

EUROFIRMS GROUP  
Code of Conduct

# 1. Meaning and description

EUROFIRMS is a business group established at both national and international levels, whose member companies are mainly dedicated to the provision of professional services related to HUMAN CAPITAL, understood as personnel management in different areas and modalities.

All EUROFIRMS' actions are aimed at providing optimal solutions to the different needs of our clients in terms of personnel, such as the provision of personnel selection services, training, provision of personnel through temporary employment agencies and outsourcing of various activities, without neglecting the social commitment carried out through Eurofirms Private Foundation.

The companies belonging to the EUROFIRMS group and its members must abide by this Code of Conduct, without prejudice to the fact that each business entity may develop its own complementary documentation on policies and

procedures according to the specifics of its activity and the applicable local regulations, always under the premises of this document.

The team of people that make up EUROFIRMS is committed to complying with the law and the ongoing improvement of our actions, and we share a code of values that we apply to our daily activities: **Transparency, Responsibility and Respect.**

In order for these three values to form the basis of our management, EUROFIRMS acquires an ethical commitment that goes beyond regulatory compliance, forming the inherent features of our "personality", so that compliance with this Code of Conduct and other complementary documentation is observed in all areas of our organisation and by all its members.



Being aware that our field of business activity is dominated by constant interaction with other parties, the Code of Conduct has an additional objective, which is to govern the principles and values that should regulate the relations of EUROFIRMS with its stakeholders, making them participants in our idiosyncrasy, and also preventing our commitment from being counteracted or undermined by the actions of third parties.

The Code of Conduct establishes the criteria for action that must be observed by all members of the organisation in the performance of their responsibilities and functions, striving for professional, ethical and responsible behaviour, as a basic element of our corporate culture.

The purpose of the Code of Conduct is not only its mandatory observance, but its natural compliance, so that all members of the organisation are aware of the values of EUROFIRMS in their training and in their

personal and professional development. No employee may ask other employees to contravene the provisions of this Code, nor shall conduct contrary to this Code be deemed justified based on an employee's compliance with an order from a superior. Any breaches of this Code of Conduct that may occur will be analysed and penalised in accordance with the applicable internal procedures, agreements, and legal regulations.

EUROFIRMS goes one step beyond regulatory compliance. Nowadays, for any business organisation seeking to earn the respect of society and the success of its activity, compliance with the applicable regulations should be a matter of course and should not require any doubts in this respect. However, we reaffirm our commitment to this compliance and we also imbue our activity with respect for people and socially recognised ethical values, such as honesty, humility, companionship, generosity, effort and dedication.

## 2. Our Claim: Living People First

Living People First is about helping to improve people's lives, seeking their best version in a sustainable business activity, with a will to contribute to their happiness and thus have a positive impact on our society.

To improve people's lives, we create socially responsible companies, where we can contribute to their development and that of leaders with values that stimulate our project.

By helping people grow and supporting the development of their professional and leadership skills, we contribute to greater well-being for the team and its environment.

- Our leadership style is helping and serving
- We lead by values: transparency, accountability and respect.
- We aspire to be inspiring, exemplary, proactive and consistent people who see the best in everyone and celebrate it.
- We operate with humility, simplicity and common sense, always pursuing excellence.

Committed people do our jobs with hope and motivation, achieving a happier team of people, loyal customers and the involvement of candidates and employees.

## 3. People

Promoting a culture of compliance, both regulatory and ethical, is a necessary element for the dissemination and implementation of this Code of Conduct, to which EUROFIRMS' Senior Management and Governing Body are fully committed, and their attitude should serve as the best example. In this way, we can affirm that we are faced with what the doctrine on the subject has called "The Tone from the Top".

All activities developed in the environment of what is traditionally called "human resources" are closely related to PEOPLE, which should lead us to seek their well-being in the development of the organisation's activity and to consider them as HUMAN CAPITAL.

The decision reflected in this Code of Conduct comes from the Senior Management and Governing Body of EUROFIRMS, and is the

result of a consolidated business and personal history, formally transferred to the exercise of good corporate governance, resulting in compliance with laws, regulations and commitments out of conviction, as obligations and rules are imposed internally that go beyond legal or regulatory obligations.

In addition, EUROFIRMS exercises a leadership that seeks to correctly adjust the commercial purposes pursued with the means used in relations with our customers, suppliers, competitors, regulators and employees, in order to position it as an ethical and highly valued company in the market in which it operates, which leads us to the need to use the necessary diligence in assessing the degree of adherence to ethical and regulatory principles held by all those with whom we interact.



