

Code of Ethics and Conduct





MESSAGE FROM MANAGEMENT

We firmly believe that the effort and perseverance of our team, together with the relationship of trust and transparency that we have managed to achieve with our stakeholders, are the basis of the success of our company.

At Grupo Maya, we pursue excellence not only in what we do but in how we do it, the role of our closeness in our relationships with our business environment is key, as well as respect and loyalty to those people who have trusted us.

We believe that ethics is the beginning where the mission, values and purpose of the company must be established, where what we are and how we act in relation to our economic, social and environmental performance are reflected.

This Code of Ethics and Conduct incorporates those Principles that are already part of our company, and it is our obligation to communicate and disseminate it to the entire business ecosystem related to our entity, since ethics is a commitment that requires the involvement of all people.

The Management is committed to promoting an ethical culture as the basis of the good governance of this company, out of conviction and responsibility.

Marian Bonias Alfonso

Jose Bonias Alfonso

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0. PROLOGUE

The Code of Ethics is aligned with the 10 Principles of the Global Compact on Human Rights, Labour, Environment and Anti-Corruption and the Sustainable Development Goals, which constitute an essential framework on which an organisation's values and behavioural guidelines must be based. At the same time, it is in line with the United Nations' demand to "embrace, uphold and implement the set of fundamental values in the areas of human rights, labour standards, the environment and the fight against corruption" codified in the Universal Declaration of Human Rights, in the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

The Code of Ethics encourages policies of direct contribution to Principle 10 of the Global Compact against Corruption, since it is the starting point for an organization to carry out the strengthening and commitment to the fight against corruption. The business fabric is key in relation to the consequence of ODS 16, since it is a fundamental actor in the incorporation of transparency processes in the organization. Specifically in relation to target 16.5 of Considerably reduce corruption and bribery, demanding that the business sector, among others, make an effort to prevent corruption in all its forms. Similarly, Principle 10 of the United Nations Global Compact and Sustainable Development Goal 16 "Peace, justice and strong institutions" are aligned with aspects related to ethics and the fight against corruption.

Grupo Maya hopes and trusts that its Stakeholders will be reflected in the values that this Code of Ethics increases, sharing and applying them as a basis in the governance of its organizations guided by the principles of transparency, integrity and respect for the law.



1. OBJETIVE

Our Code of Ethics aims to designate the guidelines of conduct of all the people who work in the business ecosystem of Grupo Maya, both in the Stakeholders through their professional relations with our entity, and with the human team in the exercise of their work functions. This Code aims to achieve our vision in a collaborative way among all the people in our organization, taking as a reference the intrinsic corporate values of our company, the application of legislation and our commitment to corporate social responsibility. The human team that makes up our company, the application of legislation and our commitment to corporate social responsibility. The human team that makes up our company must know and comply with our Code of Ethics, facilitating its integration and reporting cases in which the values that are promulgated are not complied with. This Code of Ethics will be a living document that will be reviewed every two years, being able to count on updates that improve the values and adapt to the space and time of the business environment of Grupo Maya.

2. SCOPE OF APPLICATION

This Code of Ethics is applicable to the entire company, including all departments and employees, as well as to the company's Management area. At the same time, communication and promotion actions will be included with all stakeholders related to the company in order to encourage the application of this code.

3. VALUES

- ✓ Innovation: Adapting to market changes and trends is essential.
- ✓ Passion: For a job well done and for the satisfaction of stakeholders.
- ✓ Team: Committed to our organization's values.
- ✓ Excellence: Striving to achieve the highest levels of quality in everything we do.
- ✓ Sustainability: Integrating sustainability into company culture.
- ✓ Respect: People, the environment and society.

4. PRINCIPLES AND GUIDELINES OF CONDUCT

Principle of Respect for Legality and Transparency: Grupo Maya is committed to the development of its business activity in accordance with current regulations framed both nationally and internationally. In no way will Grupo Maya participate in actions that could compromise respect for the principle of legality. We respect and comply with regulations on occupational risk prevention, the environment and data protection. Grupo Maya will base its behaviour on the principles of transparency and equality, committing itself to the fight against discrimination, the choice of all forms of forced labour, the abolition of child labour, respect for and promotion of the health and safety of the workforce, as well as the fight against corruption in all its forms.

Human Rights Principle: We promote respect for human rights and inclusion and diversity, with the commitment and support for all laws that promote the protection of workers, promoting non-discrimination in all professional and business management areas and condemning any form of abuse or illegal behaviour.

