

CODE OF ETHICS AND CONDUCT.

MD GROUP.
Lighting the Future

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1. COMPANY PRESENTATION

The MD Group (also referred to as MD) was founded in 1989 as an engineering services company and is currently made up of two commercial companies (MD Group, S.A. and MD Plastics, Lda.).

Here is a very brief timeline of MD's operations:

- 1989 MD-Moldes was founded as an engineering company specialising in mould acquisition and project management.
- 1998 Thanks to a continuous increase in customer orders, MD-Fastooling was founded to focus on complex tools.
- 1999 MD-Engineering was founded to provide engineering solutions (assist in product development, mould development, and optimise plastic injection moulding processes).
- 2002 To provide comprehensive packaging solutions and customer support, we founded MD-Plastics.
- 2015 New MD Plastics facilities inaugurated, fully dedicated to the production of plastic parts.
- 2017 Alantra buys into the company as a shareholder.
- 2019 Building of new facilities begins, integrating mould manufacturing, administrative areas, and central management.
- 2021 MD Group formed through a merger of the various mould companies. Transfer of Administration and Production to the new facilities.

Over time, the group expanded its services to cover the entirety of the mould and plastic part production chain.

As a result of this development, we built innovative facilities equipped with state-of-the-art technology, placing us on the cutting edge of our industry.

Our consistent success has come about as a direct result of the work done

by our outstanding team. A group of avant-garde, innovative people who share the same ideas and ideals and forge ahead motivated by new challenges.

MD Group is currently considered a global benchmark in mould solutions and products provided for the Automotive Lighting Industry, continually challenging its team to keep up with innovation – **Lighting the Future**.

MD believes that the key to achieving its long-term interests is strictly adhering to the highest standards of ethical conduct. The company is convinced that daily concerns relating to efficiency and economic growth must be considered through a lens of ethical, responsible behaviour.

All those who deal with the company as part of its commercial, institutional, and social operations have a legitimate interest in transparency, dialogue, and the ethical stance taken by the company and its employees.

This document expresses MD's commitment to ethical conduct in its internal and external relationships, with the objective of strengthening the ethical standards applicable and creating a working environment that promotes respect, integrity, and equity.

This code applies to all companies within the MD and is binding to all workers and employees, regardless of their role or hierarchical position.

2. MESSAGE FROM THE CEO

MD's operations consist of designing and manufacturing moulds, producing plastic parts, and providing services relating mainly to the automotive sector, seeking to provide an invaluable contribution to the sustainable management of product lifecycles across its operations and business areas.

MD has been guided by principles and values that have led to a service, image, and reputation of excellence while carrying out its operations, which it intends to build on continuously.

In terms of continuous improvement, the company intends to raise the levels of excellence adhered to by encouraging the adoption of exemplary behaviours based on the principles and values of integrity, transparency, quality, independence, freedom, equity, and respect for the well-being of both people and the environment, all of which are aligned with national and international legislation, international conventions and declarations.

Adherence to the principles outlined in this code and the implementation of the standards established herein by all those working at and for MD shall guarantee that they are respected and applied in their entirety.

Mark Martí
CEO

3. INTRODUCTION

Our widely recognised ambition for growth is not an end in itself. We strive for growth to improve the lives of our customers, employees, and society in general. Growth is essential to creating more jobs, generating more wealth, enabling more investment, and gaining more customers in new geographical areas. However, we will only be fulfilling our mission if the growth we experience is sustainable and our behaviour reflects our values.

Our behaviour is considered the sum of the actions taken by each of us, and these individual actions will allow MD to achieve its purpose.

Our honesty and integrity are founded in sound individual decisions made day to day, regardless of the working pressures we may be under.

MD is known for highly valuing action and proactivity, as well as its ability to anticipate its clients' needs. However, it also honours the importance of those who opt for additional reflection to ensure the ethical nature and integrity of every decision. Any doubt relating to what constitutes appropriate conduct should be communicated to the Ethics Committee via the channels provided.

Our ethos is, therefore, that nothing may undermine our commitment to integrity, be it a drive to achieve results, competitive instinct, personal ambition or even a direct order from a superior.

