



CÓDIGO DE ÉTICA Y CONDUCTA DE APEL ELECTRONICA SL, ED.1

1. COMMITMENT

This ethical code reflects the commitment of APEL ELECTRONICA SL to act in accordance with values that ensure responsible behavior and absolute respect for current legislation in all relationships of the Organization, both internal and with clients, suppliers, or society in general.

The approval of this ethical code represents the explicit commitment of our organization to accept certain criteria of conduct. This Ethical Code is mandatory for all individuals associated with the company, regardless of the type of contractual relationship through which their employment is formalized, their position in the company, and the role they play.

2. OUR VALUES

Commitment to Human and Labor Rights

All individuals associated with this ethical code must carry out their professional activities with total respect for human rights and public freedoms. At APEL ELECTRONICA SL, we reject any act of discrimination, abuse, or exploitation of individuals.

Compliance with Current Legislation

APEL ELECTRONICA SL is committed to complying with current legislation and internal organizational norms in the development of our activities, particularly avoiding any type of criminal behavior.

All employees will ensure compliance with the legislation and regulations in force in the location where they carry out their activities. Also, they will always respect the commitments and obligations assumed by the organization in its contractual relationships with third parties.

Fair Competition

Commitment to competing in markets fairly, complying with competition defense regulations.

Good Working Environment

The company will make every effort to create a healthy and productive working environment, respectful of differences and opinions, and to avoid any act of discrimination or workplace harassment.

Respect for the Environment

Carrying out activities with respect for the environment, complying with the standards established in the relevant regulations.

Commitment to Sustainable Development

This commitment is based on implementing a policy that identifies the environmental effects generated by each of our activities with the aim of minimizing environmental impact.



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Customer Orientation

APEL ELECTRONICA SL seeks the full satisfaction of the customer by anticipating their needs and exceeding their expectations.

Commitment to Innovation

The commitment to creative innovation is one of the traits of our company.

APEL ELECTRONICA SL believes that resources, both human and technical, and economic, should be organized and directed towards obtaining new products, processes, and services or improving existing ones to progressively adapt to the new market needs.

3. PRINCIPLES OF ACTION WITH OUR STAKEHOLDERS

3.1. EMPLOYEES

Occupational Health and Safety

Preventing accidents and safeguarding the safety and health of the people working with us is our highest priority.

APEL ELECTRONICA SL undertakes to provide our employees with the necessary resources to perform their functions safely and in a healthy environment.

All our employees and external personnel must strictly comply with safety and health rules, make responsible use of the assigned safety equipment, avoiding taking risks that could endanger their integrity and health or that of others.

Equal Opportunities

Equity, understood as equal opportunities, is a strategic principle at APEL ELECTRONICA SL. As a responsible company, we are committed to it.

At APEL ELECTRONICA SL, we promote actions to effectively achieve gender equality, ensuring equal opportunities in employment, training, promotion, maternity protection, and working conditions, eliminating any manifestation of discrimination and promoting the balanced presence of women in different areas of the company. We also guarantee the right to work for people with disabilities on equal terms and non-discrimination, strictly observing the obligations regarding the quota of reserved jobs established by current legislation for companies.

For this purpose, a guide is also established for our communications to be inclusive and consistent with the commitments and values of the company. To achieve this, the following principles are followed:

1. Make non-discriminatory use of language in our communicative actions and be aware of the transformative power of language.



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2. Use an inclusive communication register for the integration of people with physical, sensory, psychic, or intellectual disabilities.
3. Do not systematically prioritize the masculine term over the feminine.
4. In digital environments and presentations of APEL ELECTRONICA SL, select images of diverse personnel that convey messages and values consistent with equality policies.
5. Make visible, internally and externally, the presence and participation of women in leadership positions.
6. Promote the participation of the underrepresented gender in events where the company participates.
7. Encourage sharing the front rows of APEL ELECTRONICA SL events without discriminating against any person.
8. Maintain an attitude of active and respectful listening to the interventions of all company personnel.
9. Promote equality between female and male workers in our company at all levels, both internally and externally.
10. Confront and question sexist, racist, or xenophobic prejudices or stereotypes of any kind.

Work-Life Balance

Balancing work obligations with personal and family life is achieved through a human resources policy that generates measures to make it possible to reconcile the commitment to the Company with the time needed for the development of a personal life project.

Harassment-Free Environment

APEL ELECTRONICA SL ensures a safe work environment by avoiding any threat or manifestation contrary to the dignity and safety of individuals, especially various forms of harassment: workplace, sexual, physical, moral, and psychological.

