nikolin group

Business partner code of conduct.

pikolin
group

Introduction 1

Principles for action 2

Whistleblowing policy 3

Responsibility on the part of business partners 4

Violation and non-compliance with the code 5

1 Introduction

Driven by its commitment to promoting strict business ethics, and recognising the importance of its value chain for achieving sustainable performance in all areas of the business and its impact on society and the environment, Pikolin Group has chosen to implement a Business Partner Code of Conduct.

The Code aims to establish a shared understanding of how responsible business conduct should be applied in our day-to-day operations, taking into account all ethical, social and environmental considerations.

Pikolin Group's Business Partner Code of Conduct sets out the minimum standards of behaviour that suppliers of products and services, distributors, agents and other partners must observe in their contractual relations with Pikolin Group companies.

Pikolin Group requires all its business partners to comply rigorously with all applicable local and international legislation, thereby laying the foundations for solid and responsible business relationships.

This document is accessible for consultation by relevant stakeholders at www.pikolingroup.com.

pikolin group

Principles for action

2

Professional ethics

Business partners shall conduct their business with integrity, objectivity, transparency and honesty, without engaging in bribery, corruption, extortion or any other illegal or unethical practices.

They shall not accept, offer or grant commissions, gifts or remuneration to Pikolin Group employees or other stakeholders for the purpose of unlawfully obtaining or retaining business or other advantages.

Business partners shall comply with standards of ethical and moral conduct and international conventions. They shall also respect applicable laws on this matter and ensure that appropriate, enforceable procedures are in place for this purpose.

At Pikolin Group, we strive to ensure that all our transactions are objective. We therefore expect our business partners to act with full transparency in order to avoid any conflicts of interest. You are therefore requested to disclose whether a Pikolin Group employee you work with, or a close family member, has or could have a significant financial interest in its business.

Financial operations

Business partners shall not engage, directly or indirectly through third parties, in criminal financial practices, such as:

- Requesting receive cash payments in amounts higher than those legally established.
- Money laundering, terrorist financing, falsification of accounting documents, tax evasion, bribery, or any other activity that promotes corruption or undermines the integrity and transparency of financial operations.

Business partners are also required to take the necessary measures to prevent, detect and report such conduct in all their economic transactions.

Security, nondisclosure and protection of information

Pikolin Group attaches great importance to the security, nondisclosure and protection of information, including its own and that of third parties, particularly personal information.

Pikolin Group's business partners must protect the confidential and proprietary information of third parties, including personal information. They must not disclose technical, contractual or strategic information without prior authorisation. This obligation to nondisclosure extends beyond the end of the business relationship. Business partners must also comply with applicable data privacy laws.

If any security incident, vulnerability or weakness is detected that could compromise the confidentiality, integrity or availability of Pikolin Group's or our customers' information (including personal data to which they have access), business partners must notify us immediately.

Additionally, our business partners must refrain from misappropriating or infringing the intellectual property rights of others. They must safeguard Pikolin Group's intellectual property, including, but not limited to, our trademarks, patents, copyrights and industrial designs. Use of Pikolin Group's trademarks, logos or any other distinctive signs by our business partners must be authorised in advance.

Fair competition

Pikolin Group is committed to the principles of fair, open and unrestricted competition. We therefore require our business partners to comply with all applicable competition and antitrust laws. In this respect, they must not engage in anti-competitive practices, such as price fixing, market sharing, output limitation or bid rigging.

pikolin group

Respect for Legality, Human Rights and Ethical Values

Pikolin Group acts in accordance with the legislation in force in all the countries in which it operates. It respects internationally recognised human rights and public freedoms at all times, including the principles enshrined in the International Bill of Human Rights, the fundamental conventions of the International Labour Organisation (ILO) and the principles of the United Nations.

Business partners are expected to:

Comply in full with the applicable legislation in each country.

Act with honesty, legality, integrity and ethics in their business and professional relations, avoiding any conduct that could negatively affect the reputation of the company.

Promote awareness of and compliance with relevant regulations among their employees and subcontractors.

Avoid any direct or indirect involvement in activities that violate human rights.

Identify, mitigate and remedy the negative impacts that their operations may have on individuals or communities.

Ensure labour practices that respect human dignity, freely chosen work and fair working conditions throughout their supply chain.

Concerning the specific commitments to respect human rights

- Prohibition of child labour: The employment of minors shall not be permitted, with a minimum age of 16 years or the higher legal age in the local jurisdiction being established, in accordance with ILO Convention 138.
- Elimination of forced labour: Any form of forced labour, human trafficking or conditions of servitude is prohibited. All work must be voluntary and carried out without threat, coercion or deception.
- Freedom of association and collective bargaining: Employees have the right to form and join trade unions, and to engage in collective bargaining processes, free from retaliation, harassment or intimidation.

pikolin group

With regard to persons

All employees must be treated with dignity, fairness and respect. Business partners must ensure the following:

- A healthy, inclusive, safe and secure work environment, free from all forms of violence, bullying and harassment.
- They must absolute reject any form of physical, psychological, moral, sexual, gender-based or sexual identity harassment, as well as abuse of authority.
- They must also establish effective, confidential and non-retaliatory channels for employees to report improper or unfair conduct.

Professional Development and Equal Opportunities

Pikolin Group and its business partners are committed to actively promoting equal opportunities in all aspects of the employment relationship, guaranteeing:

Non-discrimination on grounds of sexual orientation, social origin, race, religion, political opinion, disability or other personal conditions.

Selection, recruitment, remuneration, training and promotion processes based exclusively on merit, competence and performance.

