

CODE OF ETHICS V2, 2025

2025

Code of Ethics

Ethical principles as a
guarantee of our quality.

Approved by **Victoria Núñez, CEO**
May, 2025



"Ethics begins with each of us and is the **driving force behind every action at Prohima."**

Victoria Núñez

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Letter from the CEO - Victoria Núñez

"Ethics begins with each of us and is the driving force behind every action at Prohima."

Over the past year, we have faced significant changes and challenges that have only strengthened my personal conviction in the vital importance of remaining aligned with the highest ethical standards.

From the very beginning, we have recognised that each of you plays a fundamental role in our success. That is why understanding and applying our Code of Ethics is not only a priority, but a shared responsibility—especially for those of us who lead Prohima.

Our reputation in the market is a direct reflection of our daily actions. Every time we act transparently with our clients, every time we choose to manage resources responsibly, and every time we treat colleagues, clients, and partners with respect, we are building a solid future for Prohima.

Our partners and suppliers are also an essential part of this commitment, and we expect them to share and uphold our same ethical principles.

The trust we inspire depends on the consistency between what we say and what we do. We all have a duty to protect our company. If you witness something that goes against our principles, we encourage you to report it with complete confidence and discretion. We have confidential and secure channels in place so you can do so safely.

Working with integrity is far more than a requirement—it is our daily commitment to the success of our clients, to the sustainable growth of the company, and to the care of the environment and society.

Thank you for being an essential part of Prohima, for protecting our company responsibly, and for helping us build an ethical legacy we can always be proud of.

Starting point

Business ethics is not merely an abstract concept; it is the concrete compass that guides every decision and action at Prohima. This Code reflects our organisational culture and clearly defines how we are expected to behave towards colleagues, clients, suppliers, and the wider community.

At Prohima, each of us carries the responsibility of understanding and applying these ethical principles in our daily routines. From how we protect confidential information to how we handle conflicts or navigate risky situations, our personal ethics have a direct impact on the success and reputation of our company.

Complying with this Code of Ethics not only strengthens our image and builds trust—it also ensures our economic, social, and environmental sustainability. On the other hand, deviating from these principles could result in serious consequences for all of us, including legal penalties and significant financial losses.

We understand that some situations can be complex. That is why our Ethics Committee is always available to support you in making ethical and responsible decisions. If you have any doubts or concerns, please do not hesitate to contact us at: comiteetico@prohima.es

This Code of Ethics is our shared promise of integrity. Upholding it is a source of pride and a clear sign of our identity as a team committed to doing what is right.

Who the code applies to

This Code of Ethics applies to all employees, managers, and members of the Board of Directors at Prohima, regardless of their rank or specific role. Furthermore, we extend this ethical commitment to all companies, clients, business partners, and suppliers with whom we engage. These stakeholders are expected to adopt internal policies that are consistent with our ethical principles.

In cases of significant breaches of this Code by external collaborators, Prohima may reassess and, if necessary, terminate the business relationship. This document is publicly available on our website, and any member of the company is free to consult it at any time.

Management, sustainability and ethics committee

Prohima has an Ethics and Conduct Committee made up of representatives from various departments and levels of the company, ensuring impartiality in the resolution of ethical matters.

The committee's main responsibilities are:

- To handle all queries and reports concerning potential ethical breaches with confidentiality, taking corrective action depending on the seriousness of each case.
- To rigorously and confidentially investigate all reports received, always ensuring the protection of whistle-blowers.
- To proactively manage prevention through regular training programmes, promoting a lasting ethical culture across the organisation.
- To issue internal periodic reports on cases addressed and actions taken, always preserving confidentiality.

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– Provide a clear and accessible channel for ethical queries and reports, available to all members and stakeholders.

If you face any situation or have any doubts, do not hesitate to contact the committee confidentially at comiteetico@prohima.es.

Expectations

Prohima expects each member of the organisation to understand and apply this Code of Ethics, as well as the applicable legislation, throughout their daily work. In particular, we expect that when facing everyday situations—such as questions around internal conflicts, the handling of sensitive information, or interactions with clients and suppliers—each person exercises sound ethical judgement.

It is the ethical responsibility of every employee to report any conduct they believe to be contrary to our values. In case of doubt, the Management, Sustainability and Ethics Committee is always available to provide guidance and help resolve complex situations in complete confidence via comiteetico@prohima.es.

Ethical commitment

Our Code of Ethics reinforces professionalism, commitment, and transparency in every action we take, aligning directly with our corporate mission and vision. Through this commitment, we ensure that quality remains a fundamental value, fostering solid and sustainable relationships based on legitimacy and trust.

Concrete examples of this commitment include our strict adherence to Good Manufacturing Practices (GMP), complete transparency in our commercial negotiations, continuous compliance with all environmental regulations, and our ongoing encouragement of open and honest communication with all our stakeholders.

