



CODE OF ETHICS



Dear employees and partners,

We are pleased to present our Code of Ethics, a guide to accompany each of us in our mission to transform the energy model of all businesses and households into decarbonised and independent solutions in a simple way. Within the Group, we believe that our actions should be guided by ethical values and morals. Integrity and honesty are fundamental to everything we do, from our decision-making to our relationships with all business stakeholders.

Our Code of Ethics sets out the clear and detailed expectations we have for how all employees and partners are expected to behave in the work environment.

We are committed to upholding the highest ethical standards throughout our value chain, and the Code of Ethics is a crucial tool in achieving this goal, helping us protect our reputation and build a corporate culture that we consider fundamental.

We expect this Code to serve as a reference guide for the ethical principles that govern our daily work and to be a backbone, with integrity and responsibility being fundamental values throughout the organisation.

Yours sincerely,
The Management of Prosolia Energy.



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1. PURPOSE

The purpose of this Code is to define the guidelines and conduct directives that will guide the behaviour of all employees and collaborators of the organisation. In the company, commitment to the development of our activities in accordance with the highest ethical standards is not an option, but a fundamental requirement.

The criteria of conduct set out in this Code are not intended to cover all situations or circumstances that stakeholders may encounter, but rather to establish general guidelines for conduct that may serve as a guide for action during the performance of work activities.

Therefore, a zero tolerance principle applies to practices that contravene any ethics and integrity provisions. All professionals and third parties with whom we interact are expected to always behave in a manner aligned with the principles and values set out in this Code.

2. SCOPE OF APPLICATION

The Code of Ethics is aimed at all persons forming part of the Prosolia Energy Group, including its directors, managers and employees, as well as all persons and organisations that collaborate and relate to the company in the development of its activity, such as suppliers, subcontractors, external consultants or advisors, business partners and collaborators of any kind.

The company considers all stakeholders acting on our behalf to be an extension of the organisation and therefore must act in accordance with the ethical principles set out in this Code. All suppliers, business partners and counterparties may be asked to formalise their commitment to comply with the Code or the guidelines it sets out.

3. ETHICAL PRINCIPLES AND COMMITMENTS

HEALTH AND SAFETY AT WORK

The company considers the health and safety of employees and collaborators as a critical issue and strives to adopt occupational health and safety policies that ensure the highest standards in this area for all employees and contractors. In addition to strictly complying with current legislation, especially in countries with less developed legislation in this area, the company ensures that it provides the necessary resources to guarantee a working environment that is respectful of the health and dignity of employees and collaborators.

HARASSMENT-FREE ENVIRONMENT

The company strives to create a safe working environment that protects the dignity and safety of all individuals, and to prevent any situation or type of harassment, including workplace, sexual, physical, moral and psychological harassment.

Immediate action will be taken in response to any unwanted or unwelcome behaviour by any employee, which may be considered harassment of another individual, disrupts the work of others or creates an intimidating, offensive, abusive or hostile work environment. This includes bullying, abuse of authority or any other form of aggression or hostility that may create a climate of intimidation. Within this area, the right to privacy and intimacy of all employees is promoted, especially with regard to personal, family, medical and financial information.

To this end, the company has a specific protocol for harassment, which is available for consultation on the employees' internal "Sesame" platform.

EQUAL OPPORTUNITIES

The company strives to apply criteria of non-discrimination and equal opportunities both in its selection processes and in the professional development of its employees.

Race, ethnicity, colour, nationality, origin or social status, age, gender, marital status, sexual orientation, ideology or religion are not considered factors in professional evaluation. Instead, the only elements considered in differentiating between employees are merit, effort, performance results, training, experience and future potential.

For the company, the promotion of equal treatment is crucial, and to this end it focuses on gender balance in all recruitment and selection practices, career advancement, training and the establishment of working conditions. The company strives to facilitate the reconciliation of professional obligations and the personal and family life of its employees.

PROTECTION OF ASSETS AND INFORMATION

All employees are responsible for the proper use of company assets and resources, and therefore for protecting them from misuse, abuse, sabotage or loss. These assets include the company's corporate image and reputation, as well as information, vehicles, tools, materials, supplies, intellectual property, computer systems, software, hardware, office supplies, communications devices, internet access and navigation, and facilities.

