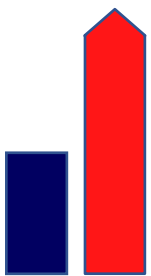


# CODE OF ETHICS AND CONDUCT



**TDF GROUP**

**KEEP FLOWING**



# 1. OBJECTIVE AND SCOPE OF APPLICATION



The objective of this Code of Ethics is to establish the basic principles and standards of conduct that must govern the integrity and professional behaviour of everyone who is part of the TDF Group (employees, managers, and directors), as well as their subsidiaries.

This Code is mandatory for all Company employees.

Furthermore, compliance with the Code of Ethics will be required of third parties, including suppliers and service providers, in cases where it is deemed appropriate due to the type of product or service provided.

In this sense, the TDF Group will not enter into business or commercial relationships with entities whose Code of Ethics does not respect our ethical principles or who do not adhere to our Code. Similarly, if any action taken by any of these third parties constitutes a breach of the principles set forth in this Code of Ethics, it may be considered a breach of contract and give rise, depending on the circumstances, to claims for damages or appropriate corrective measures, including termination of the contractual relationship.

The ultimate purpose of our Code of Ethics is to strengthen our corporate culture and brand image through our values and best practices in all areas of our operations.

TDF Group will make this Code of Ethics available to each employee in order to ensure their knowledge and proper compliance, as set out in the "Application and monitoring" section of this document.

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### 2.1 MISSION

To supply the most advanced components to European and Latin American industry, and design and provide comprehensive and agile solutions with cutting-edge technology, adapted to the needs of companies.



### 2.2 VISION

To maintain our leading position in the European and Latin American market for the supply of industrial components as well as to provide miscellaneous services to the industry.



### 2.3 VALUES

Serving our customers with honesty to keep building lasting relationships.

Communicating a transparent message through quality and trustworthy service.



## 3. GENERAL ETHICAL PRINCIPLES AND GUIDELINES FOR CONDUCT

Our ethical principles represent a guide to conduct that aims to guide our individual behaviour and decisions in the workplace. They also govern our relationships with colleagues, suppliers, and customers.

As members of the TDF Group, we agree to abide by the following principles:

### 3.1 REGULATORY COMPLIANCE AND RESPECT FOR THE LAW

It is the responsibility of each employee to be aware of and act in accordance with the applicable and current laws, rules, and regulations of the TDF Group in their daily work.

Our business relationships with customers and suppliers will be conducted in accordance with\_

the law, by respecting internal and external regulations that govern us, acting in good faith, and with a genuine commitment to integrity.

### 3.2 OUR CUSTOMER SERVICE

TDF Group customers are at the heart of our business model; their choices and satisfaction determine our achievements and results. Therefore, our priority is to provide them with the best service and always treat them with dignity and respect.

We are committed to creating positive and unparalleled experiences for our customers; these experiences are defined by the image, atmosphere, service, product, and value offered with the highest quality.

All our employees work on behalf of the customers who honour us with their business every day; exceeding their expectations is our priority.

### 3.3 EQUAL OPPORTUNITIES

TDF Group offers equal development opportunities for all company employees based on their commitment, performance, and results.

Workplace equality is expressed through dignified and respectful treatment at all organizational levels. Therefore, no act of discrimination is permitted based on age, ethnicity, nationality, political affiliation, socio-economic status, disability, marital status, religion, gender, or sexual orientation. This principle applies in all circumstances: from providing a

job opportunity and determining employment conditions to establishing a salary and deciding on an appointment or promotion within the organization.

Every employee who demonstrates a commitment to challenges, delivers good results, adheres to our values, and a capacity for learning will have the opportunity to develop and grow within our organization.

### 3.4 HUMAN VALUE

TDF Group Business activity is undertaken on the basis of respecting human rights and public freedoms included in the Universal Declaration of Human Rights.

“Every employee who demonstrates a commitment to challenges, good results, adherence to our values, and a capacity for learning will have the opportunity to develop and grow within our organization.



### 3.5 WORKPLACE SAFETY

TDF Group employees are responsible for strictly adhering to the safety standards defined in the work areas and following the internal procedures that govern the performance of our activities.

On this basis, as part of our workplace safety, the following are prohibited:

- Consuming, distributing, transporting, selling, or possessing any type of drug or prohibited substance.
- Consuming alcoholic beverages during the

workday, except for institutional events and celebrations, and avoiding abuse thereof.

- Using, implicitly or explicitly, authority to compel a colleague to engage in activities that breach the operational policies of this Code of Ethics.
- Bringing firearms or any other dangerous device to the workplace and/or company facilities.
- Threatening or harming the physical or moral integrity of any person, their property, and/or belongings.

### 3.6. RESPECT FOR THE PRIVACY AND CONFIDENTIALITY OF EMPLOYEE INFORMATION

The TDF Group shall request and use only the employee data needed for business management or whose record is legally required. Similarly, we shall take all necessary measures to preserve confidentiality when transmitting this data, when required for business reasons and in accordance with applicable law.

