



ILAS SA Code of Ethics for Purchasing

Policy compliance

- All activities undertaken in the purchasing area of ILAS S.A., such as decisions taken by purchasing personnel, must comply with current legislation and regulations.
- Activities undertaken within the purchasing area will fully respect human rights in agreement with international law.
- All employees within the purchasing area will conduct themselves ethically and avoid any kind of conduct that may damage the image of the company.
- No employee of the purchasing department will collaborate consciously with third parties in violation of any law in such a way that could damage the reputation of ILAS S.A. or harm the perception of the markets, suppliers or clients.

Conflicts of interests

- In the purchasing department of ILAS S.A. the general interests of the company will at all times take precedence over the personal interests of its employees.
- No employee will engage in personal purchases under the company name unless with the express authorisation of the Director or Operations.
- Employees in the purchasing area will avoid any situation that may suppose a conflict of interests in purchasing decisions.
- There will not be a direct family relationship between a potential supplier and personnel of purchasing, unless in the exceptional case that it is approved by the Director of Operations.

Relationships with Suppliers

- All potential suppliers will be treated equally and will receive the same information and deadlines for preparing and submitting offers.
- Confidential information provided by suppliers in response to the request for an offer will not be shared or manipulated for the benefit of other suppliers.

Working environment

- Interpersonal relations between employees in the purchasing area of ILAS S.A. will be based on mutual respect between colleagues, a respect that will extend to suppliers, clients and employees of other sections of the company.
- Any employee in the purchasing area perceiving a lack of dignity in the working environment should communicate the matter to the Director of Operations and/or Human Resources, who will pursue the matter in accordance with the stipulations of the collective agreement.
- All employees in the purchasing department occupying the same position within the company will enjoy equal opportunities regardless of personal situation, gender, race,

religion or sexual orientation. Promotion or change of role will be based on the performance assessment of each employee.

- ILAS S.A. is committed to providing for its employees in the purchasing area the necessary tools for their training, such that they are able to contribute added value to the company and to facilitate continued improvement.
- In the purchasing department, ILAS S.A. fosters teamwork and collaboration as a means of achieving the general objectives of the department.

Confidentiality

- Purchasing data, such as prices, contracts, agreements, offers and so on, are confidential and must not be shared or distributed between other sections of the company, suppliers or clients. Only employees in the departments of purchasing and accounts will have access to this data, other than in exceptional and particular circumstances with prior approval of the Director of Operations.
- All assets, such as computers and machinery, and resources, such as information and knowledge, belonging to ILAS S.A. must be used responsibly by personnel in the purchasing area.

Policy for acceptance of gifts

- Employees in the purchasing area of ILAS S.A. must not offer or receive any payment, gift or benefit that could affect relationships with its suppliers.
- Employees in the purchasing area of ILAS S.A. must not accept gifts with value exceeding 50 euros, a quantity that is revisable periodically by the Director of Operations. Receipt of a gift which exceeds 50 euros in value must be brought to the attention of the Director of Operations and the gift will be handled at the discretion of the company.

Responsibilities relating to the Code of Ethics

- All employees in the purchasing area of ILAS S.A. must understand and comply with the code of ethics and seek advice and assistance from superiors where any doubt exists on any point.
- All employees in the purchasing area of ILAS S.A. are obliged to inform the Director of Operations or Human Resources if they observe any violation of the code on the part of any party involved in the purchasing process.
- All employees in the purchasing area of ILAS S.A. will collaborate with all internal audits that may be carried out.
- Those employees in positions of leadership will lead by example, such that they will understand all points of the code of ethics and be able to transmit them to

subordinates whenever necessary. Furthermore, they will be vigilant to ensure all points of the code are adhered to.

- Management of this 'Purchasing Code of Ethics' falls under the control of the department of Processes and Continuous Improvement ILAS S.A., who will therefore be responsible for the interpretation of any question that may arise in its application, as well for any revision or update of its content.