

Code of Ethics

Purpose and scope of application

The **Code of Ethics for the Crimidesa Group** expresses the guiding principles and criteria that must be applied when performing our activities and taking decisions, as a shared reference source that defines our expectations for all persons who are part of the organisation. It also defines the proper way of maintaining relationships with our stakeholders, including our customers, suppliers, and collaborators, and with all pertinent communities and governmental bodies, in conformity with the principles of integrity, responsibility, and sustainability.

This Code of Ethics is one of the fundamental elements of our **Regulatory Compliance System**, which is made up of the internal policies, procedures, and practices that guide our operations. Its purpose is to promote the existence of a consistent culture of ethics, and to ensure that we are performing our activities in a responsible way, in conformity with all legal and ethical obligations, while also including our commitments to the community and the environment in a balanced manner.

Compliance with the Code of Ethics must be understood as compulsory for **all employees, executives, and management body members** of the companies belonging to the **Crimidesa Group**, as well as for all subsidiary companies controlled by the Group.¹ The Code of Ethics can also be applied to **third parties**, including suppliers, contractors, and external collaborators, whenever this is expressly established in the pertinent contracts, or whenever required by the nature of the relationship, in order to ensure that all conduct remains in line with the Group's principles.

Our values

The values of the Crimidesa Group are the basis for our corporate **culture**, and they provide orientation for our way of working and for the relationships we maintain both within and outside of the organisation. These values – **integrity, transparency, respect, responsibility, equality, collaboration, and commitment to society** – are used as guidance for our everyday behaviour and decisions, and for the way in which we interact with our customers, co-workers, suppliers, and local communities.

These values represent the shared ethical framework that inspires our activities, and they are reflected in the **business principles** described in this Code of Ethics, to ensure the existence of a consistent way of working that remains in line with the Group's identity and objectives.

¹ These companies are: Grupo Industrial Crimidesa, S.L.; Compañía Minera Río Tirón, S.A.U.; Crimidesa Maroc, S.A.; Compañía Minera Ilustración, S.A.; Enercrisa, S.A.; Excavaciones Castilla, S.L.; and Green Movers Mecánica y Servicio Zonas Verdes, S.L.

Business principles

Our business principles give us specific ways of applying our values when performing our work each day, and they help orient the professional conduct of everyone associated with the **Crimidesa Group**. They define the behavioural guidelines that must be applied when taking decisions, and when interacting with our stakeholders, to ensure that our business practices are always responsible and will remain consistent with our own corporate culture.

1. Human rights

The Crimidesa Group maintains a firm commitment to **respecting and safeguarding human rights**, in accordance with internationally recognised principles such as those expressed in the **Universal Declaration of Human Rights** and **Ten Principles of the United Nations Global Compact**.

Our aim is to protect the **dignity, equality, and freedom** of all people associated with our operations and professional relationships. In addition, we encourage respect for all people and their values, traditions, and cultural diversity, which is consistent with our commitment to doing business in a respectful and responsible way.

Our aim is to ensure that everyone who becomes one of our collaborators will comply with these principles too, and we encourage the formation of relationships based on ethical conduct and fair treatment.

2. Equality and labour relations

At the Crimidesa Group, we provide an **inclusive, safe, and discrimination-free** work environment, where everyone can expect to be treated in a fair and equitable way. We defend **equal treatment and equal opportunities**, with no discrimination based on sex, age, sexual orientation, religion, opinions, national origins, or any other personal or social conditions.

We recognise and respect the **rights of freedom of association and collective bargaining**, so that all individuals can freely exercise those rights in accordance with the applicable laws and regulations.

We encourage the use of hiring and promotion procedures that are based on objective criteria such as qualifications, skills, and merit, and we support professional development through ongoing education and training, internal mobility, and measures focused on **maximising professional growth and achieving life goals**. We have also implemented policies designed to help maintain an appropriate work-life balance.

We expect that everyone associated with the Group will make a positive contribution to creating a safe and respectful work environment, with zero tolerance for any

conduct that could be classified as harassment, abuse, discrimination, or any form of degrading treatment.

3. Occupational health and safety

At the Crimidesa Group, we treat each person's health and safety as an essential priority, which is especially relevant given the nature of our activities in the mining and industrial sectors. We apply maximum rigour in relation to **prevention**, to ensure the existence of safe and healthy work environments, and we apply protective measures in accordance with best operational practices and all applicable laws and regulations.

We promote a culture of safety that is based on individual and collective responsibility, with a special emphasis on strict compliance with the internal rules and legal obligations on the subject of occupational risk prevention. We also perform oversight to ensure that everyone has **the information, training, and resources they need** in order to perform their activities safely.

We expect that everyone associated with the Group will make an active contribution to maintaining a safe work environment, by acting in a responsible way and following the instructions and procedures that have been established to protect their own safety and the safety of their co-workers.

