
CODE OF ETHICS

February 2025

Dear collaborators

This Code of Ethics is addressed to all Lucta Group members and collaborators and is a faithful expression of the ethical values and principles that govern the Company's operations and represent one of the essential pillars that have helped us consolidate ourselves as a socially committed company.

Since 1949, the Lucta Group has endeavored to pursue the development and growth of its business activity in a way which is compatible with ethics and a commitment to people and society. In this regard, it is not enough for us to be leaders in our sector. We also want to make our business success compatible with a corporate policy that promotes the personal and professional growth of all members of our company and complies with the ethical standards of the society in which we operate. This Code of Ethics is a response to that objective, establishing the guidelines of conduct that we must follow and reflecting the integrity that should guide us as members of an organization which is morally and legally responsible and committed to promoting and upholding ethical values in the field of business.

I would like to take this opportunity to thank in advance everyone who is part of the Lucta Group for their hard work and contribution to not only the Company's business success, but also its commitment to legality and to carrying out our responsibilities to society.

Carlos Ventós
CEO





OBJECTIVE

The Board of Directors of Lucta, S.A. has decided to draw up this Code of Ethics with a view to **maintaining and upholding the highest ethical standards** in the Company's business activity.

This document is intended to **guide the actions of the entire workforce**, regulating daily decision-making and the day-to-day activity of the Lucta Group (hereinafter "the Group" or "the Company").



SCOPE OF APPLICATION

This Code of Ethics is **mandatory for all members of the Lucta Group**, regardless of their role and geographic location.

OUR VALUES



01 TRUST

The trust placed in us by our customers is what gives our work meaning.

At Lucta, we strive to build solid relationships, encourage cooperation, and create a safe and honest environment. We look to establish genuine, deep bonds that enable us to grow both individually and collectively.



04 PRECISION

We are a design company, and design is at the heart of everything we do. Each detail is painstakingly rendered to ensure careful and precise execution.

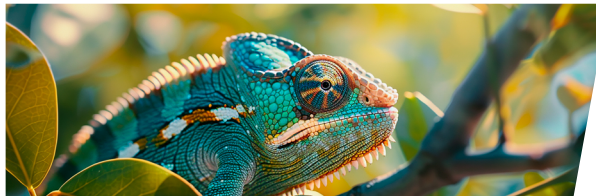
We provide science and art, creating tailored solutions that blend in naturally, generating emotions and authentic experiences.



02 COMMITMENT

We believe in a long-term commitment that combines trust and accessibility, building a future replete with opportunities.

This commitment represents an ambition to care, discover and share, pushing us to pursue our vision of the future each day, with kindness and quality.



05 ADAPTABILITY

We believe in the power to transform and reinvent ourselves, together. We firmly trust in people who are capable of learning, growing, and anticipating problems. Resilient people who meet uncertainty and challenges head on.

At Lucta, we adapt to each situation, to the needs of our customers, and market trends, with quick, proactive responses.



03 GENEROSITY

A link that transcends all limits, embracing the past and defining our essence.

Selfless dedication, a shared sentiment, which unites us around one common purpose. It is more than a way of understanding life.



06 PASSION

The catalyst for our creativity, which motivates and drives us day after day. It is a constant source of enthusiasm that remains with us throughout.

At Lucta, passion pushes us to go further, to give it our all, and find profound meaning in everything we do.

PHILOSOPHY

At the Lucta Group, we believe that corporate success lies in offering a distinctive service, in creativity, and in the ability to adapt to our environment.

Since its creation in 1949, the Lucta Group has grown thanks to our customers, suppliers, employees, and collaborators. All of them, to whom we are deeply grateful, have contributed to developing our corporate philosophy.

STRATEGIC PRINCIPLES

The pillars that allow us to ensure **the Group's competitiveness, confidence, continuous improvement, and resilience** are as follows:

- A long-term strategy that revolves around high added value products and distinctive service and quality.
- A talented, committed, and empathetic team with enterprising spirit and shared values and culture.
- We place the customers' needs at the center of all our decisions.
- Innovation in products, processes, and digital transformation.
- Specialized diversification of the business into business segments, types of customers, geographical regions, products, and channels.
- Focus on profitability, with quick responses to decreases in revenue.
- Commitment to the Company's long-term continuity through a solid financial situation and the reinvestment of profits to meet the business's needs.



01

LEGAL COMPLIANCE

Regulatory compliance is a necessary requirement of this Code of Ethics.

The entire Lucta Group team must comply with the legislation in force in each of the countries in which the Company operates.

All members of the Lucta Group **must also comply with the Company's internal regulations and procedures.**

Any existing local corporate regulations must be aligned with the standards and criteria established in this document, which will take precedence over any other internal regulations, except where more restrictive.



02



LUCTA AND ITS EMPLOYEES

Lucta Group employees will strive to maintain a work environment that is conducive to the full development of all professionals. As a result, **respect for the dignity of people, trust, cordiality, and teamwork** are essential.

