

CODE OF ETHICS

MatHolding

MatHolding

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Entry into Force and Validity

Version History

Message from the President

At MatHolding Group, we define ourselves as a responsible and socially committed company, developing our business model based on two key pillars: **innovation** and **sustainability**.

We have always understood that our responsibility extends beyond our shareholders and group companies. From the very beginning, we recognized that no company can thrive in isolation from the world around it. Our achievements are closely tied to societal well-being, progress, and how effectively we manage the resources that enable our business to grow.

Given our current geographical and sectoral diversity, and the variety of legal systems in which we operate, it is essential to establish a unified set of principles to serve as a reference framework for guiding the actions of everyone at MatHolding.

It is for this reason, and out of a strong belief in fostering ethical behavior in the business environment, that we have undertaken the review and publication of our Code of Ethics.



Message from the President

We care not only about ‘*what*’ we do, but also about ‘*how*’ we do it.

At MatHolding, consistency matters to us. Consistency and integrity. Consistency between the meaning behind our activities and how we carry them out. Integrity in decision-making, always aligned with MatHolding Group’s strategic **vision**. All of this, grounded in a firm respect for our values and ethical principles, allows us to make better decisions and strive for continuous improvement.

MatHolding’s reputation stems from the **trust** that our team and stakeholders place in us to fulfil our responsibilities and to uphold the commitments set forth in this Code of Ethics. Therefore, the MatHolding Management Committee, and I personally, are fully **committed** to ensuring its compliance. We will support anyone who wishes to adhere to it, and we count on your participation and contribution to uphold this responsibility together.

And remember: The Code of Ethics serves as our guide. The boundaries are always determined by each one of us.

Pau Relat

President

Introduction

1. Why do we have a Code of Ethics?

This Code of Ethics has as its fundamental pillar the promotion of an **ethical culture**, fostering a **culture of compliance** with a “**zero tolerance**” for non-compliance and, specifically:

- a) **to promote a sense of** shared **responsibility**, autonomy, and loyalty among individuals.
- b) to establish **general guidelines** for conduct in the work and professional behavior of those subject to this Code;
- c) **to prevent the commission of criminal acts and any unlawful behavior** by individuals subject to this Code;
- d) **to establish mechanisms for communication**, monitoring, and control of possible irregularities to ensure compliance.

The objective goes beyond merely complying with applicable regulations, extending to the observance of ethics when there are no laws that determine the proper way to act. Ethics leads us to ask what the right way to proceed is and holds a vital place in our decision-making process.

The principles outlined in this Code are not intended to cover every possible situation that members of MatHolding Group may encounter, but rather to establish general guidelines of conduct that serve as a reference for their behavior during the performance of their work activities and, when applicable, to resolve any doubts that may arise in the course of their duties.

2. Who does this Code of Ethics apply to?

This Code of Ethics is directed at and is mandatory for:

- a) all professionals working for MatHolding Group companies, regardless of their level of responsibility or geographical location;
- b) all members of the governing bodies of MatHolding Group’s companies;

Additionally, the active promotion of the application of the Code of Ethics will be encouraged in the relationships that MatHolding Group maintains with its suppliers, clients, shareholders, collaborators, advisors, public administration, and non-profit entities (hereinafter, “**Linked Third Parties**”), taking into account, where applicable, the necessary adjustments based on the context and particularities of each relationship.

This Code of Ethics does not replace or override the legal provisions in force in each country or at the international level, nor the company’s internal regulations or applicable collective agreements.



Helping You Understand Our Code of Ethics

To make it easier for you to read our Code of Ethics, we briefly share with you the outline of how we have structured it:

Our Purpose and Values

First, we explain the set of basic rules that should serve as a guide to assess what is right and wrong for us in professional performance. They are the fundamental basis of the decisions we make, and you can expect them from us regarding commitments and responsibilities.

Our Way of Doing the Right Thing

Secondly, we help you take the right approach to decision-making. We know that ethical issues can sometimes be challenging to address, so we want to provide you with tools that can make this process easier for you.

Our Commitments

Next, you will find all the commitments that we at MatHolding Group assume and to which we ask you to adhere. For each one, you will find details of what fulfilling the commitment means to us, along with ways to help you understand them. Sometimes we specify what we should and should not do, and other times we include some questions and answers with examples of how to act in practice.

