**Revision history**

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| **Version** | **Data** | **Summary of Updates** |
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**CODE OF ETHITCS**

**CARBOTAINER**

Un dibujo con letras

Descripción generada automáticamente con confianza media

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**MESSAGE TO EMPLOYEES**

Carbotainer S.L. - hereinafter Carbotainer - since its foundation, has been striving tirelessly to offer its products and services in an honest and responsible manner, respecting free competition. However, it is the challenges of an increasingly globalized and demanding society that must be considered as an opportunity to strengthen our position in the market and, in general, in society.

That is why, following the most demanding standards, we have decided to unequivocally express our permanent commitment to business ethics through the approval of this Code of Ethics. In this way, our company will be recognized not only for its high professional performance, but also for our high standards of ethical behavior, as reflected in this document. In general, it sets out the parameters within which any member or business partner of Carbotainer should perform their duties and dealings with Carbotainer and how they should act in the event that they consider that conduct may be or is contrary to the law or the ethical values of this Company.

Everyone subject to this Code of Ethics has a vital role to play in making a difference to our customers. Together, as a team, we can advance our commitment to ethics and integrity, generating the trust necessary for our customers and society to continue to value us not only for the quality of our products and services, but also for our behavior and the principles with which we identify.

Chairman of the Board of Directors.

**1. INTRODUCTION**

This Code of Ethics ("Code of Ethics" or "Code") is a statement of the principles and values that should guide Carbotainer's business conduct.

Carbotainer encourages all persons subject to this Code to conduct their business in a manner that respects free competition and to always act with honesty and integrity in accordance with the guidelines of this Code of Ethics, whose main objective is to reinforce, as a basic element of our corporate culture, professional, ethical and responsible behavior in the day-to-day conduct of our business. To this end, the principles and values that should govern Carbotainer's relations with their stakeholders.

Specifically, the Code of Ethics:

* it provides the fundamental bases of Carbotainer's corporate culture, a culture based on compliance with the law, respect for human and social rights and the guarantee of equal treatment.
* implements the principle of due diligence for the prevention, detection, and suppression of conduct contrary to current regulations or our ethical values.
* it is in line with the principle of criminal liability of commercial companies and other legal entities imposed by our legal system and, in this way, attempts to prevent and avoid the existence of behaviors that could be contrary to the regulations in force, as well as to good faith.

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| *The Code of Ethics sets out a series of guidelines, all of which are based on a commitment to act in accordance with applicable legislation and in good faith.* |

Compliance with the provisions of the Code of Ethics is a condition of continuing a relationship with any Carbotainer company. This Code does not grant rights of any kind, and Carbotainer may amend it at any time without notice.

As with all rules and regulations, the real relevance of this Code of Ethics lies not in its formulation, but in its actual and effective implementation by all those called upon to comply with it.

**2. SCOPE OF APPLICATION**

**2.1. Subjective Scope of Application.**

This Code is binding on all members of Carbotainer and its business partners, regardless of their position and function, including but not limited to:

* members of the governing body, managers, employees, workers or temporary employees or employees under a collaboration agreement, volunteers, as well as all other persons under hierarchical subordination of any of the above.
* any party, outside the above cases, with whom the Organization has or plans to establish any type of business relationship, such as clients, joint ventures and their partners, consortium partners, associations to which the Organization belongs and their associates, contractors, commission agents, consultants, subcontractors, suppliers, vendors, advisors, consultants, agents, distributors, representatives, intermediaries and investors.

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| *A Code for Everyone* |

**2.2 Objective Scope of Application.**

The Code applies to all conduct in connection with or within Carbotainer's activities. It also applies to any conduct by persons bound by it in accordance with section 2.1. that violates applicable laws and regulations outside working hours or outside the scope of work, where such conduct may have an impact on Carbotainer.

**3. GENERAL PRINCIPLES.**

The principles set out in this Code establish general guidelines for Carbotainer's members and business partners in the course of their work, professional or business activities. These are:

* to comply with applicable laws and regulations.
* to know, understand and act in accordance with our Code of Ethics.
* to respect Carbotainer's internal policies, processes and procedures.
* to use the Code of Ethics as a basis for conducting our business.
* to always act in good faith.
* and, in general, not to commit under any circumstances any act that is criminal or contrary to the Company's internal rules or that is suspected of being so.