At the Lucta Group, we respect the rights and dignity of all our employees and are guided by the following core values:

- Respect for the **dignity** of people and compliance with the **labor rights** of all employees.
- Decent, safe, and healthy working conditions.
- Fair and decent wages.
- Exclusion of minors from employment in all our activities.
- Respect for the **equality of all people** and zero tolerance for any type of discrimination based on gender, race, religion or beliefs, political views, disability, marital status, sexual orientation, age, nationality, or socioeconomic status.
- Promotion of employee **training**, to help them fully develop as individuals and professionals.

The Group is committed to **preventing and punishing any expression or behavior** that may be considered **violent, an abuse of authority, harassment, or intimidation**.

Harassment or intimidation is taken to mean any unwelcome behavior whose purpose or effect is to harm the dignity of the person and create an intimidating, hostile, degrading, humiliating, or offensive environment.

Moreover, all members of the Lucta Group undertake to prevent and report any behavior that may be considered harassment or intimidation.

03

CONFIDENTIALITY

The Lucta Group undertakes to **respect the private and confidential nature of the personal information** provided by its employees within the framework of their labor relations and preserve its integrity and confidentiality in accordance with current regulations on data protection.

The Group undertakes **not to disclose the personal data of its staff, customers, suppliers, or collaborators**, unless express consent from the parties concerned is provided or disclosure is covered under current regulations, as in cases of judicial or administrative requirements. Under no circumstances may the personal data of our staff be processed for purposes other than those established by law or contract.

Any Company staff member who, due to their activity, has access to confidential Lucta Group information undertakes to **maintain** this information a **secret**.

Furthermore, employees are required to maintain all confidential or sensitive information which they may have regarding the companies or entities in which they previously worked strictly confidential and secret.

These commitments will remain in force once their professional relationship with the Lucta Group has ended.

In the event the employment or professional relationship is terminated, the employee must return all private or confidential information, including the media on which it is stored.



04

PROPER USE OF COMPUTER MEDIA

The Lucta Group provides its employees the media and resources necessary to carry out their activity, as well as the mechanisms for the proper safeguarding of these media and resources.

The Company's employees undertake to **use the media owned by the Lucta Group in a responsible manner**, making responsible use of them and using them only for professional purposes.

Likewise, members of the Lucta Group will respect the specific corporate standards and procedures regarding the Company's resources and media.

There is no expectation of privacy while using the IT resources and media provided to employees for the performance of their tasks.

The use of and information contained in these resources and media are **subject to review by the Lucta Group** as part of its control responsibilities.

The Group's employees must be aware that, by using the media and resources placed at their disposal, they expressly accept these conditions.

The Company is the owner (or, as the case may be, licensee) of the property and any possible intellectual or industrial property rights over the software, computer systems, equipment, and other resources, as well as the works created, developed, improved, or used by its employees within the framework of their work activity or while using the Company's computer equipment.

Therefore, Lucta Group employees undertake **not to exploit or use**, in any way, **the Company's computer systems and applications for purposes other than those** provided for in this Code or in its development regulations.

Furthermore, employees will refrain from installing or using in the computer equipment provided by the Company any software or applications that infringe intellectual property rights or any other third-party rights, or which are likely to damage the resources or harm the interests of the Lucta Group or any third parties associated with the Group.

05

RELATIONSHIP WITH CUSTOMERS

The Lucta Group, in its relationship with customers, undertakes to work in accordance with the rules of transparency, information, and protection.

Care, dedication, confidentiality, and advice, as well as a commitment to product and service quality, are what govern the Lucta Group's relationship with its customers. The key values of this relationship are as follows:

- **Individual attention** and customized solutions for customers.
- Commitment to the continuous improvement of product or service quality.
- **Transparency**, providing all necessary technical, safety, legal, or any other kind of information on each and every one of the products it supplies.
- Full guarantee of **confidentiality**, essential to maintaining mutual trust.

06

RELATIONSHIP WITH SUPPLIERS

The Lucta Group will apply the criteria of objectivity, transparency, and impartiality when selecting providers and suppliers, avoiding conflicts of interest or favoritism in their selection. Likewise, the Company will treat its suppliers with respect and always in accordance with the following values:

- Guarantee that our relationship with companies is governed by the principles of **integrity and honesty**.
- Guarantee that raw materials, goods, and services will be **purchased** in the manner that **most benefits** the Lucta Group, in accordance with previously defined needs and requirements.
- Suppliers will be required to comply with the Lucta Group's ethical principles in their relationship with the Company.

*** Company employees may not give or receive gifts or remuneration to or from customers, suppliers, and/or third parties, except in the cases provided for in the Lucta Group's internal regulations.**

07

RELATIONSHIP WITH COMPETITORS

The Lucta Group undertakes to **compete** in the market in a **fair manner**, promoting free competition to the benefit of consumers and avoiding any conduct which infringes the applicable legislation on competition.



