

A high-angle photograph of a person rappelling down a rope over a turquoise river. The person is wearing a yellow shirt and blue pants, and is suspended in the air. The river is a vibrant blue-green color, and the surrounding landscape is rocky and rugged. The text 'görlan' is overlaid in white at the top of the image.

görlan

ETHICS CODE
Good work. Common good.

LETTER FROM THE PRESIDENT



JOSE JULIO GÓMEZ BARBERO
EXECUTIVE CHAIRMAN

Our way of working has been led by “good work” from the get-go. Not only the intention to do good work, but also in search of common good. The world is currently undergoing constant change, which is why this aim to act responsibly appears to have become more important than ever before.

Within the Gorlan Group, behaving responsibly is the only means of undertaking our actions and decisions. We always abide by the foundations of our corporate culture, which centre upon creativity (as a method to offer more than one correct solution to problems), support, fellowship and of course, humility and fairness.

The purpose of this Ethics Code is to inform all stakeholders involved in the Group of the way in which we operate. Additionally, we also intend to reaffirm our commitment to maintaining the highest standards of good practice, professionalism and ethical integrity. I encourage you to read this document carefully and wish to thank you for your compliance.

DEFINITION, AIM AND SCOPE OF THE ETHICS CODE

Definition

We are committed to complying with the ethical governmental and political ethics practices established by law. This commitment shall be extended to all our stakeholders.

The Gorlan stakeholders are the following: employees, clients, shareholders and partners, funders, providers, government, civil societies and training bodies.

Aim

This code establishes:

- The integration of the 10 principles of the United National Global Compact, in addition to other international instruments, in the realms of human rights, labour regulations and the environment.
- The undertaking of work relationships based on equal opportunities, meritocracy, no discrimination, respect for diversity, health and well-being.
- Transparency and free market practices, rejecting all forms of illegal or fraudulent action.
- Ethical and responsible behaviour with all stakeholders when undertaking their activity.

- Communication and dialogue channels between Gorlan and its stakeholders in order to achieve synchronisation between business values and social expectations.
- Compliance with the law in the countries within which it operates.
- Encouragement of effective protection of company information, goods, people and their data.

Scope

The code is applicable to all employees and those who have a contractual working relationship with Gorlan. It is also applicable to those undertaking training or who are undertaking their activity, in any way, in the facilities or using the materials that are property of the company, regardless of their geographical or functional location.

GENERAL COMMANDMENTS

Below, we outline Gorlan's 6 commandments, which should both guide and orient all stakeholders as regards their actions while undertaking their activities.

1 THE POWER OF THE 10 PRINCIPLES

These are based on the 10 principles of the United National Global Compact:

- ✓ Support and respect the protection of internationally proclaimed fundamental human rights, within their scope of influence.
- ✓ Ensure that they are not complicit in the abuse of Human Rights.
- ✓ Uphold the freedom of association and the effective recognition of the right to collective bargaining and working rights.
- ✓ The elimination of all forms of forced and compulsory labour.
- ✓ The abolition of child labour.
- ✓ Support the elimination of discrimination in respect of employment and occupation.
- ✓ Support a precautionary approach that favours the environment.
- ✓ Undertake initiatives to promote greater environmental responsibility.
- ✓ Encourage the development and diffusion of environmentally friendly technologies.
- ✓ Work against corruption in all its forms, including extortion and bribery.
- ✗ Breach any of the 10 principles of the United Nations Global Compact.



2 THE VALUE OF PEOPLE

We value and respect all our stakeholders equally, with the aim of promoting their health and well-being at all times.

