	CODE OF CONDUCT- ETHICS POLICY		
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Process/Sub-process: 01. GLO Management System/01.01 GLO Business Plan	Issued Date: 12/18/2024	Document #: POL-00462	Revision #: 8

1. INTRODUCTION

Fitesa is committed to conducting business with honesty and integrity and in compliance with all applicable laws and regulations. Fitesa has embraced the concept of responsible corporate behavior through the adoption of this Policy and various other policies and through participation in the UN Global Compact.

This Policy sets out the standards to be followed in relation to all actions taken and activities conducted on behalf of Fitesa and seeks to promote honest and ethical conduct.

Please read this Policy carefully. Any infringements of this Policy will be viewed very seriously and failure to comply may result in disciplinary action which could lead to summary dismissal.

2. PRINCIPLES OF THE UN GLOBAL COMPACT

The principles of the UN Global Compact have been incorporated into this Policy and various other policies adopted by Fitesa (some of which are referred to in this Policy) to establish a culture of integrity and responsible corporate behavior. The 10 principles of the UN Global Compact are:

Human Rights

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses.

Labor


3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labor;
5. the effective abolition of child labor; and
6. the elimination of discrimination in respect of employment and occupation.

Environment

7. Businesses should support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

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3. SCOPE

This Policy applies to all Fitesa companies and their directors, officers, employees, contractors, consultants, representatives and agents (and the term “employees” as used hereafter shall include a reference to such other parties, as the context may allow). Employees will be required from time to time to certify that they have read, understand and comply with this Policy.

4. REVIEW AND UPDATE RESPONSIBILITY

This Policy should be reviewed and updated as necessary at least once every 3 years.

5. RELATED DOCUMENTS

- Fitesa Management System Manual
- Anti-Harassment Policy
- Equal Employment Opportunities Policy
- Competition Law Policy
- Protection of Confidential Information Policy
- Procurement Policy

6. CODE

A fundamental underpinning of Fitesa’s vision and mission is that every employee must operate with the highest standards of integrity and ethics in everything we do. This has been, and will continue to be, a guiding principle for all Fitesa businesses, and it is important that all employees recognize their obligations in adhering to this principle.

The fundamental values that guide our actions are embodied in the 10 principles of the UN Global Compact and include respect for applicable laws, life, liberty, individual responsibility, contracts and property.

Fitesa is committed to act properly and maintain transparent relationships with our employees, customers and suppliers; we are fair with our competitors and responsible towards society.

It is impossible to issue a written policy that defines proper and ethical conduct for every situation, but these guidelines are to be relied upon in the absence of more specific directions.

(A) COMPLIANCE WITH LAWS AND REGULATIONS

Fitesa is strongly committed to conducting business affairs with honesty and integrity and in full compliance with all applicable laws and regulations. No employee shall commit an illegal or unethical act or instruct others to do so for any reason. Any violation of applicable laws or regulations, including any conflict of interest that rises to such a level, will be dealt with swiftly by Fitesa and may be required to be disclosed to the applicable law enforcement authorities.

(B) ACCOUNTING RECORDS, FINANCIAL INTEGRITY AND ANTI-MONEY LAUNDERING

All financial books, records and accounts must accurately reflect transactions and events and conform to generally accepted accounting principles and to Fitesa’s system

of internal controls. No Fitesa document may be falsified for any reason and no undisclosed or unrecorded accounts of Fitesa's funds or assets may be established for any purpose.

Fitesa management is obliged to report timely and accurate management information relating to Fitesa's businesses in good faith and to the best of their ability. In particular, compliance in all material respects with accounting policies and procedures, as outlined in the Fitesa Management System Manual, is required.

Employees must not knowingly misstate or misrepresent management information for personal gain or for any other reason. Any such action may result in disciplinary action and, where appropriate, criminal proceedings will be instituted.