08

LUCTA AND THE ENVIRONMENT

At the Lucta Group, we are perfectly aware of our **special responsibility towards the environment**, and therefore the application of environmentally-friendly measures is a priority. The main measures that we have adopted are as follows:

- Development of an **environmental policy** which defines the Lucta Group's commitment to protecting the environment.
- **Compliance with the environmental legislation** applicable in each of the countries in which the Company operates.
- Application of an environmental management system according to **ISO 14001 certification**, aimed at reducing our environmental footprint and minimizing waste, industrial emissions, and energy consumption.
- **Involvement in international programs such as Responsible Care® and Ecovadis®**, whose principles scrupulously comply with the goal of continuously improving health and safety and environmental protection measures.
- Commitment to **disseminating and promoting good environmental practices** among employees, suppliers, customers, and the community itself.

09

ACCOUNTING AND INVOICING

The Lucta Group ensures **accuracy** and **maximum transparency** in the Company's **financial reporting**, in accordance with the accounting principles stipulated in national and international regulations.

Furthermore, the Company's employees, in their relationship with customers and suppliers, undertake to provide truthful information and respect the Lucta Group's internal regulations on invoicing, payment, and reimbursements.



10

CONFLICTS OF INTEREST

Lucta Group's employees must **protect the interests of the Company**, safeguard and promote its good reputation, and avoid acting against its interests.

As a result, Lucta Group's employees **will refrain from carrying out any activity or transaction in which their personal interests take precedence over the interests of the Company**.

With a view to preventing possible conflicts of interest, if, during an activity or transaction, an employee finds themselves in a real or potential conflict of interest situation, they must immediately report this situation to the Ethics Committee so that it may advise them on how to proceed.



11

PREVENTION OF CORRUPTION AND OTHER IRREGULAR OR ILLEGAL CONDUCT

In the Lucta Group, **the giving and receiving of gifts or any other type of compensation is prohibited**, except in the cases provided for in the Company's internal regulations.

In any case, gifts or other compensation used as **bribes** or which are intended to influence the recipient in making decisions that compromise their impartiality and good judgment are **strictly forbidden**.

Under no circumstances is it permitted to deliver gifts, offerings, personal benefits, or financial compensation to civil servants or government employees, whether national or foreign, leaders of political parties, public officers, or candidates for such positions.



12

COMPLIANCE WITH THE CODE OF ETHICS

The content of **this Code of Ethics is mandatory** for all Lucta Group managers, senior managers, employees, and collaborators.

In this regard, the Board of Directors at Lucta, S.A. has agreed to set up an **Ethics Committee** entrusted with regularly verifying effective compliance with this Code and the other specific functions assigned to it under the internal regulations that govern its composition and operations.

Conduct contrary to the principles contained in the Code of Ethics, as well as the rest of the internal regulations in force in the Company, may lead to the **opening of a disciplinary file** or, where appropriate, to the application of the relevant sanction, depending on the severity of the breach and within the applicable legal framework provided by the Workers' Statute, collective agreements, and labor legislation in force.

In this regard, the Ethics Committee will coordinate with the Human Resources Department on the actions that should be adopted in relation to the employees of the Company, respecting in all cases the principle of proportionality and preserving the right to defense of the party concerned.

Furthermore, the Lucta Group's senior managers, employees, and collaborators **undertake and are required to identify and report to the Ethics Committee any behavior that is inappropriate**, irregular, and/or entails a breach of the content of this Code or the Company's internal regulations, regardless of whether it benefits or harms the Lucta Group.

For these purposes and regarding behavior that takes place within the Lucta Group, the Ethics Committee has set up an **ethics mailbox** for all senior managers, employees, and collaborators at the following email address:

— **buzon.etico@lucta.com**

Notifications submitted through this channel may be either in an identifiable or anonymous way and provide a detailed account of the events. In any case, the confidentiality of the information and, if known, the identity of the reporting party will be kept confidential, and under no circumstances may any reprisals be brought against them.

The Lucta Group undertakes to handle this information under the strictest compliance with personal data protection legislation.

Ethics Committees or control bodies may also be set up at the Lucta Group's subsidiaries, and shall be entrusted with the duty of ensuring compliance with this Code within their respective scope of action, as well as establishing the ethics mailboxes for reporting and investigating any possible irregular conduct.

DO YOU HAVE ANY QUESTIONS?

Remember that, if you have any questions about the interpretation and/or application of the content of this Code of Ethics, you may contact the Ethics Committee directly by sending your queries to the following email address:

— **buzon.etico@lucta.com**

Together we can contribute to the sustainable development of the **Lucta Group** and turn it into a **socially responsible organization** that meets the **needs of its customers**, values its **people** and **high quality work**, and applies the **ethical principles** contained in this Code.

Signed:

Carlos Ventós

Sole Director of GRUPO INVERSOR PARA EL DESARROLLO, S.L.U.

Chief Executive Officer (CEO) of LUCTA, S.A.



Lucta