

NOTE: The following provisions are applicable to TEKNO SERVICE, TEKNO SERVICE's direct suppliers and to their direct contracted sub-suppliers.

The ethical principles of organization, good corporate governance, corporate social responsibility, and the professional ethics of all individuals subject to this Code form the foundation upon which all business activity of Teknoservice, S.L. is built. All actions taken by individuals subject to this Code, as a consequence of their relationship with the company, must be guided by the ethical values and standards of conduct that govern this Code.

Teknoservice's business and professional activities will be carried out **in strict compliance with the applicable laws in each location where they take place**. Personnel shall not knowingly participate in any illegal activity or in acts that may harm or potentially harm the company's reputation, always respecting and contributing to the organization's legitimate and ethical objectives.

For the purposes of this document, "labor rights" and "occupational health and safety" include the following:

1. ILO Fundamental Principles and Rights at Work

These principles and rights are identified in the ILO Declaration on Fundamental Principles and Rights at Work, and defined in the following Conventions:

- A Safe and Healthy Work Environment (C155¹ and C187²) :

Teknoservice will provide its Personnel with a safe and stable environment and is committed to continuously updating occupational risk prevention measures, as well as strictly complying with the applicable regulations in this matter in all locations where it carries out its business activities.

All Personnel are responsible for strictly observing health and safety regulations, ensuring their own safety and, in general, that of all individuals who may be affected by their activities. Likewise, they must make responsible use of the equipment assigned to them when performing risk-related activities and share knowledge among colleagues and subordinates, promoting compliance with risk protection practices.

Teknoservice has implemented an Occupational Health and Safety Management System certified under ISO 45001, which addresses hazard identification, risk assessment, emergency preparedness, and continual improvement. Employees are actively involved in safety committees and consultation processes, as required by ILO C155 and C187.

- Child labor and the worst forms of child labor (C138³ and C182⁴):

Teknoservice strictly prohibits child labor in all operations and requires suppliers to adhere to the same standard. **Age verification is part of our recruitment process and supplier audits.**

¹ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C155

² https://normlex.ilo.org/dyn/nrmlx_en/f?p=normlexpub:12100:0::no:12100:p12100_instrument_id:312332:no

³ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138

⁴ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

On top of that, The regulation of child labor in Spain is primarily governed by the Workers' Statute Act and the Law on Infractions and Sanctions in the Social Order, consolidated under Royal Legislative Decree 5/2000 of August 4.

According to Article 8 of this decree:

"Violations of the rules on child labor as set out in labor legislation shall be considered very serious offenses."

This includes:

- Employing minors below the legal working age.
- Engaging minors in hazardous, exploitative, or degrading work.
- Failing to comply with protective measures for young workers.

These infractions are subject to severe administrative penalties, and may also trigger criminal liability if the conduct constitutes a criminal offense.

- Discrimination (employment and occupation) (C111⁵)

It is a fundamental principle of Teknoservice to provide equal opportunities in access to employment and professional advancement, ensuring at all times the absence of discrimination based on sex, race, origin, marital status, or social condition.

Any cases in which a discriminatory attitude is reported will be investigated, and the necessary actions will be taken for resolution and sanction if the allegations are proven.

Likewise, no type of behavior that may be offensive to the dignity of Personnel will be tolerated, whether carried out by external or internal staff, clients, or suppliers. Harassment, intimidation, and lack of respect will be considered unacceptable and will be pursued and sanctioned in any of their forms, as well as any other conduct that may create an intimidating, offensive, or hostile work environment for individuals.

All Personnel, and especially those in management roles, will promote at all times and at all professional levels relationships based on respect for the dignity of others, participation, fairness, and mutual collaboration, providing a respectful work environment and a positive workplace climate.

Anyone who believes they are a victim of such behavior must report it through the Complaints Mailbox so that an investigation can be carried out under strict confidentiality.

Teknoservice guarantees equal opportunities and is committed to providing the means to help its employees develop both professionally and personally.

Selection and promotion decisions will always be based on merit and on objective and transparent circumstances and evaluations. Employees will be informed of the methodologies and procedures used for professional development and advancement within the organization.

Teknoservice also undertakes to provide the resources necessary to support learning and training for its employees and to update their knowledge and skills

⁵ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312256:NO

in order to foster their professional progress and deliver greater value to clients, shareholders, and society as a whole.

- Equal Remuneration Convention (C100⁶)

Our compensation system is based on job role and performance, ensuring equal pay for work of equal value regardless of gender or other factors. An equality report was performed by a third party on 2022 in order to break the pay gap between genders.

