

CODE OF ETHICS

This document contains the code of ethics (the "**Code of Ethics**") of Sonoma Chemicals, S.L., a Spanish company, with registered office at Avenida Diagonal 503, 08029 Barcelona, and N.I.F./EORI ES-B04996096, (hereinafter, "**Sonoma**" or the "**Company**") and is addressed to all employees of the Company, partners and external collaborators.

This Code of Ethics was approved by the Company's director on 30 September 2023 and updated on 20 June 2024.

1. Target

This Code of Ethics includes the values, principles, rules and guidelines of conduct that must inspire and govern the actions of the members of the Company in their respective areas. For these purposes, members of the Company shall be understood as all partners, employees, collaborators and trainees of all the offices and companies that make up or may in the future make up the Sonoma Chemicals Group.

2. Content

The Company is aligned with the agreements of the United Nations Global Compact, endorsing the principles of social responsibility and applying the guidelines of respect for human, labour, environmental and anti-corruption rights.

The Company does not allow or tolerate discrimination on the grounds of race, colour, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political opinions, religion or any other personal, physical or social condition of its members, and promotes equal opportunities.

In particular, the Company promotes equal treatment between men and women and rejects any manifestation of harassment, abuse of authority, violence or any other conduct that creates a work environment that is intimidating or offensive to the personal rights of its members.

A. BINDING CHARACTER

The Code of Ethics is mandatory for all members of the Company and forms part of its internal regulations (the "**Internal Regulations**"), which comprise the set of regulations, codes of conduct, procedures and policies that govern the life of the Company, regardless of the body responsible for their approval.

Violation of this Code of Ethics will be considered a breach of their employment obligations (in the case of employees), of their corporate obligations (in the case of partners) or of their commercial obligations (in the case of collaborators), and will be sanctioned in accordance with the regulations applicable to them at any given time.

B. PRINCIPLES AND VALUES

All members of the Company are committed to compliance with the law in general. In addition, the Company is committed to promoting a series of values that are part of its identity:

- a) **Excellence** and **rigour**, which oblige us to demand the best of ourselves and to focus on problem solving, beyond the mere enunciation of problems.
- b) **Commitment** and **effort** in serving our customers, which demand extraordinary attention and dedication from our professionals, and which, as extraordinary, must be fairly rewarded by the Company, not only in financial terms but also through training, career opportunities and companionship.
- c) **Responsibility**, which leads to a commitment to act in the right way towards society, our teams and our customers, and to become aware of the decisions we make.
- d) **Humility** in the performance of our commitments and responsibilities, to our colleagues, to our customers and to our competitors.
- e) **Integrity**, which leads us to present ourselves to others as we are, as moral subjects whose obligation is to respect, care for and consider others.
- f) The promotion of an **open culture** with full freedom, which implies accepting people of diverse backgrounds, training, status and abilities and understanding that these differences enrich us all.
- g) **Adaptation to change**, which involves participating in changes in the environment in which we operate that require innovation, openness, search, opportunity and projection.

The set of rules, principles and values contained in this Code of Ethics constitute the ethical model of behaviour that must inspire and govern, at all times, the actions of the members of the Company.

C. PROFESSIONAL CONDUCT

Prevalence of the Company's interests

The interests of the Company as a collective entity are and must always be above the individual interests of its members. The members of the Company must (i) respect and comply with this principle in decision-making, (ii) adopt it as a guideline of conduct in their relations, and (iii) defend the interests of the Company for the benefit of the collective.

Members of the Company may not use for their own benefit or that of third parties (i) business opportunities which, by their nature, belong to the Company, or (ii) confidential information of which they become aware by reason of their activity in the Company or their relationship with customers.

Members of the Company may not use the name of the Company or invoke their status as a member of the Company to carry out transactions for their own benefit or for the benefit of persons related to them.

Commitment to the client

The Firm's activity is geared towards providing clients with legal advice and solutions of the highest quality and added value, based on ethical principles and offered through a flexible and efficient service, with the utmost commitment to their interests. This requires us to (i) understand our clients' needs, (ii)

provide them with constant dedication, (iii) maintain a high level of technical rigour, and (iv) while maintaining our independence, maintain a high degree of commitment to their interests.

In addition to excellence and professional rigour in the advice we provide, the members of the Company must pay special attention to client satisfaction, in terms of the assessment and perception of our professional services. This obliges us (i) to maintain an open and sensitive attitude to the client's suggestions, and (ii) to correct any deficiencies they may transmit to us, introducing the appropriate improvements in our professional activity.

The Company has quality control policies and procedures, which are mandatory for all its members, to ensure the quality of the service and advice we provide to our clients.

