

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, 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 has prepared the document "Guiding Principles on Business and Human Rights" and the global compact for sustainability, known as the "Global Compact", which aims to achieve 17 sustainable development goals by 2030.

Many leading companies in the industrial sector, particularly in the automotive sector, have already embraced the principles of sustainability and, in order to promote these principles throughout the supply chain, have established Codes of Conduct to be observed by their suppliers, who, in turn, must pass them on to their sub-suppliers.

Some customer Codes of Conduct explicitly incorporate aspects included in both the ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work and the United Nations Universal Declaration of Human Rights, with the requirement that the policies established by suppliers to meet these demands also explicitly include them.

For all the above mentioned reasons, we have modified the AMES Code of Conduct, which we detail below, and which establishes how we must deal with the demands of today's society and in particular of the automotive sector, based on our Principles and Decalogue.

We will also extend this request to our suppliers, including compliance with the AMES Code of Conduct 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 shall make explicit in its Conditions of Purchase 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 complaints and possible breaches**

Ames makes available to all interested parties the e-mail address whistleblower@ames.group to collect and deal with possible breaches of the contents of this Code of Conduct, guaranteeing the protection of the informants against any type of retaliation.

The recipients of the mails of these possible non-compliances are:

- The HR Director, as responsible for social sustainability.
- The Commercial Director, as the person responsible for regulatory compliance.
- The Management Systems Director, as the person responsible for environmental sustainability.

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 CO₂, 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.

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**

Any form of harassment that a person may suffer, including sexual harassment, physical coercion or verbal abuse, should be immediately brought to the attention of the HHRR department to act on it. It is the responsibility of all people from AMES, and above all of their managers, that these situations will never occur.

5.5 **Discrimination**

The people from AMES should be selected, hired and promoted on the basis of their qualifications and abilities; therefore, no one should suffer discrimination based on gender, age, religion or belief, territorial origin, nationality, political affiliation, sexual orientation, marital status or any other condition that could lead to discrimination.

A handwritten signature in black ink, appearing to read 'C. Molins', written over a horizontal line.

Dr. César Molins
General Director of AMES