

## 0. PREAMBLE

The Principles and the Decalogue, as we call them in AMES, and are actually four documents: AMES' Commitments, Company Principles, Total Quality Decalogue and Be SPORT, establish the company values and the attitudes and behaviors that we expect from our people. For this reason, since 1991 we make regular dissemination campaigns so that all the people who join our staff will be knowledgeable about them.

For some time now, society has been demanding that companies apply and promote the concept of "Sustainability". Sustainability goes beyond Corporate Social Responsibility, as it is understood as a way of doing business that guarantees the continuity of the activity, (as our Principles state) due to acting with high business ethics, (as our Commitment describes) and respecting the environment and people and their rights, (as our Principles and Decalogue state).

In this sense, the United Nations published in 2011, after three years of preparation, the document "Guiding Principles on Business and Human Rights" and the global compact for sustainability, known as the "Global Compact", where the implementation of policies that incorporate these values 17 development objectives are being pursued for the sustainable development by 2030.

Many leading companies in the industrial sector have massively published Codes of Conduct with practically identical content in all cases, which suppliers have to comply with and explicitly incorporate into their policies and procedures as an essential requirement to be part of their supplier panel, in which, unfortunately, it is perceived more as a prioritization of form over substance (the values generically described in our Principles and Decalogue).

Some customer Codes of Conduct explicitly incorporate aspects such as: forced labor, slavery or child labor, among others, which only by their approach and given the impossibility that such reprehensible situations never occur in AMES, their inclusion in our Principles and Decalogue generates an important conflict, as it is, to attend to the requirements of our clients without violating not one comma of our Principles and Decalogue.

For all the above mentioned reasons, we have created the AMES Code of Conduct, which we detail below, and which establishes how we must deal with the requirements of our

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customers and in particular of the automotive sector, without losing sight of our Principles and Decalogue. In fact, we have to understand this Code of Conduct as the document that allows people outside Ames to interpret the Principles and Decalogue to some extent.

LikeWise, will extend these requirements to our suppliers, including their content in the AMES Code of Conduct for Suppliers as well as in our Purchasing Conditions.

## **1. AIM**

The purpose of this procedure is to define the code of conduct that the people from AMES should contemplate in those decisions that, within their professional scope, may affect the company's results both in short and long term.

## **2. SCOPE**

This procedure is applicable to all people of all companies and work centers of AMES.

## **3. BUSINESS ETHICS / ETHICS IN BUSINESS**

AMES expects its people to behave ethically in their professional actions and in compliance with the laws of the country where they operate; the following aspects will be taken into account:

### **3.1 Responsible supply of materials and requirements for Suppliers**

AMES can't supply or use products made from raw materials, which, to obtain them, may contribute to the violation of human rights or other ethical misconduct and, therefore, will require its suppliers of raw materials to use smelters and refineries that do not present conflicts in this regard, especially for the acquisition of tin, tungsten, tantalum and gold. (Conflict Minerals).

AMES will make explicit in the Code of Conduct and Purchase Conditions for Suppliers, the prohibition of suppliers using child labor, being involved in any form of slavery, forced or obligatory labor or human trafficking or not respecting their labor rights with respect to any type of discrimination, contracts, wages and benefits or working hours or freedom of association and collective bargaining.

In terms of business ethics, AMES expects its suppliers to apply policies against any practice of corruption, extortion, bribery, etc.) or conflict of interest, and instead, to develop their activity with principles of fair competition and antitrust.

Respect to environmental issues, suppliers must apply policies for the optimization of natural resources, raw materials and energy resources, prioritizing supplies from renewable energies and ensuring at all times the quality of the water they return to the environment and the reduction of greenhouse gas emissions.

Suppliers shall have a channel for receiving and handling complaints about possible noncompliance with the above points that protects whistle blowers from any type of retaliation.

### 3.2 **Fight against corruption**

Rejection of all corrupt practices and behaviors, both in the commercial relationships that are established (suppliers, customers), and in the procedures that are carried out with the public administrations of the countries in which they operate.

No person from AMES, or acting on behalf of AMES, will accept, grant or offer bribes, inadmissible donations or undue benefits in the relations with customers, suppliers, officials or other business partners.

### 3.3 **Privacy and personal information**

AMES departments that have personal data of employees, former employees, that are carried out with the public administrations of the countries in which they operate.

No person from AMES, or acting on behalf of AMES, will accept, grant or offer bribes, inadmissible donations or undue benefits in the relations with customers, suppliers, officials or other business partners.

### 3.3 **Privacy and personal information**

AMES departments that have personal data of employees, former employees, customers, suppliers and other interested persons are responsible for protecting them, as well as maintaining the confidentiality criteria that have been acquired. Personal data will only be collected, processed, used and stored when there is the consent of the person concerned, a contractual agreement or some other legal basis.

### 3.4 **Intellectual Property (Know-How) and company data. (Disclosure of information).**

In addition to the confidentiality aspects described in the Customer Service Principle, it is expected that the people from AMES who have access to the organization's data or data related to the company's own Intellectual Property (*know-how*), make an appropriate use of it according to the ethical behavior that we are describing; therefore, that they do not disseminate it in any way outside the scope of the company, even after the employment relationship with AMES has ended.

We will likewise respect the intellectual property of third parties and will not make unauthorized use of their know-how, patents or copyrights.