Continuous training

Continuous training is a fundamental tool for maintaining the high level of excellence and rigour that we demand of ourselves. The Company attaches great importance to continuous training, not only as an essential requirement to achieve the technical quality we seek, but also as a necessary instrument for the full development and professional promotion of our employees.

Consequently, continuous training is an obligation for all members of the Company, who must aspire to specialisation, to deepen their technical knowledge, to increase their experience and to share it with others.

To facilitate these objectives, the Company (i) promotes the continuous training of its employees and staff, encouraging them to study, (ii) organises and encourages participation in courses, seminars and training programmes and (iii) provides timely information on regulatory developments.

The Company is nourished by the experience and knowledge of its members, who must share their accumulated professional knowledge and experience generously with the other members of the Company in the interests of all.

Professional development

The Company is committed to enabling the professional development of its employees.

This professional development is based on meritocracy, i.e. decisions regarding people's performance are based exclusively on their skills and abilities. The Company has a performance appraisal system for all its staff, the main purpose of which is to monitor and ensure their career development. Meritocracy is applied to all decisions on selection, recruitment, compensation, appraisal and assignment of functions or duties.

The Company has a vocation of permanence in time and is committed to providing the new generations, those already incorporated and those yet to come, with the means and opportunities necessary for the development of their professional careers, according to their merits and abilities.

All members of the Company must collaborate in this task with generosity and putting the interests of the collective before their own.

Gifts and invitations

Members of the Company may not give or accept gifts or entertainment in the course of their work (whether for themselves directly or for family members or partners), unless they are of insignificant or symbolic financial value and are customary courtesies, hospitality or invitations in accordance with social customs, and are within sensible and reasonable limits.

In any case, gifts or invitations that are prohibited by applicable regulations, that may condition professionalism or independence, or that may influence professional decision-making, will not be acceptable.

The members of the Company may not, either directly or through an intermediary:

- a) Promise, offer or grant unjustified advantages or benefits that are intended, immediately or in the medium term, to obtain a benefit, present or future, either for the Company, for themselves or for a third party.
- b) Receiving, soliciting or accepting benefits or advantages of any nature to unduly favour third parties in the procurement of goods or services or in commercial relations.

Nor may they receive money from customers or suppliers on a personal basis, even in the form of a loan or advance. This does not include loans or credits that may be granted by financial institutions that are customers or suppliers of the Company.

The Company will approve an Anti-Corruption Policy that will regulate all these aspects, which must be complied with by all its members.

Appropriate use of company resources

The Company provides its members with the resources and tools necessary and appropriate for the development of their activity.

Members of the Company must make appropriate use of them, in accordance with the Internal Regulations, using them only for the development of their professional activities and avoiding their private use, except in exceptional and justified cases and in accordance with reasonable parameters.

The use of the Company's resources must be responsible and comply with security criteria, avoiding any illicit use, contrary to applicable regulations or Internal Regulations.

In relation to computer and technological devices and systems, the Company has a policy and rules of use, which must be complied with by all its members.

Security and confidentiality of information

Members of the Company have access to information belonging to the Company and to its customers or suppliers. All information to which they may have access, to the fullest extent and regardless of the source or medium on which it is found, is confidential information and is expressly and without limitation in time subject to the duty of secrecy.

The information will be used exclusively for the purpose established by the Company or by the customer, as appropriate, and in accordance with the provisions of the security policies and policies on the use of computer systems and devices that the Company may have in force at any given time.

All members of the Company are responsible for (i) treating information appropriately, (ii) preserving its confidentiality, and (iii) preventing its unauthorised disclosure.

The Company has implemented technical security measures, which are continuously updated, to protect the security and confidentiality of information.

Intellectual and industrial property

The Company owns the ownership and the rights of use and exploitation of the software and computer systems, manuals, studies, technical and safety sheets, regulatory documents, contracts, writings of all kinds and any other work created by the members of the Company in the course of their professional activity.

D. REGULATORY COMPLIANCE

Prevention of money laundering and terrorist financing

The Company is fully committed to compliance with regulations on the prevention of money laundering and the financing of terrorism.

The Company has policies and procedures in place for the admission of customers, due diligence, document retention, internal control, risk assessment and management and, in general, compliance with applicable regulations, which aim to prevent and deter operations related to money laundering or the financing of terrorism.

Prevention of criminal risks

The Company is firmly committed to the prevention of criminal conduct.

To this end, an analysis of the criminal risks that could affect the Company's activities has been carried out and a criminal risk prevention programme will be implemented, which must be complied with by all members of the Company, and which will regulate and complement the policies and procedures already in place in order to prevent the commission of crimes and reduce the risk of their commission.