Fitesa is committed to doing business in a way that does not assist with or facilitate money laundering activities. We have policies and procedures in place to prevent our products and commercial dealings from being used to launder criminal proceeds, to finance terrorism, to evade taxation, or to bypass applicable sanctions laws. It is important that we know our customers, distributors and agents and understand their businesses in order to identify and prevent money-laundering schemes. Please contact the Fitesa Legal Department to seek guidance if you have any doubts about a customer or commercial transaction and to ensure that transfers of information, technology, products, or software across international borders comply with laws governing imports and exports. Consider carefully any transaction that is unusual as regards its nature, size or frequency, any overpayment with requests to refund a third party, any payments received from an unrelated third party, and any requests to redirect payments including agent's commission.

(C) MARKET ABUSE AND INSIDE INFORMATION

It is important that employees act and are seen to act with integrity regarding corporate information and must not make use of inside information for any possible personal gain. It is illegal to deal, attempt to deal or encourage another person to deal in shares on the basis of inside information that is not available to the public or to disclose inside information to a third party, other than in the proper performance of your duties. These sorts of behaviors amongst others constitute market abuse.

If you have any doubt or questions about inside information and share dealings, please consult the Fitesa Legal Department.

(D) POLITICAL CONTRIBUTIONS AND ACTIVITIES

Fitesa does not exercise any political affiliation or partisanship, but the Fitesa Board may adopt a position on issues that are relevant to the interests of Fitesa. Fitesa does not place any restrictions with regards to an employee's political activities, but they must always act individually, making it clear that they are not acting on behalf of Fitesa.

Employees are entitled to be active in the political process. Individual political contributions are entirely a matter of personal choice. Fitesa is prohibited from making political contributions without the written permission of the Chief Executive Officer and the Chief Financial Officer and then only after consultation with the Fitesa Legal Department to confirm the legality and propriety of such a contribution. All political donations must be fully disclosed. Unless so approved, no employee shall use company funds, either directly or through expense account reimbursement, for

contributions to any political party or to any candidate or holder of public office nor shall any employee in any other way be reimbursed for a political expense or contribution.

Additionally, the following activities are prohibited:

- Employees are prohibited from using company property (including the Fitesa name and letterhead) or facilities in connection with any political activity.
- Employees are prohibited from spending scheduled work time to conduct political activities.

(E) CHARITABLE DONATIONS

No charitable donations shall be made by or on behalf of Fitesa without the prior written approval of the Chief Executive Officer and the Chief Financial Officer. All charitable donations must be fully disclosed.

(F) GIFTS AND ENTERTAINMENT

Employees must not solicit, accept, offer, procure or encourage, whether direct or indirect, the giving or receiving of gifts to or from third parties with which Fitesa has or may have business dealings unless the gift meets the following guidelines:

- it complies with local laws;
- it is consistent with accepted business practice;
- it does not include cash, or a cash equivalent (such as gift certificates or vouchers);
- it is given openly, not secretly;
- it must be reasonable in cost and frequency;
- it must be appropriate to the occasion and circumstances;
- it must not be intended or appear to be intended to influence the business judgement of the recipient; and
- it must be capable of withstanding public scrutiny without damaging Fitesa's reputation.

Gifts, as described above, include all products, services, business courtesies, favors, tips, gratuities, meals, drinks, discounts, hospitality, entertainment, recreation, tickets, transportation and other similar items.

Generally, a gift to an individual valued at less than \$50 will be acceptable and a gift to an organization for use by the organization valued at less than \$200 will be acceptable.

In no circumstances should gifts be offered to, or accepted from, government officials or representatives. Secret commissions or other compensation to agents, customers or suppliers or their employees, family members or associates are a violation of this Policy.

All gifts and entertainment to be given to third parties at Fitesa's expense must be authorized in advance by the Chief Executive Officer or the Chief Financial Officer. All expense claims relating to such gifts must specify the reason for the expenditure and must be submitted in accordance with Fitesa's Travel and Expenses Policy.

All gifts and entertainment accepted or received from third parties (except for gifts of a nominal value such as diaries, calendars, pens and promotional items and modest hospitality including lunches and dinners) must be authorized by the Chief Executive Officer or the Chief Financial Officer within 5 business days of acceptance or receipt and a record of such activities should be maintained.