The truth is that there can be no conflict between excellent performance and respect for high corporate governance standards.

MD expects a serious and meaningful commitment to this code of ethics and conduct through the adoption of the principles set forth herein.

As an organisation, MD operates with a basis of trust. Trust in our customers, our partners, and above all in each other. We trust that each of us will know how not only to adopt but also defend our values and principles in the society in which we live. As such, MD commits to:

- Maintaining existing relationships based on mutual trust and respect in a working environment where any form of discrimination or harassment is prohibited;
- Fostering a good working environment that encourages the economic and commercial efficiency of the group, as well as each individual's progress and personal achievement. Asking each individual to provide long-term, consistent effort and cooperation in order for the group to continue to succeed in terms of its social development;
- Carrying out its operations in compliance with the applicable laws and regulations;
- Respecting specific guidelines in line with our Code of Ethics and Conduct as well as other internal rules and procedures.

This code aims to ensure that MD carries out its operations while respecting national and international laws.

The size and geographical distribution of the MD group justifies the articulation and formalisation of the ethical principles that must guide the collective consciousness of all workers and employees, forming a behavioural model to be followed.

This code was drafted to comply with this requirement. It contains the values and principles that underpin MD's corporate culture, therefore contributing to improving the collective consciousness of the company's workers and employees based on the principle that ethical behaviours lead to the construction of an ethical conscience. All company workers and employees must comply with this Code of Ethics and Conduct when conducting their daily operations.

4. PURPOSE AND SCOPE OF APPLICATION

MD's Code of Ethics and Conduct brings together a set of principles that govern the operations of the companies within the group and a set of ethical and deontological rules that must be observed by the respective members of the group's governing bodies as well as all employees - regardless of their role, hierarchical position or place of work - both in the relationships they establish among themselves, and those established in the name or on behalf of this institution with other public or private entities, or with individuals in general, specifically in their relationship with customers, suppliers and other stakeholders.

MD's Code of Ethics and Conduct aims to ensure that professional conduct of a high moral standard is employed by all employees, in addition to all applicable legal and regulatory provisions being observed.

The rules contained in this code also constitute a reference for the general public regarding the standard of conduct required in the company's relationship with third parties.

The code was created with the fundamental aim of:

- » Sharing the principles that govern MD company operations and the ethical and deontological rules that guide the behaviour of all employees and governing entities, and promoting the adoption of these ethical and deontological principles and rules by our partners;
- » Promoting and encouraging the adoption of the operating principles and behavioural rules established in this code, specifically of company values in relationships between Employees and Governing Bodies, with MD, and with all other stakeholders;
- » Solidifying MD's institutional image.

Providing a formal and organisational reference for the personal and professional conduct of all workers as an ethical framework

- applicable to both employees and the general public external to MD;
- » Cementing the existence and sharing of shared values and standards of conduct in the company, reinforcing a shared culture;
 - » Promoting relationships of trust between MD and its partners;
 - » Reducing the subjective nature of personal interpretations of moral and ethical principles;
 - » Responding to the civic challenge of grounding society in ethical principles that respect the guidelines of supranational organisations.

5. VISION, MISSION, AND VALUES

Vision:

To achieve global recognition and differentiation by effectively monetising our resources to meet the needs of our customers and adapt to evolving market changes.

Mission:

To design, develop, and manufacture injection moulds with maximum reliability and safety, creating sustainable economic and social value and allowing the benefits of progress and innovation to reach an increasing number of people.

Values:

MD's values represent the principles that guide the company's operations and relationships with all its partners.

MD's core values include:

- » Spirit of Service

- » Excellence and continuous improvement
- » Integrity, ethics, and trust
- » People at the heart of our success
- » Responsibility
- » Diligence
- » Tolerance and equality.

