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¿Who is Utingal?

Utingal is a medium-sized company founded in 1995, dedicated to the integral management of projects, from design to manufacturing, including production set-up.

It is a company that works to contribute to the progress of the industry, committed to its present and future.

Utingal's activity always moves within the framework of building a more competitive, better, sustainable and environmentally friendly market, responding to the needs of the most heterogeneous companies.



Objectives and scope of application

The objective of this Code of Ethics is to promote social responsibility strategies in response to diverse social, environmental and economic realities, with the aim of voluntarily assuming commitments that go beyond legal, regulatory and/or conventional obligations of mandatory compliance, seeking to raise the levels of social development, environmental protection and respect for human rights.

This Code of Ethics is mandatory for all professionals, regardless of their category, position and type of relationship, who provide services in Utingal. It shall also apply to any person working on behalf of Utingal, including all suppliers.

Utingal's management and team leaders are actively involved in the dissemination of these values, both among Utingal employees and other third parties with whom Utingal interacts.

In case of doubt in its application or interpretation, employees shall refer to their superiors or to the competent bodies provided by the Company.

The **objectives** of this code are as follows:

To establish Utingal's ethical values and fundamental principles of action, which, in turn, must inspire the internal procedures, instructions and guidelines.

Define the basic rules of conduct that guide the behaviour of all Stakeholders in the performance of their activities.

Establish **a framework of reference** conduct for those stakeholders that relate to Utingal, in everything that affects them.

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Communicate clearly the firm commitment acquired by Utingal so that the persons concerned act in accordance with ethical principles and make fully informed decisions.

Establish an effective **communication channel** for reporting fraudulent activities and unethical behavior.

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Values and operational principles

VALUES

Utingal's **core values** and guidelines for individual and collective behaviour are based on the following values:

Dynamism,
Understood as our philosophy to act promptly, diligently and tenaciously. The recipients of the work, effort and capacity of Utingal are all our customers, whose satisfaction is our main objective.

Experience,
as a result of the knowledge acquired from Utingal's activity and the impact of its projects. Quality must be the characteristic feature of all the company's actions and interventions.

Professionalism,
which, beyond the requirements of the sector, is the result of our company's commitment to a job well done. We guarantee that Utingal's actions are carried out according to criteria of excellence in management and efficiency in results.

Innovation,
as a permanent task that permeates our day-to-day business and is a prerequisite for is a condition for permanence in the sector.

Commitment to the Environment,
in relation to the inclusion of environmental issues in management decision-making.

PRINCIPLES OF ACTION

Utingal's principles of action promoted by this code, and which are further developed in order to maintain the values set out above, are as follows:

Compliance with legal requirements and standards:

The company will at all times develop an upright and honest professional conduct in the exercise of its activity. Utingal will act in good faith guided by the objective of a job well done.

Integrity and transparency:

Utingal shall perform its professional activity with integrity, honesty and transparency, maintaining at all times a behaviour based on good faith and transmitting credibility to its environment. In addition, Utingal will promote that its collaborators and suppliers with whom it relates follow the same standards of conduct.

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➤ **Conflicts of interest:** All persons working for the company have an obligation to promote Utingal's interests and are prohibited from personally benefiting from opportunities arising from Utingal information or from benefiting third parties. They must act at all times in the best interests of Utingal, applying objective criteria that are not based on personal interests. Employees may not carry out professional activities outside the company's scope that conflict with those they perform in the company and/or that may interfere with the company's interests. in the interests of the company.

➤ **Transparency:** Utingal is committed to transparency with its customers as a fundamental value of its performance. Utingal is committed to providing its customers with accurate and truthful information regarding its activities, as well as its procedures for channelling complaints and resolving incidents. The company must contract suppliers in a framework of free competition and free from any link or interference outside its interests. Collaboration relationships with suppliers must be established with objectivity and transparency, regardless of any family, economic or friendship ties with the supplier, avoiding situations that could cast doubt on the impartiality of the people involved in making decisions in this regard.

➤ **Handling of information:** Personnel working for Utingal must truthfully transmit all information they have to communicate, both internally and externally. The regulations in force and the internal rules on data processing and confidentiality must be respected at all times. Confidential information obtained as a result of the exercise of professional activity must not be used for personal benefit or for the benefit of third parties.

➤ **Fraudulent Activity:** Utingal will act in good faith guided by the goal of transparency and trustworthiness. Utingal will not tolerate any deception, trickery, dishonest practice or breach of trust, intentionally perpetrated for profit or to gain any unfair or dishonest advantage. No advantage shall be gained by acting fraudulently, misleading others or misrepresenting oneself or allowing others to do so. This shall include a prohibition against defrauding or stealing from the Company, customers or any third party, as well as any other type of misappropriation.

Social and environmental responsibility:

Utingal is committed to achieving a more sustainable world, socially and environmentally, and understands that conducting human activities in a responsible manner that respects the law and ethics contributes to this categorically.


