

# IM1001

## CODE OF CONDUCT

### IRONTECH SOLUTIONS, SL

Version 4.0

Date: 03/27/2026

#### Changelog

Version	Date	Author	Approved	Changes
1.0	07/09/2021	QB	NM	Initial drafting of document
2.0	14/09/2021	QB	NM	Drafting of document for submission to suppliers
2.1	20/05/2022	QB	NM	Incorporation of CMRT
3.0	20/06/2023	QB	NM	Incorporation of UN Global Compact requirements
3.1	02/02/2024	QB	NM	Revision for publication on corporate Website (minor changes)
4.0	27/03/2026	QB	NM	Document revision to make new requirements explicit.

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# IRONTECH SOLUTIONS, SL

## CODE OF CONDUCT

IRONTECH strives to provide better service every day, ensuring customer satisfaction and promoting ethical and responsible behaviour from all corporate stakeholders (staff, customers, suppliers, collaborating partners and administrations), while minimising our environmental impact.

This document incorporates the Irontech Solutions, SL (hereafter referred to as IRONTECH) Code of Conduct, with the aim to circulate, communicate, and extend it; while simultaneously promoting IRONTECH's core values and passing them on to our value chain, as a reflection of our commitment to social respect and environmental protection in all our activities.

This Code of Conduct formalises the minimum ethical, social, environmental, and legal requirements that IRONTECH suppliers will need to agree to and comply with in order to work with IRONTECH, and must commit to extending the aforementioned requirements to their own supply chain. For those suppliers who subcontract, they shall ensure that their contractors fully comply with all principles outlined here.

The present code applies to all IRONTECH suppliers and their subcontractors. The minimum requirements for compliance are outlined below.

### PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT

IRONTECH fully complies with the policies outlined in the United Nations Global Compact. We support the 10 Principles in relation to Human Rights, Labour Rights, the Environment, and the fight against corruption.

By adhering to the Ten Principles and through the application of policies and procedures appropriate to size and circumstances, we expect all suppliers to pay special attention to the points below.

#### Human Rights and Labour Standards

IRONTECH regards its people as its most valuable asset. In line with this, we pay special attention to their well-being, their right to non-discrimination, and their access to high quality and appropriate training, with the aim of supporting their continuous personal and professional development. To this end, IRONTECH strictly complies with current labour law. We are committed to employees joining or leaving IRONTECH out of their free will, and we use dialogue as a tool to achieve the greatest degree of agreement. We expressly oppose and prohibit slavery, forced labour, child labour, and commit to avoiding working with, as well as purchasing goods or services from, any organisation known to use child labour. In accordance with these principles, we adhere to the Conflict Minerals Policy regarding responsible purchasing practices and the use of mineral deposits in the Democratic Republic of the Congo (DRC) and surrounding conflict-affected regions.

We pledge to:

1. Identify those products affected, and direct our efforts accordingly;
2. Adopt a supply chain policy for 3TG minerals and metals that may originate from conflict-affected and high-risk areas, and communicate the supply chain policy to suppliers and to the public;
3. Avoid purchasing products or materials containing conflict minerals directly from conflict mines (CAHRAs and countries included);
4. Work closely with our suppliers to ensure that conflict minerals contained in products and materials supplied to IRONTECH originate from conflict-free sources;
5. Complement our Global Terms Agreement with this Code of Conduct; our purchasing terms and conditions shall reflect this policy.

IRONTECH has a protocol in place for the prevention and handling of sexual and psychological harassment. This is made available and communicated to all its employees.

IRONTECH regards its relationships with suppliers, customers, and employees as being of great importance, and seeks to establish and maintain them only when assurance is obtained that all parties comply with the Principles of Human Rights.

All suppliers must uphold the principles set out in the Universal Declaration of Human Rights and the conventions that further develop them, as well as all recommendations from the International Labour Organisation regarding workers' rights, when the aforementioned suppliers conduct their activities. In particular, they must promote and respect, among others, the following principles:

