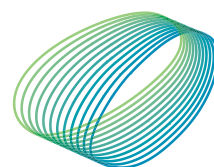


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Sustainability Policy



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Texto aprobado por el Consejo de
administración

29/04/2021

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Introduction

The Board of Directors of Arteche Lantegi Elkartea, S.A. (hereinafter "Arteche" or "Group"), has the power to approve the general policies and strategies of the entire Arteche Group of which it is the parent company.

Based on the foregoing, the Arteche Board of Directors has agreed to approve this Sustainability Policy (the "Policy"), which will form part of the Arteche Group's Corporate Governance System and Integrated Management Model.

As an essential part of Arteche's Strategic Plan, the Sustainability strategy, aligned with the mission and values, directs the actions and activities throughout the Group.

We develop our strategy aligned with the Sustainable Development Goals (SDG) and with our commitment, as a signatory company, to the principles of the United Nations Global Compact.

Arteche have a total commitment to people, the environment and society, in order to help transform this world into a better place to live. Within the pillars of sustainability, respect for the environment and the contribution to the achievement of a sustainable energy model are part of our priority objectives.

Purpose and scope of application

The purpose of this Policy is to respond to the goal of creating value in a sustainable way.

All the people belonging to the Group must contribute to the achievement of sustainability objectives, support economic progress, care for the environment and social development.

Sustainability and an ethical and transparent way of doing everything is in our DNA and is always our guide.

The Policy is applicable to all the companies that make up the Group, as well as to the investee companies not integrated into the Group over which the Company has effective control, within the limits set forth in the regulations applicable to regulated activities carried out by the Group in the different countries in which it is present.

In uncontrolled investee companies, the Group will encourage sustainability principles and guidelines to be consistent with those established through this Policy.

In order to respond to the need for a global and homogeneous sustainable management, the Group assumes a centralized model of control and sustainability management, integrated into the management model and based on the SDGs and GRI, which affects all areas of the organization.

Basic principle

To achieve the start-up, development and achievement of the defined objectives, Arteche, in accordance with what is defined in our code of behavior, we set the following principles in the development of our activities:

- **Financial strength:** Our goal is to ensure sustainable economic growth over time, based on trusting and lasting relationships with our employees, customers and suppliers, profitability and preventive risk management.
- **People:** We have the greatest energy on the planet: PEOPLE. We are committed to maintaining and implementing initiatives that make our organization an attractive, safe and healthy place to work, in which knowledge can be acquired and shared, in which to grow professionally, where the levels of demand coexist with the creation of spaces of reconciliation of personal life, based on respect and equal opportunities. We want to be able to generate a shared project in which each person feels a fundamental part of each achievement achieved, investing the necessary resources in developing and motivating the people who are part of Arteche, thus achieving the greatest development of our team, focused on ingesting diversity from a gender perspective in all our processes and policies.
- **Society:** We apply for a management based on Corporate Social Responsibility, with the aim of promoting the development of the communities in which we are present and, we declare our willingness to exercise work with responsibility and honesty, contributing to the well-being and economic and social progress of the companies in which we develop our activity.
- **Environment:** We have as a vocation to promote and integrate a responsible culture with the environment. To this end, we ensure compliance with the provisions and propose the necessary actions for the continuous improvement and prevention of environmental risks, complying with or exceeding the standards of environmental regulations that apply, minimizing the environmental impact of our business activities, making efficient use of resources and preserving biodiversity.
- **Human Rights:** In addition to committing ourselves to the strictest respect for the legal order in force in all the territories in which we carry out our activities, we have a firm commitment to the defense of human rights.
- **Transparency and good governance:** We establish a transparent environment where we operate and interact by focusing on the aspects that are in our code of behavior and that are strongly present in our corporate values, ensuring that our management is appropriate to the context and purpose of our organization. The fight against corruption and bribery is part of our core sustainability and good governance objectives and has in place of the establishment of required preventive measures.
- **Innovation:** Always be at the forefront of technological innovation in the sector, with sustainable products, solutions and services, throughout its life cycle, that guarantee the sustainability of the company, being recognized internationally for the quality and level of service in all our products and solutions, collaborating on R&D projects with different entities around the world.
- **Communication:** All our advances in environmental protection, commitment to society and people, and ethical response to business challenges in all countries in which we are present, are detailed and communicated internally and externally. Let us have seamless and two-way communication with all our stakeholders, through the different channels of communication, always based on transparency, in providing accurate, reliable, understandable and relevant

information, and always honestly, as reflected in the Code of Behavior.

These principles are aligned with the principles of Sustainable Development, Corporate Social Responsibility and, therefore, the 2030 Agenda - United Nations Sustainable Development Goals.

