

## SFC SOLUTIONS CODE OF CONDUCT

Dear All,

Everyone who works for and does business with SFC Solutions, is expected to act with integrity, make the right decisions and take the right actions in compliance with applicable laws and regulations in the countries and jurisdictions in which they operate.

Integrity drives our organization. This means that we are expected to be honest, ethical and responsible and to fully comply with this Code of Conduct (this “Code”).

According to our Code, integrity drives us in WORKING PLACE, through:

### Mutual respect

Working in SFC Solutions means being part of a team of professionals who collaborate and treat each other with courtesy, dignity and respect.

### Diversity and inclusion

We provide equal opportunities to our employees without any kind of discrimination and harassment.

### Safe workplace

SFC Solutions is committed to provide employees with a safe, clean and healthy workplace.

### Fair Wages

We follow the law and honor all agreements to which SFC Solutions is a part concerning working hours, wages and benefits.

### Record Management

We create professional records and manage them carefully, according to the law and our internal procedures.

### Protection of assets

As part of our job, we have access to many company assets, including our facilities, equipment, materials, properties, technologies, information, intellectual property. According to our Code we have to use company asset only for company business. We have to protect our asset from loss, damage, theft, unauthorized or improper use, and waste.

### Conflict of interest

We are expected to make business decision based on the best interest of the Organization.

### Confidential information

We are expected to keep confidential information safe. So, do not share confidential information with others who do not need it to do their job. Do not discuss confidential information in a public place, where someone could hear the conversation. Do not leave confidential information where it can be seen by everyone, such as on a photocopy machine or in a shared area.

### Intellectual properties

Do not share intellectual properties outside of the organization unless an appropriate disclosure agreement is in place.

Examples of intellectual properties are product design and drawings, recipes of our compounds, new product and development, technical design and process data, technical know-how, strategic plans.

Integrity drives us in MARKET PLACE, through:

### Personal data protection

Protect personal data information as well as names, addresses, emails, telephone numbers, credit cards information and so on.

Never share personal data information about employees, customers, vendors or other business partners without permission.

Always comply with all applicable data protection and privacy laws, including requirements to notify the right people of a data breach.

### Careful communication

Do not communicate with or send any information to the media, including social media channels, without permission from our HR & Communication department to speak on behalf of SFC Solutions.

### Social media

When using social media, remember always to be professional and respectful. According to our Code, offensive and disparaging material is forbidden.

### Product quality

The Quality of our product is important to us and to our success. We provide our Customer with safe, high-quality and tailored products. We have procedures and controls in place to ensure that we comply with all applicable legal and statutory, Customer and quality requirements.

### Antitrust and fair business

We earn business through quality and value of our products, not through unfair business practices. We always comply with all laws designed to protect Customers and maintain competitive market.

### Financial records and statements

We are committed to accurate accounting and record keeping and to maintaining a system of internal controls. In addition, we conduct our financial reporting and our businesses generally with integrity and transparency. We prepare periodic financial statements in accordance with applicable national and international accounting standards.

### Export Controls and Sanctioned Parties

In the context of international business transactions, we comply with all export control regulations and, in the case of crossborder transactions, we carefully check whether any export control restrictions apply to goods, services or information. In addition, countries or potential business partners (companies and individuals) could be on embargo or sanctions lists. Before entering a

business transaction, we ensure to comply with sanctions regulations when executing the transaction.

### Gratuities and entertainment

Our employees can use gifts and entertainment, that can help develop professional relationships, but we are expected to use common sense and good judgement. This means that according to the Code, we cannot give gifts to influence business decision, as well as we cannot accept gifts if someone is trying to influence our decisions.

Never accept inappropriate personal benefit beyond standard marketing items or hospitality (for us, our family or friends).

### Anti-bribery and anti – corruption

Corrupt behavior is forbidden in our organization. No matter where no matter with whom we are doing business, we do not offer or accept bribes. This applies to our employees, our suppliers and to anyone doing business on our behalf.

Integrity drives us in the LOCAL COMMUNITY where we operate.

### Care of our surrounding

We have to respect not only the teams we work with, but also our Community and the Environment, with a sustainable approach. We manage, measure and minimize the environmental impact of our facilities and demonstrate continuous improvement in areas such as air emissions; waste reduction, recovery and management; water use and disposal; energy usage and greenhouse gas emissions.

### Forced labor and modern slavery

In our business and our supply chain, it is FORBIDDEN forced labor and modern slavery in all forms, including child labor and human trafficking.

### Reporting possible violations

To report a concern anonymously, all employees can contact SFC Solutions at



[whistleblowing@sfc-solutions.com](mailto:whistleblowing@sfc-solutions.com)

All SFC Solutions Employees are responsible for understanding and fully following this Code of Conduct.

Company Representative Signature:

A handwritten signature in black ink, appearing to read 'Federico Dominguez', positioned above a horizontal line.

Company Representative Name (Printed): FEDERICO DOMINGUEZ

Date: April 7th 2022