While carrying out their work, all employees must adhere to the following principles:

- a) "Principle of legality" - employees must adhere to current constitutional and legal frameworks;
- b) "Principles of justice and impartiality" - MD directors and employees must treat all individuals and other entities fairly and impartially under any and all circumstances, operating neutrally and in pursuit of the common good;
- c) "Principle of equality" - MD directors and employees may not take advantage of nor harm any person or entity based on their ancestry, sex, race, language, political, ideological or religious convictions, economic circumstances or social condition, or any other factor that enhances the possibility of disparity in opportunities or treatment;
- d) "Principle of proportionality" - MD managers and employees can only demand from individuals that deemed essential to carry out their operations;
- e) "Principles of collaboration and good faith" - MD directors and employees must collaborate with any persons or entities with which they relate in order to achieve the best possible outcome to fulfil their mission, to serve the community's best interests, and must act in such a way that they do not create unjustifiable obstacles or difficulties;
- f) "Principle of loyalty" - MD leaders and employees must act loyally, cooperatively, and in solidarity, both among themselves and with the public and private persons and entities with which they relate in the context of the role with which they are entrusted;

- g) "Principle of integrity" - MD directors and employees must conduct themselves according to criteria of personal and professional honesty and may not adopt any acts that may harm other employees or the persons or entities with which they relate;
- h) "Principles of competence and responsibility" - MD directors and employees must act diligently and responsibly; they must be dedicated and critical and strive for professional development and the strict fulfilment of their mission;
- i) "Principle of civility" – MD leaders and employees must treat everyone with whom they relate cordially, respectfully and thoughtfully, favouring cultivating a healthy work environment and a conciliatory and cooperative relationship with other people and entities.

5.1 Values translated into day-to-day activities

While performing their role, within the scope of their abilities, MD workers and employees must be guided by the values established herein, which can be described as follows:

Spirit of Service	<ul style="list-style-type: none"> ▶ Carry out their mission with commitment and dedication.
Excellence and Continuous Improvement	<ul style="list-style-type: none"> ▶ Persevere, striving to face adversity as a challenge and opportunity; ▶ Systematically seek out solutions for innovation and technological development; ▶ Contribute to optimising processes, leading to increased effectiveness and efficiency; ▶ Employ a spirit of initiative, with a view to the continuous improvement of products and services.
Integrity, ethics, and trust	<ul style="list-style-type: none"> ▶ Adhere to anti-corruption and anti-bribery practices; ▶ Adopt practices that avoid conflicts of interest; ▶ Ensure confidentiality and professional secrecy; ▶ Employ non-discriminatory behaviour; ▶ Commit to creating economic value based on

	relationships grounded in ethics and trust in the medium and long term.
People at the heart of our success	<ul style="list-style-type: none"> ▶ Constant challenges and willingness to change are key to attracting ambitious people. ▶ Our employees are determining factors in our performance in every market in which we operate. Therefore, and in order to continuously enrich our culture, we invest in developing their capabilities and skillsets.
Responsibility	<ul style="list-style-type: none"> ▶ Act with fairness and equity; ▶ Adopt attitudes and measures that promote sustainable development; ▶ Respect national and international standards and conventions concerning worker and employee rights. ▶ Avoid actions or behaviours that could harm the company; ▶ Combat situations that may jeopardise the company's image/reputation; ▶ Develop environmental awareness of safety and external and internal social responsibility; ▶ Share knowledge and information. ▶ Have an active sense of social responsibility and try to contribute to the improvement of the society we are a part of. ▶ Shape our actions based on environmental concerns and sustainable development policies.
Diligence	<ul style="list-style-type: none"> ▶ Be coherent and consistent in applying our values and principles; ▶ Comply with and enforce all applicable laws, as well as internal norms and regulations; ▶ Make decisions with fairness, equity, and objectivity; ▶ Be transparent in processes, decisions and in sharing criteria; ▶ Protect the company's assets.
Tolerance and Equality	<ul style="list-style-type: none"> ▶ Be able to accept and respect differences and defend justice and equity.

6. CONDUCT STANDARDS

6.1 Respect for the Rule of Law and Regulations

MD, its workers and employees must respect all legal and regulatory standards applicable to the operations carried out by the companies within the group. No acts that

violate any of the various applicable normative provisions may be carried out.

6.1.1 Respecting local laws on employment, working hours, and wages

MD always complies with working hour limits established by local legislation or applicable collective labour agreements. We are duty-bound to carry out our activities in full compliance with the relevant legislation regarding wages and the payment of overtime and mandatory benefits applicable in the countries in which we operate. To the extent possible, the MDG aims to employ local labour and provide training to improve competence levels in collaboration with our employees, their representatives - where applicable - and relevant government authorities.