Unwanted or bothersome behaviors by any employee that constitute harassment towards another person, disturb the work of others, or create an intimidating, offensive, abusive, or hostile working environment will not be tolerated. This includes intimidation, abuse of authority, or any other form of aggression or hostility that can create an atmosphere of intimidation.

Within this sphere of protection, the right to privacy and confidentiality is promoted, especially regarding information about personal, family, medical, and economic data of professionals.

Commitment to Training

APEL ELECTRONICA SL, in its effort to continually raise the professional level of its personnel, will strengthen the training program, adapting it to the needs and requirements of the job,



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especialmente en adaptarse al uso de nuevas tecnologías, mejorar la calidad del trabajo, y diversificar sus áreas de acción, gestionar su diversidad y aprovechar su potencial y experiencia.

Professional Promotion and Remuneration Policy

Internal promotion at APEL ELECTRONICA SL is based on principles of capacity, competence, and professional merit. Decisions in this regard will be made according to clear, objective, and transparent criteria. All employees will be informed of the tools for evaluating their performance and assessing their results, which will in any case be based on criteria of objectivity and transparency.

APEL ELECTRONICA SL guarantees a neutral remuneration application, through a measurable update, as it results from both conventional application, on the one hand, and from a contractual standard, which is identical by professional category.

Protection of Information and Resources

Employees of APEL ELECTRONICA SL must be responsible for the proper use of the assets and resources provided by the company, and protect them from misuse, abuse, sabotage, or loss.

All resources made available to employees by the Company must be used for their intended professional purpose. In cases where they could be used for personal use, this must comply with internal regulations and applicable legislation, and be maintained at minimum levels without negatively affecting productivity and the work environment.

Conflicts of Interest

Employees of APEL ELECTRONICA SL are obliged to communicate to their respective superiors the existence of possible conflicts of interest that may arise between themselves—or people linked to them—and the Company.

Confidentiality of Information

All employees of APEL ELECTRONICA SL are required to protect information, whether technical, financial, commercial, or of any other nature, of which they are aware due to their position—whether technical, financial, commercial, or of any other nature—and not to use it outside the scope of their employment relationship, nor disclose it to third parties without the prior written consent of the company, except for requests for information demanded by a judicial or administrative authority in legal terms.

The company will ensure to its employees, suppliers, customers, and any third parties having a relationship with it the faithful compliance with data protection regulations, adopting the necessary measures in its organization for the full effectiveness of such regulations.

At APEL ELECTRONICA SL, we respect the rights of Industrial and Intellectual Property. In this sense, our suppliers, contractors, and collaborators must demonstrate that they are authorized to use or commercialize products protected by Industrial and Intellectual Property rights.



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3.2. RELATIONS WITH THIRD PARTIES

Behavior Regarding Bribery and Corruption Practices

APEL ELECTRONICA SL's commitment to developing its activities according to the highest ethical standards is not optional. APEL ELECTRONICA SL applies a zero-tolerance principle against practices that contravene any provisions on ethics and integrity, expecting its professionals and third parties with whom it interacts to have conduct and actions permanently aligned with the principles and values established in this Code, the regulations or legislation on which it is based, and/or the policies or procedures that develop it.

The delivery of any gift beyond common business or courtesy practices is not allowed and, in no case, should it be intended to obtain preferential treatment in any activity related to APEL ELECTRONICA SL.

Soliciting or accepting gifts, payments, commissions, or any other personal benefit from current or potential customers, suppliers, or other agents maintaining or aspiring to maintain relationships with APEL ELECTRONICA SL is not permitted.

Donations to Political Parties

APEL ELECTRONICA SL does not make donations or contributions to political parties, federations, coalitions, or groups of voters.

Money Laundering

APEL ELECTRONICA SL is firmly committed to preventing money laundering. Under no circumstances will we participate in activities aimed at giving an appearance of legitimacy or legality to assets or assets of criminal origin.

A) COMMITMENT TO CUSTOMERS

At APEL ELECTRONICA SL, we seek excellence and the full satisfaction of our customers. We base our relationship with our customers on professionalism and credibility. Therefore, we will always communicate to our customers rigorous, truthful, and complete information about the technical, economic, and quality characteristics of our services.

Identification of APEL ELECTRONICA SL Values with Customers

At APEL ELECTRONICA SL, the fundamental values that identify the relationship with customers and that are shared and desired are respect, service, quality, effectiveness, communication, and dialogue.

Ensuring Quality in Services

All personnel at APEL ELECTRONICA SL, in addition to offering a reliable product following safety and quality criteria, must be committed to a policy of good treatment, attention, and customer service. For APEL ELECTRONICA SL, the customer is a priority, and their needs and



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expectations must be met, providing an atmosphere of trust, respect, and prompt resolution of any problems that may arise.