Principle of Equality and Non-Discrimination: Grupo Maya's human team is the main asset of our entity, which is why we promote the principle of Equality and Non-discrimination in the professional field for reasons of age, race, sex, religion, political opinion, functional diversity or any other condition. We believe in respect as the fundamental basis of professional practice, rejecting any situation of harassment in all its forms, with the commitment to ensure a healthy work environment and work environment. At the same time, this principle will also be applicable to all Stakeholders that have any type of relationship with Grupo Maya.

Principle of Sustainability: Grupo Maya develops its economic performance by valuing human, environmental and financial resources, without compromising the resources of future generations, promoting the balance between economic, environmental and social performance. The pillars of the company are the protection and respect for the environment, which is manifested by adopting ways of working aligned with the Sustainable Development Goals of the 2030 Agenda and complying with standards in terms of sustainability and environmental protection. Sustainability is part of our DNA, and we continue to workday by day with one constant, to carry out our professional work protecting our environment. Grupo Maya's human team respects and assumes compliance with this policy.

Principle of Confidentiality: Grupo Maya protects the privacy and confidentiality of the information and personal data in its possession of all the Stakeholders with which it has a relationship. The human team will not reveal confidential information of the organization or allow its disclosure, this obligation subsisting once the employment relationship has been terminated.

Gift Acceptance Policy: Grupo Maya does not allow the acceptance of gifts in kind or cash whose value or nature exceeds courtesy attention.

Principle of the fight against bribery and fraud: We assume the commitment to interact with our stakeholders, in an ethical, respectful and lawful way, not tolerating the realization of practices that could be considered unethical or dishonest in the exercise of our business activity. The human team of Grupo Maya may not offer, grant, request or accept advantages or benefits for their own benefit, nor offer benefits for the benefit of third parties who are at the service of any private or public entity to obtain advantages, following the principle of zero

tolerance against actions that may be considered corrupt. A protocol for reporting action will be followed according to the channels established by the entity for this type of case.

5. OUR COMMITMENT

Commitments to Stakeholders: Grupo Maya is committed to promoting the involvement of Stakeholders, integrating their suggestions or contributions for improvement in business management and decision-making. To promote this action, communication channels are provided where information is offered on the actions defined in relation to economic, environmental and social performance.

Employees: Grupo Maya's staff undertakes to act in a coherent manner in relation to the content of this Code of Ethics, as well as to comply with the guidelines of said code. Grupo Maya will promote respect in the relationships of the human team during their professional practice, encouraging a healthy, safe, inclusive and fair work environment, promoting equal opportunities for the entire workforce and future additions to the company.

Shareholders: They are committed to promoting policies based on respect, equal treatment, transparency and sustainability in their economic performance.

Clients: Grupo Maya is committed to the pursuit of excellence in the performance of its economic activity in order to achieve the satisfaction of customers and consumers through effective and quality treatment, always respecting the rights of customers and the commitments acquired, responding to their demands and adapting to their needs with the utmost honesty and transparency.

Suppliers: Grupo Maya undertakes to inform its suppliers of the content of this code, and to interact with said suppliers of goods and services in an ethical, responsible and lawful manner. The criteria for selecting suppliers will be related to technical, ethical and economic aspects, based on the suitability of their products and the quality offered.

Community and Society: Grupo Maya is committed to maintaining a close relationship in the Community in which it carries out its activity, respecting its cultural integrity and trying to contribute to encourage the conditions of local life and recognizing the rights of ethnic minorities. Grupo Maya is committed to respecting human rights and democratic institutions, promoting these values on all occasions where possible.

6. ACCEPTANCE AND COMPLIANCE

Grupo Maya accepts and commits to comply with this Code of Ethics, which is mandatory for all Grupo Maya staff, regardless of their position.

Both internal and external communication will be carried out, guaranteeing the dissemination of this Code of Ethics through the usual channels. This dissemination includes Grupo Maya's human team and all Stakeholders.

Compliance, surveillance, interpretation and verification of the principles of this Code of Ethics will be carried out by the Compliance Officer, a figure in charge of attending to queries, doubts



or receiving communications of possible non-compliance. This person will ensure compliance with said code. At the same time, the Compliance Officer will propose the pertinent updates regarding legislative changes and the evolution of Grupo Maya's activities.

The Compliance Officer will treat any information with maximum confidentiality in the processing of information on non-compliance, guaranteeing anonymity and excluding any possibility of retaliation or discrimination against the person reporting non-compliance with the code. The Compliance Officer will examine the information and notify the adoption of the appropriate procedure.

For any matter related to the Code of Ethics, please contact the following email address.

mferri@grupomaya.es

Or to the postal code:

GRUPO MAYA

Compliance Officer

C/ De les Flassades, nº5

46870 Ontinyent (Valencia)

7. VALIDITY

The period of validity of our Code of Ethics is two years, which does not prevent it from being updated within that period.