## 3.1. Workplace wellbeing and the right to digital disconnection

At Eurofirms, we understand digital disconnection as both a right and a shared responsibility for everyone who is part of the organization. Therefore, we promote refraining from requesting or responding to professional communications, requests, or interactions outside working hours, thus ensuring respect for rest periods, leave, holidays, and a healthy balance between personal and family life.

People are our priority, and digital disconnection is a key pillar of workplace wellbeing, psychosocial health, and the sustainability of our working model. Making responsible, balanced, and healthy use of technology is an integral part of our People First culture.

Our commitment goes beyond legal compliance: it reflects our way of understanding professional relationships and of building a respectful, efficient, and trust-based working environment, where technology serves people and professional performance, and not the other way around.

In line with this commitment, the organization will ensure the implementation of the necessary organizational, technical, and training measures.

## 4. Policies and procedures

EUROFIRMS has established a series of policies and procedures that apply to the entire organisation, which must be known and respected by all its members, as they are the necessary complement to this Code of Conduct and the appropriate means of positioning ourselves correctly in our environment, both externally and internally, within a framework of regulatory and ethical compliance.

## 4.1. Quality

EUROFIRMS' goal is for all its services to have the best quality standards, and to that end, we have gathered a team that will monitor the Quality of everything we have to offer, striving for excellence.

Compliance with UNE/ISO standards is one of the keys to ensuring the best way of carrying out our activity, which is why we advocate obtaining the certifications that most involve us.

We have various quality management processes in place to monitor compliance with legal obligations and other commitments voluntarily undertaken, in accordance with the corresponding technical documents.

## 4.2. Information

We treat the information and documentation of all those with whom we interact with the utmost confidentiality, without sharing it with third parties beyond what is legally permitted and using it for any other interests than those agreed.

Personal data is likewise respected and processed in accordance with applicable regulations. We have a team that will guarantee that, which includes the Data Protection Officer.

## 4.3. Third parties

We understand our stakeholders to be all those people or entities affected to a greater or lesser extent by the decisions and activities that we carry out and which, in turn, allow us to function fully.

Their satisfaction is key to the survival and success of any business activity, by virtue of which we must be aware that if our services are not received positively and successfully in the market, it will end up having a negative impact on other stakeholders, such as candidates, workers or our suppliers, creating a ripple effect in reverse.

Each stakeholder group has certain expectations that they assume will be fulfilled when they interact with EUROFIRMS. For this reason, it is important to maintain communication with them, either through personal dialogue or other digital tools that allow us to know their opinions regarding the

company's activity, finding their points of disagreement and working to resolve them.

Given the diversity of stakeholders with whom EUROFIRMS has relations, ranging from company ownership, business partners, clients, candidates, employees, employees on secondment or in the provision of services, structural employees, suppliers and regulatory bodies (Tax Agency, Social Security, State Public Employment Service), we must seek, as a major challenge, common interests among all of them, with the aim of not interfering with each other's expectations, and the first step for this is: CARING AND LISTENING TO PEOPLE.

## 4.4. Collaboration

All EUROFIRMS members must take responsibility for complying with and enforcing the Code of Conduct, avoiding practices that might facilitate the justification or covering up of actions that are prohibited by the organisation.

In this respect, EUROFIRMS places the Ethics Channel at the disposal of all members of the organisation.

Specifically, any member of the organisation who becomes aware of or is affected by an irregularity, or even faces the risk of one occurring, is committed to reporting it through the Ethics Channel: [www.canaletico.es/en/eurofirmsgroup](http://www.canaletico.es/en/eurofirmsgroup), within the matters designated for this channel, as outlined in its protocol available at the provided link.

For its part, EUROFIRMS guarantees the possibility of making anonymous complaints and ensures that all cases are handled with strict confidentiality, impartiality and objectivity, without prejudging the facts. The presumption of innocence and the protection of the victim will always be respected, and any necessary information will be reported to the relevant authorities. Furthermore, special emphasis is placed on the protection of whistleblowers, ensuring that no retaliation is permitted. At the same time, the Ethics Channel must not be misused by informants to report unfounded facts and/or accusations that do not reflect reality.

Our ethical channel works through an external web platform that meets the highest standards of information security. This platform, in compliance with the criteria established by the State Prosecutor's Office, is open to all stakeholders with whom EUROFIRMS interacts.

