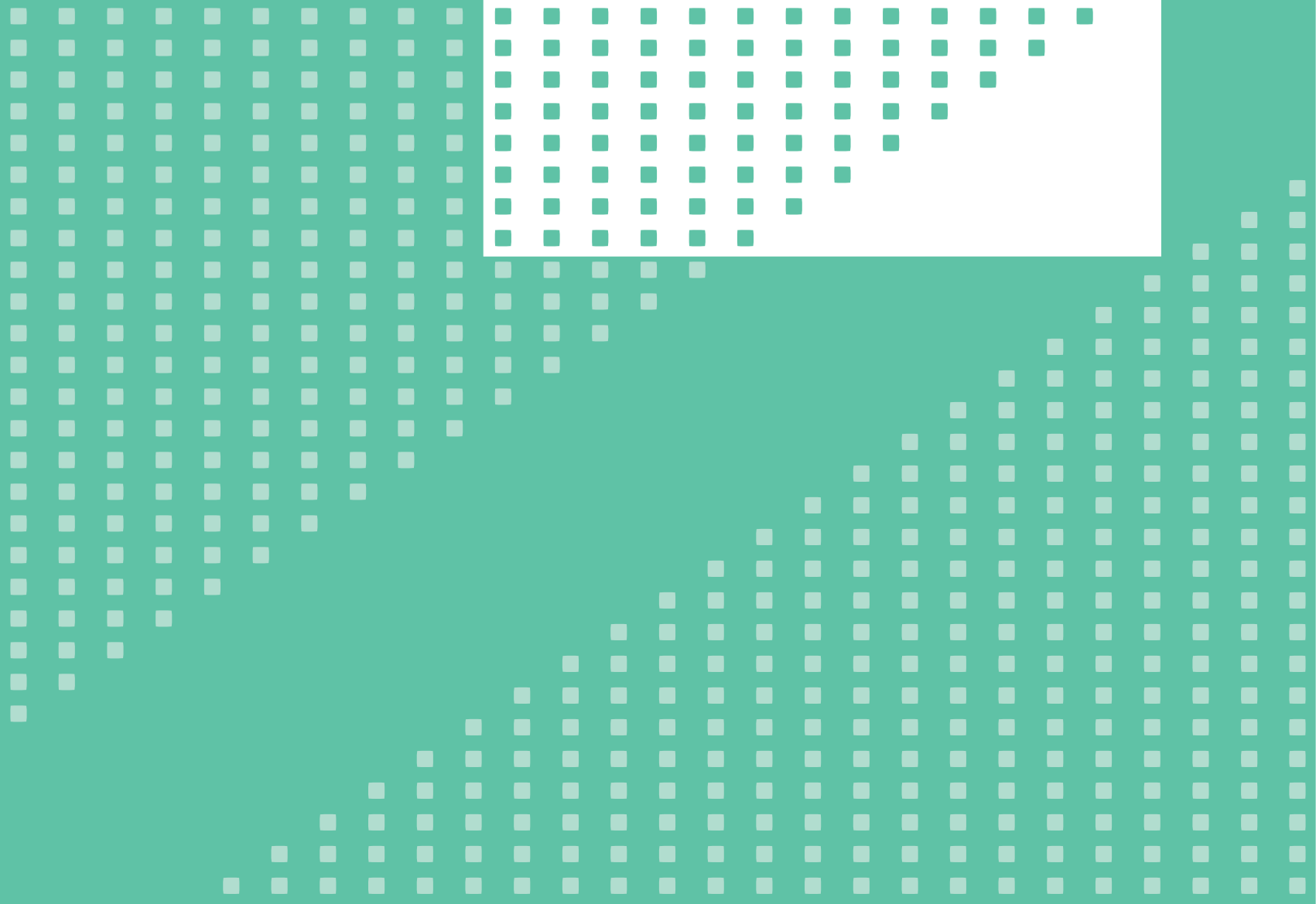




www.navarraaluminium.com

SUPPLIERS CODE OF CONDUCT



CONDUCT CODE

SUPPLIERS

GENERAL CONDITIONS

The Navarra Group's mission is to maximise the use of aluminium by meeting its customers' challenges, through sustainable management practices focused on innovation and continuous improvement, adding value for shareholders, employees and society in general.

It is with this mission and with a vision of an international benchmark company in the sector, naturally recognised for its excellent service, preserving the family-like nature with which it was born, that the Navarra Group expects its partners to also respect the Group's principles and values: Ambition and Competence; Humility and Honesty; Pride and Cooperation.