Our Compliance Model

Finally, we share with you how we ensure compliance at MatHolding Group, providing detailed information about the *Global Corporate Compliance Program* (our compliance model). We make the Ethics Channel available for reporting questions and potential violations, and we outline the actions that will be taken in case of non-compliance with Mat Holding Group's highest principles and values, aligned with the importance of adherence.

Our Purpose and Values

We contribute to the sustainability of agriculture and water resources through efficient and innovative solutions.

Purpose

Values

Our values are our driving force; they define our personality, serve as our reference, and motivate us every day to keep growing—and to do so in a particular way. At MatHolding Group, we believe in a set of **values** that we understand to be not only necessary for solid growth but also essential for continuing to build a project we are proud of.

Trust

We grow by building trust with all the stakeholders we interact with: employees, shareholders, suppliers, and customers.

Compromise

The entire team is committed to the founding values of the family business, while also maintaining a critical perspective with a constructive spirit.

Innovation

We respond to current environmental and social challenges creatively, with imagination, and by prudently adapting to exponential technological disruption.

Sustainability

We are committed to sustainability in all its aspects.

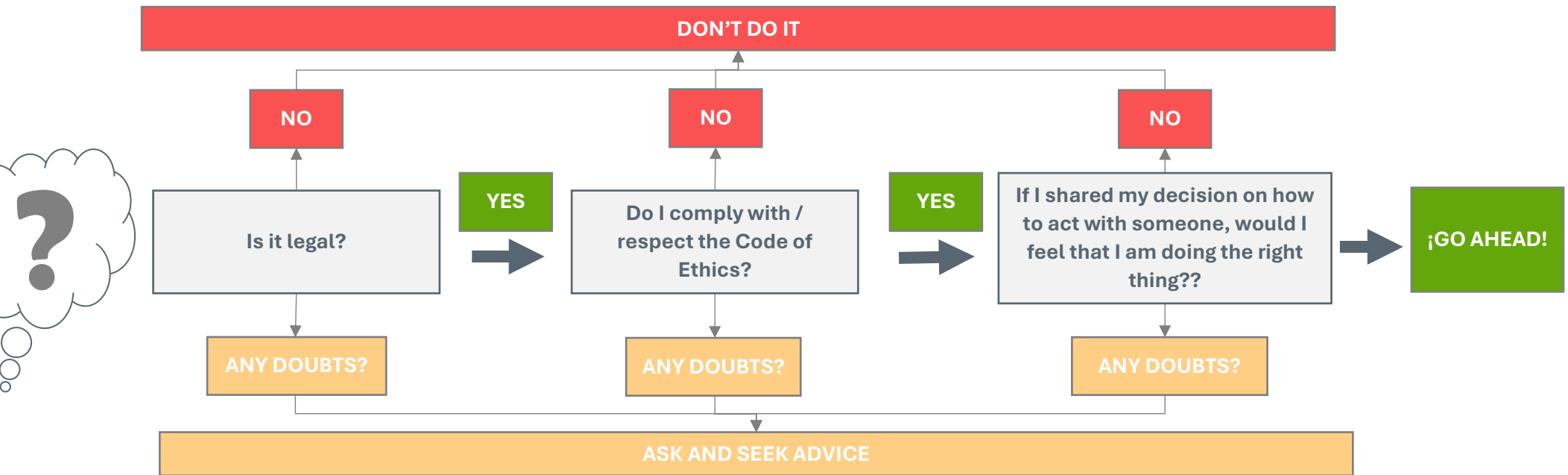
Vision

We shape the future of the corporation through responsible ambition, with flexible leadership grounded in experience.



Helping You Evaluate How to Do the Right Thing

We firmly believe that the best way to act is by doing what is right, but we understand that sometimes doubts may arise about how to guide our actions. While we cannot provide specific guidelines for every situation, we offer you a series of questions below, presented as a decision tree, to help us reflect on whether we are acting as examples of integrity and serving as role models in our conduct.



If you face a situation where you are unsure how to act and have doubts about your approach, don't hesitate to share and discuss it with the Compliance Area.

Guidelines for Conduct

Guidance for Our Relationships with Stakeholders

Our Code of Ethics is a guide that helps us understand how MatHolding Group companies and each of their members, in their representation, should act in certain matters and situations that require special care so that we can act according to the values and principles that govern us and as is expected of us.

At MatHolding Group, we maintain various relationships with different groups, and in every relationship we have, we must ensure that we apply the same ethical principles and values as part of our identity.