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| *Is it legal? Is it consistent with our Code? Does it respect the image and reputation of our Company? Does it reflect Carbotainer's values and ethical principles? Would I like to read about it in the media?* ***If any answer is no, do NOT do it*** |

**4. COMMITMENT TO CONDUCT AND RESPONSIBLE PRACTICES.**

**4.1. General rules.**

All persons subject to this Code of Ethics, regardless of the function they perform, must carry out their activities in compliance with the company's regulations, social standards and in a socially responsible manner, acting in accordance with current legislation, common sense and ethics.

**A) Compliance with laws and respect for the rights of others.**

Before engaging in any conduct, reflect on whether it

* violates applicable rules or regulations.
* limits or impairs the rights of others.

**B) Compliance with these guidelines**

In our activities related to Carbotainer, we will always conduct ourselves in accordance with the guidelines of this Code, based on laws, ethics and our own Compliance Policy and other internal rules. For this reason, we will never force a subordinate, colleague, or employee to violate the provisions of the Code, nor will we tolerate excuses for conduct contrary to the Code.

**C) To act in a responsibly and honestly way**

The following guidelines must be always considered:

* any activities shall be conducted in a serious, positive, and responsible way,
* all kinds of misleading or dishonest behaviours shall be avoided in any work or business activity,
* whoever may hold a position of responsibility shall not use this position on their own profit, either inside or outside Carbotainer
* all duties and activities shall be performed with honesty and accuracy

The mission and vision that set the direction of our company will not be limited to the pursuit of purely financial gain over ethics and honesty, as this would be a violation of this Code.

**D) Social responsibility**

All persons subject to this Code shall strive to ensure that the productive, commercial and business activities related to Carbotainer have a positive influence on all citizens and the environment, avoiding in any case the infringement of social rights and any impact that may involve damage to the environment.

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| *Do not violate the rules and regulations.*  *Be careful not to infringe on the rights of others.* |

Finally, in all those situations not expressly contemplated in this Code of Ethics, nor in the Compliance Policy or other internal rules, nor in the law, we must appeal to Carbotainer's general values and principles, acting with honesty and social responsibility.

**4.2. Relationships of Carbotainer members with each other and with Business Partners and other Interested Parties**.

Carbotainer members shall base their relationships on integrity, honesty and good faith. Therefore, it has been concluded that the basic guidelines to be followed in order for relationships to be understood as being conducted with due diligence are:

**A) Among the members of Carbotainer**

Carbotainer considers its human team a key factor for the development of its activity, therefore, defends and promotes respect for human rights and equal opportunities, and ensures strict compliance with applicable regulations and good practices in terms of employment conditions, health and safety.

Carbotainer members shall:

* take responsibility for strict compliance with occupational health and safety regulations and for ensuring their own safety and that of their colleagues.
* avoid harassment, bullying and discrimination among employees.
* respect collective rights of unionization, association and collective bargaining.
* promote diversity and equal opportunity.
* maintain a safe and healthy workplace.
* base relationships with both subordinates and superiors on mutual respect and maximum collaboration to achieve their common goals within the organization.

**B) With business partners and other stakeholders**

**I. Customers**

All members of Carbotainer are obliged to act, in their relations with customers, according to criteria of consideration, respect and dignity, considering the different sensitivity of each person and not allowing discrimination in treatment based on race, religion, age, nationality, gender or any other personal or social condition prohibited by law.

In addition, they shall make every effort to meet customer expectations in terms of quality and efficiency, basing the relationship with customers on maximum collaboration and mutual trust.

Carbotainer, through its members, shall act with integrity and honesty in its relationship with customers, protecting it to that effect, among others, through the following measures:

* strictly applying the provisions set out in Carbotainer's Gifts and attentions Policy in relation to any gifts, benefits or entertainment offered to or received from customers,
* exercising extreme care to ensure that all customer relationships are kept transparent and avoid even the appearance of dishonesty, and that any undue payment or advantage is prohibited in all cases,
* providing clear and truthful information in negotiations and ensuring that the terms of agreements are concise and avoid future conflicts,
* carrying out the company's promotional activities in a clear manner, so as not to offer false, misleading or deceptive information that may mislead customers or third parties,
* attending to any complaint received in an agile and sincere manner, and informing as quickly as possible all those departments involved in the different phases up to the sale of the product.

**II. Suppliers, Contractors and Intermediaries**

At Carbotainer we have clear parameters when dealing with our suppliers, contractors and intermediaries, among which fairness and integrity stand out. In this way, we guarantee a fair, honest and respectful treatment with free competition.