(G) CONFLICTS OF INTEREST

Employees should act in the best interests of Fitesa. All employees should avoid situations that present a potential or actual conflict of interest between their personal interests and the interests of Fitesa.

A conflict of interest occurs when an employee's private interests interfere or appear to interfere in any way with the interests of Fitesa. A conflict of interest can arise when an employee or any connected person takes an action or has an interest that makes it difficult for him/her to perform his job or duties effectively. Conflicts of interest may also arise when an employee or any connected person receives improper personal benefits or advantage as a result of his/her position with Fitesa.

It is not possible to describe every situation in which a conflict of interest may arise but some examples of situations that may constitute a conflict of interest are set out below:

- working in any capacity, for another individual or entity while employed by Fitesa, which may materially impact your ability to carry out your job function;
- accepting gifts or receiving personal discounts or other benefits from a vendor, competitor, customer or supplier as a result of your position with Fitesa. Please also refer to the above section on the Gifts and Entertainment;
- competing with Fitesa for the purchase or sale of property, services or other interests;
- having an interest in a business that seeks to do business with Fitesa or is a competitor of Fitesa;
- having an interest in a transaction involving Fitesa, a customer, a supplier or a lender (not including routine investments in publicly traded companies);
- receiving a loan or guarantee of an obligation as a result of your position with Fitesa; and
- directing business to a supplier owned, managed by or which employs a connected person.

Conflicts of interest can arise where these activities involve your connected persons, which would include:

- family members including your spouse or civil partner and anyone with whom you live as a partner;
- your children and stepchildren;
- your parents;
- trustees of a trust of which you (or a connected person) are a beneficiary; and
- bodies corporate that are connected with you.

Situations involving a conflict of interest may not always be obvious or easy to resolve. Please direct any questions you may have to the Fitesa Legal Department.

All actual and potential conflicts of interest must be fully disclosed to the Chief Executive Officer or the Chief Financial Officer as soon as possible and the employee must recuse himself/herself from decisions which could be influenced by such a conflict of interest.

(H) FAIR DEALING

Employees must at all times deal with Fitesa's customers, suppliers and competitors, the public and other employees fairly and in accordance with ethical business practices.

Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice. This prohibition includes any conduct that would violate Fitesa's Competition Law Policy.

In dealings with customers, suppliers and other third parties, employees should act in the best interests of Fitesa to the exclusion of personal advantage. Dealings with customers, suppliers and third parties must be fair, legitimate, and without prejudice. Certain practices must be avoided, such as reciprocity, kickbacks, and special discounts. Purchases and procurement activities should be made in accordance with Fitesa's Procurement Policy.

No payment in any form should be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action. Fitesa and the employee involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of this Policy.

(I) HEALTH, SAFETY AND THE ENVIRONMENT

Fitesa is committed to conducting its business in compliance with all applicable workplace health and safety and environmental laws and regulations and it strives to provide a safe and healthy work environment for our employees and to avoid adverse impact and injury to the environment and communities in which we conduct our business. Achieving this goal is the responsibility of all employees.

Fitesa expects its employees to follow safety, accident prevention and health protection standards. Each employee is responsible for a safe workplace, which includes the responsibility to report any conditions that make the workplace unsafe.

(J) ANTI-HARASSMENT

Fitesa's HR policies are designed to ensure that all employees are treated, and treat each other, fairly and with respect and dignity. All employees must respect and maintain mature relationships between themselves and other co-workers, not exerting authority or power to embarrass colleagues or subordinates or to force them to act in ways contrary to principles of this Policy.

In line with Fitesa's Anti-Harassment Policy, all employees have the right to work in an environment free from harassment. Fitesa forbids any form of harassment of employees by other employees, supervisors or managers, outside contractors or vendors.

All employees are responsible for preventing and eliminating any harassment in their departments or work areas. It is important to remember that persons of any gender, or sexual orientation, can be victims of sexual harassment, and this Policy covers conduct or comments between members of the opposite gender, as well as members of the same gender.

