



## LOINTEK CODE OF ETHICS

LOINTEK has an ongoing commitment to the application of ethical governance practices and to the maintenance, development, and supervision of compliance policies in all areas.

This ethical and good governance commitment extends to all of its professionals and opposes the commission of any wrongful act, whether criminal or otherwise, and that it advances a preventive culture based on the principle of no tolerance for the commission of wrongful acts and fraud and on the application of the principles of ethical conduct and responsible behavior.

LOINTEK has established specific guidelines for action in their areas of activity that conform in all respects to its principles and values and are laid down in this Suppliers' Code of Ethics, which must be expressly accepted by Lointek's employees.

### ETHICS IN COMMERCIAL RELATIONSHIPS

**Corruption:** Lointek relationship with its suppliers is based on legality, efficiency, and transparency.

No employee of Lointek shall offer or give government officials, third parties, or any employee of the client, within the context of the business activity, whether directly or indirectly, gifts, presents, or other unauthorised advantages, whether in cash or otherwise, in order to secure favourable treatment in the award or maintenance of contracts or to obtain benefits for themselves or for Lointek. Acts of bribery, which are expressly prohibited, include the offer or promise, of any kind of improper advantage, any instrument designed to conceal them, and influence-peddling.

Employees shall abide by the strictest rules of ethical and moral conduct and by international agreements and shall comply with the law applicable to these matters, ensuring the establishment of adequate procedures required for such purpose.

**Conflict of interest:** employees shall maintain mechanisms ensuring that their independence of action and full compliance with applicable law shall not be affected in the event of a possible conflict of interest.

**Information:** the information owned by Lointek and disclosed to employees shall, as a general rule, be deemed to be private and confidential information.

Employees and all professionals therewith shall be responsible for adopting adequate security measures to protect such private and confidential information.

The information provided by an employee to its contacts shall be true and shall not be given with the intent to mislead.

**LABOUR PRACTICES:** Lointek respects the protection of internationally recognised basic human and workers' rights within their sphere of influence.

**Forced labour:** Lointek shall take steps and adopt all required measures to eliminate all kinds of forms of forced or compulsory labour, understood as any work or service demanded from an individual under threat of any kind of penalty.

**Child labour:** Lointek expressly rejects the use of child labour within their organisation, respecting the minimum hiring age limits in accordance with applicable law, and shall have adequate and reliable mechanisms in place to verify the age of their employees.

**Freedom of association and collective bargaining:** Lointek respects the freedom of union association and the workers' right to collective bargaining, subject to the law applicable in each case.

**Equal opportunity and non-discrimination:** Lointek rejects all discriminatory practices in employment and occupational matters treating their employees fairly and with dignity and respect. For purposes hereof, discrimination shall include any distinction, exclusion, or preference by reason of race, colour, sex, religion, political opinion, national extraction, or social origin which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.

**Fair remuneration:** Lointek shall pay their employees in accordance with the provisions of applicable wage laws, including minimum wages, overtime, and social security benefits.



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**HEALTH AND SAFETY:** to provide a safe working environment, complying with the requirements established in connection with the prevention of occupational risks.

**Employee protection:** Lointek shall ensure the protection of their employees, particularly protecting them from overexposure to chemical, biological, or physical hazards or to tasks demanding excessive physical effort at the workplace.

**Potential emergency situations:** Lointek shall identify and evaluate potential emergency situations at the workplace and shall minimise the possible impact thereof by implementing emergency plans and emergency response procedures.

**Training and qualifications:** Lointek shall provide their personnel with the training and means required to do their work as agreed under contract, and shall be liable for any damage or loss attributable to the suppliers by action or omission, especially as a consequence of not having taken appropriate preventive measures to avoid it.

**ENVIRONMENT:** to maintain an environmentally-friendly preventive approach, fostering initiatives to promote enhanced environmental awareness.

**Environmental aspects:** Lointek ensures compliance with all obligations applicable thereto under applicable law.

**Waste and emissions:** Lointek shall identify and manage those substances and other materials that present a hazard when released into the environment in order to ensure that they are handled, transported, stored, recycled or reused, and disposed of safely and in compliance with applicable regulations. All waste materials, waste water, or emissions having the potential to adversely affect the environment shall be appropriately managed, controlled, and treated.

**PRODUCT QUALITY AND SAFETY:** to promote continuous improvement in the quality of the products and services supplied.

**Legal and customer requirements:** all products and services delivered by Lointek shall meet the quality and safety standards and parameters required by applicable law, with special emphasis being placed on adherence to agreed prices and delivery dates.

The basic principles set forth herein apply to all of employees, and may ensure compliance therewith and shall act accordingly in the event of any violation. Furthermore, Lointek shall make available suitable means to collaborate with its employees with a view to increasing their competitiveness, establishing appropriate programmes in each case.

Employees must promptly report any illegal act or act in violation of the provisions of this Suppliers' Code of Ethics within the framework of their labour relationship with Lointek. Any queries or comments regarding the Suppliers' Code of Ethics may be consulted at the following email address: [rsc@lointek.com](mailto:rsc@lointek.com).

This Suppliers' Code of Ethics is understood to be without prejudice to such additional conditions or requirements as may be imposed by applicable law, by the practices and rules of the various jurisdictions in which Lointek operates, and by the respective contract with each supplier or client, which shall apply in all cases.