All Navarra Group suppliers commit to comply with the principles defined in this Code of Conduct, which are presented below.

SUPPLIERS CODE OF CONDUCT

I. COMPLIANCE WITH GENERAL LEGISLATION

Navarra Group's suppliers undertake to comply with the applicable laws and regulations of the countries where they operate, as well as to conduct their business according to the principles and values associated with honesty and integrity.

II. INTEGRITY AND FAIR DEALING

Navarra Group's suppliers should promote and respect the highest standards of ethics, morality and human integrity, as well as transmit real and accurate information about their current management practices.

Corruption and Fraud

Navarra Group prohibits the use of any fraudulent practice or any type of corruption in its businesses.

Gratification and Gifts

Navarra Group does not encourage the practice of giving or receiving gratifications and commercial offers. We encourage the building of good relations between the Navarra Group and our various external partners. The exchange of gratifications, offers or gifts can help to build or improve professional relationships. However, this practice should only take place on routine business or cultural occasions. No offer of any kind should be made in the context of a pending or imminent decision or in order to obtain any undue advantage involving the Group.

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II. INTEGRITY AND FAIR DEALING

By **Gratifications** we mean any form of courtesy with monetary value, such as: money, checks, loans, donations, favours, rewards, gifts, giveaways, tickets for events (sports, music, others), free services or discounts, electronic equipment or games, drinks, food, flowers, gift baskets, sports equipment, clothes, entertainment in general, meals, travels, transports, among other services or materials.

Suppliers, Service Providers or any other individual or collective entity that has, has had or intends to have a commercial relationship with the Navarra Group must not offer any gratifications or other gifts to Navarra Group employees or their family members, with the exception of those of a symbolic or courtesy value (which, for these purposes, is set at a maximum amount of 25 euros or equivalent in the applicable local currency).

The offer, under any circumstances and regardless of value, of cash, checks, loans, tuition and other goods subject to legal restrictions or with similar monetary advantages is forbidden.

Conflict of interest

Any type of particular relationship, of a regular nature, between Suppliers and Navarra Group employees should be immediately communicated to the Management of the Purchasing Department. For example, family relationships between employees of Suppliers and employees of the Navarra Group who are involved in a context of a (directly or indirectly) pending or imminent decision related to that supplier.

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III. HUMAN RIGHTS POLICIES

The respect and protection of human rights, dignity and preferences of each employee as a unique individual as well as their privacy are fundamental to the Navarra Group. Each employee has a prominent role in the performance of their duties within the Group and, as such, all their rights and their individuality must be respected. This also applies to all partners who directly (suppliers) or indirectly (subcontracted by suppliers) collaborate with the Navarra Group.

Remuneration and Working Hours

Navarra Group's suppliers must ensure that all their employees are remunerated in accordance with the labour laws in force in the country where they operate, and should receive, at least, the minimum wage in force, as well as all social benefits provided for by law.

They also undertake to respect the maximum number of weekly working hours defined by the legislation in force, and the legally established periods of time off, holidays and public holidays.

Discrimination

Therefore, it also requires its suppliers not to use any form of discrimination based on: ascendancy, social class, race, caste, gender, age, marital status, sexual orientation, religion, nationality, ethnic origin, disability, pregnancy, family responsibilities, political or ideological convictions and union membership, or any other, ensuring that decisions on recruitment, remuneration, access to training, promotion, termination of contracts or retirement, are independent of any discriminatory criteria.

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III. HUMAN RIGHTS POLICIES

Forced Labour and Punitive Practices

Any form of slave or forced labour, harassment, threats and/or aggression, any practices involving physical or mental punishment, isolation, corporal punishment, harassment, sexual abuse or bullying, threats, violence, verbal or gestural insults, or any other form of inhumane treatment, as a method of discipline and control, among other reasons, are totally prohibited and condemnable by the Navarra Group

Child labour

The Navarra Group's suppliers undertake to comply with all legislation applicable to child labour and to be in possession of documents that prove the date of birth of each employee. Any form of child labour and child exploitation, whether mental, physical, social, morally harmful and/or unduly interfering with schooling requirements, is expressly prohibited.

Health and safety at work

Navarra Group's suppliers must ensure a safe and healthy working environment, complying with the parameters established by legislation on health, hygiene and safety at work, adopting measures to prevent and minimise accidents at work and promoting responsibility, continuous improvement and awareness among all those involved.