In the following sections, we have outlined how we can live up to our commitments in our relationships with:



In each of these sections, you will find the issues that are relevant to MatHolding Group clearly explained, along with guidance on how we should or should not act, frequently asked questions, or examples of how to act in specific cases to help you apply them.

Our Commitment to Society

Our Commitment to Society

We feel responsible for the impact we create in society

At MatHolding Group, we work guided by our purpose: to care for agriculture and water, fundamental elements for our society.

We pursue social, economic, and environmental sustainability, complying not only with legislation but also with the core values that drive us.

At MatHolding Group, we have a strong commitment to environmental protection. Therefore, we implement controls and safety measures aimed at ensuring compliance with environmental regulations, as well as regular oversight by public authorities to ensure that our activities are always conducted in accordance with these regulations.

As a responsible company, we also strive to minimize the environmental impact of all our activities by incorporating sustainability as a cross-cutting principle that permeates not only our business areas but also all the processes that make up our corporate operations, thereby helping to address the most pressing environmental challenges in all their dimensions.

In this regard, both the MatHolding Group team and Linked Third Parties must comply with the Group’s existing quality and environmental policies to minimize any possible risks. It is especially important that, if there are any doubts about whether an action might involve prohibited activity, it is promptly consulted with the Compliance Area.



How can we contribute in our day-to-day?		
Be proactive in finding ways to reduce our environmental impact	Collaborate with those who ensure they share our same commitments	Evaluate the environmental impact of the decisions we make

We have a commitment to give back to society what we have received



Compliance with Laws and Regulations

We want to be an example of how we do things and of the proper application of the regulations that apply to us

MatHolding Group operates in various countries, each with not only cultural diversity but also differences in the legal environment.

It is essential for MatHolding Group that all team members and Linked Third Parties maintain strict compliance with the legal regulations in all the territories where MatHolding Group's activities take place. This commitment ensures respect for the law as well as the integrity and reputation of our organization.

There may be occasions when the Code of Ethics does not fully align with local, national, or international legislation or customs in one of the countries where we operate. In such cases, where local regulations may be more or less strict, we will always seek the best possible alignment and prioritize the principles established in our Code of Ethics.

Ignorance of the applicable laws and regulations at any given time and place, or widespread violation of a rule, can never justify non-compliance. Therefore, we continuously strive to stay updated and informed about how regulations apply to us and will respond to any breaches with internal disciplinary measures or external legal actions if non-compliance occurs.

**We choose a real
commitment**



Transparency and Good Governance

We are honest, sincere, and íntegrous, and we justify every action we take

At MatHolding Group, we believe that values such as integrity, honesty, and transparency are essential and form part of the culture we strive to promote in our daily activities. In this regard, all members of MatHolding Group and Linked Third Parties are expected to act in accordance with these principles.

To uphold these principles, at MatHolding Group we commit to:

- **Ensuring that relevant information is accessible and shared clearly, honestly, truthfully, timely, and understandably** with stakeholders (shareholders, employees, clients, etc.), **keeping the information constantly updated and available** to facilitate informed management
- At the same time, promoting **respect for the proper confidentiality** of personal or sensitive information related to the corporation.

Furthermore, for good governance purposes, we assume the following commitments:

- All members of MatHolding Group take **responsibility for their actions and decisions** and are accountable for them.
- We establish **internal**—and where appropriate, external—**control mechanisms** to oversee MatHolding Group's processes and detect and correct possible irregularities or unethical behavior within the organization
- **We make strategic and operational decisions in an informed manner with proper justification.**

As part of this approach, we fight against any practice that may call into question this way of working and our commitments. That is why the statements regarding Corruption and Conflicts of Interest, which defend our **integrity**, are so important.

We are consistent in our thoughts and actions

Fight against corruption, bribery, and influence peddling

At MatHolding Group, **we do not tolerate any act of corruption, bribery, or influence peddling in any form.**

To this end, all members of MatHolding Group and Linked Third Parties are obligated not to engage in any of the following acts:



WHAT SHOULD I NOT DO?

- * **Offer** any public official, authority, or private individual, directly or indirectly, any kind of **benefit, compensation of any kind, or undue advantage** with the purpose of causing them to violate their duties to favor MatHolding Group. This prohibition also extends to situations where the offer responds to a prior request from a public official, authority, or private individual
- * Engage in any behavior or activity intended to unlawfully **influence the actions of a public official, authority, or private individual** to make or refrain from making a decision that could benefit any company of MatHolding Group.
- * **Receive, request, or accept any** unjustified **benefit** of any kind, with the purpose of **favoring the party granting it or from whom the benefit or advantage is expected**, in violation of one's obligations.
- * Engage in any activity that constitutes **influence peddling**.