### 3.5 **Conflict of interests**

Decisions can only be made based on solid objective arguments, without the influence of personal relationships or opinions. The people from AMES who have personal interests in any of their suppliers or customers will refrain from making any decision that affects the supplier or customer.

### 3.6 **Financial accountability. Accurate Records**

No AMES document shall be falsified or altered inappropriately. Financial officers shall ensure that all transactions are legal and that they have passed the expected internal controls.

### 3.7 **Fair Competition and Antitrust Laws**

Business aspects and decisions shall be based on fair competition practices and strict observance of existing competition and antitrust laws.

### 3.8 **Regarding export limitations to sanctioned countries**

AMES shall not export or sell its products to countries that are sanctioned for terrorist activities, drug trafficking or other actions deemed appropriate by the governments of the countries in which AMES operates.

### 3.9 **Channel for receiving alerts and/or possible non-compliance**

Ames offers all interested parties a channel for receiving alerts and/or possible non-compliance with the code of conduct through the following link .

<https://co-resol.bcnresol.com/webclick>

or by using the «co\_resol» app with the identification code "**AMES**".

This link as well as the app strictly comply with the whistleblower protection as required by law 2/2023 of February 20th. Both options are available in Catalan, Spanish and English. Instructions for use and operation of the alert channel can be obtained from the following link: [Instructions for use and operation of the alert channel](#).

## 4. **ENVIRONMENT**

All work centers of AMES will have the permits, licenses, inspections and reports required by law of the country for the development of their activity; they will be updated and available for review at any time.

Likewise and taking into account the commitment to the environment, actions will be taken to improve the environmental performance of our products and services, as well as to reduce the use of the natural resources used, choosing alternatives with less environmental impact.

#### 4.1 **Energy consumption and resource efficiency**

Documented monitoring of energy consumption, water, raw materials and packaging materials will be carried out in each center, seeking options to improve their efficiency and, therefore, reducing their consumption in relation to the units or Tm produced.

#### 4.2 **Emissions, wastewater discharges and waste management**

In the line of consumption, options will be sought to reduce atmospheric emissions, especially those corresponding to greenhouse gases and in particular those corresponding to CO<sub>2</sub>, wastewater discharges and the generation of waste per unit or tonne produced.

Likewise, the reuse and recycling of waste will be prioritized over its energy recovery or, as a last resort, its deposit in controlled landfills.

#### 4.3 **Responsible management of chemical products**

We will actively work to limit and restrict the amount of chemical products used in productive activities and to select chemicals with the lowest possible risk to health and the environment.

### 5. **HUMAN RIGHTS AND LABOR CONDITIONS**

At AMES we will apply the same requirements to ourselves as we do to our suppliers and therefore we will not use child labor under any circumstances, we will not be involved in any form of slavery, forced labour or obligatory or human trafficking and we will respect their labor rights: Contracts, wages and benefits, working hours, freedom of association and collective bargaining, etc..

#### 5.1 **Young workers**

Only people who meet the minimum legal age established by law in each country will be hired. Also, people under 18, or under the age established by the law as a condition of a young worker, can not do overtime, night shift or dangerous jobs.

The apprenticeship programs or internships for students will be done according to the requirements that the applicable laws and regulations establish, carrying the necessary records that are established to protect their rights.

#### 5.2 **Salaries and remuneration**

All persons will receive a salary statement / receipt which includes the appropriate information to be able to verify the compensation received for the work in each payment period. This compensation must be in accordance with all legal requirements, including minimum wage, hours of work and overtime.

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## 5.3 Health and Safety

All information related to the health and safety of people and to emergency procedures must be personally communicated and published in each workplace in a language that the worker understands. Likewise, necessary personal protection equipment will be provided, which will be easily accessible. Training in machines, equipment and safety required by each job will also be done.

Emergency exits, fire detection systems, alarms and fire-fighting equipment are correctly installed and operational at all times. Evacuation drills will be held periodically to assess the effectiveness of the measures.

All workplaces must be perfectly adapted to people by applying the principles of ergonomics.

## 5.4 Harassment

It is the obligation and responsibility of all AMES people to establish and maintain their relationships based on respect and dignity. Additionally, the commanders must ensure that situations of harassment do not occur in their area. AMES' commitment to people means that no tolerance is allowed in this section.

For this reason and in order to be able to act immediately, AMES makes available to people who may be considered harassed all the communication channels established, understanding that in the event of wanting to guarantee their anonymity, the Co-Resol alert channel may be appropriate in these cases.

## 5.5 Equality

AMES's equality policies mean that all people enjoy the same opportunities and the same rights, in relation to the workplace. Consequently, all selection, hiring or promotion will be carried out with objective criteria based on the knowledge, skills, attitudes and aptitudes professional of each person, and therefore avoiding any type of discrimination based on birth, race, sex, religion, opinion or personal or social circumstance, could occur.

## ANNEX:

[Instructions for use and operation of the alert channel.](#)

A handwritten signature in black ink, appearing to read "C. Molins", with a long horizontal stroke extending to the left.

*Dr. César Molins*  
*General Director of AMES*

Rev. 7

*This policy will be available to any interested party: Customers, Suppliers, Administration, Local Bodies and Entities, etc. through the AMES website [www.ames-sintering.com](http://www.ames-sintering.com)*