4. Compliance and legality

At the Crimidesa Group, we perform our activities in a **fully lawful manner**, and this includes compliance with all laws, regulations, and other rules and standards that apply to each of our operations. The need to act in accordance with the law is a basic principle that is used as a source of guidance for all of our decisions, and it is also an essential part of our corporate culture.

We promote a culture of compliance that requires us to act with **integrity, good faith, and professional rigour** during all of our activities, to ensure that our behaviour remains in line with our legal, ethical, and contractual obligations. All persons associated with the Group must be aware of the internal policies, procedures, and practices that are used to implement this commitment, and they must apply these on a daily basis.

We expect that every person will act in a responsible way, and they should always look for clarification if they have any uncertainties about the applicable laws, regulations, or rules. They must also avoid any conduct that could represent a risk of non-compliance for the Group or for any third parties, because our respect for the law is an essential aspect of maintaining the trust of our stakeholders.

5. Information security

At the Crimidesa Group, we manage information in a **careful, secure, and confidential** manner, to ensure that all information is used in a responsible way, in accordance with the laws and regulations in force. All of the information we handle,

whether it belongs to the Group, to our customers, or to any other parties, must be treated with maximum caution, and it must be shared only with persons who are authorised to receive it, or who have a need to know that information in order to perform their functions.

We strictly comply with all laws and regulations on the subject of **personal data protection**, and we also require compliance with our own internal policies on this subject. All persons associated with the Group have an obligation to protect and safeguard all data and sensitive information they gain access to, and they must do this during their professional relationship and also after it has ended, with all forms of improper use or unauthorised disclosure prohibited.

Responsible information management is an essential part of maintaining the **trust** of our customers, collaborators, and other stakeholders.

6. Prevention of corruption and money laundering

At the Crimidesa Group, we maintain a **zero tolerance** policy towards all forms of corruption, bribery, and unlawful conduct, and we reject all practices such as fraud, embezzlement, influence peddling, and improper use of resources. The Group also prohibits any offering or acceptance of gifts or invitations that could have a negative impact on the independence, impartiality, or integrity of our professional decisions.

We also expressly prohibit all activities related to **money laundering** or terrorist financing, as well as any use of assets or funds with an illicit origin. In addition, we require compliance with our internal procedures and controls that have been designed to prevent these types of conduct.

Everyone associated with the Crimidesa Group must act with honesty, transparency, and responsibility, while also avoiding any relationships or activities that could put the Group's regulatory compliance at risk, or that could damage the Group's reputation. We expect that all of our collaborators will maintain the same ethical standards, and will contribute to the development of professional relationships that are based on the principles of integrity and responsibility.

7. Management of conflicts of interest

At the Crimidesa Group, we must always act in a **fair, objective, and impartial manner**, and we need to ensure that personal interests, or the interests of family members or third parties, will not be able to influence our professional judgment or harm the legitimate interests of the Group or its customers. Each person is responsible for identifying any situations that could represent a conflict of interest, and we must all act with transparency to prevent those situations from affecting our performance or the decisions taken by the organisation.

Individual interests must never be given priority over professional obligations, or over any commitments taken on with the Group. Whenever a potential conflict of interest exists, or could exist, the situation must be reported by using the **channel or**

mechanism established by the Group, so that the situation can be assessed and any necessary measures can be implemented to ensure its proper management.

We expect that under any such circumstances, everyone associated with the Group will act with responsibility, prudence, and transparency, to help maintain the principles of integrity and trust in our internal and external relationships.

8. Responsible use of resources

At the Crimidesa Group, we need to ensure that the resources and assets made available to our employees are only used in a **responsible, efficient, and professional** way. This commitment means that we must protect the security and integrity of these resources and assets, while managing them in an honest and efficient manner and avoiding any improper use.

Any fraudulent, inappropriate, or personal use of our corporate resources or materials is prohibited, and this includes, among others, our physical, financial, and technological assets. Each person has a responsibility to protect and safeguard the Group's assets and make a contribution to their rational and sustainable use, in accordance with all applicable internal policies and laws and regulations in force.

Using resources in an appropriate way will enhance the operational efficiency, transparency, and integrity of the Group's activities, and it represents an essential part of the professional conduct that we expect from everyone associated with the Crimidesa Group.

9. Environmental protection

At the Crimidesa Group, we perform our activities in an **environmentally responsible and respectful way**, with a commitment to preventing, minimising, and controlling their potential impacts. We are also committed to acting in compliance with all applicable laws and regulations, while applying operational guidelines that encourage environmental protection.

We promote efficient and sustainable use of natural resources, as well as practices that will contribute to the preservation of ecosystems and allow continual improvement of our environmental performance. We also perform oversight to ensure that all required authorisations, controls, and preventive measures are in place for our facilities and processes, to allow our operations to remain environmentally safe and respectful.