The following are the fundamental criteria to be followed in our relationship with suppliers, contractors and intermediaries:

* the internal processes applicable to the selection of suppliers, contractors and intermediaries must be rigorously respected, ensuring in all cases the protection of free competition,
* clear and truthful information must be provided in negotiations, ensuring in all cases that the terms of the agreements are concise and avoid future conflicts,
* all types of undue payments or advantages are prohibited, and extreme care must be taken to ensure that all relationships with suppliers, contractors and intermediaries are kept transparent and avoid even the appearance of dishonesty,
* gifts, attentions or entertainment activities offered by suppliers, contractors and intermediaries will only be given and accepted on the terms set forth in Carbotainer's Gifts and Attentions Policy,
* no decisions in relation to suppliers, contractors and intermediaries shall be made based on personal motives in a manner that may involve a conflict of interest or constitute a breach of trust,
* no advantage of a dominant position shall be taken to make inappropriate purchases or demand terms and conditions from suppliers, contractors and intermediaries in other areas,
* choosing suppliers that meet the mandatory standards for all suppliers in terms of health and product safety. For this reason, those products that do not meet the required standards or do not comply with the specifications legally required for their commercialization should not be offered.

**III. Public and Government Officials**

The Carbotainer team, as well as its representatives, by their own activity, do not normally establish relationships with public and governmental officials, beyond those imposed by law. Notwithstanding the foregoing, no member, representative or business partner of Carbotainer may:

* offer advantages, gifts or entertainment to public officials or subjects recognized by law as such in order to obtain benefits,
* provide money or inappropriate or illegal economic benefits to public officials or personnel related to Public Administrations, Entities or Public Bodies for the development of the functions of their position, avoiding any conduct that may be considered as bribery, even its appearance,
* requesting socially unacceptable advantages from public officials,
* offering remuneration to a public official to promote commercial or business opportunities,
* providing information in breach of confidentiality obligations or making requests involving bribes.

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| *Relationships with public officials should not raise any suspicion.* |

**4.3. Respect for Intellectual and Industrial Property Rights.**

In Carbotainer we are in continuous development, therefore, we are aware of the importance of intellectual and industrial property, both our own and that of third parties. For this reason, the persons subject to the Code of Ethics must:

* respect the intellectual and industrial property of Carbotainer's products and services and those of third parties,
* check whether there is intellectual and industrial property registered by third parties that could be infringed in the context of new technological developments,
* maintain the confidentiality of technical information relating to R&D and results, production processes and technological developments, among others, keeping them as Carbotainer's property by virtue of the corresponding patent rights obtained or protecting their disclosure before obtaining them. To this end, members who have access to Carbotainer's confidential information will be required to sign the Confidentiality and Non-Disclosure Agreement,
* obtain consent or license from the owner to use software, images, text and other data published on the Internet.

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| *Respect the intellectual property rights and registered industrial property rights of others.* |

**4.4. Work environment.**

In order to develop the corporate social responsibility commitment assumed by Carbotainer to improve the quality of life of employees and their families, the persons subject to this Code shall promote a work environment compatible with personal development, helping their teams to reconcile work and family life in the best possible way.

Consequently, all persons subject to this Code shall respect their colleagues, and promote participation, fairness and reciprocal collaboration in order to achieve a respectful and productive work environment. In particular:

* superiors shall communicate regularly with their subordinates and foster an appropriate working environment,
* it will be avoid acting in an egocentric and unsupportive way,
* no behavior or language that is disrespectful to fellow students or causes discomfort to the opposite sex shall be adopted,
* no behavior or language that is disrespectful to fellow colleagues or that causes discomfort to the other gender shall be adopted,
* the Protocol for the prevention and treatment of situations of sexual and gender-based harassment and discriminatory harassment regulated in the General Collective Bargaining Agreement for the chemical industry shall be applied.

**4.5. Health and Safety.**

Carbotainer attaches great importance to the occupational health and safety of its employees, as well as that of all persons bound by this Code, and the continuous improvement of working conditions is a priority objective. Therefore, Carbotainer, in general, and all its members, in particular, undertake to

* take acknowledge and obey the applicable health and safety rules, as well as other related policies established by Carbotainer. Each person in charge of an area, department or workplace is responsible for complying with and enforcing compliance with the regulations in force at any given time, as well as with the preventive policies established by Carbotainer,
* monitor their own safety and that of their colleagues, following the instructions and training they have received in this regard,
* report immediately in case of unsafe and/or unhealthy behavior, as well as any incident that occurs,
* keep the workplace free of alcoholic beverages and drugs.

