



# CODE OF CONDUCT



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# WHO WE ARE

- ▶ ATUSA has been a pioneer in the manufacturing of malleable iron pipe fittings for more than 100 years. Today, it is a benchmark in the marketing and distribution of pipe accessories and complements in various materials, spanning numerous sectors such as sanitary, heating, civil engineering, fire protection systems, and the electrical industry.
- ▶ **ORIGINS** ATUSA, located in the North of Spain, an area with a significant influence in the metallurgical sector, has achieved growth that places it at the forefront of Malleable Iron Fittings manufacturers. Our long tradition, dating back in some of our manufacturing plants to almost a century of existence, has laid the foundations for a modern, agile, up-to-date, and forward-thinking company.
- ▶ In its commitment to meet the demands of different markets, ATUSA maintains constant growth by incorporating new products for various sectors, including sanitation, heating, fluid conveyance, construction, and electrical.
- ▶ This combination of the production process and the marketing of products makes ATUSA a reference in international markets.





# OUR CODE OF CONDUCT

The Code of Conduct of Grupo Atusa is the document that establishes the formal declaration of principles, outlining the values and ethical standards by which Grupo Atusa is governed. It serves as our basic reference guide, promoting and reflecting our ethical and positive corporate culture. The matters covered in this Code of Conduct are complemented by policies and rules specified by various departments.

The Code of Conduct considers the principle of criminal liability for legal entities, establishing the principle of due diligence for the prevention, detection, and eradication of irregular behaviors, regardless of their nature, with special emphasis on reporting and eliminating such behaviors.

The code of conduct affects and applies to all employees of Grupo Atusa.



WHAT IS A CODE OF CONDUCT

# OUR PRINCIPLES

QUALITY

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CORRUPTION  
AND BRIBERY



GRUPO ATUSA  
PRINCIPLES



## QUALITY PRINCIPLE

The management of Grupo Atusa directs the quality system that has been implemented in accordance with the following principles:

- ❑ Fulfillment of the quality requirements of the manufactured products.
- ❑ Promoting continuous improvement in processes to improve efficiency and quality.
- ❑ Promoting the training of individuals within the organization with the aim of improving quality.
- ❑ Maintaining open communication channels with clients and suppliers.
- ❑ The quality of our products is based on an effective and experienced human workforce, as well as the most modern and efficient technical means and analysis procedures. A Quality Department is present throughout all production processes and in the reception controls of the marketed products, managing the proper functioning of the Quality System and anticipating possible discrepancies that could lead to significant functional defects.



GRUPO ATUSA  
PRINCIPLES



## COMMITMENT TO THE ENVIRONMENT

"The management of Grupo Atusa, fully aware of the environmental impact generated by the activities of the production process, logistics, and transportation, seeks to act in a way that respects our surroundings and the social well-being of present and future generations."

Therefore, we establish the following principles:

- ❑ Compliance with applicable environmental legislation and regulations for our facilities and operations.
- ❑ Implementation of necessary measures to prevent pollution, minimize waste generation, and use resources responsibly .
- ❑ Continuous improvement through the editing, evaluation, and analysis of the adequacy of the adopted measures.
- ❑ Promoting environmental training and awareness.
- ❑ Encouraging the implementation of good environmental practices.





## PRINCIPLE OF EQUAL TREATMENT AND NON-DISCRIMINATION

The management of the company declares its commitment to establishing and developing policies that integrate equal treatment and opportunities for women and men, without discriminating directly or indirectly based on gender. We also commit to promoting and encouraging all measures to maintain real equality within our organization, establishing equal opportunities for women and men as a principle of People Management.

GRUPO ATUSA advocates for the inclusion and integration of all individuals, considering not only the gender perspective but also any circumstance or group susceptible to discrimination, including the LGBTQ+ community.

We define ourselves as a diverse company that seeks to empower people and enhance their talent. Therefore, within the organization, we promote, at all levels, relationships based on mutual respect, participation, equity, and collaboration. Employment and professional development decisions are made based on non-discriminatory and objective criteria, fostering equality and diversity. Discriminatory, harassing, disrespectful, or degrading behaviors towards individual dignity are dealt with through internal protocols.

The commitment from GRUPO ATUSA is:

- ▶ Respect for diversity and inclusion.
- ▶ Prohibition of discrimination and harassment.
- ▶ Protection of freedom of expression and association.