The web platform is managed by an external company that is committed to receiving reports and ensuring the highest levels of confidentiality when communicating with the Ethics Channel System Manager for further investigation, if applicable. Additionally, this external company will be responsible for monitoring potential conflicts of interest between those involved in a report submitted through the Ethics Channel and those responsible for its assessment.

EUROFIRMS makes its principles of action and values known on a regular and updated basis, in order to transmit and "infect" the whole organisation with the spirit of this Code of Conduct. However, the attitude of the members must be proactive, collaborative and participative in the field, taking advantage of the training and information opportunities that EUROFIRMS makes available.



## 4.5. Equality

We treat everyone with whom we interact equally, abiding by the domestic and international laws, regulations and conventions. We advocate for ensuring that no personal factor is considered in a discriminatory manner based on race, national, territorial or social origin, caste, birth, religion, disability, age, gender, sex, sexual orientation, membership in any group within the LGTBI community, family responsibilities, marital status, trade union affiliation, political opinions or any other condition that could lead to discrimination.

We offer equal opportunities and equal treatment to all people, both within our organisation and in the practice of our activity.

Across all areas of the organisation, we have consistently championed gender equality. Furthermore, the integration of people with disabilities, especially in the labour market, is an important part of our business activity.





## 4.6. Non-Financial Information

Without prejudice to the legal obligations in this regard, we view it as a tool that helps to collect, measure and disseminate data on environmental, social and governance issues in our organisation.

It is a further sign of transparency in order to build trust with third parties and to strengthen our credibility and the trust that others place in EUROFIRMS, to which we must all contribute from our position in the organisation.

It is another factor that adds value to our company and fosters our differentiation in the market. We must make known who we are, what we do and how we do it, in order to attract talent and business opportunities from a perspective that goes beyond purely economic and/or financial aspects.

## 4.7. Respect for human rights

As our core value is respect for Human Capital, this Code of Conduct expressly includes our commitment to the human rights recognised in national and international legislation, committing us to identify the potential impacts that the operations and activities carried out, directly or through a third party, may generate in this aspect, assuming the obligation to respect and monitor compliance with these rights, promote awareness of them and enforce compliance with all necessary regulations for their protection.

A commitment to respect for human rights, particularly with regard to combating child labour, forced labour, slavery and people trafficking, and the different international ethical guidelines, including those of the International Labour Organisation (ILO), the United Nations Universal Declaration of Human Rights and the European Convention on Human Rights, is guaranteed.

Diversity, individuality and respect for all communities must be fostered at all times.

Any work or service involuntarily performed by a person under the threat of punishment and/or without payment is strictly prohibited.

It is guaranteed that the employment of minors of working age will be conducted in strict compliance with the applicable laws and regulations. In other words:

- It will always take place with the authorisation of the parent/legal guardian.
- They will not be able to work overtime.
- Night work will be prohibited.
- They will not be able to do effective work for more than eight hours a day, including the time devoted to training.

- If the continuous working day exceeds four and a half hours, a rest period of no fewer than 30 minutes will be established.
- Weekly rest periods will be at least two consecutive days.
- The right to special protection of their health and safety at work.

Additionally, the organisation must, in all cases, comply with legal and contractual regulations regarding working hours, wages, social security contributions, work schedules, rest periods, public holidays and overtime.

The organisation must treat all personnel with dignity and respect. The organisation must not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of the personnel. Harsh or inhumane treatment is not permitted.

Disciplinary measures will be those established in the applicable collective agreement and other relevant regulations, including internal policies.

Among other rights, all personnel must have the right to assemble, join, participate in and/or organise trade unions of their choice and to negotiate a collective agreement on their behalf with the organisation. The organisation must respect these rights and not interfere with their practice or development. On the contrary, it must facilitate them without any negative consequences or retaliation, in accordance with the provisions of the Workers' Statute and applicable agreements.