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| *Communication and cooperation in the workplace.* |

**4.6. Maintaining a solid and competitive base.**

In Carbotainer we develop our activity with the utmost professionalism and with the aim of customer satisfaction, competing in the market with products and services that provide added value for their quality and innovation and distinguishing ourselves by our attention to the needs of customers. Therefore, the treatment of our competitors will always be within the limits of fair competition, business ethics and current legislation. To this end,

* our functions will be carried out with respect for free competition and in accordance with socially acceptable standards,
* we will work daily to ensure that our goods and services provide added value in terms of quality, price and delivery,
* It is possible to consult validly published competitor information, but you should be aware that illegitimately obtaining confidential information about them is conduct that violates the limits of free competition,
* providing entertainment activities or gifts to customers shall not be allowed if this violates commercially and socially accepted standards, and always within the limits of *Carbotainer's Gifts and Attentions Policy.*

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| *Free competition must not be infringed* |

**4.7. Information management and processing.**

Honest and accurate information is the key to the proper functioning of a large company. Therefore, the members of Carbotainer:

* shall prepare reports for the top management or hierarchical superior in the quickest and most accurate way,
* shall immediately inform the relevant superior of any negative data, contradictory information or complaint,
* shall take due care not to leak any information accidentally,
* shall protect and treat personal information appropriately, respecting at all times the regulations in force regarding personal data protection and the internal processes related to them,
* shall not falsify reports to the authorities, as this may be considered a crime.

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| *Be fully aware that hiding negative information or failures can only aggravate the situation.* |

Regarding the recording of information, the following shall be considered:

* the obligation to record the information obtained or developed in execution of the duties of the position accurately and in accordance with the provisions of current legislation,
* the damage that may be caused to Carbotainer in the event that inaccurate or erroneous information is provided or reports are falsified,
* the need to obtain prior authorization from the line manager to change or delete essential information.

In addition, Carbotainer members should be aware of:

* the obligation to report any negative information to their superior as soon as possible and to seek his or her guidance immediately,
* the harm that would be caused by the possible publication of false information about the company to outside sources,
* the interest of not providing any data or information that has not been published without the confirmation of senior management or the head of department,
* the need to protect information and physical assets to which we have access, including protecting them from any malicious threat or accidental loss,
* the importance of respecting the integrity of our working documents and not making inappropriate changes to them once they have been completed and approved,
* the importance of managing non-proprietary technical information with special care,
* the harm that would be caused by the destruction, alteration, or deletion of potentially relevant documents or information stored in electronic format. Such potentially relevant records include documents, e-mails or any other data reflecting, among other things, the following:

1. Contacts or meetings with other companies of the competition, as well as the reason or content of such contacts or meetings
2. Business and product development strategies
3. Pricing, quotations and responses to requests for quotations for our products and services
4. Data relating to demand and sales of products marketed by Carbotainer
5. Customers and the ways in which Carbotainer has obtained, retained or lost them

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| *Information must be managed with care. You will communicate information accurately and in a timely manner. Improper disclosure may be a violation of the Code.*  *Preserve and retain documents. Company information must be managed properly and accurately.* |

In connection with information acquired in the performance of their duties, members of Carbotainer shall observe the following guidelines:

* while employed by the company, in the event of filing a personal application for a patent, management shall first be consulted and their guidance sought,
* no academic or technical articles will be published unless authorized by a superior,
* after termination of the contract, all technical or business-valuable information and resources made available by Carbotainer shall be returned to the company,
* after termination of the contract, personal or technical information obtained during the term of the contract shall not be published or used unless express permission is obtained from Carbotainer.

**4.8. Protection of confidential and privileged information.**

At Carbotainer we are aware of the importance that a company's confidential and proprietary information can have, as well as the value of our own information to our Company. For this reason the members of Carbotainer must:

* maintain information relating to R&D projects, plans and results, among others, such as company information by virtue of patent rights obtained,
* keep the information that may be considered relevant when we know and foresee any type of investigation, litigation or important procedure,
* maintain the utmost confidentiality with respect to any information prior to the patent application,
* to preserve technical information not protected by any patent with due diligence and special care,
* sign and abide by the Confidentiality and Non-Disclosure Agreement,
* treat confidential information owned by Carbotainer or obtained by Carbotainer from third parties in an appropriate manner, preventing its disclosure and/or disclosure to unauthorized third parties.

