



CODE OF ETHICS AND CONDUCT

GRUPO SEGURA

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1. INTRODUCTION

Grupo Segura is characterized by its commitment to defending and promoting compliance with current legislation by all members of the organization at all times.

In this regard, it has undertaken to develop and implement, firstly, a *compliance* system, understood as a set of rules to prevent and avoid any unlawful conduct or legal non-compliance within Grupo Segura; and, secondly, a system of good corporate governance, understood as a set of rules and procedures whose purpose is to ensure that Grupo Segura operates in a correct, transparent and responsible manner, regardless of the persons who at any given time perform the function or functions of governance and representation thereof (hereinafter, the "Code of Ethics and Conduct").

Therefore, this document constitutes the Code of Ethics and Conduct of Grupo Segura, which establishes the general guidelines or principles of conduct and behavior that should guide the actions of the individuals and legal entities identified in section 3.

2. OBJECTIVE

Our Code of Ethics and Conduct defines the basic principles of conduct and corporate values that we must follow in our day-to-day professional relationships, constituting the basic pillars of our way of working. With this code, we aim to establish a common framework of behavior applicable to all Grupo Segura staff.

This Code of Ethics and Conduct is intended to be a document that sets out the guidelines that define who we are and how we act, the essence of who we are, how we do things and a reflection of our day-to-day actions.

The objective is for all of us to know and share our framework for action within the company and to be aware of the responsibility that each of us has as an integral part of Grupo Segura.

Each and every one of Grupo Segura employees and managers must respect the Code of Ethics and Conduct and promote its dissemination and respect by their colleagues.

3. SUBJECTIVE SCOPE OF APPLICATION

In general, the Code of Ethics and Conduct shall apply to all persons who make up Grupo Segura, regardless of their position or role, whether they are employees, managers or collaborators.

Consequently, the Code of Ethics and Conduct shall apply to the following natural and/or legal people (hereinafter, the "Subject Persons"):

- a) The management team of Grupo Segura, understood as the staff (subject to special or general regulations) who manage one or more departments of Grupo Segura.

- b) Persons employed by, dependent on or linked to Grupo Segura, regardless of whether, at any given time, they may have delegated powers or decision-making authority on behalf of and in representation of Grupo Segura.
- c) Those who have powers of representation validly conferred by statute, by Grupo Segura and/or by its representatives.

Thus, the conduct set out in this Code is mandatory for Subject Persons, who are responsible for knowing, complying with and enforcing current regulations, in accordance with their functions, responsibilities and position.

4. GENERAL ETHICAL PRINCIPLES

4.1 Compliance with and respect for legislation

At Grupo Segura, each and every employee complies with the legal regulations applicable at all times. These regulatory requirements must be respected by Grupo Segura employees, who shall ensure compliance with them. At the same time, Grupo Segura employees must adhere to the internal regulations agreed upon by the Company's Management and the workers' representatives. Grupo Segura aims to create an atmosphere of trust at all levels of the company, encouraging employees to express themselves freely. Similarly, Grupo Segura recognizes the freedom of association and to strike, and does not practice any form of discrimination in relation to its activities.

4.2 Respect for people

Respect for people is a fundamental principle in the day-to-day running of our company. Those subject to this code shall ensure that everyone in our environment is treated fairly, equitably and respectfully.

Specifically, Grupo Segura expresses its commitment to creating and maintaining a working environment characterized by good relations between its employees, where all those involved in the activity carry out their work in a safe and healthy manner, guaranteeing their integrity in all aspects. This commitment entails the prohibition of any conduct that involves harassment of any kind.

Grupo Segura undertakes not to suppress or restrict the rights recognized to its employees by legal provisions, collective agreements or individual contracts.

Similarly, external relations will be based on professional respect and mutual collaboration.

4.3 Equal treatment. Non-discrimination. Harassment

At Grupo Segura, we guarantee all our employees, interns, trainees and job applicants equal treatment, respect and non-discrimination on the grounds of race, anti-Semitism, ideology, religion or beliefs, family situation, ethnicity, race or nationality, sex, sexual orientation or identity, gender, illness or disability. Grupo Segura supports the integration of disadvantaged groups.