Can we give gifts to third parties, or would that be considered corruption?

We have an **Anti-Corruption** Policy that sets the limits to ensure that any gifts we give are legitimate and do not influence business decision-making regarding the third party. The document defines when we are allowed to give or even receive gifts to foster the relationship.

If I'm about to lose a business opportunity and I have a contact who can help unblock it, is it really not advisable to use that contact?

The answer is simple: the principles and values of MatHolding Group are more important than its business activities. Therefore, we firmly believe that **losing a business opportunity by doing the right thing will always be the correct decision to make.**

Thus, the MatHolding Group team may not, either directly or through an intermediary, offer or grant, nor request or accept, any unjustified advantages or benefits aimed at obtaining any present or future benefit for MatHolding Group, for themselves, or for a third party.

Our integrity is founded on 0 tolerance for corruption

Loyalty and conflicts of interest

MatHolding Group believes that **the relationship with its members should be based on loyalty arising from their shared interests.**

. A "**conflict of interest**" is considered to exist in **situations where personal interest—or that of a Related Person—directly or indirectly conflicts with the interest of any company within MatHolding Group.**



What is meant by "Related Person"?

A Related Person can be:

- The spouse or any person united by a relationship similar to that of affection.
- Ascendants, descendants, and siblings of the professional or their spouse.
- Entities controlled, directly or indirectly, by the professional or related persons, or in which they hold a management or administrative position.

As examples, the following are situations of conflict of interest:

- a) being involved, personally or through family, in any transaction or economic operation in which any of the companies of MatHolding Group is a party;
- b) Negotiating or formalizing contracts on behalf of MatHolding Group with individuals related to the professional or with legal entities in which the professional or a related person holds a management position, is a significant shareholder, or an administrator.

In all circumstances, **the decisions and actions** of members of MatHolding Group and Linked Third Parties **must be based on the best defense of the Group's interests**, ensuring they are not influenced by personal or family relationships or any other particular interests

In the event of a conflict of interest, it must be reported to the immediate supervisor and/or the Compliance Area, who will jointly decide on the existence of a conflict of interest and, if applicable, the most appropriate course of action.

We must avoid situations of conflict of interest

Commitment to Our Business Partners

Relationships with Our Suppliers

We believe we must be credible, consistent, and honest leaders

At MatHolding Group, we consider **our suppliers** a key and essential part of the development of our business. Therefore, we expect the relationships we maintain to be transparent and based on ethical principles.



WHAT SHOULD I DO?

- ✓ Conduct an ethical selection of suppliers (based on criteria of transparency, quality, cost, sustainability, respect for labor rights, and derived from a fair, impartial, and merit-based process).
- ✓ Respect established agreements, ensuring good faith compliance by both parties according to the agreed terms.
- ✓ Foster a collaborative relationship aimed at mutual benefit and continuous improvement of processes (including sustainability and jointly promoting innovation).



WHAT SHOULDN'T I DO?

- ✗ Use discriminatory practices or corruption (bribery, illicit commissions, or undue favors) in selection processes.
- ✗ Accept gifts or presents during commercial activities intended to obtain an undue advantage from the supplier.
- ✗ Fail to comply with the conditions agreed upon in contracts between the parties, damaging the good faith that should govern our activities.

The MatHolding Grup team, therefore, avoids any kind of interference or influence from suppliers or third parties that could compromise their impartiality and objectivity. Employees are not allowed to receive any form of remuneration from suppliers for services related to their work activities.

Together with our suppliers, we create partnerships that add value

Relationships with Our Clients and Distributors

We want to do our job well and be the leaders our clients trust

At MatHolding Group our goal is to continuously improve the offering of products and services, focusing on quality and seeking mutual benefit in all our dealings with **our clients**.

The MatHolding Group team adopts a client-oriented approach based on efficiency, professionalism, a service mindset, and collaboration, always aiming for maximum customer satisfaction while providing competitive and high-quality solutions.



WHAT SHOULD I DO?