This ethical approach not only protects our reputation but also directly improves our working environment and strengthens long-term, trustworthy relationships with clients, business partners, and the wider community.

Corporate identity

Mission

To support our clients in achieving their goals by being the trusted partner they need.

Vision

To be the leading company in the single-dose packaging market, specialising in sachets for the cosmetics, perfumery, pharmaceutical and parapharmaceutical sectors.

Our values

Our values are much more than mere words: they are the DNA that guides every decision, action, and relationship within and beyond Prohima. These values not only define who we are, but also reflect the quality and commitment we offer.

Professionalism

Our team works with excellence, taking care of every detail with skill, respect, efficiency, and integrity. The punctual delivery of each project and the strict fulfilment of our standards are the clearest expression of our professionalism.

Commitment

We take personal responsibility for always keeping our promises. Each time we respond to a need quickly and efficiently or proactively resolve a client's problem, we are demonstrating our commitment.

Honesty

We act at all times with sincerity and transparency. Openly acknowledging our mistakes, correcting them promptly, and communicating clearly helps to strengthen trust in our environment.

Integrity

We are committed to always doing what is right, maintaining high moral and ethical standards. Protecting confidential information, acting consistently, and being trustworthy in every decision we make is our most distinctive hallmark.

These values not only shape the way we work, but also strengthen our reputation, foster long-term relationships with clients and suppliers, and create a working environment that inspires pride and satisfaction.

Ethical principles

As part of its ethical development, Prohima has adopted the ten principles of the United Nations Global Compact and is fully committed to their implementation. We also reaffirm our commitment to the International Declaration of Human Rights and to the fundamental rights outlined by the International Labour Organization.

Our ethical principles are the result of more than 40 years of experience, forming a solid foundation for our corporate culture and guiding our day-to-day decisions and actions. Below is a brief explanation of each principle, outlining why it is essential to Prohima and how each member of our organisation can apply it in practice:

Clients

Our clients are at the heart of everything we do. Our ethical commitment is to guarantee their safety and satisfaction in every action we take.

Human resources

We deeply value our team. Acting ethically means respecting, protecting, and nurturing the talent and wellbeing of every individual at Prohima.

Environment

Our environmental responsibility goes beyond legal compliance; it means actively reducing our ecological impact and adopting sustainable practices every day.

Quality

Quality is non-negotiable. Our ethical commitment to quality ensures safety, trust, and continuous excellence in our products and services.

Business integrity

Acting with integrity means maintaining impeccable conduct and firmly rejecting any unethical or illegal practice, even when that means giving up immediate benefits.

Stakeholders

We always strive for fair and transparent relationships with our suppliers and partners. We expect the same in return, building strong relationships based on mutual trust and respect.

Every day, you have the opportunity to make a difference by applying these principles in your work. Remember that failing to uphold them can significantly harm both our reputation and your own professional development within the company.

These ethical principles define our path towards sustainable success and ensure a fulfilling future for Prohima and everyone who forms part of it.

Clients – our main commitment

Our main commitment is to our clients. We are dedicated to being the trusted partner that supports them in achieving their goals, always maintaining fair, ethical, transparent, and legally sound business relationships.

Data protection

We guarantee the highest level of confidentiality and security in handling our clients' personal and commercial data. We strictly comply with applicable data protection laws in all countries where we operate. Any disclosure or misuse of confidential information is strictly prohibited unless expressly authorised or legally required. Any breach may result in serious internal consequences.

Product safety

We are committed to providing safe, reliable, and high-quality packaging services, in full compliance with all relevant legal and regulatory standards. Every product we deliver represents our absolute commitment to customer safety and satisfaction.

Dialogue

We maintain clear and efficient channels of communication with our clients at all times. We are committed to actively listening to their needs and responding promptly, effectively, and respectfully, ensuring a personalised and excellent service experience at every stage.

Every member of Prohima can contribute to this commitment by responsibly handling confidential information, always prioritising safety and quality in their work, and treating each client with respect and care. Remember that our reputation is strengthened with every positive interaction—and that failing to uphold these principles can seriously harm our image and credibility.

Human resources – our most valuable asset

Teamwork

Prohima actively promotes a working environment based on cooperation and a spirit of collaboration. We expect every employee to contribute by sharing knowledge and resources in pursuit of common goals. Mutual respect is essential; behaviours such as offensive language, discrimination, or any form of harassment will not be tolerated and may result in disciplinary action.

Diversity and inclusion

At Prohima, we celebrate diversity, recognising that differences strengthen our capacity for innovation and creativity. We actively promote equal opportunities and ensure a workplace free from discrimination based on origin, race, religion, gender, age, or physical condition. Any discriminatory or harassing behaviour will have immediate consequences.