In particular, the confidentiality of the following items shall be strictly respected:

* new information on R&D projects and new products,
* agendas, forecasts, business and commercial strategies, financial data,
* information about personnel or possible personnel movements such as transfers or organizational changes,
* information, whether personal or technical, without the permission of our superior.

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| *Insider trading is prohibited* |

On the other hand, Carbotainer's business partners:

* shall refrain from disclosing any confidential information or any information which, even if not classified as such, is by its nature sensitive to Carbotainer and to which they may have access through their dealings with Carbotainer,
* shall apply the same diligence as they would to their own information in the retention and storage of any data they receive in the course of their dealings with Carbotainer.

**4.9. Company Assets.**

Persons bound by this Code of Ethics:

* shall treat the company's assets with due diligence,
* shall be aware that the company's assets are resources assigned by the partners and their misuse may be considered a violation of this Code,
* shall take care of the resources offered by the company, paying due attention to them and shall not acquire them for their own or personal use. In the case of e-mail, the Human Resources Department will provide the internal regulations for the use of e-mail. The theft of company material shall be considered conduct contrary to this Code.

In addition, employees, as well as all persons bound by this Code:

* shall be aware that the resources and technological means provided by the company may not be used for non-work use, unless expressly authorized by a superior,
* may not remove, dispose of inventory, resources or material without prior authorization,
* must return the resources provided by the company at the end of the contract, applying in any case the corresponding internal processes. At the time of return of the resources provided, the Human Resources Department will provide the Carbotainer member with the Company's certificate listing the resources that have been returned,
* company funds and assets may not be used for illegal purposes or in contravention of socially accepted standards.

Carbotainer will communicate how to properly manage the information related to the material and resources provided by the company.

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| *Take care of the company's assets. These are only for work and for lawful purposes.* |

**4.10. Environmental protection.**

Carbotainer attaches great importance to the protection of the environment and is therefore committed to make every effort to prevent the Company's activities from causing damage to our environment. For this reason, we have developed an Environmental Protection Policy, which is known to all our employees as well as to all persons subject to this Code.

In addition, Carbotainer has the following environmental protection guidelines:

* to comply with national, local and internal European regulations concerning polluting substances and the transport of hazardous substances,
* to legally and properly dispose of industrial waste generated during our activity in compliance with laws and company regulations,
* to report any conduct that may pose an unnecessary environmental risk in the development of our activity,
* to comply with the specifications given by the superior when dealing with polluting material,
* to comply and enforce compliance with the rules, policies and procedures for the preservation of the environment established by the company,
* to make efficient use of water and energy.

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| *Strictly comply with the company's laws and regulations concerning environmental protection.* |

**4.11. Offshore Activities.**

In connection with offshore activities, Carbotainer undertakes to:

* conduct offshore practices respecting the culture and customs of the country,
* increase its awareness towards any employee of the company and act with safety in mind.
* take acknowledge of the religion, culture and customs of the country or region before undertaking a business trip.
* do not presume our nationality in less fortunate or developing countries.

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| *Respect the culture of each country.* |

**4.12. Conflicts of Interest.**

Conflicts of interest arise in situations where persons subject to this Code have interests that are contrary or conflicting to the interests of Carbotainer. This may lead to a hindrance in the performance of the duties and responsibilities of the person concerned.

Accordingly, all persons subject to this Code should make every effort to avoid any conflict of interest with Carbotainer.

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| *Avoid conflicts of interest with the company.* |

**5. COMMUNICATION OF INCIDENTS.**

**5.1. Introduction and assurances.**

At Carbotainer, we want all persons subject to this Code to have the confidence to speak up, particularly with regard to ethical concerns.

We guarantee the commitment of all members of Carbotainer and third parties to the strictest confidentiality with respect to whistleblowers, reporters or witnesses called to participate in the investigation process.

We declare the prohibition of any form of retaliation, and we guarantee that the necessary measures will be taken to protect those members of Carbotainer or third parties who make communications in good faith and on the basis of reasonable indications, through the communication channels provided for in this Code.

In the event that the whistleblower chooses to remain anonymous, an external Incident Communication Channel has been set up, managed by the lawyer Estanislao Gracia Carabantes which, in compliance with the duty of professional secrecy that binds him, is obliged not to disclose the whistleblower's personal or employment data.