- ✓ Encourage and value diversity among individuals, their perspective and experience.
- ✓ Facilitate measures for personal and work reconciliation.
- ✓ Take advantage of the energy of all generations driving professional development by way of training and job role adaptations.
- ✓ Promote equal access to opportunities for professional development that exist by way of meritocracy.
- ✓ Implement a preventative culture in order to avoid unsafe or dangerous acts, prioritising the health, well-being and safety of all stakeholders.
- ✓ All incorporations must undertake the general selection process and comply with the specific selection requirements that correspond to the role being advertised.
- ✗ Abuse, harassment, intimidation or any other form of humiliation of another stakeholder.
- ✗ Discrimination due to sex, gender, race, religion, disability, age, sexual orientation or political views.
- ✗ Making decisions that affect the professional career of the stakeholders or their families, based solely on personal relationships or exchange of favours.
- ✗ Actions that do not comply with the Equality Plan.



3 HONESTY IS THE BEST POLICY

We establish clear limits and processes that guarantee proper risk management.

- ✔ Zero tolerance for corruption, bribery and money laundering by way of the internal control of the finance department and external audits.
- ✔ All gifts, invitations, donations, hospitality packages and sponsorship activities we offer or receive must be legal and in keeping with our [Gifts and Hospitality Policy](#).
- ✔ We comply with the laws in force in the countries in which we operate, adopting, in a complementary manner, international commitments, standards and guidelines where there is no adequate legal development.
- ✘ Offering or accepting bribes of any kind.
- ✘ Prohibition of false records in accounting books.



4 TEAM WORK IS BEST

We encourage inclusive team work.

- ✔ Team work, collaboration, support, help, kindness and respect towards the other stakeholders.
- ✘ Inappropriate behaviour towards the other stakeholders, lack of collaboration and showing a negative attitude.

5 WHAT IS NOT EXPLAINED IS IMAGINED

We promote communication channels in order to achieve synchronisation between business values and social expectations.

- ✓ Active listening, fluid and constructive dialogue and assertiveness.
- ✓ Promote transversal communication towards all stakeholders and two-way in all hierarchical ways that may exist, by way of our communication plan.
- ✗ Not be disrespectful to other people.
- ✗ Stop communicating topics that are important to the company or that impact the stakeholders involved.