Engagement with stakeholders

The way we understand Arteche is like a shared project. The people who are part of the Group, our customers, our suppliers, and with the whole society in which we develop our activity are fundamental players in the development of our business in a sustainable way.

"Our commitment is to move forward together, #MOVINGTOGETHER"

Ethics, honesty, solidarity and transparency are the principles that integrate our philosophy and our management model, and for which we govern all the people who are part of Arteche, always seeking excellence, in quality and service, in a sustainable way. Our commitment to society is strong, and we all at Arteche want to actively participate to contribute to social development, to generate value for our customers and society.

With the human team

At Arteche group we consider diversity as a value, present in different countries we currently integrate people of various nationalities and cultures. Proper management of cultural diversity results in tangible competitive advantages, related to openness to knowledge and plural views, contribution to attracting and retaining talent, strengthening Arteche culture, increasing innovation, creativity and productivity.

At Arteche group we seek the well-being of the people who work with us and we want to contribute to this by promoting conciliation and flexibility programs that facilitate the best balance between personal life and work responsibilities, as far as possible given the complexity, location and place of realization of the different activities.

Arteche is an organization fully committed to the continuous improvement of safety and the Prevention of Occupational Risks, with the aim of achieving and maintaining a healthy working environment, focused on both the people who make up the Arteche Group and those who collaborate with us or use our products and services.

We ensure compliance with all requirements and legislation relating to forced labor and its abolition, those relating to freedom of association and collective bargaining and the minimum age and prohibition of child labor.

With shareholders

We are committed to working as efficiently as possible, guided by our sustainable objectives and commitments, to generate value to shareholders through the return on invested capital with the aim of remunerating the risk assumed by them.

We ensure the participation of our shareholders in the decisions of their competence, for this purpose, the Arteche Group is committed to guaranteeing equal information and the exercise of their rights, avoiding any situation of privilege or advantage, in the context of the social interest. To this end, our board of directors is the main pillar of the Arteche Group's governance and sustainability system.

With customers

We consider knowledge the key factor of competitiveness. We learn from our clients through seamless two-way communication and the joint work we do with them to obtain the best possible results, both financially, socially and environmentally. In addition, we collaborate and cooperate

with other entities and agencies to share knowledge, good practices, as well as useful and relevant information.

With suppliers

We are committed to working together with our suppliers, ensuring that the requirements of our code of conduct are adhered, shared and applied, as well as alignment and implementation within their governance and management of the sustainable objectives defined by the United Nations Global Compact (SDP). Suppliers are a fundamental part of our sustainable growth and we maintain with them smooth two-way communication, teamwork and full support to sustainably get the best possible results.

With society

The fiscally responsible behavior of all Societies of the Arteche Group is part of the General Corporate Responsibility Policy, which includes the basic principles of action that must be respected.

The taxes we pay in the countries in which we operate are the main contribution of the Group's companies to the support of public burdens and therefore one of the contributions to society.

The fiscal policy we implement is integrated within the ethical principles, social responsibility, transparency and institutional loyalty with which the Arteche Group is governed.

Arteche Group impacts on the economic development of different tax jurisdictions spread over the world geography through the tax contribution that we generate from our activity, thus fulfilling a dual economic and social function, and respecting the value of transparency.

With environment

People who are part of Arteche assume as guidelines in our field of work:

- • Minimize waste and pollution,
- • Prevent any type of environmental incident,
- • conserve natural resources,
- • promote energy savings and,
- • to carry out and sponsor research and development projects that promote environmental protection.

We also transfer this commitment to our suppliers, customers and collaborating companies.

We apply the precautionary approach to the development of new products and activities of the company, in order to avoid any negative impact that said product or service may have on the environment, performing the complete environmental analysis of the product lifecycle.

We define environmental programs that include the best use of raw material, decreased waste and optimization of packaging placed on the market.

We preserve, restore and promote biodiversity in all places where the Arteche Group develops our activity during the entire environmental life cycle of the organization.

Supervision, approval and dissemination of the policy

Supervision

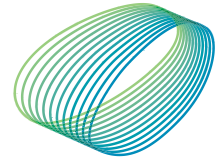
This General Sustainability Policy has a vocation to remain, and it is up to the Governing Body, the Sustainability Committee and the Steering Committee to ensure compliance by the entire Arteche Group, for which the necessary internal mechanisms will be established.

The Sustainability Committee will periodically review the content of this Policy and propose to the Governing Body any changes that contribute to its development and continuous improvement.

Approval and dissemination

This Policy is approved by the Board of Directors of Arteche at its session of May 2021, the date from which it enters into force.

To facilitate your knowledge by stakeholders and recipients, this Policy will be published on the intranet and on the Group Portal and will be disseminated to the entire organization.



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Moving together