The TDF Group safeguards the confidentiality of information provided by its employees by adopting effective security measures.

regarding the physical and electronic storage of the media on which the aforementioned information is recorded.

Similarly, employees who, due to the performance of our professional activity, have access to information from other employees or third parties, shall respect the confidentiality of this information, and make responsible and professional use of it.

**”TDF Group employees must strictly comply with the safety standards defined in the work areas and adhere with the internal procedures that govern the performance of our activities”.**

### 3.7. TAKING CARE OF OUR RESSOURCES AND WORK TOOLS

The TDF Group must make proper and effective use of both our work tools and company resources.

The equipment, machinery, and information owned by The TDF Group are intended for use exclusively for activities related to our operations and business.

We must avoid at all costs using company assets, such as technological equipment, machinery, software, work tools, materials, and office facilities, for activities unrelated to our job duties. We consider it our duty to care for and avoid

damaging or wasting them in order to prevent unnecessary expenses.

Taking any company property without authorization or misusing it constitutes a breach of our Code of Ethics and may, in some cases, be considered a crime, subject to the applicable laws of each country.

The TDF Group fosters a culture of austerity in everything we do. Through disciplined expense management, we safeguard the business and protect our future. Caring for the resources entrusted to us by the company is everyone's responsibility.

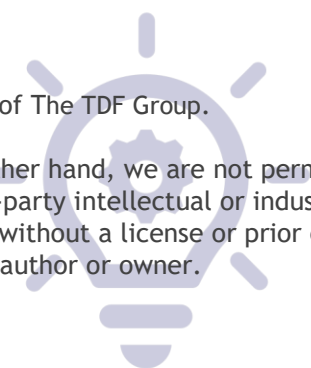
“The TDF Group fosters a culture of austerity in everything we do. Through disciplined expense management, we safeguard the business and protect our future. Caring for the resources entrusted to us by the company is everyone's responsibility”.

### 3.8. INTELLECTUAL PROPERTY

Any invention, drawing, design, line of research, system, program, or any other information or document produced by us as employees during the course of our professional activity shall be considered the intellectual

property of The TDF Group.

On the other hand, we are not permitted to use third-party intellectual or industrial property without a license or prior consent from the author or owner.



### 3.9. TDF GROUP IMAGE PROTECTION

The TDF Group is committed to ensuring the proper use of the company's name, brand, image, and reputation, and act at all times with prudence, integrity, and honesty towards the TDF Group and in accordance with its interests.

All TDF Group employees shall always act in the best interests of the company, making appropriate use of all available resources and avoiding any actions that may

harm the company. In this regard, all posts and opinions expressed on any public platform, media outlet, social network, or opinion forum shall always be considered the private responsibility of the TDF Group employee, manager, or administrator, without publications being made or opinions being issued on behalf of the company without the prior authorization of the competent decision-making bodies.

### 3.10. ENVIRONMENT AND SOCIAL RESPONSIBILITY

All TDF Group employees and brands are committed to caring for the planet's natural resources by consuming water, electricity, and fuel responsibly, and by contributing to their preservation through their rational use.

We are aware of damage caused to the environment and, for this reason, we are taking actions and initiatives in order

to optimize and protect resources; we also support campaigns that encourage environmental stewardship.

This is part of the TDF Group's Social Responsibility philosophy, which through the Sustainability, Responsible Consumption, Quality of Life and Community committees, enables us to have a positive impact upon those communities where we operate.

“The TDF Group is committed to ensuring the proper use of the company's name, brand, image, and reputation, and act at all times with prudence, integrity, and honesty towards the TDF Group and in defence of its interests”.

### 3.11. CONFIDENTIALITY

All information generated and used by employees, managers, directors, advisors, and shareholders as a result of their activities is the property of the TDF Group. Therefore, it should be treated as private and confidential.

It shall only be used for internal purposes and in accordance with established policies and procedures.

The TDF Group's confidential information includes, but is not limited to, the following: business strategies, non-public financial information, product development, internal policies and procedures, audit results, merger and acquisition plans and status, and intellectual property aspects.

“It is our obligation to treat all information generated by the TDF Group as confidential”.

### 3.12. FINANCIAL INFORMATION

The TDF Group has adopted specific procedures ensuring that its financial statements are prepared in accordance with applicable principles and standards and present its financial position and the results of its operations appropriately and transparently in all material respects.

Discussion or disclosure of any information related to specific transactions that have been carried out or agreed upon is prohibited, except by the directly involved parties.

It is our obligation to treat all information generated by the TDF Group as confidential.

This also applies to our customers and suppliers, who, upon establishing a relationship with us, commit to safeguarding the information regarding our procedures.

When a confidentiality agreement is signed, it is the responsibility of the employee or supplier to fully comply with its terms.