## Equality Plan



## Prevention Protocols:

- Moving
- Sexual harassment
- Gender-based harassment
- Inclusion of LGBTQ+ communities in the prevention of harassment

PREVENTIVE  
MECHANISMS  
In the fight for  
equality and non-  
discrimination

The organization believes in diversity, equity, equality, non-discrimination, and respect for others. To advocate for these values, Grupo Atusa has developed various tools and mechanisms for preventing behaviors contrary to these values, especially those that may involve inequality, discrimination, workplace harassment, sexual harassment, and/or gender-based harassment.





## CARE FOR THE SAFETY AND HEALTH OF INDIVIDUALS

The management of Grupo Atusa, in its natural concern for the safety and health of employees, aims not only to comply with the legal requirements regarding risk prevention but also to improve working conditions to the extent possible, taking advantage of such compliance.

To achieve these objectives, recognizing that continuous improvement is essential, we commit to:

- Adhere to all provisions established in laws and regulations.
- Engage the organization in fulfilling all preventive and legal requirements through the integration of prevention, participation, information, and training for employees.
- Analyze processes, techniques, and products used, choosing those that pose fewer risks to individuals.
- Involve personnel in all aspects, whether required by law or not, that affect their safety and health.
- Allocate sufficient resources for the development of preventive activities.
- Foster a positive culture regarding risk prevention."

This commitment reflects a comprehensive approach to ensuring the well-being of employees and continuous improvement in health and safety measures.



# HUMAN RIGHTS

In addition to complying with the current applicable legislation, we commit to respecting internationally recognized human rights, which encompass the rights outlined in the International Bill of Human Rights and the principles related to rights established in the International Labor Organization Declaration on Fundamental Principles and Rights at Work, including the 8 Core Conventions that elaborate on these principles.

Non-exhaustively, the responsibility to respect human rights implies:

- ❑ Maintaining with its employees, workplace practices consistent with national and international regulations.
- ❑ Eliminating all forms of forced labor and eradicating the use of child labor.
- ❑ Treating all employees with dignity and respect.
- ❑ Ensuring that working conditions and the work environment are in line with applicable national and international labor standards.



## FIGHT AGAINST CORRUPTION AND BRIBERY

At GRUPO ATUSA, we are committed to combating any form of corruption, and we expect the same commitment from our employees and collaborators.

"Corruption" is understood as the act of offering, promising, granting, receiving, soliciting, or accepting, directly or through an intermediary, an unjustified benefit, for oneself or for a third party, with the aim of unduly favoring a party in the acquisition or sale of goods, in the contracting of services, or in commercial or personal relationships. On the other hand, "Bribery" refers to anything of value offered, promised, paid, or delivered to a third party with the aim of influencing decision-making or obtaining an unjustified benefit in the development of the Company's activities. It is one of the ways in which corruption manifests itself.

In accordance with these terms, any practice of corruption or bribery during business activities is strictly prohibited. Similarly, any employee must refrain from engaging in any activity or conduct that may appear corrupt or as an attempt at corruption. The collaboration of all is essential to prevent, detect, investigate, and remedy any corrupt practices that may occur within GRUPO ATUSA. In case of doubt regarding possible bribery or other corrupt practices, the employee should seek guidance from their immediate supervisor and report it through the ETHICS CHANNEL.



Grupo Atusa respects the confidentiality of our clients and the personal, financial, and health information of our employees. Personal data should only be processed, used, or shared when there is a legitimate reason, and only in accordance with applicable law and company policy.

Individuals who handle confidential data in their work are responsible for understanding and complying with legal requirements and the company's data privacy and security policies. This obligation persists even after the termination of the employment relationship. Additionally, the employee will only access and/or process data necessary to fulfill the functions established for the performance of their job, will take all necessary security measures to ensure the confidentiality of this data, and will not disclose it to third parties without the express authorization of the company.



# PRIVACY AND PERSONAL DATA

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PRIVACY AND  
PERSONAL  
DATA

# COMMUNICATION CHANNELS

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The company has established preventive tools for inappropriate behaviors. Likewise, it has opened reporting channels for various cases of protection.

Employees of Grupo Atusa commit to reporting through the relevant Whistleblower Channel any violation of the Code of Conduct and/or regulations they detect.



Moving Reporting Channel  
[personal@atusagroup.com](mailto:personal@atusagroup.com)



Sexual Harassment and/or  
Gender-based Harassment  
Reporting Channel  
[acososexual@atusagroup.com](mailto:acososexual@atusagroup.com)



Ethics Channel  
Grupo Atusa Webpage



COMMUNICATION  
CHANNELS

# CODE OF CONDUCT APPROVAL

Ignacio Guibert, General Manager