



# **CODE OF ETHICS AND PROFESSIONAL CONDUCT**

**InterPur Chemicals**





## **ADMINISTRATOR'S MESSAGE**

InterPur Chemicals organization has among its essential objectives to develop an activity in a responsible chemical industry that contributes to a sustainable society and environment, to be an excellent company where we work respecting our employees, treating our customers with transparency and honesty and contributing to the improvement of our society, especially by collaborating with organizations that help improve the living conditions of those with difficulties.

Our Code of Ethics and Behavior, which is mandatory, is an instrument with which we establish appropriate behaviors by all our employees and stakeholders, so it is a guarantee of respect and responsibility that is present in everything we do. It also allows us to ensure that the third parties with whom we work share ethical principles and conduct common to ours.

We have a Communication Channel so that anyone can report in good faith any breach of our Code of Ethics and Behavior in a completely confidential manner and free of retaliation.

All of us who work at InterPur have the responsibility to act with integrity and honesty to safeguard the company's reputation at all times, generating positive impacts for society.

Ethical behavior, compliance with the law and transparency are always present in all our actions, while we reinforce our commitments to the safety, well-being and development of all our teams and communities.

Oscar Garcia

**Administrator**



## **CODE OF ETHICS AND PROFESSIONAL CONDUCT OF INTERPUR CHEMICALS**

### **1. PURPOSE AND SCOPE OF APPLICATION**

The purpose of this Code is to establish the values and ethical principles that govern the actions of INTERPUR as well as its administrators and workers in the performance of their functions.

This Code enjoys the highest regulatory status within INTERPUR and is integrated into the organization's standards and policies. The conduct included in this Code is mandatory for all INTERPUR administrators and workers.

Supervision and compliance with this Code will be carried out through an Ethics Committee, a collegiate body, internal and permanent in nature, whose purpose will be to manage the system of surveillance and compliance with the standard of ethics and conduct, and will be composed of the Administrator and those responsible for Regulatory Affairs and Financial Management of INTERPUR.

### **2. ETHICAL VALUES AND GENERAL PRINCIPLES OF ACTION OF INTERPUR**

In a general way and in all its actions, INTERPUR:

- Accepts, assumes and respects the Universal Declaration of Human Rights and the Conventions of the International Labor Organization.
- Adheres to the guiding principles of the Organization for Economic Cooperation and Development and those of the United Nations Global Compact.

The basic principles that inspire INTERPUR's conduct are those listed below in this section:

- **INTEGRITY:** Act diligently, responsibly and efficiently, maintaining loyal, honest and good faith behavior.
- **RESPONSIBILITY:** Achieve your challenges taking into account the global impact of decisions and actions on people and the environment.
- **COMPLIANCE WITH REGULATIONS:** Act in compliance with both the general provisions that apply and the internal regulations of INTERPUR. In this regard, the Ethics Committee will continuously supervise the design and implementation of best practices for control, investigation and training of workers to prevent possible irregular conduct by them that could generate any type of responsibility or consequences on the reputation of INTERPUR. .

- **TRANSPARENCY:** Provide, in accordance with the law and best practices, relevant and truthful information about the activities, policies and management of INTERPUR to foster relationships based on trust and good faith, understanding the information as an asset of the Company that generates worth.

- **FLEXIBILITY:** Maintain an attitude of dialogue with the different interest groups in order to achieve the challenges in a balanced and sustained way.

- **HONESTY:** Reject corruption in all its forms, public and private, active and passive.

- **RESPECT:** Promote respect for the diversity of people (including diversity of culture, gender, race, religion, sexual orientation, etc.).

- **SAFETY:** Maintain a high level of safety in processes, facilities and services, and offer workers and other stakeholders the best possible health and safety conditions.

- **ENVIRONMENTAL PROTECTION:** Comply with the standards established in the applicable environmental regulations, efficiently use energy in INTERPUR facilities and activities with the purpose of preserving natural resources, as well as minimizing negative environmental impacts on the environment.

The transcribed values constitute the reference that must inspire the basic conduct of all INTERPUR workers to fulfill the responsibilities of the job in accordance with the principles of loyalty to the company, good faith, integrity, respect for legality and ethical criteria. At the same time, these values allow us to define a series of behaviors that must be observed by all workers in their professional performance, regardless of their area of activity or professional level.

### **3. RULES OF CONDUCT FOR INTERPUR WORKERS**

The rules established in the following paragraphs of this section 3 are not exhaustive but constitute a mere reference of basic conduct. The people to whom they apply must always behave in accordance with these ethical standards and when doubts arise, they must contact the Ethics Committee, through any of its members, so that it establishes the guidelines to follow.