All our employees must comply with this principle and ensure its enforcement. At Grupo Segura, we pursue and report harassment in the workplace and encourage all our employees to report any situation that may constitute harassment.

4.4 Respect for Human Rights

Each and every employee must respect the laws and regulations in force in each of the countries where Grupo Segura operates. We are fully committed to human rights, as set out in our *Human Rights Policy*.

Grupo Segura complies with both national and international laws relating to child labor. Under no circumstances do we work with children under the age of 16, and we always ensure that our suppliers and customers comply with this premise, following the guidelines set by the ILO and the regulations relating to child labor in each of the countries where we operate.

At Grupo Segura, we firmly believe that work is a right, not an obligation, and for this reason we condemn any type of forced labor or service performed against one's will and under threat of punishment.

We demand total respect in our supply chain for local communities and their right to water and land, always avoiding any forced evictions.

You must not promote, directly or indirectly, on behalf of Grupo Segura, acts that contain elements of vulgarity, violence or any other element that affects individual, family and social values. The use of public or private security forces that do not respect human rights will not be permitted.

4.5 Fair remuneration, salary benefits and working hours

Working hours shall comply with the local legislation of each country, ensuring compliance with the conventions and recommendations of the International Labor Organization.

Likewise, Grupo Segura is committed to complying with current legislation on remuneration for work of equal value, salary benefits for its employees and compliance with working hours.

4.6 Health and safety at work

We strive every day to provide a healthy and safe environment in our organization, as we understand that promoting this situation creates a positive atmosphere and benefits everyone.

It is the obligation of each and every employee of our company to ensure and respect the rules relating to health and safety at work and to use the equipment and facilities to which they have access correctly.

5. GUIDELINES FOR CONDUCT

5.1 Conflicts of interest and transparency

All decisions made by Grupo Segura employees must be based on the best interests of our company and must never be based on personal interest, always following exclusively professional criteria and never for personal gain.

If, in the course of their duties, any Grupo Segura employee finds themselves in a position to contract the services of a collaborator and/or supplier with whom they have family and/or friendship ties, in such a way that there may be doubts about the objectivity of this decision or a possible conflict of interest, they shall automatically report this situation to their immediate superior and a decision shall always be made in accordance with our company's values.

The acceptance or offering of gifts, lunches, dinners, services and any other type of consideration by Grupo Segura employees to our collaborators or from them is not permitted under any circumstances, except for those due to normal commercial practices or courtesy and whose value is symbolic, always with the aim of preventing any possible corruption. To this end, Grupo Segura has a ***Policy against Corruption***.

5.2 Money laundering and terrorist financing

Grupo Segura shall comply at all times with current anti-money laundering regulations, such that all Grupo Segura personnel shall not acquire, possess, use or transmit goods when these originate from criminal activity, nor shall they perform any other act to conceal or cover up their illicit origin.

In particular, specific control mechanisms will be established for the receipt of donations.

In order to prevent the commission of this type of offence, Grupo Segura and the Persons Subject to the Regulations must be vigilant in detecting and preventing any activity involving money laundering, reporting any situation that may be related to such criminal conduct as soon as possible.

For their part, before establishing relationships with third parties, they must check the credentials available to them in order to ascertain their respectability and the legitimacy of their activities.

5.3 Respect for the environment and sustainability

Grupo Segura supports environmental protection by promoting environmental responsibility initiatives, avoiding emissions, spills or waste deposits that could cause damage to air, soil, water quality or the ecosystem in general. This commitment is expressed in our ***Environmental Policy***.

Grupo Segura complies with ISO 14001 certification in environmental management.

In any case, Grupo Segura has protocols in place to regulate the issues outlined in this section, such as the waste management protocol, the emergency protocol and the training regulations in this area.

Grupo Segura is committed to being a sustainable company, promoting:

- good governance;
- its commitment to society; and
- preserving the environment through actions that reduce greenhouse gas emissions, prevent air, soil and water pollution, and promote responsible use of resources.