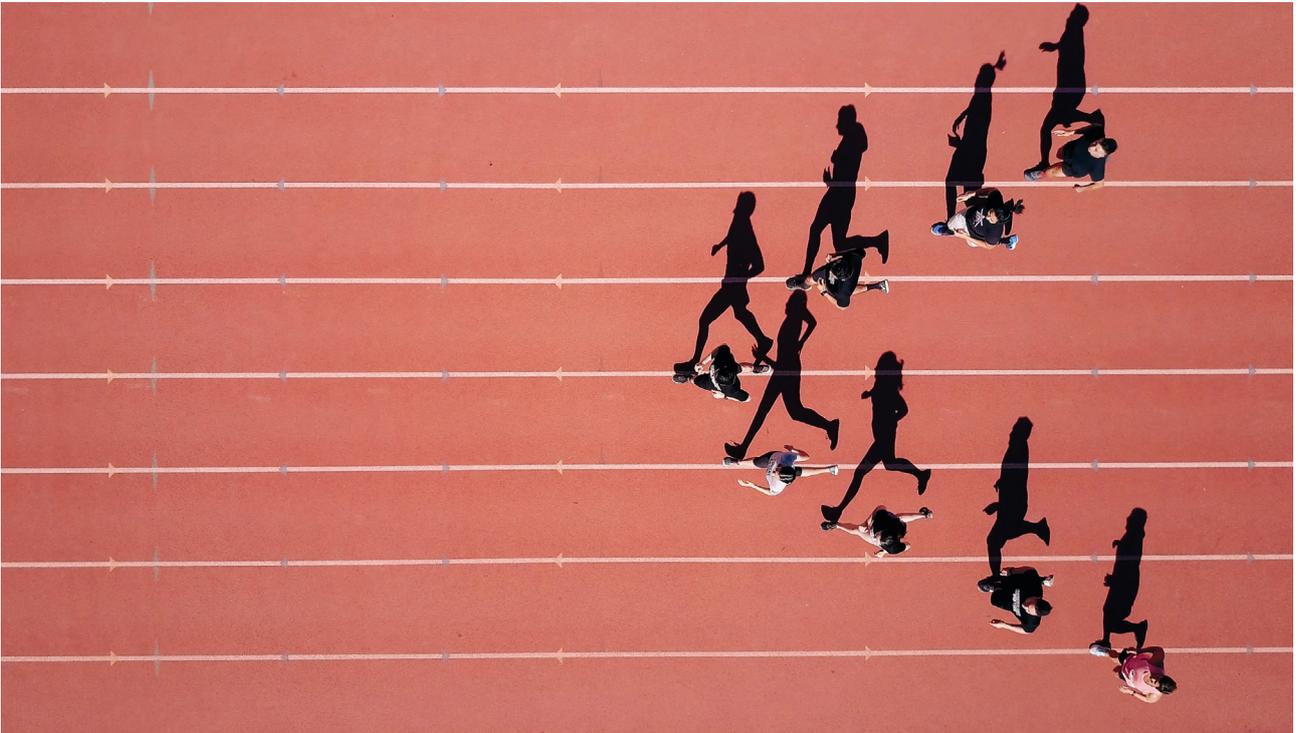


6 THE ART OF SECURITY

We ensure the highest standards of cybersecurity, privacy and data protection.

- ✓ Give advice and training to allow everyone to comply with cybersecurity regulations.
- ✓ Establish an incident notification system.
- ✗ Share strategic, financial or commercial information regarding Gorlan's companies or personnel with any other stakeholders that do not require this information in order to undertake their duties, nor with external agents to the Group.
- ✗ Not respect or share intimate data or data regarding the personal situation of each employee.

APPLICATION OF THE ETHICS CODE



This message must be shared decisively to all stakeholders, who must commit to respecting the ethical commitment.

Each stakeholder is obliged to be informed regarding potential non-compliance of the principles included in this code, by means of the communication channels indicated below.

COMPLIANCE WITH AND APPROVAL OF THE CODE

This Ethics Code enters into force with the approval of the Ethics and Compliance Committee, and will remain in force unless its repeal is approved. The Code will be reviewed every 6 months, with the proposal of appropriate modifications and taking into consideration any suggestions and proposals made by the stakeholders.

MEMBERS OF THE ETHICS AND COMPLIANCE COMMITTEE

- Corporate Managing Director
- Chief Commercial Officer (CCO)
- Chief Human Resources Officer (CHRO)
- Chief Finance-IT Officer (CFO)
- Chief Marketing and Sustainability Officer (CMO & CSO)
- General Manager at Pronutec
- General Manager at Merytronic
- General Manager at Plastibor
- General Manager at Inaselec
- General Manager at Telergon

Ethics and Compliance Committee

- To promote ethics culture and guarantee of the diffusion of the Ethics Code among all stakeholders.
- To facilitate a direct communication channel to all stakeholders and assess and inform regarding the degree of compliance with the Ethics Code.
- To resolve any queries that may arise as regards the interpretation of the Ethics Code.

- To resolve controversial and conflicting situations.
- To receive, process and make decisions regarding inadequate behaviour, establishing the sanctions that correspond to any behaviour that directly goes against the code.

Two meetings will be held per year, with the possibility of convening special meetings in order to address specific issues.

Ethics channel

In compliance with the obligation to have an external whistleblowing channel that ensures anonymity, all stakeholders can also report through our whistleblowing channel available on the homepage of our websites <https://whistleblowersoftware.com/secure/CanalDenunciasGorlan>.

Compliance

All Gorlan stakeholders agree to not breach the policies and regulations established in the Ethics Code. Any non-compliance should be reported immediately and will be subject to corrective disciplinary action, ranging from minor, serious or very serious conduct, up to and including the termination of the relationship with Gorlan.

PUBLICATION OF THE CODE

The Ethics Code, which is available in English, Spanish, German, Polish and Chinese, will be available for external diffusion on the website www.gorlan.com, on the Internal Communication platform, Nexus (accessible for all employees with computer access) and as a hard copy for those who do not have said access. It will also be essential that this document be annexed to all contracts written up between Gorlan and its stakeholders.



gOrlan