- Forced labor (C029⁷ and C105⁸)

Teknoservice prohibits any form of forced or compulsory labor. Employment is voluntary, and employees have the right to terminate their contracts under legal conditions. Supplier agreements include strict clauses against forced labor. **Spain explicitly prohibits forced labor through both national legislation and international commitments.**

- Freedom of association and collective bargaining (C087⁹ and C098¹⁰)

Teknoservice respects employees' rights to join trade unions and engage in collective bargaining. We maintain open dialogue with worker representatives and comply with national labor laws.

Spain guarantees the rights to freedom of association and collective bargaining through its Constitution and several key legislative instruments, in alignment with international conventions.

These legislative instruments are the obligation to state a labor agreement in companies. The agreement applicable to Teknoservice is called **Collective bargaining agreement for the electronics industry** and it is updated every year as a result of the constant dialogue between employers, employees, government and labor unions.

For the purposes of these requirements, "labor rights" also includes the principles and rights defined in the ILO C190.¹¹

2. Occupational Health and Safety (OHS)

The OHS principles are defined in the following ILO Conventions, which were added to the ILO Declaration as fundamental to a Safe and Healthy Work Environment (added by Amendment in 2022):

- Occupational Safety and Health Convention, 1981 (C155¹) and Recommendation, 1981 (R164¹²)

⁶ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312245:NO

⁷ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C029:NO

⁸ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C105:NO

⁹ https://normlex.ilo.org/dyn/nrmlx_en/f?p=normlexpub:12100:0::no::p12100_instrument_id:312232

¹⁰ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312243:NO

¹¹ https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C190

¹² https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R164

- Promotional Framework for Occupational Safety and Health Convention, 2006 (C187²)

Teknoservice will provide its Personnel with a safe and stable environment and is committed to continuously updating occupational risk prevention measures, as well as strictly complying with the applicable regulations in this matter in all locations where it conducts its business activities.

All Personnel are responsible for strictly observing health and safety regulations, ensuring their own safety and, in general, that of all individuals who may be affected by their activities. Likewise, they must make responsible use of the equipment assigned to them when performing risk-related activities and share knowledge among colleagues and subordinates, promoting compliance with risk protection practices.

The requirements of this annex also include the OHS due diligence principles found in the management system major categories of ISO 45001:¹³

- OHS management system describing context of the organization
- Leadership and worker participation including OHS Policy, Roles, Responsibilities, Accountabilities and Authorities,
- Risk and hazard identification and assessment and determination of applicable OHS legal requirements and other OHS requirements and risks, including related actions and objectives to address them,
- Provision of resources competence and awareness; information and communication and documented information,
- Operational planning and control including operational controls that apply to outsourcing, procurement and contractors, emergency preparedness and response and change management,
- Performance evaluation including internal audits, monitoring and measurement, analysis and evaluation and management review, and EPEAT-RSC-2025 Responsible Supply Chains Criteria
- Incidents, nonconformities and corrective action, continual improvement of objectives and processes.

The implementation of Teknoservice's Code of Ethical Conduct, and compliance policies in general, is the responsibility of Management and the Quality Department. To this end, it will be governed by the following rules:

Processing of complaints and sanctions: Personnel must contact the Quality Manager to report any breach or violation of the conduct outlined in this Code. The Quality Manager will be responsible for monitoring and, where appropriate, investigating the communications received, informing Management of the complaints and may involve any individuals or departments deemed necessary for analysis. Based on the results of the investigations, the assessment of the facts and any actions required will be the responsibility of the General Manager.

¹³ <https://www.iso.org/standard/63787.html>

Communications: If any person believes they are subject to conduct contrary to this Code or to applicable legal regulations, they must inform their immediate supervisor for prompt consideration and follow-up.

Likewise, if they become aware of actions by third parties that are contrary to this Code or to applicable legal regulations—including clients and suppliers—they must report it through the Whistleblower Channel so that an investigation can be initiated and, if necessary, appropriate measures taken. Without prejudice to the Whistleblower Channel being the preferred means for any communication under this Code, any other channel that allows proper communication may also be used. It is strictly prohibited to submit unfounded, inaccurate, or false complaints.

Non-Compliance: Failure by individuals subject to this Code of Ethical Conduct to adhere to Teknoservice’s rules and principles will be sanctioned in accordance with current labor regulations and the applicable collective agreement, without prejudice to any other administrative or criminal liabilities that may also apply in each specific case. In all cases, any disciplinary procedure that takes place will be governed by strict respect for fundamental rights and guarantees inherent to any sanctioning process.

Confidentiality: The Quality Manager will ensure, in accordance with current legislation, the confidentiality of any communications received regarding allegedly unlawful conduct.