- ✓ Be transparent in communicating products and services, ensuring that offers are clear, truthful, and not misleading, and that information is accurate.
- ✓ Foster commitment to customer satisfaction and well-being, providing effective customer service and proper follow-up on after-sales support.



WHAT SHOULDN'T I DO?

- ✗ Failing to respect customer privacy and the protection of personal data.
- ✗ Discriminating based on gender, race, sexual orientation, religion, etc., not promoting principles of equality and respect, as well as fair treatment in all interactions.

The MatHolding Group team will avoid any kind of interference or influence that could put at risk the principles mentioned above.

We listen to each customer and are an ally in their growth

Relationships with Our Competitors

We base our market conduct on the principles of free competition

MatHolding Group, as well as its team and Linked Third Parties, value **our competitors** and commit to respecting the principles and rules of fair competition, promoting free competition for the benefit of consumers and users, and avoiding behaviors that could harm the defense of competition.



WHAT SHOULD I DO?

- ✓ Act in the market respecting the principles of free competition and equal opportunities.
- ✓ Respect commitments with third parties and act diligently in case of non-compliance due to impossibility or other reasons.
- ✓ Protect the confidential information of competitors and third parties.
- ✓ Respect the intellectual property rights of competitors (patents, trademarks, and trade secrets).
- ✓ Promote collaboration with competitors when it is beneficial for the industry as a whole (for example, on sustainability or safety issues) without engaging in anti-competitive practices.



WHAT SHOULDN'T I DO?

- * Act abusively to obtain an unfair or illegitimate benefit, advantage, or exploitation over third parties (for example, through practices such as abuse of dominant position or unfair practices).
- * Make unethical decisions, such as industrial espionage, false advertising, spreading false rumors, or price manipulation.
- * Access data and technical or strategic information of a competitor or information to which lawful access is not granted.

We protect both our information and reputation as well as that of our third parties

Relationships with Other Stakeholders

We have the ability to think big: we consider all the implications of the work we carry out

MatHolding Group, as well as its members and Linked Third Parties, also value the **general public** with whom we interact directly or indirectly (investors, regulators, local communities, non-profit organizations, among others), who also have a legitimate interest in the activities we carry out.



What commitments do we assume in these cases?

- Transparency with authorities and regulators.
- Collaboration with civil society and non-profit organizations to promote social and environmental well-being.
- Open and responsible communication with society, committing to dialogue and managing expectations of different stakeholders, fostering long-term trust.
- Responsible management of crises or controversies, providing quick and effective solutions while maintaining an ethical stance.

Respect for any third party is part of our responsibility

**Our
Commitment to
Our Team and
Company**

Work Environment, Equal Opportunities, and Non-Discrimination

We are committed to respecting human rights and combating all forms of discrimination

The relationship among MatHolding Group team members must be based on **mutual respect, integrity, trust, dignity, and adherence to the laws** in each of the territories where MatHolding Group operates.

At MatHolding Group, we **ensure objectivity, impartiality, and fairness** in both hiring and internal promotion and professional development of our team. We are committed to **equal opportunities** and, among other initiatives, we promote gender equity and the inclusion of people with disabilities and other vulnerable groups, ensuring an **inclusive work environment free from any form of discrimination** (whether based on sex, race, country of origin, religion, beliefs, age, sexual orientation, nationality, ideology, marital status, disability, or any other personal or social circumstance).

MatHolding Group will provide **policies that facilitate work-life balance** between personal, family, and professional life for the team.

Linked Persons to MatHolding Group team members may work within the Group's companies as long as the nature of their kinship or affinity does not affect job performance or the employment relationship with the Group. Therefore, the following family or affinity situations must be excluded:

- a) employment relationships where there is process interaction between linked persons;
- b) Direct hierarchical relationships between linked persons; and
- c) If one of the linked persons holds an executive or managerial position, the other must not work in the same department and should ideally be in a different area and/or workplace.

To implement the above, those holding any level of leadership are responsible for monitoring this aspect to **prevent potential conflicts of interest** and to act promptly

We value people who are sensible, honest, committed, and hardworking

Workplace Health and Safety

Health, workplace safety, and the well-being of all members of Grupo MatHolding are our priority

Workplace safety and **health** are fundamental aspects for MatHolding Group, and for this reason, we are committed to adopting the preventive measures established by current legislation, both for our team and for Third Parties Associated.

Additionally, the entire Group team and Third Parties Associated actively engage in creating and maintaining a safe work environment, strictly respecting the applicable regulations in every location where we operate and anticipating the necessary preventive measures to ensure the best possible conditions for physical and mental occupational health and safety.

