



CORPORATE RESPONSIBILITY POLICY: CODE OF ETHICS AND CONDUCT

Global Code of Ethics and Conduct for NUADI Group Employees

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1. SCOPE

The code of ethics and conduct is applicable to any employee of the Nuadi group, including its subsidiaries SADECA, hereinafter all referred to as the NUADI GROUP, regardless of country or nationality.

2. OUR PRINCIPLES

NUADI GROUP is committed to meeting the highest possible ethical standards in all of its operations and labor practices. This Code of Ethics and Conduct establishes the basic principles to guide all employees and managers who provide their services in the company.

2.1 Our People

- We guarantee and respect the fundamental rights of all the people who provide their services in the company.
- We promote the professional and personal development of workers.
- We promote the responsible use of the company's material assets.
- We guarantee privacy and confidentiality of the personal information of our professionals.
- No person shall be discriminated against on the grounds of race, physical disability, disease, religion, sexual orientation, political opinion, age, nationality or gender.
- Any form of physical, sexual, psychological or verbal harassment or abuse, as well as any other conduct that could generate an intimidating, offensive or hostile work environment, will be immediately monitored and prohibited.

2.2 Our Business

- We guarantee the quality and safety of our products and services.
- We guarantee the accuracy and completeness of the company's records.
- We guarantee ethical behaviour in our relationships with customers, suppliers and collaborators.
- We respect competition laws. Our goal is to outperform our competitors fairly and honestly.
- We protect information and intellectual property.

2.3 Our environment

- We behave ethically in our relationship with institutions, administrations and public bodies.
- We are environmentally responsible.
- All of us who work at NUADI GROUP are committed to using water, paper and electricity efficiently and to ensure that they are consumed without misusing them.

We assume the obligation to adhere to the principles of sustainability, to contribute to the optimization of resources and to monitor that our work genere



the lowest environmental impact.

- We have a strong commitment to our community.

We protect our corporate identity and reputation and defend the interests of our company.

3. APPLICATION OF THE CODE OF ETHICS

All the professionals who make up NUADI GROUP must behave honestly, uprightly and responsibly. The Code of Ethics is our guide to achieve this objective in our daily performance regardless of the hierarchical level, geographical location or group company for which we work. We extend the application of this Code of Ethics to our suppliers and collaborators.

It is essential to understand the obligation to respect this Code. NUADI GROUP will actively ensure compliance. Those who violate the rules set out in this code will be subject to the corresponding disciplinary sanction in each case within the workplace. Violations of this code may also constitute violations of the law and lead to the application of other civil or criminal sanctions.

4. FRAUD AND ASSET PROTECTION

We emphasize honesty and respect the Company's assets and property.

4.1 NUADI GROUP's financial records form the basis for managing the Company's business and for fulfilling its obligations towards all interested parties.

4.2 No employee should be involved in fraudulent actions or any other dishonest conduct involving or affecting the property or assets or financial records and accounting of NUADI GROUP or a third party. This can not only lead to the application of disciplinary sanctions in the workplace, but also have criminal implications.

4.3 Employees must protect the assets of NUADI GROUP and use them only in an appropriate and efficient manner. All employees shall attempt to protect the property of NUADI GROUP against loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or privileged information, and computer systems.

4.4 To the extent permitted by applicable law, and in accordance with the provisions set forth in the **Instructions on Use Document of the company's computer system and electronic communications**, the Company is reservation the right to control, monitor and inspect how employees use their assets, including the right to inspect all emails electronic devices, data and files located on the network of computers and mobile devices owned by the Company.



5. BRIBERY AND CORRUPTION

We comply with anti-bribery, anti-corruption and anti-money laundering measures.

5.1 No employee should, directly or through intermediaries, to offer or promise ever an improper personal or financial favor or other type of benefit for the purpose of obtaining or obtaining a business or other advantage by a third party, whether public or private. Nor should it accept such an advantage in exchange for preferential treatment from a third party. Likewise, they must refrain from exercising any activity or conduct that could give rise to the appearance or suspicion of corruption or an attempt to do so.

5.2 We compete and conduct our business on the basis of quality and competence alone Honest.

5.3 No employee may be influenced by receiving favors or attempt to influence third parties in an improper manner by giving favors. Employees may only, for example, offer or accept reasonable meals and symbolic gifts, which are appropriate under the circumstances, and will not accept or offer gifts, meals, or entertainment, if such behavior could create the impression that it constitutes an inappropriate influence on the relevant relationship commercial.

When assessing the situation in accordance with the above, employees should consult the policy applicable in their country, applying in any case, the most restrictive local practice. In case of any doubt, the employee must seek the advice of his immediate superior.