(K) ANTI-DISCRIMINATION AND NEPOTISM

Fitesa's policies for recruitment, advancement and retention of employees prohibits discrimination on the basis of any criteria prohibited by law including but not limited to color, nationality, race, religion/belief, ethnic or national origin, sex, marital status, disability, part-time or fixed term status, parental responsibilities, age or sexual orientation.

The practice of nepotism or favoritism of relatives and friends, involving the admission or promotion to positions within Fitesa is not ethical and these practices are governed by Fitesa's Employment of Relatives Policy. This favoritism also applies to creating advantages for suppliers and new clients. All cases that do not meet this standard should be reported and approved by the Fitesa Board.

The promotion and recognition of employees is guided by established criteria that adhere to Fitesa's values and the principles set out in this Policy.

(L) FAIR COMPETITION

Fitesa's Competition Law Policy requires all employees to comply with all applicable competition laws in all jurisdictions in which Fitesa does business. The consequences of violating these laws can be severe to both Fitesa and the individual involved and may include fines, penalties and imprisonment. Please read Fitesa's Competition Law Policy carefully and contact the Fitesa Legal Department if you have any questions regarding competition law compliance.

(M) COMPANY ASSETS

Fitesa's physical and intangible assets as well as proprietary information are key to its success and they should be used only to achieve Fitesa's business goals. All employees have a responsibility to protect Fitesa's assets against loss, misuse or theft. Employees should report any such loss, misuse or suspected theft to their line manager.

Company provided computers and communication tools and resources are the property of Fitesa. Their usage shall meet the needs of each function.

Employees are responsible for the proper use of corporate e-mail and the internet. The use of electronic mail systems to send messages of illegal content, such as pornographic, racist or any other content that could involve Fitesa in civil or criminal liability is prohibited.


(N) CONFIDENTIALITY

Fitesa's Protection of Confidential Information Policy requires all employees to protect all confidential information held, whether belonging to Fitesa or to third parties, because we may be required to do so by data protection or other laws or by contractual obligations and because our confidential information is a valuable asset which gives us a competitive advantage. Employees should have a continuing awareness of the importance of the confidentiality of company information.

7. OBLIGATION TO REPORT

Any employee who becomes aware of a violation of any laws or regulations, this Policy or any other Fitesa policy should report it in writing immediately to the Chief Executive Officer, the Chief Financial Officer or the Head of HR.

Employees who report violations will be treated with dignity and respect, and will not be subjected to any form of disciplinary action or retaliation for reports made in good faith and based on a genuine belief, even if the report proves to be groundless. All matters dealt with through these procedures (including any records produced) will be handled with discretion and will, as far as practicable, be kept confidential to those involved.

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Fitesa offers employees a global and/or regional system for the reporting of violations. These systems are managed by independent third parties and allow employees to confidentially and (if needed) anonymously report violations of any laws or regulations, this Policy or any other Fitesa policy, or raise concerns or queries on ethical issues. For further information, please refer to the Disclosure of Unethical Conduct Policy or contact local HR.

Employees who believe they are being treated unfairly as a result of a reported violation, should communicate this fact to the Chief Executive Officer, the Chief Financial Officer or the Head of HR.

Any employee who is identified as having retaliated or punished another contributor because he/she, in good faith, reported a violation or who deters or attempts to deter employees or others from genuinely raising concerns under this Policy may be subject to disciplinary action. Fitesa will view this sort of victimization very seriously and therefore any disciplinary action may result in dismissal in accordance with applicable local law.

Anyone who knowingly or maliciously makes false accusations may be subject to disciplinary action which may also result in dismissal if sufficiently serious.

8. CONSEQUENCES FOR POLICY VIOLATIONS

If it is determined that you have violated this Policy, failed to report a known or suspected violation of this Policy, or provided intentionally false or malicious information in connection with an alleged violation of this Policy, Fitesa may take disciplinary action against you as appropriate based on the nature of the violation, up to and including dismissal, and/or reporting your conduct to appropriate governmental authorities.