Employees are expected to take the utmost care to preserve the company's image and reputation in all their professional actions. Respect for and correct and appropriate use of the corporate image and reputation by all business partners should be monitored.

All resources made available to the employee must be used for the intended professional purpose. In those cases where they may be used for private use, this must be in accordance with internal regulations and applicable legislation and kept to minimum levels without adversely affecting productivity and the working environment.

All professionals must comply with current legislation on personal data protection and the procedures that have been implemented in this area. Employees undertake to maintain confidentiality and to make discreet use, in accordance with internal and external regulations, of the data and information to which they have access in the performance of their duties. In case of doubt, and unless otherwise stated, all information to which employees have access in the course of their work shall be considered reserved and confidential.

COMPLIANCE WITH THE LAW

In any territory or country in which the company operates, compliance with applicable national and international laws, regulations and best practices must be respected at all times, without exception.

It is important that all professionals maintain impeccable ethical behaviour in all circumstances and avoid any conduct that may go against applicable regulations, damage the reputation of the organisation or negatively affect its public image. Furthermore, they must not collaborate with third parties in activities that violate current legislation or damage the confidence of third parties in the organisation.

It is the responsibility of management and other personnel with management and team leadership responsibility to inform their staff of the importance of legal compliance and to provide the conditions and means necessary to create an environment that fully respects and complies with the law.

COMBATING BRIBERY AND CORRUPTION

Under no circumstances may employees, managers or business partners engage in unethical practices that could be considered as dishonest influences, lack of transparency or fairness in the decisions of third parties with whom they interact, whether in the public or private sphere.

These unethical practices include offering or promising gifts, favours or any kind of compensation, or giving preference to situations arising from personal relationships with authorities, public officials or any other person outside the organisation who can influence decision-making that generates direct or indirect economic benefits for the company or for third parties.

Staff and their business partners must not accept or solicit unjustified benefits or advantages for themselves or for third parties in exchange for unduly favouring another in the purchase or sale of products, procurement of services or in business relationships.

It is irrelevant whether these actions take place outside working hours, on company premises or in another country, and whether they are individually funded or not. Careful monitoring of third parties acting on behalf of the company is especially important, and due diligence should be carried out to know business partners and all persons with whom business relationships are maintained.

- *Gifts, presents and hospitality*

As a general rule, the company does not permit the offering, giving or acceptance of gifts, presents or hospitality that may give rise to preferential treatment or commitments, even if fictitious. Exceptions are only permitted in the case of gifts or hospitality that are of insignificant economic value and are in line with standard business practices and the regulations in force in each country.

This prohibition is particularly relevant in relations with governments, public bodies, political parties, international organisations and civil servants, and special care must be taken in these cases.

- *Donations to political parties*

The company does not make donations or contributions to political parties, federations, coalitions or electoral groups.

- *Money laundering*

The company is firmly committed to the prevention of money laundering. Under no circumstances will it engage in activities aimed at giving the appearance of legitimacy or legality to property or assets of criminal origin.

PROTECTION OF FREE COMPETITION

The company competes fairly and ethically in the markets in which it operates, and refrains from engaging in any anti-competitive practices or disclosing false information about its competitors. Employees and their business partners fully respect the law and do not undertake any initiatives, whether in isolation or in concert, that violate antitrust laws. This includes avoiding agreements or concerted practices between competitors that restrict competition, bid rigging, accepting or implementing collective decisions that limit competition, exchanging commercially sensitive information, abusively exploiting a dominant position, or engaging in acts of unfair competition.

DEFENSE OF HUMAN RIGHTS

The company expresses its respect for the human rights recognised in national and international law in accordance with the Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the principles underlying the United Nations Global Compact, the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, the conventions of the International Labour Organisation (including Convention 169) and the Sustainable Development Goals (SDGs) adopted by the United Nations (UN).