Carbotainer allows the reporting of incidents anonymously.

Carbotainer guarantees the investigation of all communications received.

Investigations will be conducted in accordance with PR-C-7: Incident Communication and Investigation Procedure, which is available from TEAMS. The rights of the whistleblower, the reported and witnesses involved in the investigation procedure are guaranteed.

**5.2. Obligation to report.**

Any member of Carbotainer who has reasonable grounds to suspect any of the incidents referred to in the following paragraph shall be obliged to report them immediately through the channels set out in this document.

**5.3. Concept of Incident.**

The concept of Incident shall mean the following:

(a) any breach, irregularity or circumstance that may involve the materialization of a criminal risk to Carbotainer, based on prima facie evidence,

(b) acts or omissions contrary to Carbotainer's Criminal Compliance Policy,

(c) weaknesses in the Criminal Compliance Management System,

(d) any violation of applicable law.

Excluded from the concept of Incident are all those issues not contained in the previous paragraph, and in particular those related to Human Resources policies (remuneration, vacations, etc.) or to the development of the job (cleanliness of the facilities, office temperature, etc.).

To decide whether a violation of the Code has occurred or is about to occur, you should first ask yourself the following questions:

* How would I feel describing this behavior in a staff meeting? To my family? To the media?
* Could this behavior damage the image of the company or to the company itself? Could this behavior cause a loss of confidence on the part of our customers, suppliers or investors?
* Could this conduct harm others, such as other employees, investors or customers?
* Is this conduct a criminal offense and could it result in legal sanctions?

If the answer to any of these questions is "yes" or even "maybe," you have identified a potential problem and should report it.

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| *Report any Incident of which you have reasonable indications* |

Examples of what to report and what not to report through the Communication Channels provided in this Code:

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| WHAT DO NOT REPORT | WHAT TO REPORT |
| "I would like to change the vacation already chosen in the month of August." | “I have seen the purchasing manager accept commissions to choose that supplier.” |
| "I need a new mouse for my PC, because the current one doesn't work." | "My department has delivered a ham to the head of urban planning at City Hall to expedite municipal licenses." |
| "The work clothing provided is one size larger than indicated." | "In the workshop, copper is sold in b-cash, which is used by the company to make minor payments, outside the legal accounting system." |

**5.4. Means for the communication of incidents.**

The **communication of incidents** can be done through two different ways:

(a) Through the **internal Incident Communication Channel** that can occur in all areas and departments, by means of communication to the reporting party's hierarchical superior, who will have 3 working days to channel such communication to the Ethics Committee.

(b) Through the **external Incident Communication Channel** that the Gracia Carabantes law firm has enabled through the following means:

* By e-mail to [egracia@graciacarabantes.com](mailto:egracia@graciacarabantes.com)
* by telephone communication to the number (+34) 976 23 83 34

**5.6. On the reporting of Incidents by the whistleblower.**

Any person who decides to report an Incident through the means of communication made available by Carbotainer shall provide as much information as possible about the evidence of which he has become aware, as well as the identity of the perpetrator, the date of commission and the documentary evidence and witnesses, if any.

Any whistleblower shall be guided by the principle of good faith when resorting to the avenues provided for herein.

**5.7. Advice: doubts or concerns.**

Carbotainer Company, through the Ethics Committee, will provide advice to those persons who raise questions or concerns about the Criminal Compliance Management System or any issue arising therefrom, and must acknowledge receipt to the whistleblower within 3 working days following the communication, and answer their questions or concerns within a period not exceeding 7 working days from the sending of the acknowledgment of receipt.

**5.8. Ethics Committee.**

The Board of Directors of Carbotainer S.L. founded the Ethics Committee in June 2022 for the purpose of supervising and promoting the implementation of the Criminal Compliance Management System.

If you have any doubts or questions about any provision of this Code, please do not hesitate to contact the committee by e-mail at compliance@carbotainer.es. Remember that you will not be harmed in any way for having made a query regarding this Code.

**6. PUBLICATION OF THE CODE.**

The Code of Ethics will be available in Spanish and will be published at the following address: Carbotainer website.

This Code of Ethics will be communicated and published, and will also be the subject of training and awareness-raising activities so that its contents are understood and implemented by all those who are bound by it.

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| *The Code of Ethics is available on the Carbotainer website.* |