Conduct

Each employee has the personal responsibility to act with integrity, professionalism, and respect at all times. We expect full transparency in internal communication—hiding information, providing false data, or engaging in obstructive behaviour are serious breaches and will be sanctioned accordingly.

Occupational health and safety

The health and safety of our team is an absolute priority. Prohima is committed to providing a safe and healthy working environment, offering the necessary resources and training to achieve this. Every employee is expected to participate actively, immediately reporting any irregularities or identified risks. Ignoring or violating safety rules may pose personal and collective risks, and may lead to internal disciplinary measures.

Each of us can contribute daily by being respectful, actively promoting inclusion, behaving transparently and responsibly, and always safeguarding our own safety and that of others.

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Remember that our working environment depends on individual commitment and ethical conduct. Your collaboration is essential to keeping Prohima an exceptional place to work.

Environment – our top priority

At Prohima, we are committed to the continuous evaluation of our environmental impact throughout the entire value chain, aligning ourselves with the 17 Sustainable Development Goals (SDGs) set by the United Nations and adopted by Spain. This commitment is not symbolic—it guides our daily decisions and our long-term business strategy.

We recognise that our packaging activities can have a direct environmental impact. That is why we take full responsibility and are actively committed to environmental care and social wellbeing.

How do we do it?

- By properly separating waste, especially in shared spaces such as dining areas.
- By avoiding unnecessary printing and minimising waste generation.
- By ensuring that all materials are recycled or processed through authorised waste managers.

Responsible use of natural resources

From the initial phase to the final delivery of the product, we strive to use natural resources efficiently, adopting measures that combat climate change and protect biodiversity. We favour renewable, sustainable, and responsibly sourced materials.

Circular economy

We are fully committed to the circular economy. We use recyclable or reusable packaging materials and implement increasingly eco-friendly production processes. Cleaner production not only reduces environmental impact, but also improves efficiency and enhances the quality of our results.

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Every person at Prohima can make a difference—from correctly sorting waste to proposing new sustainable practices.

Your commitment matters. Ignoring these guidelines, on the other hand, may compromise our ethical standards and damage our environmental reputation.

Quality - our pride

Quality and safety are fundamental pillars of our packaging services. They reflect our commitment to excellence and our respect for our clients. Every delivery we make is a tangible expression of our responsibility, and it is the foundation upon which Prohima remains a benchmark company in the industry.

Continuous improvement and innovation are present throughout the entire production chain. We are committed to using only the highest quality materials, previously assessed for their effectiveness and safety, and to following strict validation procedures. Everyone involved in the process—from manufacturing and sales to customer service—must take responsibility for ensuring total product quality.

In addition, we comply with all current legal and regulatory requirements, both nationally and internationally, ensuring the conformity of our products across all the markets in which we operate.

Our commitment is never to compromise the safety of our packaging services. Quality is non-negotiable.

Our pillars are:

- ✓ To package and deliver safe, reliable services that improve quality of life
- ✓ To continuously improve our management systems in order to provide the highest possible quality and safety
- ✓ To promote individual responsibility among all employees regarding service quality at every stage of the process

Every person at Prohima is responsible for upholding our quality standards.

You can contribute by:

- Precisely following established protocols
- Reporting any deviation or potential improvement
- Ensuring that every action, no matter how small, aligns with our quality principles

We hold international certifications such as ISO 9001, GMP, ISO 22716, and ISO 13485, which endorse the excellence of our processes. These standards are not just badges—they are commitments we honour every single day.

Business integrity - our daily work

Integrity is the principle that guides all our business decisions and relationships. Acting with honesty and fairness is not optional—it is a duty.

Child labour and forced labour

At Prohima, we have a zero-tolerance policy towards any form of child labour, forced labour, or modern slavery, both within our facilities and throughout our value chain. We categorically reject any practice that involves the exploitation or violation of fundamental human rights and are committed to ensuring that all activities related to our organisation are carried out within an ethical framework that respects human rights.

We strictly prohibit all forms of child labour, ensuring that no individual under the legal working age is employed—either directly or indirectly—in our operations or those of our suppliers. We also reject any form of forced or involuntary labour, ensuring that employment is always free and voluntary, without coercion or any conditions that restrict personal freedom.

Human trafficking

We are committed to combating human trafficking, raising awareness and promoting respect for human rights across our value chain, and actively working to ensure that no one connected to our operations is affected by this practice.

Freedom of association and union membership

We are firmly committed to respecting every employee's right to freedom of association, including their active participation in trade unions and professional associations, without fear of reprisal or interference.

Financial transparency and prevention of economic crimes

We ensure that our financial records are accurate and auditable. We only work with clients and suppliers whose activities are legitimate and whose funds come from lawful sources, rejecting any connection with operations that may be linked to money laundering. Any deviation will be investigated and reported.

