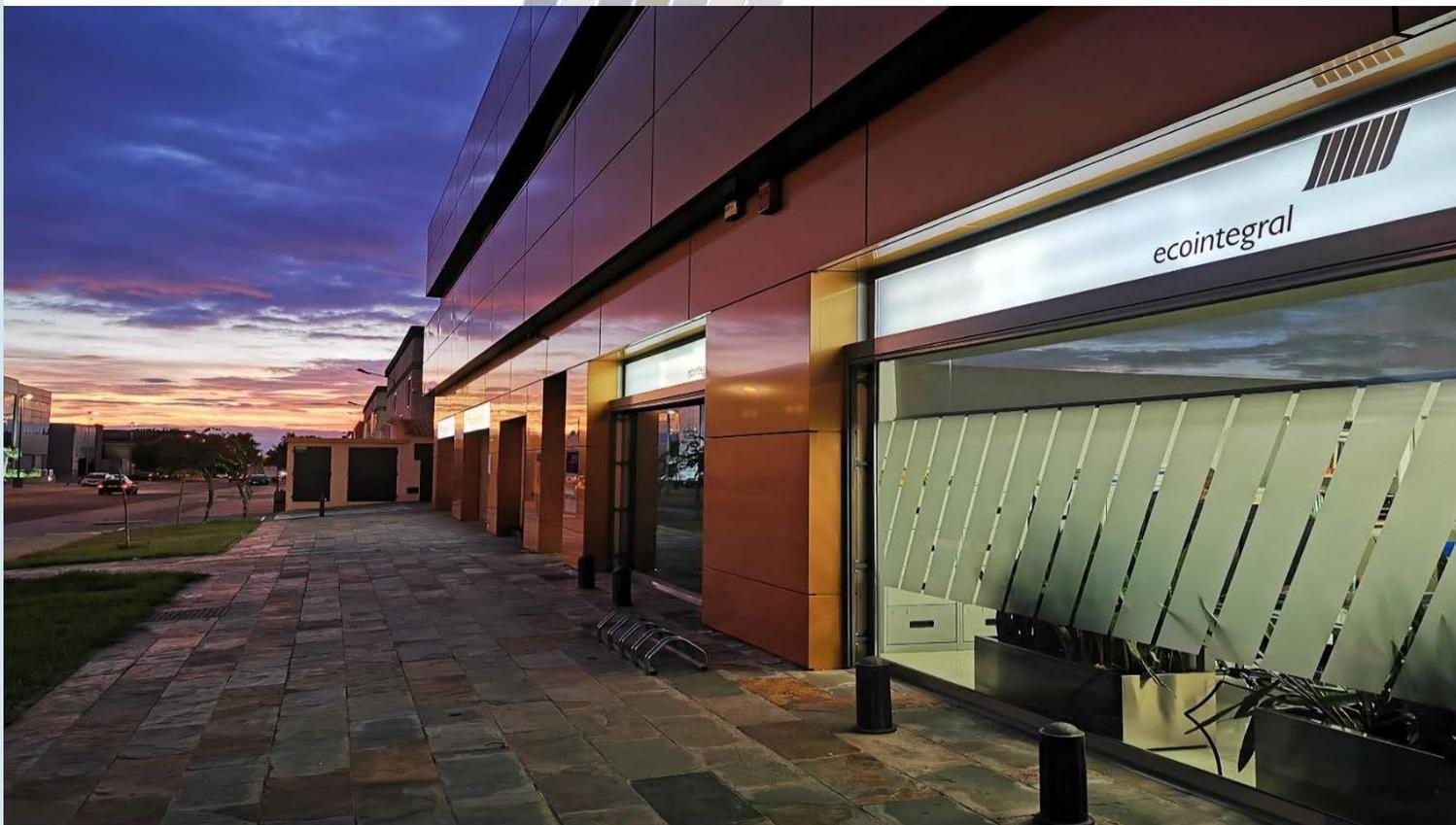


# Code of Conduct and Ethics

Ecointegral Ingeniería

---



## TABLE OF CONTENTS

1. Objective	2
2. Application	2
3. Ecointegral's values	2
4. Code of conduct	3
4.1 Basic principles	3
4.2 General code of conduct	3
4.3 Personnel relations	4
4.4 Relationship with the market	6
4.5 Relationship with the community	7
5. Follow-up and monitoring	8
6. Validity	8
7. Ethics commitment	9
8. Monitoring and follow-up committee of the Code of Conduct and Ethics	9

## 1. Objective

The Code of Responsibility and Ethics of Eointegral Ingeniería, SL (hereinafter Eointegral) draws its values, principles and legal commitments from both external and internal policies and recognised standards.

This code's mission is to share with all stakeholders the corporate values, principles and commitments that are part of the Eointegral culture.

Our objective:

- To develop models and patterns of professional behaviour, ethics and responsibility, which should guide all the people who make up Eointegral in carrying out their work.
- To prevent unethical behaviour, as well as any illegal behaviour on the part of the people who make up Eointegral and which may have an impact on work performance.
- To establish necessary monitoring and follow-up mechanisms to guarantee the fulfilment of all our values, principles and legal commitments.

## 2. Application

This code applies to any person who is part of Eointegral:

- Board of Directors
- Executive Staff
- Employees
- Co-workers

Everyone, in their desire to maintain their relationship with Eointegral, must comply with this code, as well as our underlying policies and procedures.

## 3. Eointegral's values

This code of responsibility serves as a framework for the development of corporate values and principles, such as:

- Integrity, tolerance and respect
- Transparency, trust, honesty
- Equal opportunities
- Commitment and excellence

These values constitute a basis on which this code is built and establish guidelines on the mode of operation that must be respected by all those who make up or collaborate with Eointegral.

## 4. Code of conduct

### 4.1 Basic principles

#### *Respect for the law*

Any person who works at or collaborates with Ecomintegral, must maintain a strict and rigorous respect for the legal regulations in force in all areas in which the Company performs its professional activities.

In this way, no argumentation will be justifiable when committing any legal infraction, such as generalised or commonly permitted illegal conduct.

No order that contravenes the provisions of a legal norm or the policies established herein shall be obeyed. Workers, confidentially, may communicate the existence of these types of guidelines or bad practices through our established non-compliance channel.

#### *Integrity and Ethics*

Personal integrity and professional ethics are fundamental assets at Ecomintegral. That is why all the people who make up the company must carry out their activities with objectivity and professionalism.

Respect for human rights:

All actions by Ecomintegral and the people who make it up scrupulously respect the Human Rights and Civil Liberties enshrined in the Universal Declaration of Human Rights.

### 4.2 General code of conduct

#### *Company Reputation*

Ecomintegral Ingeniería, SL is a company of recognised reputation in the sectors in which it operates, with a strong presence, thanks to a team of expert professionals, who are committed to and identify with the values, principles and work model of the company.

All members must comply with the laws and avoid behaviour that could cause, to any extent,

damage to the image and reputation of the Company.

### *Commitment to the company*

Ecointegral always seeks to safeguard the interests of all agents that may be involved in its activities, implementing procedures and appropriate measures for the resolution of possible conflicts of interest.

Everyone who makes up Ecointegral shall treat the Company's interests as a priority and, as a consequence, must refrain from any private act that could give the appearance of differing interests directed towards obtaining an advantage in the company. However, in case of doubt it is recommended to indicate the general casuistry and communicate it truthfully.

Ecointegral personnel must identify and avoid any situation that could compromise their objectivity, and as in the previous case, refrain from participating in situations in which there may be a conflict between private interests and those of the company, for example, in cases of kinship and other relationships.

## **4.3 Personnel relations**

### *Working environment*

Ecointegral cares about generating and promoting work environments where trust, communication, collaboration and respect for the dignity of people are paramount. The company expressly rejects any abuse of authority, as well as any conduct that could cause conflicts in the work environment.

Each person who composes Ecointegral must commit to contribute to promote and maintain a cordial and trustworthy work environment that motivates both the most experienced and newly hired staff to give their best.

### *Equal opportunities and non-discrimination*

Ecointegral guarantees equal opportunities and is committed to actively supporting all the people who make up the company in their personal and professional development. The selection, promotion and remuneration of the people of Ecointegral is based on objective criteria of meritocracy and developed capacities.

On the other hand, the company does not accept any type of discrimination based on sex, race, age, sexual orientation, religious beliefs, membership or affiliation with workers' or political organizations, nationalities, social origin, difference in abilities or any other case that is likely to be a source of discrimination.

Those who make up Ecointegral will try to promote principles of equality and non-discrimination and will contribute to generating a respectful and inclusive work environment.

### *Diversity*

Ecointegral promotes the integration of the diversity and complexity of its teams, in the same way that guarantees the collective application and compliance with the same internal regulations.

Every person who makes up the company expects respect for diversity and an attitude that promotes the integration and promotion of a solid corporate identity at all times.

### *Professional development and training*

Ecointegral undertakes to promote and contribute to the training and development of the entire person belonging to the company, in order to improve employability and personal growth to thereby provide differential value in the tasks carried out during their work.

The Ecointegral team will participate in those actions and training programs that contribute to their development, in so far as the company's needs require it, endeavouring to take full advantage of said training.

### *Occupational health and safety*

Ecointegral maintains its commitment to create and facilitate the necessary means to create a safe and stable environment, in addition to constantly and periodically updating the measures for the prevention of occupational hazards, as well as to respect fully the applicable regulations in this area and in every location in which it practices.

Any person who belongs to the company must maintain strict compliance with the established health and safety regulations. Likewise, when undertaking an activity involving a risk, they must make responsible use of the necessary equipment and maintain collaboration with the rest of their partners, conveying the importance of compliance with Occupational Risk Prevention practices.

### *Personal data privacy*

Ecointegral will ask its workers for the necessary information for the correct management of the business, appropriate to what is established by law. Non-public data is confidential and reserved information, so strict mechanisms are applied to preserve its integrity and availability, while complying with current legislation.

Likewise, staff in the organisation who may have access to this information will ensure its confidentiality, avoiding disclosure and making incorrect or unethical use of said information.

### *Use and protection of assets and resources*

Eointegral makes available to all persons belonging to the company the necessary resources for the performance of their professional activity and provides the means for their adequate protection and safeguarding.

Each of the people who make up Eointegral is responsible for the correct use and protection of the assets and resources provided by the organisation. These include the intellectual property, facilities, computer equipment and financial resources of Eointegral Ingeniería, SL.

The computer and communication equipment and systems that the company makes available to personnel must be used exclusively for the development of their professional activity.

The use of external software could bring serious risks to the company's security or constitute an infringement of intellectual property. That is why its use should be avoided where not authorised, moderating and making reasonable use of downloads or any other action that puts the Eointegral network at risk through viruses or other dangerous elements.

## **4.4 Relationship with the market**

### *Quality and innovation*

Eointegral has as a priority to offer a service that meets optimum quality standards and, to this end, invests in the appropriate technical knowledge, as well as in advanced technologies and material resources, putting these at the service of its team.

For their part, the professionals that make up the organisation must carry out their tasks with due professionalism, commitment and initiative, responding in the best possible way to the needs of the client.

### *Transparency and communication*

Eointegral always tries to maintain clear communication, conveying information about the company in an honest and truthful way, which will allow its shareholders, analysts and other interest groups to form as comprehensive and objective a judgment as possible about the organisation.

The company's personnel must ensure that any operation of financial significance that is carried out on behalf of the company, is clearly and accurately recorded in the accounting and represents a faithful image of the transactions made. To this end, accounting standards and principles must be strictly followed, making complete and accurate financial reports that allow for their appropriate drafting in order to comply with the law.

Any conduct aimed at avoiding tax obligations or obtaining advantages through fraud at the expense of the Public Treasury and Social Security are expressly prohibited.

#### *Confidentiality*

Any person who belongs to Eointegral or collaborates with the company shall maintain strict confidentiality regarding information known through performance of their duties, and whose disclosure or exposure may affect the interests of the company.

This duty of confidentiality extends to any non-public information of third parties available for commercial or business reasons.

#### *Relationship with suppliers and clients*

The selection of Eointegral suppliers will be undertaken in terms of impartiality, transparency and objectivity, taking into account objectively the benefits that they might bring to the organisation.

Every person who composes Eointegral must apply quality, opportunity and cost criteria in selection processes, always acting in the interests of the organisation.

In business relationships it is prohibited for those responsible for acquisition or contracting of goods and services, to offer or receive any type of illicit benefit to/from any person, or on their behalf, or to/from any company, or on its behalf, in order to obtain a clear advantage, either in their favour or one's own, creating an unfair advantage towards the rest of competitors.

## **4.5 Relationship with the community**

#### *Environmental protection*

Eointegral maintains its commitment to one of its main objectives, protecting and respecting the environment as a whole, carrying out a comprehensive survey of environmental impacts, preventing pollution and mitigating its effects as much as possible, and improving processes or providing the necessary training for our team to meet these goals.

For their part, the people who make up Eointegral shall commit to protect and respect the environment, minimising their impact or environmental footprint and working with maximum energy efficiency. In the same way, they shall respect biodiversity, developing knowledge acquired in environmental matters and conducting a constant evaluation of the different activities in which they participate.

### *Corporate social responsibility*

Corporate social responsibility means a change of business mentality for EcoinTEGRAL, accentuating values that we consider forgotten in the commercial sphere, such as the need to generate value for all parties (employees, shareholder clients and, of course, for society) and, in turn, creating a norm that gives importance to shared objectives over the individual.

During the last five years EcoinTEGRAL has donated part of its benefits to different Spanish social projects and has collaborated on projects in different countries, supporting the progress of some of the most disadvantaged communities. We estimate that in the coming years our involvement in various works that have an impact on the improvement of the world and the progress of all will increase.

## **5. Monitoring and follow-up**

### *Ethics Committee and Compliance Committee*

To ensure strict compliance with this code, to resolve issues in its interpretation and to adapt the appropriate measures for its acceptance, a Conduct and Ethics committee will be established including:

- A.- Juan Ramón Mateos Márquez
- B.- Francisco Gabriel Martín Jiménez
- C.- Rafael Clemente Ordás Diéguez
- D.- Juan Pedro Dueñas Ruat

## **6. Validity**

This EcoinTEGRAL Code of Conduct and Ethics has been in force since 2020, having been approved as the result of necessary adaptation to the new trends and obligations that business development demands.

This Code has been communicated to all employees and is accessible at all times on the company's website. This Code will remain in effect until the board approves its update, renewal or repeal.

## 7. Ethics commitment

Any person who makes up Eointegral, as clearly stated in point number 2. *Application*, you must commit to comply with the standards of ethical conduct established here, contributing and helping to improve them periodically.

Commitment will imply that you have read the Eointegral *Code of Conduct and Ethics* and that you fully understand the values, principles and actions that govern the company. Likewise, you understand the obligatory nature of your compliance and, in case of any conflict, will act in a logical and rational way within the framework of values and the company's commitments.

## 8. Monitoring and follow-up committee of the Code of Conduct and Ethics

The Monitoring and follow-Up Committee of the ECOINTEGRAL Code of Conduct and Ethics was created on JANUARY 1, 2020, and consists of:

- A.- Juan Ramón Mateos Márquez
- B.- Francisco Gabriel Martín Jiménez
- C.- Rafael Clemente Ordás Diéguez
- D.- Juan Pedro Dueñas Ruat