The company is aligned with the respect and integrity of Human Rights in all its operations, including the value chain, with special attention to equal opportunities regardless of people's characteristics and with the elimination of child labour and forced labour, guaranteeing fair and favourable working conditions that ensure the well-being and dignity of professionals.

Furthermore, the company recognises the right of employees to participate in or form organisations aimed at defending and promoting their interests, supporting freedom of association and collective bargaining, respecting freedom of opinion, information and expression, recognising and protecting the right to freely express and disseminate thoughts, ideas and opinions.

RESPECT FOR THE ENVIRONMENT AND THE LOCAL COMMUNITY

The company is firmly committed to contributing to the socio-economic development, respect for the environment and the creation of shared value in the territories where it is present. The company will take appropriate measures and make every effort to prevent its actions (including the value chain) from damaging the environment and always comply with the environmental laws applicable in the different jurisdictions in which it operates. To this end, the company is committed to identifying, assessing and managing the positive and negative environmental aspects and impacts of its activities, ensuring adequate environmental management and the minimisation and mitigation of their impact.

TRANSPARENCY, TRUTHFULNESS AND INTEGRITY OF INFORMATION

The company considers the value of transparency as a key foundation and key element in all its relationships, as it helps to establish solid and trusting long-term relationships. Internally and externally, it is essential that the information shared and published is accurate and complete, so that stakeholders can trust it.

The organisation therefore ensures that accounting records clearly and accurately reflect transactions in accordance with generally accepted accounting principles and policies. While some employees have specific responsibilities in this area, the responsibility for ensuring proper recording of transactions and maintenance of recorded information belongs to everyone.

IMPARTIALITY

The company guarantees equal opportunities for all suppliers and providers that meet the requirements of quality, experience, resources and prices. In any selection or tendering process, the absence of any kind of discrimination is ensured.

Employees involved in these processes must act objectively and impartially, applying the criteria established by the company for the selection of suppliers, contractors or external collaborators. Under no circumstances will employees be allowed to accept or request payments or advantages that could compromise impartiality in these processes. The company promotes transparency and fair competition in all its business relationships and encourages ethical decision-making in the selection of suppliers.

CONFIDENTIALITY

Company employees shall follow the procedures established by the organisation for the security of information. Any information not publicly disclosed shall be considered reserved and confidential, and unless otherwise instructed by a line manager, shall not be used externally by any professional. This obligation extends beyond the termination of the employment relationship.

Technical and economic information provided by clients, suppliers and other third parties that relate to the company in selection processes and tenders or in the development of contracted supplies must be treated as confidential by employees who have access to it.

This principle is particularly important for inside information, which refers to specific information relating directly or indirectly to the company or any of its subsidiaries. In such cases, an employee who possesses or knows inside information must not only refrain from disclosing it, but also from making or recommending a purchase or sale transaction based on the content of that information.

4. ACCEPTANCE AND COMPLIANCE

The Code of Ethics comes into force on the day of its publication and must be complied with by all employees and collaborators of the organisation. The company will communicate and disseminate the content of this Code of Ethics to all employees, and to those third parties for whom it is relevant.

Professionals must formally undertake to comply with the Code at the time of joining the company and in such other circumstances as the company deems appropriate.

The company provides its employees with a whistleblowing mailbox to honestly report irregular conduct or conduct contrary to the provisions set out in this Code, related regulations, policies or procedures, or in current legislation. All professionals have the responsibility to immediately report any irregular practice, illegal or unethical behaviour they may know of or witness. To access this channel, you can use the whistleblowing channel on the Sesame platform or send a letter by post to the attention of the Legal Team in Valencia, Spain.

- **Complaints channel link**
- Address: Plaza del ayuntamiento 27, piso 3, 46002, Valencia.

5. REVISION OF THE CODE

The commitment to continuous review and improvement of the Code of Ethics is crucial to ensure that it remains relevant and effective over time. To this end, the company has defined the following mechanisms:

- **Communication and dissemination:** The Code of Ethics will be effectively communicated and disseminated to all employees and relevant stakeholders.
- **Periodic review:** This Code of Ethics should be reviewed annually to ensure that it remains relevant and up to date with new ethical trends and regulations.