Utingal has a high sense of responsibility in environmental matters, committed to the conservation of the environment to the preservation of the environment, not only by complying with current environmental legislation, but also by adopting the necessary procedures for measuring and adopting the necessary procedures to measure and reduce the environmental impact of its activities.

Professionalism and teamwork:


Utingal's most valuable asset is the people who make it up and the values and principles that motivate them. Utingal will respect and promote diversity, valuing the capabilities and contributions of each person individually.

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Respect for people:


 **Diversity and non-discrimination:** Utingal respects people, their dignity and fundamental values. In this sense, it promotes equal opportunities and non-discrimination, harassment, abuse or inappropriate treatment based on gender, race, nationality, religion, political opinion, affiliation, age, sexual orientation, disability and other situations protected by law, both with respect to its employees and collaborators, suppliers or any person who interacts with the company.


Utingal is governed by the principle of equal opportunities in the evaluation of the people who participate in the selection processes to join the company. Likewise, the talent evaluation processes are based on meritocratic criteria or on professional qualification and capacity.


 **Work environment and work-life balance:** Utingal shall ensure a work environment free of harassment, abuse of authority, intimidation and violent conduct that has the purpose or consequence of violating the dignity of persons. Stakeholders of the company subject to this code will avoid and report these behaviours by using the email address provided for this purpose codigoetico@utingal.es, being the company responsible for preventing and sanctioning them, where appropriate. In this regard, Utingal has a protocol for the prevention of sexual harassment based on gender.

Utingal encourages and promotes a favourable and inclusive work environment that facilitates flexible working hours and the reconciliation of personal, family and professional life for all employees, all with the aim of improving the quality of life of the workforce and productivity levels.

 **Human Rights:** Utingal is firmly committed to respecting the human rights recognized in national and international law and, in particular, respecting the principles of the United Nations Global Compact. This includes, but is not limited to, providing fair and competitive wages, prohibiting the use of child labour, obliged, forced and or in bondage and/or prison labour and not engaging in human trafficking for any purpose.

 **Migrant workers:** Utingal will ensure that migrant workers are employed in full compliance with the labour and immigration laws of the host country.

 **Free association:** Utingal will recognize and respect the associational rights of workers by making it a free choice.

 **Working hours:** Utingal operates in accordance with regulations and standards governing work, rest hours, maximum consecutive working days and annual leave.

Counterfeit parts:

Utingal develops, implements and maintains appropriate methods in its processes for the purpose of minimizing the risk of introducing counterfeit parts or materials into its value chain. To this end, preventive measures and controls are in place to ensure detection and reporting of any suspected fraud or counterfeiting.

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These principles are important because they reflect the type of company Utingal aspires to be and allow us to build sustainable relationships with our customers, employees, suppliers, public administrations and other stakeholders with whom we interact, with the common goal of contributing to a positive impact on society. Utingal will encourage collaboration with those who are governed by standards of conduct similar to the values and principles of action set out in this code.

Compliance

Of the code

All people who have any kind of contractual relationship with Utingal are obliged to read and comply with the provisions of this code. In this regard, by accepting a job or position within the company or by entering into any contractual relationship, the parties concerned are responsible, in their own conduct, for respecting the laws, values, principles and rules set out in it and any other provisions issued by Utingal or that it may issue in the future.

In the event that Utingal confirms a breach of the Code by any of the Parties concerned, the organization reserves the right to sanction such conduct, where appropriate, in accordance with labour legislation, the Disciplinary Regime established in the applicable collective bargaining agreement and other applicable regulations.

Persons to whom this Code of Ethics applies are required to cooperate with any investigation and/or internal audit that may be carried out.

Utingal will implement a specific communication procedure through the Company's Human Resources Department and its Labour Lawyer (the "Ethics Committee"), which will allow all those involved, with guaranteed confidentiality and without fear of reprisals, to communicate, in a simple, confidential (although not anonymous) and direct manner, those actions that, to their knowledge and understanding, could constitute inappropriate or contrary conduct or actions in reference to the Code of Ethics.

Communications received through the e-mail account will be treated confidentially, and the necessary measures will be implemented to guarantee this confidentiality at all times.

To ensure the veracity of the information received, only those reports in which the complainant is clearly identified will be accepted.

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¿What to do if we observe behaviour that does not comply with the Code of Ethics?



Communication Channels

To facilitate compliance with the Code of Ethics, Utingal has a confidential channel for queries and complaints through which doubts about its interpretation or practical application can be submitted and possible violations can be reported. In this sense, Utingal has an e-mail account enabled to communicate with the organization regarding ethical issues. All communications, regardless of their nature, will be resolved using a rigorous, transparent and objective procedure, safeguarding in all cases the confidentiality of the complainant.

Utingal guarantees that queries or complaints will not be subject to retaliation, provided they are made in good faith. Good faith is demonstrated by providing evidence that proves the facts reported or the possibility that they will be committed.

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