The criminal risk prevention programme will be updated and supplemented to adapt it to regulatory changes and changes decided by the Company in this area.

Prevention of harassment

The Company has as a priority objective the total absence of harassment practices in any of its manifestations.

The Company will implement a code of good practice for the prevention of sexual harassment, harassment based on sex and harassment at work, which establishes the channels and procedures for

reporting, managing and resolving this type of conduct, maintaining the confidentiality of the complainant.

The Company will maintain zero tolerance for this type of conduct and will apply the sanctions applicable in each case.

Gender equality

Equal treatment and opportunities for women and men is a priority for the Company and is considered a fundamental principle of labour relations and human resources management.

The Company will implement an Equality Plan that aims to (i) advance equal opportunities and treatment between women and men, (ii) further integrate a gender perspective in the management of the Company, and (iii) ensure equal pay for work of equal value.

This Equality Plan will be updated and complemented to adapt it to regulatory changes and to the changes decided by the Company in this area.

Data protection

The Company is fully committed to complying with the regulations on the protection of personal data.

The Company has manuals, policies and procedures for the management of (i) processing activities, (ii) the rights of employees, customers and users in this area, (iii) rights to unsubscribe from commercial communications, (iv) incidents, (v) employee privacy, and (vi) the impact assessment of new processing activities, which are mandatory for the entire organisation. These manuals, policies and procedures will be updated and supplemented to adapt them to regulatory changes and changes decided by the Company in this area.

Prevention of occupational hazards

The Company is firmly committed to compliance with occupational risk prevention regulations and to the continuous improvement of its occupational risk management systems.

The well-being of its employees is of fundamental importance to the Company and is taken into account in (i) the design of the offices, (ii) the operation of the facilities, and (iii) the selection of furniture and work tools.

The Company is assisted by an external prevention service (SPA) with which it has contracted health surveillance and occupational risk prevention.

E. RELATIONSHIP WITH THE ENVIRONMENT

External activities

The members of the Company shall devote to it all the professional ability and personal effort necessary for the performance of their duties.

Unless otherwise agreed or expressly authorised by the competent body, employees shall perform their work on a full-time basis and subject, in all cases, to the provisions of the applicable regulations and the contractual terms applicable from time to time.

Employees may not, except with the prior written authorisation of the Company, provide, for their own account or for the account of others, to companies or entities other than the Company, employment or professional services similar or equivalent to those provided by the Company, or which may involve a conflict of interest with the Company.

Membership or collaboration with political parties

The Company respects the performance of social or public activities by its members, provided that this does not interfere with their work or cause or be likely to cause any damage to the Company, reputational or otherwise.

In any case, any link, membership or collaboration with political parties or associations shall be made in a personal capacity and shall avoid any relationship or link with the Company. It is strictly forbidden to refer to present or past membership of the Company in any kind of political activities or activities carried out under the protection or cover of political parties.

Membership of or collaboration with associations, foundations and non-profit institutions

Members of the Company may, to the extent appropriate and convenient for the Company, be members of or collaborate (in their own name or on behalf of the Company) with associations, foundations or similar non-profit professional associations, foundations or entities related to the legal or business world.

Unless acting on behalf of the Company, any connection, membership or collaboration with such associations, foundations or institutions shall be on a personal basis and shall avoid any relationship or connection with the Company.

The members of the Company must report and obtain the relevant authorisations in accordance with the Internal Regulations applicable from time to time.

Social networking, blogging and other social media

The Company conceives the use of social networks as an institutional communication tool that, in line with the Company's strategy and objectives, can contribute to strengthening its corporate identity and culture.

In the use of social networks, blogs and other social media, members of the Company shall abide by any policies and best practice guidelines that may be approved from time to time.

Members of the Company are expressly prohibited from using social networks and other social media to disseminate information, make statements or show images that may be (i) offensive, discriminatory, defamatory, inadequate or inappropriate, (ii) that may violate the duty of secrecy, or (iii) that may affect in any way the prestige and reputation of the Company, its members and/or its clients.

Environmental responsibility

The Company complies with all environmental laws and regulations and promotes environmental awareness, incorporating environmental best practices in its professional and corporate conduct and seeking to minimise negative environmental impacts.

The Company is constantly concerned with (i) improving energy efficiency, (ii) reducing water and electricity consumption, and (iii) reducing waste generation.

Procurement of goods and services

The Company purchases goods and services based on price, quality, performance and suitability.

All of the Company's suppliers must comply with the highest degree of business ethics and provide the documentation requested by the purchasing department to ensure that they comply with the quality, ethical and social responsibility requirements established by the Company from time to time.

F. REVIEW

This Code will be subject to periodic review and updating and will be duly communicated to the members of the Company.

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