This includes promoting the prevention of work overload, respecting the right to digital disconnection and work-life balance, as well as adopting firm measures to prevent and address any situation of workplace, sexual, or gender-based harassment, fostering a work environment based on dignity and equality.



WHAT SHOULD I DO?

- ✓ Understand the obligations and risks of my job position.
- ✓ Complete the Occupational Risk Prevention (PRL) training provided by MatHolding Group.
- ✓ Request and use the personal protective equipment provided to me.
- ✓ Report any risk situations or breaches that could endanger the team.



WHAT SHOULDN'T I DO?

- ✗ Failing to adopt, or when in a position of responsibility, failing to oversee compliance with Occupational Risk Prevention (PRL) obligations.
- ✗ Underestimating the risks of the job position and the associated measures to prevent their occurrence.
- ✗ Prioritizing comfort over safety.
- ✗ Putting ourselves or others at risk through risky behaviors we engage in.

We guarantee safe working conditions for everyone

Reserved and Confidential Information

Information and knowledge: essential and indispensable assets for the management of our companies

All members of MatHolding Group and Associated Third Parties must **maintain confidentiality** regarding all sensitive information accessed in the performance of their duties, even after the termination of the employment or contractual relationship. This obligation includes information related to the Group—such as business strategies, internal processes, technological developments, or commercial or financial documentation—as well as personal or professional data of employees, clients, suppliers, and other stakeholders.

We will use this information solely within the scope of professional activity and never for personal purposes or the benefit of third parties. We will also not allow materials developed by the Group (such as software, computer systems, studies, reports, etc.) to be used outside the professional environment without authorization. Likewise, we commit to ensuring the **protection of personal and confidential data** by strictly complying with current regulations and **applying appropriate technical and organizational measures** to preserve their security, integrity, and availability. We will pay special attention to ensuring that IT systems and digital tools have the necessary controls to prevent unauthorized access, loss, or misuse.

The **intellectual and industrial property** created by the members of MatHolding Group shall be the property of the Group, including documents, copies, and personal notes related to activities within the Group. Therefore, vouchers and other documents may not be removed from MatHolding Group's premises without the express authorization of MatHolding Group.

Once the employment relationship has ended, members of the MatHolding Group team must return to the company in question, or to the person designated by it, any of the aforementioned items, without prejudice to other documents that may contain information related to intellectual and industrial property.



If I create any document while doing my job, can I not take it with me?

No, all documents you generate as part of your job duties are considered company assets and, therefore, you cannot take them with you or use them outside the company.

We use the company's assets responsibly

Compliance Measures

Compliance Model:

Global Corporate Compliance Program

At MatHolding Group, we have implemented a *Global Corporate Compliance Program* to highlight our commitment to ethical and regulatory compliance, as well as to minimize the occurrence of unlawful acts.

Specifically, the *Global Corporate Compliance Program* (“**GCCP**”) addresses the various compliance obligations affecting MatHolding Group to clearly demonstrate the ethical and compliance stance maintained throughout its operations. Thus, the *Global Corporate Compliance Program* establishes principles and guidelines that must be respected and followed at all times.

The main **objectives** of the *Global Corporate Compliance Program* are as follows:

- a) To promote an ethical culture and regulatory compliance.
- b) To maintain zero tolerance for the commission of offenses.
- c) To establish control measures for the prevention of unlawful acts.
- d) To maintain relationships based on ethics and regulatory compliance with all members of MatHolding Group and with third parties.
- e) To pursue the continuous improvement of the *Global Corporate Compliance Program*.

Specifically, the *Global Corporate Compliance Program* is composed of the following **elements**:

- a) Code of Ethics.
- b) Risk maps.
- c) Compliance Policy.
- d) Internal regulations.
- e) Ethics Channel.