6.2 Relationship with Customers, Suppliers and other Entities

Workers and employees must actively combat all forms of corruption - whether active or passive – with special attention to payments, favours and complicity, that may result in illicit advantages that constitute subtle forms of corruption, such as gifts from or to customers or suppliers.

As such, gifts estimated to be worth over €100 will not be accepted. However, in some cases, gifts worth more than this amount may be accepted if they are intended for the common use of workers and employees of MD companies. Gifts of this nature must always be registered in Human Resources Proceedings.

No one shall be given preferential treatment or other unlawful or illegitimate advantages by the MD by means of payment, gifts, or any other benefit, in cash or in kind. The opposite is also true: no entity or person may receive money or benefits for violating laws or regulations.

Paying any gratuity, in kind or otherwise, directly or indirectly to any customer representative or supplier to obtain a contract or other commercial or financial advantage is strictly prohibited.

Giving gifts or favours to current or potential customers or suppliers is strictly prohibited, except when the gift is purely symbolic. Giving money is strictly prohibited.

The selection of any supplier of goods or services to the MD shall be based on the requirements of quality, competitiveness, financial strength, and service provided. During

negotiations with suppliers, all MD employees and executives are responsible for safeguarding the interests of the company, ensuring compliance with the law. It is also important to seize the best opportunities and obtain the best conditions without exercising favouritism based on friendships or discriminatory criteria prohibited by this code.

6.3 Relationship with Regulatory Authorities

The company commits to collaborating with all applicable regulatory, supervisory, and oversight authorities, satisfying any requests addressed to them and not engaging in any conduct that may impede such authorities from exercising any powers assigned to them.

No payments may be made to secure the favourable intervention of a governmental authority. Luxurious gifts, services or entertainment may not be gifted to employees or executives of such authorities, as these may be interpreted as attempts to influence governmental and administrative decisions in favour of the MD.

6.4 Corporate Governance

Management of the MD and the exercise of senior management positions must be carried out with diligence, zeal, and transparency, in compliance with the highest standards of good corporate governance.

All assets, liabilities, expenses and other transactions carried out by the MD's establishments shall be recorded in the books and accounts of such entities and shall be strictly maintained in accordance with applicable principles, rules and laws. Under no circumstances may the MD or its establishments create or maintain secret funds or unregistered assets. Documents relating to commercial or financial transactions must accurately reflect such transactions. No payment may be authorised or made if there is any intention to use it partially or fully for any purpose other than that described in the documents supporting said payment. Under no circumstances may false or unfounded entries be made in the books or records kept by the group or its establishments.

6.5 Relationship with other Entities

The company must maintain a cooperative and participatory stance in all institutional

relations with other national and international entities and organisations, supporting initiatives that fit within the scope of its operations and add value to the MD and its workers and employees.

6.6 Relationship with the Media

In its relationship with the media, MDG employs the appropriate means to ensure the comprehensive nature of all information, as well as that it is coherent, truthful, transparent and timely, fully respecting its duty to inform.

In matters relating to the company's operations and public image, while in the employ of the company, workers and employees must refrain from granting interviews or providing information, except when mandated to do so.

6.7 Competitors

MD complies with the rules and laws governing competition applicable in the European Union and in each member state in which it operates. These laws specifically prohibit formal or informal agreements, arrangements, or coordinated conduct between competitors regarding their prices, territories covered, market shares, and customers.

MD executives and employees are strictly prohibited from entering into any agreement or understanding with competing companies.

Additionally, prior approval from the Head of Human Resources is required before joining professional associations that unite competing companies.

6.8 Political and Trade Union Activities

The MD does not fund or provide services to political parties, incumbents, or candidates for public office, even if such contributions are permitted by the country's laws.

In exercising political-partisan or trade union operations, MD workers and employees must respect the constitutional principles and applicable legal framework and act prudently and respectfully to avoid conflicts and maintain their company's independence.