This corporate commitment, expressed in our **Sustainability Policy**, must be respected and supported by all members of the Company, bearing in mind that, as far as possible, (i) preference will be given to the use of renewable raw materials, the development of environmentally friendly packaging, and the use of clean energies that reduce environmental impact, (ii) the minimum amount of waste will be generated, recycling it whenever possible, (iii) any violation of environmental regulations will be immediately reported to the Regulatory Compliance Committee through the Whistleblower Channel.

5.4. Maximum quality in work

Grupo Segura strives for excellence in the services and products it provides. These must comply with the quality standards, requirements and tests agreed with the customer.

In this regard, Grupo Segura has a **Quality Policy** and complies with the most prestigious international certifications in this area: ISO 9001 for quality and IATF 16949:2016, specific to the automotive sector.

5.5 Accurate records

Our books and financial accounts must reflect accurate records of all transactions and activities and must comply with applicable laws, regulations and standards, as well as Grupo Segura's financial procedures.

5.6 Free competition and antitrust

All our employees shall take into account antitrust and free competition regulations and shall refrain from collusive or anti-competitive behavior.

5.7 Trade requirements

Grupo Segura has a responsibility to be aware of and comply with applicable laws, regulations and restrictions on exports/imports. Under no circumstances shall business be conducted with sanctioned countries.

5.8 Counterfeit and fraudulent parts

Grupo Segura undertakes to reject counterfeit or fraudulent parts in all our purchasing, receiving, production and sales processes, thereby ensuring our customers' confidence in the supply chain. In this regard, we guarantee the requirements and traceability of raw materials, accessories and products through market reference approval, inspection and product control. Our suppliers must develop,

implement and maintain effective methods and appropriate processes for their products to minimize the risk of introducing counterfeit parts and materials into the products they deliver.

6. EXTERNAL RELATIONS

In carrying out its activities, Grupo Segura establishes relationships with its customers, as well as with other companies, organizations and public institutions, always following the principles governing this Code of Ethics and Conduct.

6.1 Company image

Our company's corporate image is very important to us, which is why we encourage our employees to follow and promote the values of integrity, honesty, sincerity, equality, respect and proactivity that Grupo Segura's management strives to promote every day with the aim of making Grupo Segura a dynamic, modern company that fosters creativity, the achievement of its goals and a sense of responsibility.

6.2 Relations with suppliers and others

Grupo Segura's relationships with its suppliers, collaborators and subcontractors must be governed by criteria of honesty and mutual trust. Likewise, in order to determine who will be Grupo Segura's suppliers, the persons responsible must base their approval on impartial criteria and must not be influenced by personal or illicit interests.

In any case, Grupo Segura has a strict supplier approval procedure regulated by various protocols, such as the following: Supplier Quality and Development Manual; Initial approval of suppliers; Continuous evaluation of suppliers; Supplier sustainability commitment; and Supplier capacity management.

Grupo Segura will require its suppliers to comply with human rights and to have codes of ethics and conduct in line with our own.

6.3 Relations with public organizations, institutions and bodies

In their relations with any public administration, the Persons Subject to this Code shall act with transparency, truthfulness and rigor in all the information provided, ensuring full compliance with the current legal system and this Code of Ethics and Conduct, assuming the corresponding obligations and complying with them.

7. INFORMATION MANAGEMENT

7.1 Use of our equipment and resources

As employees of Grupo Segura, we have an obligation to use the resources provided by the company (IT equipment, telephones and the internet) in an appropriate, responsible and effective manner, respecting the purposes for which they are provided and exclusively for the benefit of the company.

Any activity not intended for the benefit of Grupo Segura, in which its resources are used, is strictly prohibited.

Employees who, due to the activity they carry out in our company, are responsible for handling its funds, are responsible for ensuring that they are used appropriately and efficiently, always with authorisation and in accordance with the guidelines established for this purpose.

7.2 Protection of information. Personal data

Under no circumstances shall any employee of Grupo Segura disclose confidential information relating to our company to other individuals or legal entities outside Grupo Segura. At the same time, this type of information shall not be disclosed internally, unless its use is necessary for the normal performance of the duties of each job position.