Compliance Policy and Compliance Area

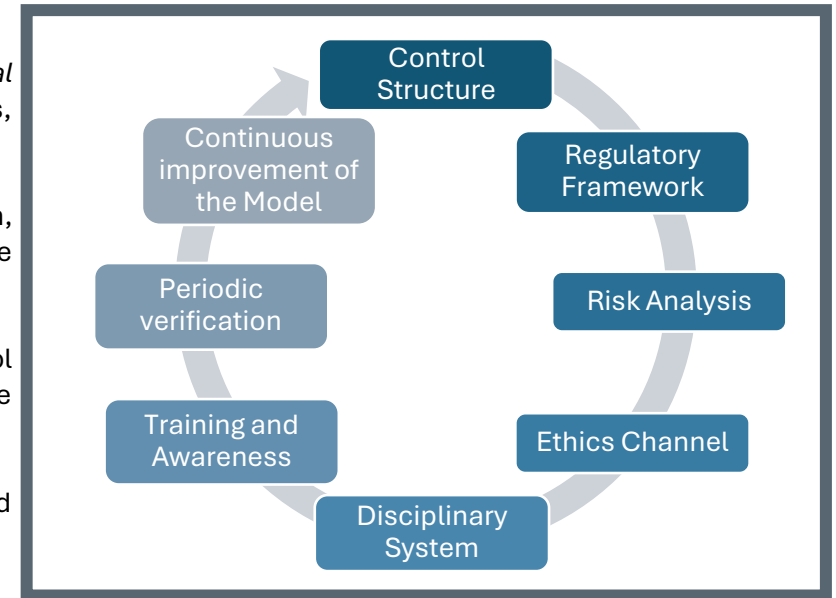
Compliance Policy

At MatHolding Group, we have a Compliance Policy in which we describe our *Global Corporate Compliance Program* with the aim of preventing the occurrence of risks, especially in the criminal area.

This Compliance Policy contains a description of the key elements -both human, organizational and documental- that the company implements to prevent violations of the law, particularly acts that may constitute criminal offenses.

At MatHolding Group, we ensure the real and effective application of preventive and control measures, aiming to eliminate behaviors that could jeopardize the reputation of the company and its members.

This Compliance Policy is reviewed periodically to adapt it to legal developments and regulatory changes.



Compliance Area

The Compliance Area of MatHolding Group, led by the Compliance Director, is responsible for supervising the implementation of the *Global Corporate Compliance Program*, ensuring its content is appropriate, and promoting its compliance. It is an internal control body, autonomous and independent, which reports directly to the Corporate General Management and the Group's Board of Directors.

In this regard, the Compliance Area is in charge of driving the compliance with this Code of Ethics, as well as interpreting it and resolving any doubts that may arise. This is without prejudice to the fact that it is also the responsibility of the entire MatHolding Group team to ensure adherence to the principles and guidelines set forth in both the Code of Ethics and the *Global Corporate Compliance Program*, as well as other internal regulations of the Group. In particular, those who have other members or teams under their supervision must actively ensure the prevention of inappropriate conduct and the correct application of the means and processes established in the Code of Ethics.

Ethics Channel



MatHolding Ethics Channel

Being able to quickly **identify** breaches of this Code of Ethics is key to ensuring its proper implementation and correcting behaviors when necessary. Therefore, we consider it essential to have communication channels that allow raising concerns, questions, or knowledge of potential violations.

All members of MatHolding Group have the **right to raise questions, seek advice, propose improvements, etc., and the obligation to report any information or indication that a crime or irregularity** may have been committed or may be committed within the scope of MatHolding Group's activities. The Ethics Channel is also **open to external stakeholders** who may report the same types of situations.

In any case, such communications must provide true, accurate, complete, and up-to-date information, and this mechanism cannot be used for purposes other than those aimed at ensuring compliance with the rules of the Code of Ethics.

To promote compliance with the law and the conduct guidelines set forth in the Code of Ethics, and with the purpose of reporting any detected incidents and/or consulting any questions regarding the interpretation of the Code of Ethics, an **Ethics Channel** has been established through which communications can be made via the following **communication channels**:

Communication channel	Contact information
Website	https://mat-holding.web.omnino.com/secure#/797e9277-b859-42c4-b95e-9b3169950e30
Email	ethics@matholding.com

The **Compliance Area** is responsible for managing and overseeing the **Ethical Channel** and handling the communications received through it (which may be outsourced to a third party), always respecting the **highest level of confidentiality** and, where applicable, anonymity (therefore, the identity of the person reporting the irregular conduct will not be disclosed to the accused without the complainant's consent). We also want to assure you that we do not tolerate, and actively prevent, **any retaliation against whistleblowers** acting in good faith.

The guidelines for use within the communication channels themselves, as well as in more detail, can be found in the [Policy for Managing Inquiries and Complaints Received through the Ethical Channel](#).



If I report a concern that turns out to be mistaken, will there be any consequences?

