

CSR CODE OF CONDUCT

Company	Crearomatic, S.L.
Edition / revision	Edition 1 - Revision 2026
Date of update	23 July 2026
Approval	Management

Review note

This version unifies the document date as July 2026, corrects drafting inconsistencies and adapts the content to Crearomatic's actual activity.

1. Our Code of Conduct

Crearomatic carries out its activity under principles of integrity, quality, trust, sustainability and responsibility. This Code of Conduct sets out the basic guidelines that should govern the behaviour of all people who form part of the organisation, as well as relationships with customers, suppliers, collaborators and other stakeholders.

Crearomatic's corporate culture goes beyond strict compliance with the law. The company promotes management that is consistent with its values, with applicable legal and regulatory requirements and with the commitments assumed in relation to quality, safety, social responsibility and sustainability.

2. Purpose

This Code of Conduct establishes the essential values, principles of action and ethical commitments of Crearomatic. All areas of the company shall make decisions and adopt behaviours aligned with this framework, without prejudice to the application of stricter legal or contractual rules.

3. Scope of application

This Code of Conduct applies to management, Crearomatic personnel and, where appropriate, suppliers, contractors, external collaborators and other stakeholders that have a relationship with the company. Crearomatic will promote awareness and respect for its principles throughout its value chain.

4. Our values

Crearomatic's actions are based on the values of Integrity, Excellence, Trust, Sustainability and Profitability. These values contribute to the creation of shared value for stakeholders and to the sustainable growth of the organisation.

5. Integrity

Crearomatic promotes and recognises behaviours aligned with ethics, regulatory compliance and professional responsibility.

5.1. We comply with the rules

All people at Crearomatic must comply with current legislation and act in accordance with its spirit and purpose. The company does not tolerate legal breaches, especially those that may have criminal, serious administrative or reputational relevance.

5.2. We act with loyalty

In the performance of their responsibilities, Crearomatic people must act with loyalty and in defence of the legitimate interests of the company. Situations that may create conflicts of interest shall be avoided and promptly communicated whenever they may arise.

5.3. We oppose corruption and bribery

Crearomatic maintains a zero-tolerance policy towards corruption, bribery and any undue advantage. It is prohibited to offer, promise, request or accept gifts, payments, gratuities, favours or benefits that may influence a professional, commercial or administrative decision.

5.4. We prevent money laundering

The company shall act with due diligence in the selection of third parties, the review of transactions and the management of payments and collections, avoiding operations that may be linked to goods or assets of unlawful origin.

5.5. We promote fair competition

Crearomatic rejects any conduct that restricts or distorts free competition, including anti-competitive agreements, collusive practices, abuse of market position or misleading conduct.

5.6. We respect international trade rules

The company shall ensure compliance with the regulations applicable to international transactions, trade restrictions, embargoes, sanctions, export controls and documentary requirements imposed by the markets in which it operates.

5.7. We defend tax integrity

Crearomatic shall comply with the tax regulations in force in each territory in which it operates, avoiding improper tax avoidance practices, concealment of information or abusive use of tax benefits.

5.8. We protect information

Confidential, technical, commercial, documentary and personal information shall be protected against unauthorised access, improper disclosure or illegitimate use. The company shall adopt data security and protection measures in accordance with applicable regulations.

5.9. No discrimination or harassment

Crearomatic rejects any form of discrimination on grounds of gender, age, religion, race, sexual orientation, nationality, disability or any other personal or social condition. It also does not tolerate harassment, abuse of authority, intimidation, retaliation or degrading treatment.

5.10. Child labour, forced labour and minority rights

Crearomatic rejects child labour and forced labour, and will promote respect for human dignity, minority rights, persons with disabilities and migrant workers, in accordance with applicable legislation and international standards of responsible conduct.

6. Excellence

Excellence means professionalism, customer focus, continuous improvement and commitment to the quality of products and services.

6.1. Quality and innovation

Crearomatic works to offer safe, traceable products and services adapted to its customers' technical requirements. The company promotes innovation, development and continuous improvement as means to strengthen quality and competitiveness.

6.2. Customer focus

Crearomatic people shall act with professional treatment, collaboration and a service vocation, seeking to understand customer needs and respond with appropriate technical solutions.

6.3. Training

The company promotes continuous training of personnel in order to strengthen their skills, improve professional performance and consolidate a culture of quality, safety and responsibility.

6.4. Use and protection of company assets

The company's material, technical, documentary and intangible resources must be used responsibly, efficiently and only for authorised professional purposes. They must be protected against loss, damage, theft or misuse.

7. Trust

Trust is built through transparent relationships, respect for people and fulfilment of commitments assumed.

7.1. We respect people

Crearomatic defends internationally recognised human and labour rights, promotes decent working conditions and respects the privacy and personal data of workers.

7.2. Occupational health and safety

Occupational health and safety is a priority for the company. Crearomatic will promote safe working environments, assess risks and adopt appropriate preventive measures with the aim of avoiding accidents and incidents.

7.3. Equal opportunities

Selection, training and professional promotion shall be based on objective criteria of merit, ability, performance and suitability for the position.

7.4. Transparency

Information communicated by the company must be truthful, necessary, complete and timely. Communications made on behalf of Crearomatic may only be carried out by authorised persons.

8. Sustainability

Crearomatic maintains a constant commitment to sustainable development, responsible management of its impacts and the integration of social, environmental and ethical criteria into its activity.

The company takes the core subjects of social responsibility and the guidance of ISO 26000 as a reference, without this constituting ISO certification or automatic adherence to external initiatives. Any formal adherence to international organisations or compacts must be expressly approved and documented.

Crearomatic undertakes to comply with applicable environmental legislation, prevent environmental damage and manage natural resources, waste, emissions, water and energy responsibly.

9. Responsible profitability

Profitability is necessary to ensure the continuity of the company, the creation of employment, investment in continuous improvement and the creation of value for its stakeholders. Crearomatic will pursue responsible profitability, compatible with quality, safety, legality, ethics and sustainability.

10. Organisational measures

10.1. Ethics and Management System Committee

Crearomatic may rely on an Ethics and Management System Committee, formed by the person responsible for the management system and the company's external consultant, to interpret this Code, promote its application and channel questions or communications related to compliance.

10.2. Ethics Channel

Crearomatic people and other stakeholders may communicate questions, concerns or possible breaches through the channels made available by the company. Communications will be managed under the principles of confidentiality, impartiality, good faith and protection against retaliation, in accordance with applicable regulations.

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Corporate website: <https://www.crearomatic.com>

Email: canaldenuncias@crearomatic.com

11. Response to breaches

Failure to comply with this Code of Conduct or with the rules that develop it may put the company at risk and lead to disciplinary, contractual or legal measures. The response shall be proportionate to the seriousness of the facts, regardless of the position or relationship of the person involved.

12. Interpretation and validity

This Code of Conduct enters into force upon approval by Management and shall be communicated to Crearomatic people. The company's internal rules shall be interpreted consistently with its principles.

13. Related essential policies

This Code is complemented by the internal policies and documents published or made available to stakeholders, including:

- Integrated policy on quality, safety and social responsibility.
- Environmental policy.
- Code of Ethics.
- Privacy and data protection policy.
- Legal notice and terms of use of the corporate website.

Date: 23 July 2026