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### 1. INTRODUCTION

At FYTISA we believe that the success and the safeguarding of our future development as a company depends on, amongst others factors, our sustainable business strategy.

FYTISA intends to make the principles of the FYTISA Code of Conduct detailed below, key elements of our business and behavior.

### 2. HUMAN RIGHTS AND WORKING CONDITIONS

FYTISA is committed to respecting and complying with the Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights, international Labor Organization conventions (ILO conventions n° 29, 87, 98, 100, 105, 111, 138 or 182) and the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises, among other international standards and practices. We work to ensure that neither the company nor its employees abuse any of these principles.

#### **Child labor and young workers conditions**

FYTISA will not allow any form of child labor in their business activities and in the activities of their supply chain, as described in article 3(d) of Worst Forms of Child Labour Convention, 1999 (No. 182).

#### **No forced labor, modern slavery or human trafficking.**

FYTISA is committed to refuse, to do not allow and to denounce any kind of forced labor, modern slavery or human trafficking that may be known in its business activities.

#### **Fair wages, Non-Discrimination and Equal Remuneration (Payment).**

Non-discrimination and equal remuneration as well as the commitment with applicable regulations are base of FYTISA recruitment and employment process.

#### **Freedom of Association**

FYTISA will always respect the right of workers to associate freely, form and join workers organizations of their own choice, seek representation, and to bargain collectively, as permitted by and in accordance with the applicable laws and regulations.



## **Health & Safety**

FYTISA is committed to have and maintenance Risk Assessments Plans for whole sites and workplaces as well as emergency procedures and potential safety hazards, to provide adequate safety training to employees and suitable protective equipments.

FYTISA is committed to ensure that all required permits, licenses, inspection and testing reports are in place, up to date and available as required by law.

No kind of tolerance against alcohol and drugs as well as people under their effects will be strictly followed with the aim to prevent any incidents / accidents and to preserve employee health and safety.

## **Non -Discrimination (Diversity and Inclusion)**

Equal treatment and provide an inclusive working environment to all of FYTISA employees is integral part of our labor policy. Taking as minimum reference the applicable Labor Law and any other related with it.

## **Harassment**

FYTISA is committed to provide a work place free of any form of harassment.

## **3. ENVIRONMENT**

FYTISA is committed not only to comply with all environment laws and regulations, but to also adapt sustainable and responsible practices that promote conservation of resources and raw materials, and to contribute to the protection of the environment.

### **Energy Consumption & Gas Emissions**

FYTISA tracks and documents energy consumption and is committed to reduce as far as possible greenhouse gas emissions.

Any kind of improving energy efficiency are looked far from next perspectives: Cost-effective, Energy Consumption and Greenhouse gas emissions.

### **Water Reduction, Air Quality & Waste Management**

FYTISA will constantly work to preserve water resources and consumption, waste reduction, reuse, recovery, recycling and finally waste disposal.

To preserve the environment and the health and safe of employees and local communities.

### **Natural Resource Management**

The use of sustainable, renewable and natural resources in an efficient manner over the product's life cycle is integral part of our behavior.

### **Responsible Chemical Management**

FYTISA is committed to identify and manage chemicals to ensure their safe handling, storage, use, recycling and disposal. As well as to collect data from their material manufacturers for all chemicals and components classified as hazardous substances.



## 4. BUSINESS ETHICS

FYTISA is committed to maintain the highest standards of corporate ethics and lawful conduct.

These standards will be passed through to its supply chain.

All business relationships and transactions by FYTISA and its supply chain must conform to local laws and be conducted with the utmost integrity and honesty; including in particular:

### **Responsible sourcing of materials**

FYTISA will work in order to assure its supply chain will not provide products containing materials that contribute to human rights abuses, bribery and violation of ethics, or negatively impact the environment. As well as to inform about the use or not of conflict free smelters and refiners for procurement of Tin, Tungsten, Tantalum and Gold contained in FYTISA products.

### **Anti-Corruption**

FYTISA is actively and consistently fighting against any form of bribery, corruption, extortion or embezzlement, and complies with all applicable laws pertaining to these issues. Our policy goes beyond these laws and prohibits improper payments in all of our activities, both with governmental entities and in the private sector. Negotiations in which transactions are made using illicit means will not be tolerated.

### **Privacy and Confidentiality**

FYTISA complies with all applicable laws concerning data protection and information security, ensuring that privacy is safeguarded, personal data is protected, and all business information is kept secure.

FYTISA drives its supply chain to follow these principles.

### **Financial Responsibility/Accurate Records**

Every documentation, whether internal or external, must be accurate and truthful. FYTISA is acting in accordance with applicable law and generally applicable accounting Principles.

### **Import/Export Controls and Economic Sanctions**

FYTISA is engaged to ensure that its business practices are in accordance with all applicable laws, directives and regulations governing the import / export of parts, components and technical data.

### **Whistle blower Protection and Non-Retaliation**

FYTISA will not tolerate any form of retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this Code.

Approved By  
Guillem Soler  
FYTISA CEO