As a minimum, drinking water, adequate and good sanitary facilities, emergency exits, essential safety equipment, access to medical care, and adequately lit and ventilated workplaces should be provided for all employees.

Employees should be trained and equipped with the appropriate and necessary means and equipment for their individual and collective protection, ensuring adequate working conditions. There should also be defined measures in case of accident or emergency, appropriate to the type of activity, location and circumstances. All Navarra Group health and safety requirements and policies must also be complied with and respected whenever services are provided on our premises, according to the ***Best Practises Regulation for Suppliers and Visitors***.

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IV. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

The strategy of the Navarra Group is based on the sustainability of the environment and society in general, always seeking to minimise the adverse impacts of our activity on the environment and on the local and global community. Minimising emissions and the waste generated, reducing the consumption of energy and other natural resources, and continuously improving environmental performance are key factors in the Group's strategy.

ENVIRONMENT

Navarra Group's suppliers are required to adopt environmentally responsible behaviours and practices and act in accordance with applicable national and international environmental legislation and regulations.

In particular, suppliers commit to:

- 1) Obtain the environmental certifications necessary for the development of its activities;
- 2) Ensuring that its activities, processes, products, materials and means of transport have the least possible risk and adverse impact on the environment;
- 3) To make every effort to reduce, eliminate or prevent the production of emissions and waste generated by its activities, complying, whenever applicable, with legislation on noise, air emissions, effluents, waste, water, energy, raw materials and products;
- 4) To promote the rational use of natural, material and energy resources, implementing sustainability measures in its facilities and production processes;
- 5) Adhere to integrated waste management systems in order to guarantee, whenever possible, the appropriate final destination for all the waste generated, promoting its reduction, reuse and recycling.

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IV. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

- 6) To develop efforts and measures aimed at promoting the maintenance and protection of ecosystems, habitats and species in the geographical areas where it operates or has influence, whether in production processes or in the control and selection of its suppliers;
- 7) Systematically seek continuous improvement in their environmental performance.

Whenever providing services in our facilities, or on our behalf, environmental requirements defined by the Group must be met, in accordance with the ***Best Practices Regulation for Suppliers and Visitors.***

Sustainability

Navarra encourages sustainable operational practices and production systems and expects its suppliers to continuously strive to improve the efficiency and sustainability of their operations.

V. PRODUCT QUALITY AND SAFETY

Navarra Group's suppliers undertake to comply with the applicable legislation on quality and general safety of products/services, respecting the quality standards in force in the country where the products are commercialised.

In particular, suppliers must ensure that products are subject to compliance and quality assurance testing. In addition, they must be strict with regard to rules on composition, labelling, packaging, technology and production procedures.

The supplier must also comply with quality standards and other requirements defined in the ***General Purchasing Conditions of the Navarra Group.***

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VI. CONFIDENTIALITY AND PRIVACY OF PERSONAL DATA

No confidential, strategic or sensitive information may be disclosed or used for personal benefit or the benefit of third parties.

Navarra Group's suppliers undertake not to disclose to third parties confidential, strategic or sensitive information provided to them in the purchasing processes in which they are involved. They must also guarantee the security of all information provided to them, in digital, printed or other format. Confidential, strategic or sensitive information is understood to include any information that has not been disclosed to the public and to which they would not have access without being a supplier or potential supplier of the Group. All suppliers of the Navarra Group and their employees or subcontractors must ensure compliance with our **Privacy Policy** and sign our **GDPR Compliance Request** whenever they handle personal data of the Navarra Group.

VII. AUDIT

Navarra Group reserves the right to verify compliance with this Code of Conduct by its suppliers.

Navarra Group has the right to demand corrective measures if it becomes aware of any actions or conditions that are not in compliance with this code.

Failure to comply with the Supplier's Code of Conduct may result in the disqualification of the Supplier and consequent termination of the relationship between the parties, depending on the severity of the violation and the specific circumstances.

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VIII. MANAGEMENT COMMITMENTS

All suppliers, their employees and subcontractors, regardless of their legal ties to the company, must comply with the provisions of this Code of Conduct and be informed, qualified and competent to perform their duties in accordance with its terms.

Management measures/procedures should be implemented to verify compliance with this Code of Conduct. In case of non-compliance with the principles of this Code, it is mandatory to report the respective violations to Navarra and provide evidence thereof. All those mentioned above must respect the Navarra Group's internal rules and procedures, as well as care for the well-being of our employees, our goods and products, our customers, the environment and society in general.

WE ARE ALL STRONGER TOGETHER