We are particularly committed to protecting the personal data of our employees, customers, suppliers and external staff, for whom Grupo Segura is responsible, and the data handled will be processed in compliance with current regulations.

7.3 Intellectual property

All Grupo Segura employees shall refrain from infringing the intellectual property rights of the company or any third party, preventing its use without proper authorization.

Grupo Segura undertakes to comply with the highest requirements in terms of information security.

8. COMPLIANCE WITH THE CODE OF ETHICS

The principles and criteria for action contained in this Code of Ethics are mandatory for the Persons Subject to it, and Grupo Segura will communicate and disseminate its content to them.

Likewise, new recruits who join Grupo Segura must expressly accept the values, principles and rules of conduct established in this Code.

To ensure the application of the Code, as well as the Crime Prevention Model of which it forms part, a Compliance Body has been set up to ensure the proper monitoring and compliance with the Code, promoting awareness of it and interpreting its rules, as well as resolving any doubts or questions that may arise in this regard.

Any questions that may arise regarding the interpretation or application of this Code should be referred to the line manager or, if necessary, to the Compliance Body.

When Subject Persons become aware of any irregular conduct, breach or violation of Grupo Segura's internal regulations, including this Code of Ethics, they must report such irregularity or breach through the channel established by Grupo Segura for this purpose.

9. REPORTING CHANNEL

Grupo Segura has implemented a reporting channel to enable Subject Persons to report the following types of infringements:

- Criminal offences
- Serious or very serious administrative offences
- Infringements of European Union law in various areas (public procurement, public contracts, services, products and financial markets, and prevention of money laundering and terrorist financing; product safety and conformity; transport safety; environmental protection; public health; protection of privacy and personal data, and security of networks and information systems).

This channel will be easily accessible via our website: www.fsegura.com or the following QR:



The aforementioned reporting channel complies with the provisions and requirements established in *Law 2/2023 of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption*, which transposes the Whistleblowing Directive into Spanish law.

The principles on which Grupo Segura's reporting channel is based are set out in Grupo Segura's ***Internal Information System Policy***.

In this regard, the Grupo Segura reporting channel will be available to Subject Persons, as well as other third parties with links to the group (suppliers, subcontractors, etc.), and will be accessible via the Grupo Segura website.

The Grupo Segura reporting channel is managed by a person specifically appointed to process the reports received in accordance with the provisions of the ***Procedure for managing reports*** received.

Grupo Segura will preserve the confidentiality of the identity of the whistleblower, as well as all actions taken in relation to the report, allowing anonymous reports to be made in all cases.

Grupo Segura undertakes to protect the whistleblower, rejecting any form of retaliation.

10. DISCIPLINARY REGIME

Failure to comply with this Code of Ethics and Conduct is subject to the disciplinary regime set out in the *Disciplinary System* document, which forms part of the Crime Prevention Model implemented by Grupo Segura.

11. PUBLICATION, DISSEMINATION AND TRAINING

This Protocol and any amendments thereto shall be published on the Grupo Segura website for consultation by the Persons Subject to it.

The existence of this Code, as well as the policies and procedures approved in its implementation, shall be disseminated among all employees, as well as new recruits to Grupo Segura, so that they are aware of its content and, consequently, comply with it.

Grupo Segura shall carry out the necessary training activities to ensure that all its members internalize and accept this Code of Ethics. To this end, the relevant training sessions shall be given, with a duration sufficient for all members of Grupo Segura to properly understand the implications of this Protocol.

Finally, Persons Subject to the Code who, by reason of their position, post or powers, deal directly with public administrations, civil servants and public officials, shall receive such training on a regular basis.

12. ENTRY INTO FORCE. VALIDITY.

This document has been approved by the Board of Directors of Grupo Segura and shall enter into force on 3 March 2026. It shall remain in force indefinitely unless any amendments are made thereto.

Amendments to this document shall enter into force on the day following their approval and publication on the Grupo Segura website.