Fraud

We do not tolerate fraud in any form—whether internal or external—and we have control mechanisms in place to detect, investigate, and sanction fraudulent conduct.

Conflict of interest

We act with integrity and objectivity in all our decisions and business relationships. We avoid any situation in which personal, family, or financial interests could interfere—or appear to interfere—with the interests of the organisation. Any potential conflict of interest must be disclosed transparently and managed appropriately to ensure fairness and ethical conduct in all our actions.

Confidentiality and use of information

Internal information will only be shared externally on a “need-to-know” basis and only when it serves the legitimate interests of Prohima. Any unauthorised or negligent disclosure affecting employees, users, clients, or suppliers will be considered a serious offence. We are committed to the secure safeguarding of all confidential information, in both physical and digital formats.

Anti-corruption

Corruption is unacceptable. It is illegal, and it harms the company, the communities where we operate, and the economic system as a whole. We will not offer or accept bribes, and we will reject any advantage obtained through unethical means.

How you can contribute:

- Ensure that all your actions comply with the principles of legality and transparency
- Reject any sign of corruption or unethical behaviour
- Report any suspected misconduct to the Management, Sustainability and Ethics Committee, even if you are unsure

Remember: integrity is not what we say—it is what we do, even when no one is watching.

Stakeholders – our connection to the world

Suppliers

We expect our suppliers to demonstrate a clear commitment to confidentiality, ethics, and human rights. Any information accessed as part of our business relationship must be handled with the utmost discretion. In turn, Prohima will protect the confidential information of its suppliers with the same level of rigour.

We negotiate contracts with full transparency, avoiding dependencies and ensuring fair and sustainable conditions. We pay on time unless there are justified reasons not to. Our suppliers must strictly comply with the labour and human rights laws of the countries in which they operate. The use of child labour, forced labour, or any form of discrimination based on race, gender, religion, nationality, or personal condition is strictly prohibited.

Competitors

Prohima competes in the market with integrity. It is strictly forbidden to take unfair advantage of our position. We do not tolerate illegal agreements with competitors or practices that distort competition. We respect those who share our sector and aim to excel through innovation, continuous improvement, and fair business practices. We expect the same ethical standards from our competitors.

Society

Our commitment to society goes beyond regulatory compliance. We reject all forms of corruption—whether active or passive, direct or indirect. Prohima is committed to contributing positively to the communities in which we operate. We strive, within our means, to offer constructive and sustainable contributions that strengthen the social fabric and support development.

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How you can contribute:

- Ensuring that suppliers meet the established ethical and quality standards
- Negotiating transparently and on equal terms
- Rejecting any unethical advantage in dealings with competitors
- Striving to ensure that our actions also generate value for society

Your decisions can open or close doors. Let's make sure every external interaction strengthens our integrity and reputation.

Glossary

Value chain: The set of processes and activities that add value to a product or service, from its design to its delivery to the final customer.

Code of ethics: A document that outlines the principles, values, and standards of conduct that govern the behaviour of members within an organisation.

Ethics committee: An internal body responsible for overseeing the implementation of this Code, resolving ethical queries, and managing internal reports confidentially.

Confidentiality: The obligation to protect sensitive company information and prevent its unauthorised use or disclosure.

Obstructive conduct: Any action or omission that deliberately hinders, delays, or sabotages the work of others or the organisation's processes.

Corruption: An illegal practice involving the offering, requesting, or accepting of favours, payments, or other benefits to improperly influence decisions.

Circular economy: An economic model that seeks to reduce, reuse, and recycle resources in order to minimise waste and extend product lifecycles.

Authorised waste managers: Legally registered external companies authorised to handle, transport, or treat industrial waste.

Integrity: The alignment between ethical principles and actual behaviour, whether of an individual or an organisation.

Continuous improvement: A systematic, ongoing process of optimising products, services, and procedures.

SDGs (Sustainable Development Goals): A set of 17 global goals promoted by the UN to eradicate poverty, protect the planet, and ensure future wellbeing.

Stakeholders: Groups or individuals affected by the decisions and activities of an organisation (clients, employees, suppliers, the community, etc.).

Child labour: Work carried out by minors in conditions that violate their rights or harm their development.

Forced labour: A situation in which a person is made to work under threat or coercion, without free and informed consent.

This Code of Ethics enters into force on the date of its publication in the respective country and will remain valid until it is officially reviewed or repealed.

Target group

All Prohima employees and partners.

Members of the Management, Sustainability and Ethics Committee

Victoria Núñez – CEO and General Director

Vanessa Roca – Technical Director

Matilde Revellón – Staff Representative

M. Celeste Pérez Sánchez – Head of Marketing and Communication

"This Code is not just a guide; it is a reflection of who we are and the future we choose to build—together." – *Victoria Núñez*

PROHIMA INTERNACIONAL S.A.

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