Under no circumstances should incorrect, inaccurate, or imprecise information that could mislead be deliberately provided. Similarly, the reliability and accuracy of financial information, both for internal use and that provided to the market, must be ensured, and this will only be performed by individuals expressly authorized to do so.

“It is important to know that not only is it not permitted to offer, promise or deliver something of value, but also to ask for, accept or receive it as consideration for the performance or non-performance of any action for the benefit or advantage of any third party”.

### 4.1. RELATIONSHIP WITH SUPPLIERS

Our relationships with our suppliers are an essential part of our business, so we believe that it is crucial that this Code be applied to our relationships with them.

We refrain from entering into business relationships with those who breach our ethical principles of conduct.

### 4.2. GIFTS, PRESENTS AND COMPENSATION

The TDF Group does not accept or receive gifts, invitations, favours, or courtesies from third parties within the scope of our professional activities, whether directly or indirectly, in cash or in kind, and which are carried out with the intention of exerting an influence as consideration for the performance or non-performance of any action for the benefit or advantage of any third party, unless these are symbolic in nature and their economic value does not exceed the limit of €150 per year.

In particular, we are strictly prohibited from offering public officials, politicians, and other representatives of public institutions gifts, gratuities, invitations, or any object of value that may compromise their independence or integrity.

If we have any doubts about the acceptability of a gift or invitation, we should consult our immediate supervisor or, if applicable, the Human Resources Department.

### 4.3. TRANSPARENCY AND VALUE CREATION

Transparency is key to strengthening the trust of all our stakeholders, and we foster open and bidirectional information sharing and accountability for our activities.

Through ongoing dialogue, we aspire to be a company capable of building trust among all those who participate in and interact with us: employees, shareholders, customers, and suppliers.



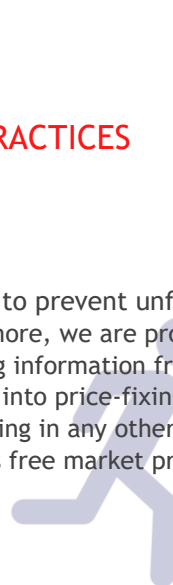
“Through ongoing dialogue, we aspire to be a company capable of building trust among all those who participate in and interact with us: employees, shareholders, customers, and suppliers”.

### 4.4. FREE COMPETITION AND ANTITRUST PRACTICES

The TDF Group upholds the principles of free competition. Our goal is to achieve our business objectives through ethical business practices and always within the bounds of the law.

We safeguard our confidential information, as well as that of our employees, suppliers, customers, and/or third parties,

in order to prevent unfair competition. Furthermore, we are prohibited from illegally obtaining information from our competitors, entering into price-fixing agreements with them, or engaging in any other illegal activity that breaches free market principles.



The TDF Group is committed to conducting all its activities in accordance with strict ethical standards.

This commitment aims to achieve the following objectives:

Any questions regarding the application of this Code should be directed to the immediate supervisor, who is responsible for internal control and compliance and reports to the General Legal Directorate. The supervisor may escalate the matter to the General Legal Directorate if necessary.

Similarly, if employees need to report any breach or violation of the conduct outlined in this Code,

they may contact their immediate supervisor or, if applicable, use the Whistleblowing Channel at the following email address:

[rrhh@grouptdf.com](mailto:rrhh@grouptdf.com)

The person responsible for monitoring this code of ethics is:

Ana Ruth Gutiérrez  
HR Manager

### 5.1. APPROVAL AND ENTRY INTO FORCE

Alberto Maestre, CEO of TDF Group, has approved this Code, which will be mandatory from its entry

into force, starting from its date of publication.

### 5.2. ADHERENCE

All employees, managers and administrators must receive the Code of Ethics upon joining the TDF Group. All those subject to the Code must sign it and renew their signature whenever there is a substantial change to its content.

Similarly, our suppliers and service providers must confirm their adherence to our Code of Ethics upon formalizing the business relationship.

“In our work environment, we all commit to upholding our cultural values, internal policies, rules, and related principles in order to ensure the achievement of our goals and objectives, build a positive work environment, and protect our reputation”.

Therefore, any act of non-compliance with our Code of Ethics may result in disciplinary measures, ranging from a warning and commitment to a corrective and improvement plan to termination of employment with the company and the application of respective legal penalties.

The foregoing is based on the applicable laws in force in each country, in order to guarantee the legality of its imposition.

The Code of Ethics does not cover all situations that may arise in our work environment; therefore, its content must be considered alongside the requirements of current laws, as well as the ethical standards that guide our actions.

We must bear in mind that if a particular situation is not included in this document but represents a breach of TDF Group ethics, we must apply our own judgement, based on the values that shape the company's culture.

If you have any questions regarding the interpretation and understanding of the Code of Ethics, we recommend contacting the Human Resources department.