6.9 Illegal and Unlawful Activities

Workers or employees employing illegal or illicit means or activities or using group funds, services or assets for illicit, unauthorised or illegitimate purposes, with or without the objective of gaining benefits for themselves or third parties is strictly prohibited and condemned by the MD.

6.10 Use of Company Resources

The company's resources must be used efficiently with a view to pursuing pre-established objectives and not for personal or other purposes. Workers and employees must ensure that the company's assets are protected and maintained in a good state of conservation, always seeking to maximise their productivity.

MD directors and employees must protect and conserve MD's physical, financial, and intellectual heritage to the extent of their responsibilities. All available resources must be used efficiently, with a view to pursuing all pre-established objectives. They must not be used for the direct or indirect personal benefit of directors, employees, or third parties.

6.11 Confidentiality and Professional Secrecy

Professional secrecy applies to all workers and employees, especially under circumstances where, due to their importance or the existing legislation, they should not be made known to the general public.

MD workers and employees must always act with discretion regarding facts and information to which access has been gained while exercising their duties. Files, assets, technical data, and confidential information about the company are important assets that may be crucial to maintaining MD's results and competitive advantage. All these elements are considered company property and must be returned upon termination of any contract entered into with an employee.

The following are particularly confidential: information relating to the existence and terms and conditions of MD's business plans and agreements, the group's financial and technical data, and all other important data, such as that relating to MD production unit revenue, intellectual property rights, technology, software, or IT equipment used in normal business operations, engineering, production, and control.

Information about employees' private lives, performance reviews, promotions, and remuneration must be kept confidential. Access to this type of information is reserved for duly authorised personnel.

Consequently, MD employees are prohibited from seeking personal information from other employees unless authorised to do so as part of their work. The following is also prohibited:

- a) Collecting information about the private lives of other employees, with the exception of the information necessary to manage human resources or other legitimate professional reasons;
- b) Sharing personal information with unauthorised third parties.

6.12 External operations

MD workers and employees must strive to defend the company's interests. The results of their work carried out within the company, including those of an intellectual nature, shall remain the property of the company.

In order to respect the legal framework and internal regulations established by the company, MD workers and employees may not engage in activities that are incompatible and/or likely to generate conflicts of interest.

MD shall not object to workers and employees carrying out professional activities that do not compete with employee time dedicated to the company and that do not generate conflict of interest, though the group must be informed thereof.

Voluntary work activities are excluded and are supported and encouraged by MD.

6.13 Loyalty

MD employees and executives must perform their duties loyally. A director or executive position in the group is a full-time commitment: no director or executive may carry out a second professional activity or have a business that requires an active investment of their time outside of that stipulated in their employment contract.

This rule does not prohibit involvement in a company outside of working hours, as long as it does not compete with MD's operations and there is no conflict of interest.

6.14 Alcohol, Drugs, and Tobacco

MD prohibits the distribution, sale, purchase, exchange, possession or consumption of illegal drugs in its workplaces.

The consumption of alcohol in the workplace is prohibited.

6.15 Prevention of Potential Conflicts of Interest

MD workers and employees shall be responsible for avoiding any situation that may directly or indirectly result in a conflict of interest.

A conflict of interest is understood to be circumstances under which an employee directly or indirectly has a personal interest that could potentially benefit themselves, a family member, friends or acquaintances and that could influence their performance of their duties.

Whenever such circumstances are deemed to be foreseeable, the employee must inform their superior of their suspicion in order to ensure their impartial, objective, transparent performance.

Workers and employees may not use any privileged information obtained by virtue of their role within the group.

Employees and executives must not take advantage of the fact that they work for MD in order to obtain the advantages guaranteed by suppliers to the group for personal purchases.

Employees and executives may not lend money to or invest - whether directly or indirectly - in the share capital of a supplier with relations to MD, a parent company, or subsidiaries. However, they may purchase securities traded in accordance with the applicable regulations.

6.16 Relationship between Workers and Employees

In carrying out their duties, MD workers and employees should be responsible and cooperative, fostering a positive environment that emphasises respect and good personal interactions with both colleagues and supervisors, as well as between supervisors and their subordinates.