#### **3.1. SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION**

INTERPUR is committed to conducting its activities in a way that achieves a high level of safety in its



processes, facilities and services, paying special attention to the protection of its workers and other interested parties. Likewise, it undertakes to conduct its activities in a way that minimizes negative environmental impacts and assumes the commitment to efficiently use energy in its facilities and activities with the purpose of preserving natural resources, reducing atmospheric emissions and contributing to mitigating the effects of climate change.

To this end, INTERPUR promotes training in safety, health and environmental protection for all its workers.

INTERPUR workers must ensure their own safety and will pay special attention to the rules relating to safety and health at work, with the aim of preventing and minimizing occupational hazards and accidents.

INTERPUR workers must comply (and ensure that they are complied with) the environmental protection standards, policies and procedures established by current legislation and by the company's internal regulations.

### **3.2. EQUAL OPPORTUNITIES AND NON-DISCRIMINATION**

INTERPUR promotes non-discrimination based on race, nationality, age, sex, marital status, sexual orientation, ideology, religion or any other personal, physical or social condition of its workers, as well as equal opportunities among them. INTERPUR workers will refrain from carrying out any act or conduct that involves any type of discrimination and any case of discrimination must be immediately reported to the Ethics Committee. Equal treatment between men and women will be promoted with regard to access to employment, training, remuneration and professional classification and promotion. INTERPUR workers must treat each other with respect at all times.

INTERPUR rejects any manifestation of violence, physical, sexual, gender-based, psychological, moral harassment, abuse of authority at work and any other conduct that creates an intimidating or offensive environment for the rights of its workers.

Any INTERPUR worker who witnesses or is aggrieved by any of the above conduct must immediately report it to the Ethics Committee through any of INTERPUR's internal communication channels, so that the necessary measures can be adopted.

### **3.3. USE AND PROTECTION OF SOCIAL ASSETS**

INTERPUR will make sufficient resources available to its workers to carry out their professional activity. INTERPUR workers are committed to the correct use

of these resources, observing the utmost care in their custody.

INTERPUR workers will not use the resources that the company makes available to them for personal, extra-professional uses or for the performance of activities that are not related to the interest of the organization.

In this sense, INTERPUR workers:

- They may not use the INTERPUR brand or logo for personal benefit.
- They must use INTERPUR's communication systems, such as telephone, internet access or email, to perform the functions of their job, doing so in accordance with the procedures that INTERPUR has established.
- They may not reveal, store, disseminate, download or distribute material that is threatening, false, defamatory, obscene or that may in any way constitute a crime or negatively affect the reputation and good image of INTERPUR.

### **3.4. CONFLICT OF INTERESTS**

INTERPUR employees must avoid situations that could give rise to a real or potential conflict between their personal interests (whether economic or not) and those of INTERPUR. INTERPUR employees will refrain from intervening or influencing decision-making in matters in which there may be a conflict of interest, and must communicate such conflicts to their hierarchical superiors immediately.

In particular, any INTERPUR worker who has financial or property relations, either directly or through family ties, with suppliers, competitors or clients of INTERPUR with whom they have a professional relationship, must immediately notify INTERPUR Management. Measures may be adopted that are necessary so that the corporate interests of the company in question are sufficiently guaranteed.

### **3.5. PROFESSIONAL ACTIVITIES OUTSIDE OF INTERPUR**

INTERPUR workers will dedicate all the time, professional skills and personal effort necessary to perform their duties. They may not provide labor or professional services (on their own or on behalf of others) for other companies or entities other than INTERPUR, with the exception that the activity outside of INTERPUR does not entail any unfair competition or detriment to the Company.

### **3.6. RELATIONSHIP WITH FOREIGN GOVERNMENTS OR AUTHORITIES**



INTERPUR workers will strictly comply with the laws of the countries in which they are present and will avoid any conduct that, even without violating the Law, could harm the reputation of the organization before the Authority, Government, Agency or Community of the country in which they operate.

### **3.7. GIFTS AND ATTENTIONS**

INTERPUR workers may not accept or offer gifts or hospitality whose value or due to the circumstances in which they are given, may exceed what is reasonable, according to local customs and practices. This prohibition applies especially in the event that the recipient is a person who, due to the position held, can influence, directly or indirectly, decisions related to INTERPUR, including corporate operations, purchase of goods, equipment or services, and/or issuance of reports. .

Workers who are the subject of gifts, gifts and offers that exceed the limits of prudence or the customs of the place, must inform the INTERPUR Management of the facts.