Ensuring Transparency and Fairness in Service and Communication

At APEL ELECTRONICA SL, the relationship with the customer and the information conveyed to them must be based on sincerity, honesty, loyalty, and transparency, always seeking compliance and respect for the agreements made, based on real offers and viable contracts in terms of both quality and price and time.

B) COMMITMENT TO SUPPLIERS AND SUBCONTRACTORS

Our suppliers and collaborating companies are an essential part of achieving our objectives. Therefore, we want to maintain relationships with suppliers and collaborators based on trust, mutual benefit, and respect for established commercial contracts and agreements.

The selection of suppliers and subcontractors will be made with criteria of transparency, objectivity, and free competition, ensuring the quality of the acquired goods or services and the best economic conditions, especially valuing the technical and financial solvency of the supplier and subcontractor and the experience gained from previous relationships with them.

In this sense, we will promote the establishment of collaborative relationships with those suppliers, contractors, partners, and collaborators who share ethical standards, compliance, and due diligence compatible with ours.

Identification of APEL ELECTRONICA SL Values with Suppliers and Subcontractors

At APEL ELECTRONICA SL, the fundamental values that identify the relationship with customers and that are shared and desired are respect, service, communication, dialogue, and equality.

Transparency in Agreements with Suppliers

At APEL ELECTRONICA SL, contracts established with suppliers must be clear and specific, describing the work to be carried out correctly, with fair periods and prices, as well as clauses for compliance with safety, quality, environmental, and ethical management criteria.

APEL ELECTRONICA SL will fulfill the agreements made with suppliers in terms of time, prices, and quality, and must demand compliance with them from suppliers.

Guarantee of Transparency in Information Exchange

At APEL ELECTRONICA SL, the information provided to suppliers must be the same for everyone, based on sincerity and honesty. APEL ELECTRONICA SL will always avoid unnecessary litigation with its suppliers if possible.

Continuous exchange with suppliers, whether in technology or knowledge, is encouraged at APEL ELECTRONICA SL to improve the quality of the work.



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C) COMMITMENT TO OTHER COMPANIES IN THE SECTOR

Identification of APEL ELECTRONICA SL Values with Other Companies in the Sector

At APEL ELECTRONICA SL, the fundamental values that identify the relationship with customers and that are shared and desired are respect and dialogue.

At APEL ELECTRONICA SL, we establish relationships of respect and collaboration on matters of common interest with other companies in the sector, and we do not disseminate false or tendentious information against our competitors.

D) COMMITMENT TO THE PUBLIC ADMINISTRATION

Identification of APEL ELECTRONICA SL Values with the Public Administration

Transparency, trust, and compliance with current legislation are the principles that APEL ELECTRONICA SL applies in its relationship with Public Administrations.

Relationships are based on compliance with the obligations presented by the Public Administration and institutional relations under the principles of transparency and honesty.

E) COMMITMENT TO OUR COMMUNITY AND ENVIRONMENT

From our beginnings, APEL ELECTRONICA SL has been a company especially committed to the environmental, economic, and social development of our community and its citizens.

APEL ELECTRONICA SL is a company deeply rooted in the local community. Therefore, to the extent of our possibilities, and with full respect for the laws, we will seek to hire personnel and collaborate with providers of goods and/or services from our immediate surroundings.

4. CODE INTERPRETATION

This Ethical and Conduct Code includes guidelines for behavior that all individuals associated with the company must apply in the exercise of their functions in the company.

However, it does not cover all situations that may arise in the day-to-day application and compliance. If there are any doubts about what our correct action should be for any reason, before making a decision, we must ask ourselves:

- Does it comply with the provisions of the Ethical Code?
- Is it legal?
- Is it aligned with the principles and values of APEL ELECTRONICA SL?
- Would I feel comfortable if the decision I made or the action I took became public?
- Would I like it to be done to me?



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- Would these actions or the decision made be acceptable to my family, colleagues, professionals, and superiors?

If the answer to any of the above questions is "no," you should consult or seek advice before making the decision.

5. VALIDITY AND DIFFUSION

All individuals associated with APEL ELECTRONICA SL undertake to contribute to the dissemination of this Ethical and Conduct Code and its full consolidation in the corporate culture.

The Ethical and Conduct Code is conceived as a living document. Therefore, its content will be subject to periodic review and updating, and, in any case, it may be subject to modification whenever there is a substantial change in the company's activity, structure, and objectives.

Approved by: Josep Lluís Sanchez Falcó

Sant Boi de Llobregat, February 5, 2024