5.4 No employee shall offer or accept from third parties gifts included in the following list, whatever their value: money, loans, bribes and/or similar monetary advantages.

6. THE CODE OF ETHICS AND THE LAW

Both the workers and all the operations of our companies are subject to compliance with the law of those countries in which we operate. Our workers and managers shall comply with this Code and applicable government laws, rules and regulations. The legal provisions are usually complex and different depending on the geographical location, so if you have any questions about this, you should make a consultation to the company's Legal Area.

7. YOUR ROLE AS A NUADI GROUP WORKER

7.1 Rights

- Working in an environment with guaranteed compliance with the principles



Ethical. NUADI GROUP has the responsibility to ensure an environment that is conducive to compliance with ethical principles.

- NUADI GROUP must provide the necessary training and time to that all professionals and workers know the principles indicated in the Code of Ethics and know how to act in the face of a dilemma.
- All of us who work in NUADI GROUP We have the right to work in an ethical environment, so if you are involved in or witness behaviour contrary to the principles of the Code of Ethics, you should report this behaviour, confidentially, through the channels that NUADI GROUP at your disposal.
- This is especially important in case there are doubts About legality of the behaviour.

If your duties include **team management** , you must also:

- To display and promote ethically exemplary professional conduct.
- Ensure that all members of your team have access to this Code, making sure they understand its contents.
- Prevent violations of the Code by your team members and not encourage the achievement of results to the detriment of ethical conduct.
- Create an environment where your team members have resolution to issues or concerns that may arise. You should not feel obligated to give an immediate response, ask for help if necessary.

7.2 Obligations

- Fulfill the Code of Ethics.
- Employees and managers must maintain the confidentiality of the proprietary information entrusted to them by the company, or your customers o Suppliers
- All professionals and workers who are part of NUADI GROUP we must know and comply with this Code of Ethics.
- You should read all the principles carefully and guidelines for action established in the Code and make sure that in your daily activity you comply with them.
- Sometimes a situation will arise that is not included in the Code what will raise doubts about whether or not such a situation complies with the Code. In these cases you have to apply common sense, ask yourself:
 - ¿It is this ethical action?
 - ¿Is it legal??
 - ¿I would feel comfortable if I had to explain myself in court?
 - ¿I would feel good if my family knew about this behavior?

If the answer to any of these questions is 'NO' then don't do it.

- At other times you should ask for advice or consult the Responsible Persons of Ethics when you hear phrases like the following before a behavior of dubious ethics:
 - *"No one is going to find out"*
 - *"It doesn't matter how we do it as long as we do it"*



- *"It's not right, but everyone does it"*
- *"Don't worry, we do things like this here"*
- *"Do what you want, but I don't want to know anything about it"*

8. HOW TO ACT IN THE EVENT OF A VIOLATION OF THE CODE OF ETHICS

We are all responsible for ensuring compliance with the ethical standards of NUADI GROUP. If you see questionable behavior or believe that there may be a violation of our Code of Ethics, you must report it immediately. This gives the company the opportunity to face the problem and, if possible, solve it before it leads to a bigger problem.

The Nuadi Group undertakes to respond to and investigate breaches of this code if necessary.

An infraction must be reported respecting the hierarchical order of action:

- Inform your manager or immediate boss.
- If the first channel is involved or the magnitude of the non-compliance is greater, inform the Human Resources Manager.
- If the above channel is an involved party, Inform the General Management of the company.
- And ultimately, if after this communication the infringement persists, there is a reporting channel available on Nuadi's corporate website. (<https://www.nuadi.com/>)

8.1 Anonymity and Confidentiality

NUADI GROUP undertakes to maintain the confidentiality of the complaint and the complainant. NUADI GROUP must investigate the facts reported and respond to all complaints.

8.2 Anti-retaliation policy.

Reporting a situation in which you believe the Code of Ethics is not being respected, your cooperation and honest answers to questions is expected. NUADI GROUP will guarantee confidentiality and the absence of retaliation. The company values the collaboration of workers to identify and solve problems. Raise a concern or participate in a process about The infringement will not jeopardize employment, professional category, remuneration or the development of the company's workers.

8.3 False accusations.

NUADI GROUP must protect anyone who raises a concern in an honest manner, that is, accurately reporting an event that concerns him, regardless of whether or not it is finally determined to be a violation of the Code. However, intentionally making a false accusation, deliberately lying to those responsible or refusing to cooperate with an ongoing investigation constitutes a violation of the Code what may lead to disciplinary action.