In their professional relationship, MD workers and employees must promote the exchange of information and cooperation and foster team spirit. Workers and employees

who contribute to the decision-making process must support the decision-maker, take responsibility, and remain united during its implementation.

The exchange of gifts is strictly prohibited among MD employees, except when the gifts are of purely symbolic value, as is the receipt or payment of any amount of money.

6.17 Environmental Commitment

In its business operations, MD consistently aims to promote sustainable development and protect the environment by prioritising non-polluting techniques, environmental monitoring, and energy efficiency, among other initiatives.

MD adopts and encourages the responsible use of natural resources and the preservation of the environment, specifically by promoting eco-efficient management that minimises the environmental impact of its companies' operations.

6.18 Social Responsibility and Sustainable Development

MD adopts practices that promote progress and well-being in communities, enhancing citizens' quality of life and significantly contributing to environmental, economic, and social sustainability.

When confronted with difficult situations where the course of action is unclear, MD workers and employees are encouraged to pause, analyse all available information, and seek additional information to make the best decision.

They are also encouraged to answer the following questions:

- » Are my uncertainties based on verifiable facts, or just assumptions and rumours?
- » From where, or from whom, did I receive this information?
- » Do I believe this information to be correct, and does it expose my company to any risk?
- » If this information was reported by the media, would I feel embarrassed?

Direct management is usually a good place to start if faced with an ethical problem.

6.19 Labour Relations

6.19.1 *Child and/or Forced Labour*

MD operates in compliance with national laws and regulations relating to child labour and, in any case:

- » Commits to not employing children under the age of 16;
- » Complies with ILO (International Labour Organisation) Convention No. 138 relating to the employment of children between the ages of 15 and 18.

MD discloses this policy and encourages its suppliers and partners to comply with this requirement.

6.19.2 *Diversity, Discrimination, and Harassment*

MD condemns any form of discrimination, whether based on origin, race, ethnicity, sex or sexual orientation, age, physical disability, philosophical or religious conviction, opinion or political affiliation and condemns any form of sexual or psychological harassment, verbal or physical conduct of humiliation, coercion or threat.

MD complies with national laws and requirements relating to the employment of persons with disabilities and is committed to creating specific jobs that ensure good working conditions.

MD also commits to scrupulously respecting the provisions of the country operated in with regards to respecting the rights of pregnant women.

This standard applies to recruitment, internships, training, and the management of personal development.

No worker or employee shall be punished, fired, or discriminated against for having testified in good faith about any of the actions listed hereinabove or for having reported them.

The following preventive measures employed anticipatively by MD to avoid potential risk behaviours are of particular note;

- » Awareness-raising actions to prevent discrimination and/or harassment;
- » Integration measures for workers with disabilities;
- » Promoting pay equity;
- » Creating an inclusive environment with regards to "gender" and/or

"minorities";

- » Integration measures for senior workers;
- » Procedure for dealing with potential cases of discrimination and/or harassment.

6.19.3 Human Rights of External Stakeholders

MD demands that Human Rights be respected at all times. Everyone, without exception, must be treated with dignity and respect. MD is committed to respecting, protecting, and providing for the human rights and fundamental freedoms of all who work for or are affected by our business.

6.19.4 Worker Representatives

MD recognises employee representatives through specific organisations provided for in the laws and regulations of the applicable country and encourages the development of responsible social dialogue. To this end, MD keeps employees or their representatives informed of operations in a timely manner and, in any case, operates in accordance with the applicable laws and regulations regarding the information and consultation of employees.

MD is committed to developing relationships based on mutual trust at every level within the company, particularly by inviting employees to express themselves freely to improve their working environment. A suggestion system is in place to improve and facilitate communication.

6.19.5 Trade Unions

MD recognises trade unions and the rights of employees to join them of their own free will, and to nominate employee representatives in accordance with the laws and regulations of the applicable country.

6.20 Health and Safety of Workers and Employees

MD attaches great importance to health and safety in the workplace and is

committed to ensuring that all work environments meet requirements that ensure the physical health and well-being of employees at all levels.

All accidents in the workplace are recorded and analysed using a problem-solving methodology. The causes of accidents and subsequent solutions presented are gathered across the group and shared with all factories, making it possible to avoid the re-occurrence of such accidents in the workplace.