If the information provided is considered truthful and the investigation does not reach the same conclusion, as long as it was done in good faith, there will be no consequences. We'd rather you report it!



If I have a concern but don't have all the details and evidence, what should I do?

If you believe you have witnessed inappropriate conduct, even without proof, report it to us. Provide all the information you have, and we will take care of the investigation.

Talk to us.

Your message matters.

Monitoring, Promotion, and Dissemination of the Code of Ethics

At MatHolding Group, we believe that acting with integrity and responsibility should be part of our daily routine. That's why we want the Code of Ethics to be more than just a document — it should be a living guide that everyone knows, understands, and puts into practice.

The Compliance Area will ensure that the Code of Ethics reaches all stakeholders (through internal channels like the intranet, external ones such as the website, or specific training sessions, among others); promote its awareness, understanding, and proper application; continuously monitor its compliance; and guarantee it is always available for consultation whenever needed.

Additionally, if there are any doubts or unclear situations, the Compliance Area will always be available to provide support, guidance, and assistance.



We set the
limit
ourselves.

The management, the leaders, and the team - **ALL** of us - play a very important role in promoting it: we must lead by example and foster a culture based on respect, honesty, and adherence to our standards.

Ethical Measures and Disciplinary System

As we have discussed, all members of MatHolding Group and, as much as possible, the Third Parties Linked, must comply with this Ethical Code.

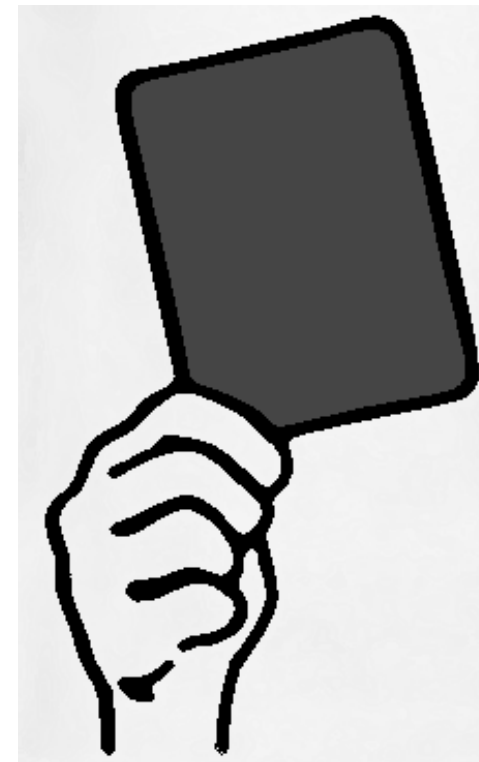
At MatHolding Group, we will address possible breaches of the Ethical Code with ethical and preventive measures. We will proactively anticipate the emergence of compliance issues, strengthening our ethical commitment and offering opportunities for correction or realignment before reaching disciplinary consequences. These actions will allow us to correct behaviors in a proportional and educational manner, aligning with the preventive and continuous improvement approach that inspires MatHolding Group's *Global Corporate Compliance Program*.

If the previous measures cannot be applied or are insufficient due to the seriousness of the events, the breach of this Ethical Code, the law, or the regulations that form part of Grupo MatHolding's *Global Corporate Compliance Program* will constitute an offense whose severity and sanction will be determined in accordance with current legislation.

The disciplinary procedure will begin with a report, communication, the outcome of an investigation, or upon the discovery of the alleged breach by the Compliance Area.

The investigation procedure for the alleged violation will follow the Procedure for Managing Queries and Complaints Received through the Ethical Channel and will be confidential.

The consequences of breaching this Ethical Code will not only affect the offender but also any personnel and/or Third Parties Linked who, through action or omission, allowed the breach to occur.



Entry into Force and Validity

This new version of the Ethical Code will come into effect on the day of its publication, superseding the previous version.

It will be reviewed and updated periodically by the Board of Directors, upon the proposal of the Compliance Area, which will take into account suggestions and proposals made by the members of MatHolding Group and in line with the commitments made by the Group in terms of corporate responsibility and good governance.

VERSION HISTORY

Version	Date	Author	Action taken
01	31.03.2017	Board of Directors	Version Approved by the Board of Directors of MatHolding
02	03.06.2025	Compliance Area	Complete review of the document for its update and validation
	30.06.2025	Board of Directors	Approval of the document

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