Without prejudice to any other measures that may be appropriate (including the possible obligation to return the gift or deliver it to INTERPUR), the acceptance of such gifts will be considered cause for the recipient's abstention from any file, process or decision in which he or she is directly or indirectly interested. whoever gave or offered them.

### **3.8. TRANSPARENCY OF INFORMATION**

Transparency in information is a basic principle that must govern the actions of INTERPUR and its workers. All information communicated to third parties will be true and complete to the extent required by the circumstances of the case. This principle of transparency will also be applied to INTERPUR's internal communication policy.

### **3.9. PERSONAL DATA PROTECTION**

INTERPUR complies with current legislation on the protection of personal data and especially protects the data provided by workers, clients and suppliers. INTERPUR employees who have access to this data as a result of their professional activity undertake not to reveal it, ensuring its confidentiality and respecting the legitimate rights of the owners of said data.

### **3.10. RESERVED AND CONFIDENTIAL INFORMATION**

Non-public information that is owned or guarded by INTERPUR will, in general, be considered reserved and confidential information. All workers are obliged to maintain the strictest confidentiality regarding the aforementioned information and not to reveal or disseminate it. Revealing and using reserved and

confidential information for private purposes contravenes this Code and constitutes a lack of loyalty to INTERPUR.

In the event of termination of the employment or professional relationship, the reserved and confidential information will be returned by the worker to INTERPUR, including the documents and storage media or devices, as well as the information stored in their computer terminal, subsisting in any case. the worker's duty of confidentiality.

### **3.11. RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND CONTRACTORS**

INTERPUR maintains a commitment to total quality, providing the necessary resources to achieve excellence and establishing the necessary measures to ensure that the quality policy is practiced by all workers. INTERPUR workers will establish lasting business relationships with clients based on the interest of the parties and a permanent attitude of service, maintaining a high commitment to honesty, professional responsibility and a job well done, achieving relationships based on trust and respect. mutual respect. INTERPUR will adapt the supplier and supplier selection processes to criteria of objectivity and impartiality and will avoid any conflict of interest or favoritism in their selection. INTERPUR workers are committed to complying with the internal procedures established for the award processes, including especially those related to the approval of suppliers and contractors.

### **3.12. FAIR COMPETITION AND DEFENSE OF COMPETITION**

INTERPUR is committed to respecting free competition for the benefit of consumers and users, strictly complying with competition regulations.

### **3.13. MEASURES AGAINST BRIBERY AND CORRUPTION**

INTERPUR workers may not offer or make, directly or indirectly, any payment in cash, in kind or any other type of benefit, to any natural or legal person, at the service of any entity, whether public or private, with the intention of:

- Unlawfully obtaining or maintaining any business or advantage;
- That that natural or legal person abuses his or her influence, real or apparent, to illicitly obtain any business or advantage from any entity, public or private.



### **3.14. TRAINING POLICIES**

INTERPUR will promote the training of its workers. The training programs will promote equal opportunities and professional career development and will contribute to the achievement of the company's objectives. Workers will actively participate in the training plans that INTERPUR makes available to them and will keep the necessary knowledge and skills updated in order to achieve the highest performance in the fulfillment of their obligations.

### **4. COMMUNICATION, DISSEMINATION AND EFFECTIVENESS OF THE CODE**

This Code will be communicated and disseminated among INTERPUR workers through the usual channels and to third parties through the Company's website. The general responsibility for this Code corresponds to the Ethics Committee, which may modify or update it periodically. Any breaches that may occur of this standard of ethics and conduct will be analyzed and, where appropriate, sanctioned in accordance with the internal procedures, agreements and applicable legal regulations.

### **5. SUPERVISION, REPORTING OF IRREGULARITIES AND COMPLIANCE**

Supervision and compliance with this Code is ultimately managed through the INTERPUR Ethics Committee. Notwithstanding the above, all INTERPUR workers have the duty to ensure compliance with the provisions of this Code and current Legislation. To this end, INTERPUR has a communication channel for formulating queries or reporting irregularities through the email account [codigoetico@interpurchchemicals.com](mailto:codigoetico@interpurchchemicals.com). This channel guarantees the best commitment of INTERPUR and its workers in relation to:

- Absolute confidentiality regarding the data of the complainant.
- Absence of retaliation.

### **6. APPROVAL AND ENTRY INTO FORCE**

The content of this Code will be updated and reviewed periodically as a way to meet the needs of INTERPUR due to the inevitable process of change in society in general and INTERPUR in particular.

This Code has been approved by INTERPUR CHEMICALS, S.L.U, (INTERPUR), at its meeting held on July 23, 2023 and will come into force the day after its approval.