6.20.1 Detailed health and safety risk assessment

The risk assessment primarily focuses on the following factors, among others:

- Hearing hazards
- Mechanical hazards
- Hazards relating to cargo handling
- Hazards relating to heat and possible discharges
- Chemical Hazards

In addition, each unit has a first aid team that is regularly trained to intervene, ensuring safety in the event of any incident and firefighting.

6.20.2 Procedure implemented to anticipate health and safety risks - alteration of existing operations

MD has a procedure in place to ensure that risks associated with health and safety and the handling of hazardous substances are adequately identified and controlled when the company adopts new facilities or operations or when it makes changes to existing ones.

6.20.3 Provision of Personal Protective Equipment for All Workers and Employees

MD distributes personal protective equipment to its employees to reduce exposure to health and safety hazards relating to their work.

6.20.4 Procedure for handling chemical or hazardous substances

MD protects its employees from any products purchased or connected to the process that may endanger their health. Employees are trained to handle hazardous products and in the correct use of personal protective equipment.

6.20.5 Active Preventive Measures for Noise

The most effective noise control method is undoubtedly taking action on the noise-emitting source. MD privileges this approach to noise reduction and, whenever possible, takes actions that may involve:

- Improved maintenance of machinery and/or work equipment;
- Use of equipment coupled to machines in order to reduce the noise levels emitted by the machines;
- Changes to the production process and/or techniques;
- Anti-vibration isolation;
- Encapsulation;
- Acoustic treatment of surfaces;
- Cabins;

When the noise level to which workers are subjected exceeds permissible values and any of the solutions described hereinabove is not (technically or economically) feasible, or the control carried out is not effective, then individual protection will have to be resorted to.

Thus, when exposure to noise exceeds the lower action values (80 dB(A) or 135 dB(C)), of daily exposure and peak sound pressure level, respectively), MD makes personal hearing protectors available to workers and, when such exposure equals or exceeds the higher action values (85 dB(A) or 137 dB(C)), such protectors must be used

compulsorily.

Personal hearing protectors should be selected with a view to eliminating the risk of hearing loss or reducing it to a minimum.

6.20.6 *Worker safety and health risk training and good practices*

MD promotes the training, information and awareness of its employees, boosting the continuous improvement of their performance and taking into account that each employee contributes decisively to preventing occupational health and safety risks.

6.20.7 *Mandatory health checkups for all workers*

MD invests in preventing diseases and promoting health. To do so, it seeks to ensure that every company within the group is aware of its employees' disease profile (epidemiological profile) in order to implement preventive actions and correlate the diseases identified with the use of worker health insurance.

As such, the routine check-up provided is the ideal tool to allow for the identification of risk factors among employees, such as:

- » Smoking
- » Excessive alcohol consumption
- » Obesity
- » High blood pressure
- » High cholesterol
- » High blood glucose levels
- » Unhealthy diet
- » Sedentary lifestyle

Routine employee check-ups provide numerous benefits to employees themselves and the companies within the MD.

6.20.8 *Training in matters relating to the health and safety of visitors and subcontractors working on the premises of MD companies*

All visitors and workers - whether part of external organisations or operating as individuals - who carry out activities on the premises of MD companies are given access to prior information regarding the organisation's health and safety conditions.

6.20.9 *Conducting regular inspections and audits to ensure the availability of safety equipment*

MD has implemented procedures for carrying out regular inspections and audits, where the use and operability of safety equipment are verified to ensure that no person works in dangerous conditions and to avoid adverse events.

The main objective of inspections and audits is to avoid occurrences that are potentially harmful to the lives or physical integrity of workers while verifying that the occupational safety policy is actually implemented.

6.21 Working Conditions

MD commits to respecting and promoting the fundamental rights of individuals, as defined in the Universal Declaration of Human Rights. Likewise, it respects and promotes the dignity, equality, and value of individuals and the private lives of its employees.

In carrying out their duties, MD workers and employees should be responsible and cooperative, fostering a positive environment that emphasises respect and good personal interactions with both colleagues and supervisors, as well as between supervisors and their subordinates.