- The taking of reasonable measures and acting in good faith to avoid human rights abuses or violations.
- The enforcement of equal opportunities and non-discrimination criteria, ensuring that selection, promotion, access to training, and any other staff management practices are based on professional merit and objective assessments.
- The prohibition of every form of discrimination on any grounds, in particular those that follow: ethnic or cultural origin, sex, gender identity, sexual orientation, disability, nationality, religion, age, social origin, or ideology.
- The prohibition of the use of child labour forced labour, in compliance with all international, national, and local laws, regulations, and declarations, with regard to the minimum working age.
- The prohibition of forced labour, as well as any work conducted under coercion.
- The respect of freedom of association and the right to collective bargaining.
- The provision of safe and hygienic working conditions and comply with occupational-risk prevention standards, including risk assessments, improvement plans, accident reporting, and safety indicators.
- The payment of fair wages in line with legally established minimum wage standards.
- The avoidance of excessive working hours and encourage work–life balance, prohibiting excessive overtime and ensuring regulated overtime pay.
- The prohibition of subjecting employees to any form of physical or verbal abuse, as well as any other sort of intimidation.
- The avoidance of harsh and inhumane treatment in employment practices.

- The compliance of provisions in Regulation (EU) 679/16 on Personal Data Protection, as well as any other applicable legal regulations on data protection in all locations where activities are conducted.
- The respect and protection of intellectual-property rights.
- To act with honesty and transparency, participate openly in audits or supervisory activities with truthful information, and accept only work they are capable of completing properly.
- The respect embargo regulations, export controls, and anti-terrorism financing rules.

## Environment

IRONTECH, in addition to strictly complying with current environmental legislation, gives priority to the preservation and improvement of the environment. It views prevention as the most effective tool in the fight against environmental harm and climate change. IRONTECH is committed to integrating environmentally friendly practices, technologies, and equipment into all its processes.

Suppliers must also promote and uphold the following principles, among others:

- Minimisation of the use of substances hazardous to health and the environment;
- Responsible management of hazardous waste;
- Efficient use of materials and resources, prioritising reusable, recycled, and recyclable materials;
- Sourcing of materials from sustainable and local sources wherever possible;
- Efficient energy use and minimisation of harmful emissions.
- Comply with legislation regarding soil, water, air, noise, and waste pollution.
- Comply with the following international conventions:
  - Minamata Convention (mercury)
  - Stockholm Convention (POPs)
  - Basel Convention (transboundary hazardous waste)

## Commitment against corruption

IRONTECH is an independent, private company, and is neither directly nor indirectly linked to any political party, lobby group, or organisation unrelated to its professional activities, or unaligned with its ethical and social codes of conduct.

IRONTECH is committed to conducting its activities entirely free from any corrupt practices, extortion, or bribery towards any of its stakeholders, particularly its suppliers; who commit to:

- Promoting transparency in the conduct of their activities,
- Not engaging in any form of corruption, extortion or bribery,
- Respecting competition law and refrain from abusive market practices,

- Ensuring all taxes required by law are paid in a timely manner,
- Complying with audit and accounting requirements in accordance with applicable law,
- Complying with applicable money laundering prevention laws,
- Implementing control measures to prevent offences within the organisation, and maintaining reporting channels ensuring security, accessibility, and anonymity.
- Treating all information that suppliers should obtain through IRONTECH in the conduct of their activities as strictly confidential.

## COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

IRONTECH suppliers must comply with applicable laws of the countries in which they operate, and avoid any behaviour, unlawful or not, that could harm IRONTECH's reputation or have adverse consequences for the company or its stakeholders. Whenever faced with conflicting demands, suppliers shall seek alternatives that allow them to uphold internationally recognised human rights.

## SUPPLIER COMMITMENT

UPON ACCEPTANCE AND SIGNATURE OF THIS CODE OF CONDUCT, ALL IRONTECH SUPPLIERS COMMIT TO:

- Adhering to this code for as long as they continue to be a supplier to IRONTECH,
- Willingly participating in any activities related to enforcing compliance with this Code that IRONTECH may wish to undertake,
- Putting in place corrective actions wherever needed as a result of the activities mentioned above,
- Passing on to IRONTECH any information they deem relevant in relation to the requirements established in this Code.
- Establishing due-diligence measures for their own suppliers.

IRONTECH will ensure the continued application of all these principles by suppliers, and may request audits to verify their compliance. Failure by suppliers to adhere to the full contents of this code may affect their contractual relationship with IRONTECH. Depending on the severity of the breach, consequences may range from a simple warning to disqualification as an IRONTECH supplier, without prejudice to any other legal or administrative actions that may be applicable. Open communication and good faith are encouraged in the relationship between IRONTECH and its suppliers. As such, suppliers may notify IRONTECH at any time of any breach of the conduct outlined in this code and their intention to resolve it.

Name, Position, Company	Date and Signature



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Rev.  
02/02/2024