic review of the Code of Ethics and will update it whenever it is deemed necessary, whose approval will correspond to SAMCA's Board of Directors.

All Subject Persons are required to communicate through the Reporting Channel any suspicion or knowledge of non-compliance with this Code of Ethics. SAMCA Group ensures the confidentiality and security of all the reports that are sent to the Reporting Channel, as well as the prohibition of actions against those reporting in good faith.

In addition, it is expressly placed on the record that SAMCA Group will adopt disciplinary measures that are pertinent in order to sanction any non-compliance with this Code of Ethics, always according to the labour laws and other legislation that may be applicable regarding the relationship between the Subject Person and SAMCA Group.

APPROVAL

This updated version of SAMCA Group's Code of Ethics has been approved in the SAMCA Board of Directors' meeting held on 27 December 2021 and substitutes the previous version, being applied from **1 January 2022**.

As a result of the agreements adopted by the boards of directors and decisions adopted by the sole directors of the different subsidiaries of SAMCA Group, it is immediately applicable, without the need for any additional agreement or decision, in all the subsidiaries of SAMCA Group.

Zaragoza, 27 December 2021.