In their professional relationship, MD workers and employees must promote the exchange of information and cooperation and foster team spirit. Workers and employees who contribute to the decision-making process must support the decision-maker, take responsibility, and remain united during its implementation.

The exchange of gifts is strictly prohibited among MD employees, except when the gifts are of purely symbolic value, as is the receipt or payment of any amount of money.

6.21.1 *Organisational environment*

» In their relationships with each other, MD's managers and employees

must foster a good working environment and promote mutual help and teamwork, adopting conduct that is underpinned by mutual respect, professionalism, cordiality, and honesty.

- » MD managers and employees must develop their ability to adapt to the modernisation of work processes and new management tools and must attend the training sessions suggested to them with a view to continuous learning, thus optimising their skills.

6.21.2 Interactive communication with workers relating to working conditions

- » Compensation for overtime or atypical work;
- » Extended holidays beyond standard days;
- » Flexible working arrangements for workers;
- » Remuneration process communicated to employees.

6.21.3 Employee Satisfaction Assessment Questionnaires

MD regularly conducts questionnaires on a set of themes relating to employee perception of the organisation to assess the degree of satisfaction and motivation employees feel in relation to their work, with a drive for continuous improvement.

6.22 Career Management

At MD, careers are not seen as lifelong positions where individuals remain in the same role indefinitely. The main focus placed by the group in terms of career management is on developing MD's professionals as a tool for professional success and to retain the best talent.

6.22.1 Transparent recruitment process

Transparency and ethics are the guiding threads of the process of hiring a person for a particular position at MD.

When a candidate demonstrates sincerity in the selection process, they stand out

from their competitors, as this conduct also reveals a lot about the way they conduct their operations in the workplace. By talking openly about topics such as the reason for leaving their previous position, their profile, affinities and aspirations with the vacancy, the candidate provides essential information for more effective decision-making, in addition to saying a lot about their professional stance. The same goes for MD, when clearly specifying what the group requires of the professional, even in cases where it is not possible to reveal all the details of the vacancy to the candidate due to confidentiality.

The recruitment specialist must manage the process effectively and ensure transparency in their actions to avoid jeopardising a hire or damaging the credibility of individuals and/or companies within MD.

6.22.2 Evaluation of individual performance

Performance evaluation is a human resources tool that extends beyond merely analysing individual and collective employee performance and behaviours. Performance evaluations allow MD to provide feedback on results, assess work effectiveness, identify talents, and evaluate employee productivity, among other factors. These insights contribute to developing measures and training programmes that aim to address any issues and foster continuous improvement in the organisation.

These assessments are carried out periodically per the organisation's needs.

6.22.3 Individual development and career planning for all employees

Career plans are key instruments for attracting talent and helping achieve business objectives, supporting company growth. Career plans are described as a “road map,” listing the short, medium, and long-term career goals expected of every worker.

This helps the company establish and generate key indicators to measure job performance, and employees to know exactly what actions can be taken to achieve their goals.

A career plan helps employees:

- ▶ Make daily decisions;
- ▶ Identify obstacles in their development and that of their team and/or area;
- ▶ Recognise opportunities for growth for both themselves and the company;

- ▶ Enhance key skills and competencies;
- ▶ Take responsibility and improve communication with colleagues and supervisors.

6.22.4 Internal Mobility

MD prioritises the internal development of its employees' employability by fostering staff commitment, offering training and skill acquisition opportunities, encouraging responsibility and autonomy, and ensuring career advancement prospects.

MD encourages each employee to take responsibility for their personal development and is committed to providing equal opportunities for promotion and professional mobility to all.

6.22.5 Promotion Skills Development Training

MD aims to provide all employees, regardless of their location, age, gender, or position, with the training they need throughout their careers to perform their duties correctly and in a more effective and efficient manner.

7. CONSEQUENCES OF NON-COMPLIANCE

Any violation of the principles or duties outlined in this code, if found to meet the legally established criteria, may result in disciplinary action taken against those responsible, in addition to any other procedures deemed appropriate and applicable.

8. ENTRY INTO FORCE

This Code shall enter into force on the day following its publication on the MD website.