Continuous training as a means for the personal and professional development of employees, encouraging their active participation and growth within the organisation.

pikolin group

Adequate employment and fair working conditions

Business partners must ensure that working conditions are consistent with international labour standards and applicable national legislation, which includes:

Providing decent employment, with fair and competitive remuneration, commensurate with the responsibilities of the job, the experience and training of the worker.

Complying with applicable regulations on working hours, maximum working hours, weekly rest, leave, sick leave, holidays and compulsory work benefits.

Promoting a work-life balance through flexible working arrangements where possible.

Protecting the confidentiality of employee records and processing their personal data in accordance with applicable privacy and data protection laws.

Occupational health and safety

Pikolin Group has adopted health and safety policies that comply with current legislation, and it expects the same from its business partners. They must undertake the following commitments:

- Spearhead health and safety from top management and throughout the organisation.
- Establish safety as an individual responsibility and a condition of employment.
- Report, assess and manage potential risks.
- Promote learning through continuous training and accident analysis.
- Integrate safety criteria into processes, projects and supplier selection.
- Provide the necessary resources to meet safety standards. Communication and transparency:
- Report any incident, unsafe condition or injury immediately, and cooperate openly in its investigation.
- Always prioritise safety over operational results.

pikolin group

Demonstrate commitment to care and respect for the environment

Business partners must comply with the environmental legislation standards and requirements, as well as Pikolin Group's environmental commitments, by applying the following principles:

The transition to a low-carbon economy

A

Pikolin Group recognises the urgency of the climate transition. In relation to its commitment to climate change adaptation and mitigation, the Group expects its business partners to play an active role in reducing greenhouse gas emissions and adopting more sustainable business practices. We encourage our business partners to set emission reduction targets, improve energy efficiency in their operations, promote energy savings, explore the use of renewable energy, and to consider the climate impact of their products and services throughout their life cycle.

Efficient use of resources

Pikolin Group recognises the fundamental importance of the responsible management of natural resources and raw materials for environmental and social sustainability. Therefore, business partners are required to make efficient use of water in all their operations to minimise consumption and ensure water availability. In addition, sustainable exploitation of timber products is required to prevent deforestation. The aim of adopting these optimisation and sustainable exploitation practices is to minimise the negative impact on natural ecosystems and protect their integrity and biodiversity. Respecting the rights, traditions and resources of indigenous peoples and local communities associated with the extraction or use of these resources is also crucial.

B

pikolin group

C Pollution reduction

In order to contribute to a cleaner and healthier environment, Pikolin Group asks its business partners to implement environmental management measures to reduce their environmental impact. This involves actively managing all operational processes to minimise and control air, soil and water pollution, based on the principle of continuous improvement.

D Circular economy and waste management

Pikolin Group promotes a transition towards a circular economy model and expects its business partners to adopt this approach in their operations and throughout the life cycle of their products and services.

Regarding waste management, business partners are expected to prioritise preventing and minimising waste generation, including both hazardous and non-hazardous waste, in all their activities. Where waste generation is unavoidable, responsible management is required, including sorting, proper treatment, reuse and recycling. The aim is to prioritise recovery over disposal and to work with authorised waste managers.

E Use of hazardous substances

Pikolin Group prioritises the protection of human health and the environment. Therefore, it expects its business partners to actively plan the progressive elimination of hazardous substances from their operations, products and services.

Regarding products supplied to Pikolin Group, strict compliance with all legally required health and safety standards is essential. This includes submitting the necessary documentation and certifications to demonstrate compliance, and ensuring that products are safe for their intended use and do not contain prohibited or restricted substances under applicable regulations. Transparency in product composition and proactive communication about any potential health or safety risks are key aspects of our relationship with business partners.

pikolin group

3 Whistleblowing policy

Pikolin Group is committed to upholding the standards of this Code in all its operations. We expect our business partners to share this commitment and report any illegal, unethical or fraudulent activity they observe in their dealings with the Group.

To facilitate the submission of such complaints in a secure and confidential manner, a specific channel has been set up. Business partners and their employees can report any breach of this Code or other malpractice anonymously and without risk of retaliation via the following link:
https://grupopikolin.integrityline.com/

All complaints will be treated with the utmost seriousness and confidentiality, and will be investigated thoroughly.

pikolin group

4 Responsibility on the part of business partners

Business partners undertake to:

- Adhere to this Code of Conduct, as well as Pikolin Group's other applicable policies and procedures.
- Communicate this Code of Conduct to their relevant stakeholders.
- They must also communicate any relevant facts or information relating to the principles set out in this Code of Conduct to Pikolin Group in sufficient advance, and implement the corresponding corrective actions if necessary.

Pikolin Group will ensure compliance with this Code of Ethics, and business partners agree to be assessed according to the above principles.

pikolin group

5

Violation and non-compliance with the code

It is the responsibility of the business partner to be aware of, comply with, and ensure compliance with the legislation and regulations applicable to their operations and business relationship with Pikolin Group. This obligation includes obtaining and maintaining all necessary permits, licences and authorisations in force. If Pikolin Group becomes aware that a business partner is not complying with applicable legislation, it reserves the right to terminate the business relationship.

Pikolin Group expects its business partners to comply fully with the principles and standards set out in this Code of Conduct. Any violations or non-compliance with the provisions of this Code will be treated seriously and may affect the business relationship between the parties, depending on the nature and severity of the non-compliance.

Pikolin Group's Business Partner Code of Conduct was approved on 7 October 2025.

Supplier signature as a sign of agreement with the whole document:

José Antonio González
CEO

Pikolin Group

Company Name :

Name of the Responsible person signing :

Position :

Date :

pikolin group

Business Partner Code of Conduct