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Ethical Code of Conduct >>

Noxium, global electronics engineering and information and communications technology services

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Since 2002, the year of Noxium's birth, the company's main objective has been to build a business model based on the creation of value and commitment to our stakeholders: collaborators, customers, suppliers, society, public administrations, ...

Integrity, honesty, commitment, quality, and full compliance with all applicable laws have guided Noxium's best practices.

Operating globally and being present in the most demanding markets is a great ethical and transparency challenge. For this reason, this Code of Ethical Conduct sets out Noxium's ethical commitments and responsibilities in the management of its business and corporate activities.

The Code applies to all areas of Noxium and is binding on all Noxium's personnel, regardless of their position and function, and will also apply to external collaborators.

D. Antonio Corral
Director General
Noxium

❖ We are committed to pursuing our core values and principles

- ❑ Noxium's personnel will always abide by the company's value: commitment, integrity, honesty, responsibility, professionalism and transparency.
- ❑ The personnel will always act under the strongest commitment to comply with laws, rules and regulations.
- ❑ Moral integrity, honesty and respect towards colleagues and other collaborators must inspire our daily activities.
- ❑ Personnel shall avoid activities that are in conflict of interest with the organization
- ❑ Personnel shall refrain from using for their own benefit any information obtained in the course of their work.

❖ We prevent and disapprove of all forms of bribery and corruption. Zero Tolerance

- ❑ Noxium rejects any kind of corruption and bribery, adopting appropriate measures to prevent corruption and company integrity
- ❑ The personnel will always act under the firmest commitment to comply with the laws, rules and regulations that allow the eradication of any type of extortion or bribery
- ❑ In any Noxium business relationship, it will be essential to impose truthfulness and transparency in the exchange of information and to respect contractual commitments with absolute determination
- ❑ Any kickback or bribery between Noxium and its personnel, supplies or public officials is strictly prohibited

❖ Maximum responsibility in the performance of our activities

- ❑ Noxium acts in accordance with the principles of good corporate governance.
- ❑ Noxium's firm commitment to support and respect human rights, in accordance with the United Nations Declaration of Human Rights and the Conventions of the International Labor Organization
- ❑ For Noxium, the policy of economic, social and environmental sustainability is part of its core responsibility and is transmitted in all relations with its stakeholders

❖ Liability and disciplinary regime

- ❑ Maximum responsibility is promoted in the performance of activities and behaviors of personnel, collaborators and suppliers. Any breach of our Code, our internal regulations or applicable legislation, may be subject to disciplinary measures, which could include termination of contract or reprimand as well as other possible legal actions and sanctions.

- ❑ In order to guarantee and ensure compliance with the company's Code of Ethics and Conduct, there is an Ethics Committee composed of:
 - ❑ General Management
 - ❑ Quality, Environment and CSR Management
 - ❑ Human Resources Management

❖ Accessible to all interested parties

- ❑ Noxium fosters an open environment and a work climate that respects ethical principles
- ❑ Noxium's Code of Ethics and Conduct will remain accessible on the Noxium website and will be the subject of the necessary communication actions for its timely understanding and implementation throughout the organization
- ❑ Noxium has an internal whistleblower channel to report any irregularities and/or non-compliance by personnel, collaborators and suppliers of the company, guaranteeing the confidentiality of the whistleblower's identity
- ❑ If you have any questions, if you are unsure about what to do, or if you are concerned that someone is doing something that may violate our Code, please contact our Quality Area



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