## 4.8. Anti-bribery and anti-corruption

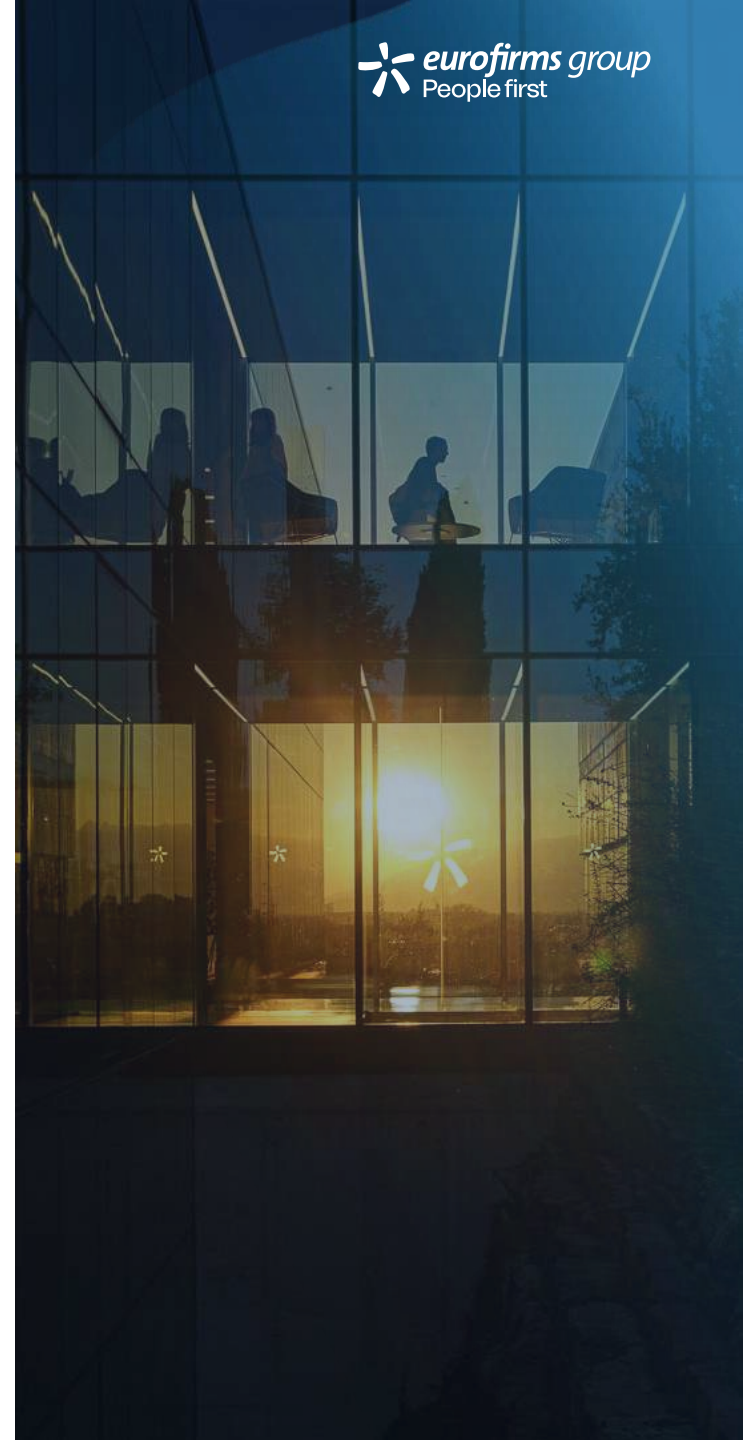
Both concepts must be contained in this Code of Conduct in a particular way, due to their relevance in today's economic society, and we expressly and clearly adhere to all national and international legal regulations on the subject.

In our organisation, it is strictly forbidden to pay, offer to pay or authorise the payment, whether directly or indirectly, of anything of value to any public official, political party, client, employee, candidate or anyone acting on behalf of a public organisation or private entity to obtain or secure a business opportunity, business advantage or any undue benefit.

Likewise, any intent to promote, incite or participate in such actions will also constitute a violation of this Code of Conduct.

Similarly, receiving anything of value from a third party in exchange for providing them with an advantage, as described in the previous paragraphs, is expressly prohibited.

On the other hand, it should not be forgotten that "anything of value" is a very broad concept and includes, by way of illustration but not limitation, items such as money, gifts, offers of employment, discounts, payment of expenses, debt forgiveness or personal favours, whether provided or received directly or indirectly.



## 5. Control

The corporate reputation of our company will depend on the stakeholders' view of us, and the organisation is convinced that it will only achieve excellence through the positive impact we can have on society at all levels.

EUROFIRMS is aware that it is necessary to monitor compliance with legally binding regulations and ethical rules that the organisation has voluntarily adopted to guide its activities.

Senior Management and the Governing Body are responsible for implementing, communicating and promoting a culture of compliance, and to ensure that it is being adopted and applied, they develop surveillance and monitoring systems to this end, thus safeguarding the policies, procedures and regulations developed on the basis of a continuous improvement process.

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