Each person associated with the Group must comply with all internal and external rules on this subject, and we must all act in a responsible way, in all situations within our scope of activity, so that we can make a contribution to environmental protection within the framework defined by the organisation.

10. Social and community engagement

The Crimidesa Group contributes to the social and economic development of the communities in which it operates, by generating employment, performing its activities in a responsible way, and supporting initiatives that promote training, participation, and well-being for all persons. During all of our activities, we need to show sensitivity towards the social, economic, and cultural characteristics existing in each location, while encouraging the development of relationships based on mutual respect and cooperation.

We are also committed to promoting activities that will provide opportunities for development and training, especially in communities where our activities have led to the formation of direct relationships. We must also ensure that our presence and our operations are having a positive and responsible impact, while bearing in mind the needs and expectations of our stakeholders.

Compliance oversight

The Crimidesa Group has a governance body that addresses the subject of compliance, and which is responsible for proper application of the Code of Ethics and the system of internal policies and procedures used for its implementation. The **Compliance and Risk Committee** performs oversight to ensure that the internal rules are being applied in a consistent and effective way, along with all corresponding controls and procedures.

All persons associated with the Group must be aware of this Code of Ethics, and they must comply with its contents and participate in any planned training activities. Any failure to comply with the principles it contains, or failure to comply with the internal rules, could lead to application of the disciplinary regime set forth in the laws and regulations on the subject of labour and employment, or the one set forth in the applicable contracts, while also being subject to any appropriate administrative or judicial actions.

The compliance system is complemented by the Ethics Channel, which has been designed to comply with the pertinent laws and regulations in force. This channel makes it possible to perform secure, confidential reporting of any potential irregularities or non-compliances.

Training and distribution for the Code of Ethics

The Crimidesa Group will make ongoing training available to all persons who are subject to compliance with the Code of Ethics, as necessary to ensure proper awareness and application of its contents. That training must be offered in conformity with the programmes established in the Regulatory Compliance System, and it may also include periodic activities for raising awareness, updating, and improving understanding of the subjects related to ethical conduct and compliance.

The Group must also ensure that the Code of Ethics is properly distributed and made available to the Group's employees, executives, and management body members, as well as to external parties in cases where applicable.

Internal reporting system

The Crimidesa Group provides an **Ethics Channel** that can be used by all employees, and also by any external parties that the Group maintains a professional relationship with. This channel meets the requirements for internal reporting systems established in Spanish Law 2/2023 of 20 February, which governs the protection of individuals who report regulatory and legal infractions, and on anti-corruption measures (*Ley 2/2023, de 20 de febrero, reguladora de la protección de las personas que informen sobre infracciones normativas y de lucha contra la corrupción*). The purpose of this channel is to allow secure and confidential communication regarding any conduct that could represent a failure to comply with the Code of Ethics, or an infringement of any internal policies or applicable laws and regulations.

The Ethics Channel is managed by the **Compliance and Risk Committee**, which is responsible for ensuring proper receipt, analysis, and processing of the communications, and for ensuring compliance with the principles of **confidentiality, identity protection, independence, non-retaliation, and data protection**. In cases where permitted by law, anonymous communications may also be accepted, and they will be evaluated based on their contents and the corresponding internal procedures.

These communications may take place via the means made available by the Group, which may include use of its website, postal mail, telephone calls, email, or in-person meetings, as set forth in the specific procedures. Use of the Ethics Channel will ensure that, within the time periods established by law, an acknowledgement of receipt will be issued and the reporting party will be able to receive further information about the status of the case file.

All communications will be managed in a rigorous manner, to safeguard the rights of the individuals affected. These rights will include the **presumption of innocence**, the right to be heard, and the right to compliance with the data protection laws and regulations. In cases where appropriate, and always in accordance with the legislation in force, the information reported may also be made available to the competent authorities.

The Crimidesa Group expressly prohibits any form of **retaliation** against anyone who reports possible non-compliances in good faith, or against anyone who cooperates during an investigation. Any **improper use** of the Ethics Channel, such as by submitting false reports or performing communications in bad faith, may result in the application of **disciplinary measures** in accordance with the applicable laws and regulations.

Approval and entry into force

This Code of Ethics was approved by the **Board of Directors of the Crimidesa Group** on **26 March 2026**, with its contents entering into force immediately for all companies belonging to the Group.

The Code of Ethics will remain valid until it is eventually revised or updated, as the case may be, and this may be done whenever there are changes to the size of the Group, to the sectors in which it operates, or to its regulatory context or applicable standards, or whenever the Board of Directors believes there is a need to revise the Code of Ethics to ensure its ongoing adequacy and effectiveness.