Additional (non-mandatory) guidance may be found in ILO Technical Conventions, as relevant, including the following:

- Asbestos Convention, 1986 (C162¹⁴) and Recommendation, 1986 (R172¹⁵)
- Chemicals Convention, 1990 (C170¹⁶) and Recommendation, 1990 (R177¹⁷)
- Code of Practice: Prevention of Major Industrial Accidents¹⁸
- Code of Practice: Safety in the use of chemicals at work¹⁹
- Prevention of Major Industrial Accidents Convention, 1993 (C174²⁰) and Recommendation, 1993 (R181²¹)
- Radiation Protection Convention, 1960 (C115²²)
- Working Environment (Air Pollution, Noise and Vibration) Convention, 1977 (C148²³) and Recommendation, 1977 (R156²⁴)

Teknoservice certifies the compliance of these principles by having a third-party certification of ISO 45001.

¹⁴ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312307:NO

¹⁵ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312510:NO

¹⁶ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312315:NO

¹⁷ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312515:NO

¹⁸ <https://www.ilo.org/resource/prevention-major-industrial-accidents>

¹⁹ <https://webapps.ilo.org/static/english/protection/safework/cis/products/safetytm/chemcode/codetoc.htm>

²⁰ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312319:NO

²¹ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312519:NO

²² https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312260:NO

²³ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312293

²⁴ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:55:0::NO::P55_TYPE,P55_LANG,P55_DOCUMENT,P55_NODE:REC,en,R156,/Document

3. Minimum Wage, Working Hours, Overtime and Employment Contracts

“Labor Rights” also includes the following areas regulated by domestic law in the applicable legal jurisdiction and/or by the international standards identified below at the highest level required:

- minimum wages (ILO C131²⁵)

According to Spanish legislation, the Government is responsible for determining the minimum interprofessional wage (SMI) on an annual basis. This value is subject to revision each year and is established following consultation with the most representative trade union organizations and employers' associations.

This provision is set forth in Article 27.1 of the Workers' Statute Act:

"The Government shall set the minimum interprofessional wage annually, following consultation with the most representative trade union organizations and employers' associations."

Teknoservice

- standard working hours (60-hour maximum workweek or local laws, whichever is less)

Spanish labor regulations establish that the standard duration of the ordinary working week is forty hours of actual work, averaged over the year. This provision is defined in Article 34.1 of the Workers' Statute Act, which states:

"The maximum duration of the ordinary working day shall be forty hours of actual work per week, averaged over the year."

- overtime compensation

Overtime work is regulated under Article 35 of the Workers' Statute Act, which defines the conditions under which overtime hours may be performed and compensated in Spain.

"Overtime hours shall be considered those hours worked in excess of the maximum duration of the ordinary working day, as established in the previous article. Through a collective agreement or, failing that, an individual contract, it shall be agreed whether overtime is to be paid at the rate established (which shall never be less than the value of an ordinary hour), or compensated with equivalent paid rest time. In the absence of such an agreement, it shall be understood that overtime worked must be compensated with rest within the four months following its performance."

Additionally, the law stipulates that:

The maximum number of overtime hours shall not exceed eighty per year, except in specific cases outlined in paragraph 3.

²⁵ https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312276:NO

For employees whose annual working time is less than the general working time in the company due to the nature or duration of their contract, the maximum annual overtime limit shall be proportionally reduced.

Overtime hours that are compensated with rest within four months shall not be counted toward the annual limit.

- employment contractual relationships

Teknoservice guarantees equal opportunities and is committed to providing the means to help its employees develop both professionally and personally.

Selection and promotion decisions will always be based on merit and on objective and transparent circumstances and evaluations. Employees will be informed of the methodologies and procedures used for professional development and advancement within the organization.

Teknoservice also undertakes to provide the necessary resources to support learning and training for its employees and to update their knowledge and skills in order to foster their professional progress and deliver greater value to clients, shareholders, and society as a whole.

4. Prohibition of Trafficking in Persons

"Labor Rights" further includes the prohibition of trafficking in persons as defined in the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children,²⁶ supplementing the United Nations Convention against Transnational Organized Crime

Prohibited under Spanish Law, human trafficking is regulated by Article 177 bis of the Criminal Code. This provision outlines the criminal liability for individuals who engage in trafficking activities, whether within Spanish territory, from Spain, in transit, or with Spain as the destination.

"Anyone who recruits, transports, transfers, harbours or receives a person, including the exchange or transfer of control over such persons, whether in Spanish territory, from Spain, in transit or destined for Spain, using violence, intimidation, deceit, or abusing a situation of superiority, need or vulnerability of the victim (national or foreign), or by giving or receiving payments or benefits to obtain the consent of the person who has control over the victim, shall be punished with five to eight years of imprisonment as a perpetrator of human trafficking, when done for any of the following purposes: a) Imposition of forced labour or services, slavery or practices similar to slavery, servitude or begging."

This article forms part of Organic Law 10/1995, and serves as the legal basis for prosecuting human trafficking offenses in Spain..

²⁶ <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons>