



konecta

Code of ethics

Corporate policies 2025

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01

Introduction

The objective of the Code of Ethics of Konecta, a multinational group of companies specializing in the provision of digital client experience services and solutions (hereinafter, Konecta, the Company, or the Firm), is to establish the company's commitments and the principles that guide the actions of its entire team of professionals to ensure integrity and responsible behaviour in all daily decisions and activities carried out within the framework of their employment relationship with the company, defining how they should interact, both internally and in their relationship with different external stakeholders.

This Code is an extension of Konecta's regulatory framework with the aim of promoting best practices and guidelines for conduct developed in the other policies that make up the company's Compliance Programme, while also ensuring scrupulous compliance with the laws and regulations in force in each country, its own requirements, and international standards, and responding to the expectations of Konecta's stakeholders (employees, clients, partners and shareholders, investors, financial institutions, suppliers, public administration and regulatory bodies).

This Code will be available on the corporate website (www.konecta.com) to ensure that it can be consulted by all interested parties.

In this regard, the ethical principles of the organisation, good corporate governance and the professional ethics of the persons subject to this Code constitute the pillars on which Konecta's activity is based, in line with fundamental principles such as those of the Universal Declaration of Human Rights, and those established by the International Labour Organisation (in particular those relating to the prohibition of child and forced labour), by the OECD (in particular in the fight against corruption), and the commitments that the company has adopted, particularly in relation to the environment with the SBT initiative, and as a partner of the United Nations Global Compact since its accession in 2004, committing itself to promoting its Guiding Principles and the Sustainable Development Goals related to its business activity.

The Compliance Committee and the Human Resources department will promote a culture of prevention by designing and implementing appropriate training programmes for Konecta professionals in order to support the dissemination of knowledge, as well as understanding and respect for the content and obligations established in the Code of Ethics.

Similarly, persons subject to this Code must be familiar with its content, apply its provisions in their daily work and collaborate to facilitate its implementation and compliance at Konecta.

To this end, they must participate in all training activities that are offered and to which they are invited, in order to achieve an adequate understanding of the principles of conduct set out therein and to ensure their correct implementation.

In this regard, the company will provide training and education resources to ensure that the principles set out in this document are understood, internalised and applied consistently throughout the organisation.

Scope of application

The content of this Code applies globally to all Konecta entities as part of its Compliance Programme and is endorsed by the company's senior management.

Consequently, it is mandatory for all Konecta employees, regardless of their position or role within the organisation or their geographical location. All such persons shall hereinafter be referred to collectively as "persons subject to the Code" and are responsible for promoting the principles and commitments set out in this document.

Notwithstanding the foregoing, the scope of action and application of this Code may, when necessary and possible due to the nature of the relationship, be extended to all individuals and/or legal entities linked to Konecta on a business or professional basis. In particular, Konecta's suppliers are required to comply not only with the Code of Ethics for Suppliers, but also with this Code insofar as it applies to them.



02

Konecta's general ethical principles

All actions taken by persons subject to the Code, as a result of their relationship with Konecta, must be guided by ethical values, including the following:

Equal opportunities and non-discrimination

Create diverse and inclusive environments, providing equal opportunities in access to work and professional promotion, is a basic principle for Konecta, and it will therefore ensure that there is no discrimination on the basis of, among other things, racial and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national ancestry or social origin, or other forms of discrimination covered by European Union regulations and local legislation in the countries where the company operates.

Consequently, persons subject to the Code who are involved in recruitment, selection or professional promotion processes shall act and make decisions objectively.

Equal opportunities shall be promoted at all times, and a fundamental objective shall be to identify those individuals who best match the profile and requirements of the position to be filled, based exclusively on merit and competence, without any bias that could imply discrimination for the reasons already stated.

For further information, you can refer to policies on Human Resources and Human Rights.

Respect for people

Harassment, bullying, abuse, intimidation, discrimination, disrespect and inconsiderate behaviour, or any other type of physical or verbal aggression, are unacceptable and will not be permitted or tolerated at work. Likewise, Konecta will ensure that there is no discrimination against individuals, especially those with disabilities or belonging to vulnerable groups, and will fully reject any behaviour contrary to these principles.

In this regard, Konecta maintains a zero-tolerance policy towards the violation of fundamental human rights and any form of modern slavery - understood as forced or compulsory labour, servitude, child labour and human trafficking, as well as deceptive recruitment of labour and services - both in its operations and in its commercial activities and supply chains.

Those persons subject to the Code, with staff under their responsibility in the various departments or business areas of Konecta, must promote and ensure, with the means at their disposal, that such situations do not occur and immediately report any knowledge of such serious behaviour through the Information Channels available on the Konecta website (<https://konecta.integrityline.com>).

All persons subject to the Code, and especially those who perform management and organisational functions at Konecta, shall always promote, at all professional levels, relationships based on respect for the dignity of others, participation, equity and mutual collaboration, fostering a respectful working environment in order to achieve a positive working atmosphere.

For further information, you can refer to policies on Human Resources and Human Rights.

Work-life balance

In order to fulfil Konecta's commitment to corporate social responsibility to improve the quality of life of workers and their families, those subject to the Code shall promote a working environment compatible with personal development, helping the members of their teams to reconcile, as far as possible, the demands of work with the needs of their personal and family lives.

For further information, you can refer to the Human Resources Framework Policy.

Prevention of occupational hazards

Konecta, aware of the importance of the health and safety of its workers, establishes as a fundamental pillar the creation and maintenance of safe and healthy working environments, as well as the promotion of the physical, mental and social well-being of its teams within the company's preventive culture.

Therefore, those subject to the Code shall at all times respect the preventive measures implemented by the company and the principles contained in its Occupational Health and Safety Policies, assuming the procedures established by the organisation in this area and complying with the preventive functions associated with their position, as indicated in the local plans existing for this purpose.

In order to facilitate the achievement of this objective, Konecta provides training in this area to its work teams and promotes awareness.

For further information, you can refer to the Occupational Health and Safety Policy.

Environmental protection and social responsibility policies

Those subject to the Code, within the scope of their powers, must actively and responsibly commit to conserving the natural environment, complying with legal requirements, promoting actions aimed at preserving the environment, reducing greenhouse gas emissions and reducing the consumption of natural resources linked to their activity.

Likewise, this commitment extends to promoting the sustainable development of the communities and environments in which the company operates through, among other things, the promotion of volunteer initiatives and projects, and the creation of partnerships that contribute to this end.

For further information, you can refer to the Environmental, Sustainability and Human Rights policies.

Collective rights

All persons subject to the Code shall respect the legally recognised rights of unionisation, association and collective bargaining, as well as the activities carried out by organisations representing workers, in accordance with their legally assigned functions and powers, with whom a relationship based on mutual respect shall be maintained.

For further information, you can refer to the Human Resources and Human Rights framework policies.



03

General guidelines

Persons subject to the Code, in accordance with their position, shall use their professional experience, prudence and due care in the performance of their duties.

They shall act in compliance with the existing legal system and shall conduct themselves in a manner that is appropriate to their duties, honest and loyal, refraining from participating in illegal or immoral activities, or from attracting business to Konecta by engaging in such activities.

In particular, and without prejudice to this general rule, persons subject to the Code shall:

- Comply with the external and internal regulations applicable to the type of duties they are required to perform.
- Respect the policies and procedures established internally.
- Observe the rules relating to health and safety at work, with the aim of preventing and minimising occupational risks.
- Protect the intellectual property, trademarks and licences of both Konecta and other companies with which it interacts.
- Take care of Konecta's available resources.

Persons subject to the Code shall, in the performance of their work duties, always act in the interests of the company, making appropriate use of the resources made available to them and avoiding actions that could cause harm to the company. They shall refrain from using business opportunities that conflict with Konecta's interests for their own benefits.

04

Behaviour guidelines for certain specific situations

Possible conflicts of interest

General rules

In general, a personal conflict of interest is understood to exist when a situation arises in which a person's private interests interfere or may be understood to interfere with the performance of their job duties, conflicting with the interests of the company and jeopardising the objectivity required in decision-making. Therefore, persons subject to the Code shall always act diligently, ensuring the impartiality of their actions in the interests of efficiency and professionalism.

Persons subject to the Code shall refrain from participating (whether in decision-making or in representing Konecta) in transactions of any kind carried out by a Konecta entity in which they or any related person has an interest.

If personal or family conflicts of interest arise that could compromise objectivity or professionalism as a Konecta employee, this circumstance must be communicated honestly, transparently and completely through the Information Channels available on Konecta's corporate website (<https://konecta.integrityline.com>).

In the case of activities that constitute the same or complementary activity as that carried out by Konecta or that generate an exchange of goods and/or services with Konecta, such as the supply of goods or provision of services to any company within the group, this must also be notified through the aforementioned Information Channels.

General rules. Commitments to Quality

Konecta has local quality management systems based on the ISO 9001 standard, always aimed at:

- Ensuring that the services provided meet client requirements and expectations.
- Ensuring internal communication of client requirements.
- Providing a training plan accessible to all Konecta employees.
- Providing all services with quality control to ensure compliance with the requirements agreed with each client.
- Encouraging employee participation in the management, development and implementation of the Management System.
- Ensuring compliance with the legislation and regulations applicable in each country, as well as with any other voluntarily acquired commitments.
- Maintaining permanent contact with clients and suppliers in order to collaborate jointly in improving the services provided.

These commitments are specified and deployed in specific objectives and goals, within a process of continuous improvement in accordance with their resources and impacts.

For further information, you can refer to the Quality policy.

Relationships with suppliers and clients

Suppliers:

Persons subject to the Code, and especially those involved in decisions regarding the procurement of suppliers or services or the setting of their economic conditions, shall avoid any kind of interference that could affect their impartiality or objectivity in this regard and, whenever possible, shall avoid exclusive relationships.

The procurement of external supplies and services shall be carried out in accordance with duly approved and documented internal procedures. Persons subject to the Code shall deal with suppliers in a respectful, lawful and ethical manner, and their selection shall be governed by criteria of objectivity and transparency.

All suppliers who work or wish to work with Konecta must comply with the company's Code of Ethics for Suppliers, its corporate policies, and applicable legislation, including labour, tax, occupational risk prevention, and environmental laws, as well as committing to fully respect human rights.

The supplier must reflect the mandatory compliance with the Code of Ethics in its agreements with its subcontractors.

Konecta's suppliers undertake to inform the company if they become aware of any deviation from compliance with the Code of Ethics. They must communicate the information they have through the Information Channels available on Konecta's corporate website (<https://konecta.integrityline.com>).

The supplier must at all times be up to date with any modifications and updates to the Code of Ethics and the Code of Ethics for Suppliers. Konecta will publish both, as well as any modifications or updates thereto, on its website: <https://konecta.com>

For further information, refer to the Code of Ethics for Suppliers.

Clients:

While always respecting Konecta's own interests in order to achieve mutual benefit, persons subject to the Code shall act in the interests and objectives of Konecta's various clients.

Improvements shall be sought in order to achieve service efficiency and better performance.

Respect for the principles that should govern the actions of persons subject to the Code is considered fundamental with regard to:

- Good faith in contractual relations between the parties, and
- Maintaining professional secrecy and confidentiality in relations.

All Konecta clients shall be treated equally, without favouritism or privileges. Persons subject to the Code undertake to strive for excellence and offer high-quality services that guarantee the security and satisfaction of clients.

Anti-competitive behaviour / Antitrust

Employees must carry out the company's activities in a manner consistent with fair competition and in strict compliance with applicable antitrust laws. Konecta does not collaborate with its competitors; it competes on the basis of the quality and efficiency of its services, the prices offered and other services provided to clients. It does not interfere with its competitors' ability to compete in the same way.

The company uses fair business practices. Employees must not engage in activities that constitute restrictive business practices, abuse of a dominant market position, or similar unfair business practices.

Gifts or commissions

It is prohibited to request or accept any type of payment, commission, gift or remuneration for services provided by Konecta, as well as to obtain any other form of benefit from one's position for personal gain.

No person subject to the Code may request or accept any type of payment, commission, gift or remuneration in relation to their professional activity at Konecta from clients, suppliers, intermediaries or any other third party.

The following are not included in this limitation:

- Gifts or items of little economic or symbolic value..
- Normal invitations that do not exceed the limits considered reasonable in customary, social and courtesy practices.
- Occasional gifts for specific and exceptional reasons (such as weddings or births), provided that they are not in cash and are within reasonable and modest limits.

Any invitation, gift or favour that, due to its frequency, characteristics or circumstances, could be interpreted by an objective observer as intended to influence the impartial judgement of the recipient, shall be rejected and reported to the Compliance Committee.

No person subject to the Code may, either directly or through an intermediary, borrow money or receive any other type of financial facility from customers, suppliers, intermediaries, counterparties or any other third party, unless such transactions take place within the framework of a commercial relationship with a financial institution or family relationships.

Donations, contributions, philanthropy, sponsorship

Charitable donations, contributions and sponsorships are gifts made for charitable purposes, or to support a specific charitable or philanthropic cause. Charitable donations, contributions and sponsorships may be in cash, services or new or used products.

They may also include humanitarian or emergency aid, development aid and medical assistance.

When collaborating with a charitable institution or sponsoring a charitable cause or activity on behalf of Konecta, you must ensure that the recipient is a legitimate charity, duly registered or licensed in the local jurisdiction, and that the contribution is consistent with our corporate values and standards.

- Donations, contributions or sponsorship to a charity associated with an official are not permitted.
- All approved charitable donations, contributions and sponsorships must be properly accounted for and accurately reflected in the company's books.

Information Control And Confidentiality

General duty of secrecy and confidentiality

Persons subject to the Code must maintain professional secrecy with regard to any non-public data or information they become aware of as a result of their professional activity, whether it originates from or refers to clients, suppliers, Konecta, other employees, managers or any other third party. Consequently, and without prejudice to the above general rule:

- They must use such data or information exclusively for the performance of their professional activity at Konecta, they may only disclose it to other professionals who need to know it for the same purpose, and they shall refrain from using it for their own benefit.
- Information relating to other employees, managers and directors, including, where applicable, information relating to remuneration, evaluations and medical examinations, shall be protected to the same standards as Konecta's confidential client information.
- Likewise, the technology, methodologies, know-how, and industrial, commercial or strategic secrets belonging to the company, its clients or suppliers, to which they have had access and which represent legitimate, industrial, commercial or strategic secrets, shall not be disclosed or transferred to third parties.
- This duty of secrecy shall continue to apply to the protection of personal data and business secrets under the terms provided for in current legislation.
- The provisions of the preceding paragraphs are understood to be without prejudice to the fulfilment of requirements made by competent authorities in accordance with applicable regulations.

In case of doubt, the Compliance Committee shall be consulted.

Personal data protection

Persons subject to the Code are obliged to respect the personal and family privacy of both employees and any other persons whose data they have access to as a result of Konecta's own activity, including personal, medical, financial or any other data that may in any way affect the intimate and personal sphere of the data subject.

Konecta has a Privacy and Confidentiality Policy as well as internal procedures to establish and disseminate the company's basic and general rules on the protection of personal data and business secrets, ensuring, in all cases, scrupulous compliance with current legislation in this area.

All personal data will be treated in a particularly restrictive manner, so that:

- Only persons subject to the Code, authorised to do so by virtue of their duties, will have access to such data to the extent necessary.
- Its computerised processing and use shall be carried out in such a way as to guarantee its security, veracity and accuracy, the right to privacy of individuals and compliance with Konecta's obligations under the applicable regulations..

For further information, refer to the Privacy and Confidentiality policy.

External relations and relations with authorities

Dissemination of information

Unless it is public information, persons subject to the Code shall refrain from transmitting, on their own initiative or at the request of third parties, any confidential information or news about Konecta or third parties to the media, referring in all cases to the Communications Department.

Relation with authorities

Persons subject to the Code shall maintain an attitude of respect and cooperation with representatives of the authorities within the scope of their powers, and always within the framework of the law and under the principles and values described in this Code.

Political or associative activities

Any affiliation, membership or collaboration with political parties or other types of entities, institutions or associations with public purposes must be made in such a way that its personal nature is clear and any involvement with Konecta is avoided.

In this regard, the company does not support any specific political party or candidate. It is strictly prohibited to make a political contribution to unduly influence a government official or in exchange for any improper advantage. Konecta maintains transparency and neutrality in its dealings with political parties and government authorities, complying with laws and regulations and adequately disclosing interactions.

Any individual covered by the Code who may be elected to public office shall, prior to accepting the position, assess whether there are any conflicts of interest or restrictions between these functions and those performed for Konecta, in order to determine whether it is necessary to inform the Human Resources Department.

Konecta does not seek to limit or restrict the fundamental rights and public freedoms of persons subject to the Code.

Konecta's material resources

Persons subject to the Code shall ensure that Konecta's material resources are not damaged in any way. They shall also protect and take care of the material resources at their disposal or to which they have access, which shall be used appropriately for the purposes of the professional functions for which they have been provided: for example, laptops, mobile phones, etc.

They shall ensure that expenditure is strictly limited to what is necessary and shall comply with all internal procedures established by Konecta to protect its material resources. Likewise, they shall not dispose of, transfer, assign or conceal any property owned by Konecta for the purpose of evading its responsibilities to its creditors.

Measures against corruption, bribery, and prevention of money laundering in business

Konecta operates with zero tolerance towards corruption and bribery in any form, regardless of whether they are directed at public officials or private individuals, and is committed to complying with anti-corruption laws in all markets where it operates.

The company strictly prohibits offering, authorising, promising, soliciting or receiving, directly or indirectly, any benefit or advantage, regardless of its amount or nature, that could influence its decision-making or that of third parties (whether customers, persons from supplier companies and other individuals or public officials). This includes, but is not limited to, obtaining or retaining business, securing an unfair competitive advantage, influencing decisions or actions, or inducing the recipient to act inappropriately or in breach of a duty of trust. Similarly, no employee should solicit, agree to, receive or accept any financial or other benefit in connection with their employment or relationship with the company.

Persons subject to the Code shall refrain from conducting any transactions with individuals or legal entities suspected of being involved in illegal capital movements and, in general, with any persons whose activities are suspected of being illegal, giving priority in business dealings and contracts to the company's ethical principles over the achievement of commercial goals.

Prevention of money laundering in business

Specifically, persons subject to the Code shall ensure compliance with policies and procedures aimed at preventing and controlling money laundering and terrorist financing in the course of their activities, taking into account the following:

- Ensure that clients linked to the company meet quality and character requirements such that there is always recognised moral integrity and lawful and transparent activity. The economic capacity of customers must be consistent with their activity and with the movements or operations they carry out in the entity.
- When information about a suspicious activity by a client or supplier becomes known, and it is considered that the business relationship between them and the company should not be extended, this circumstance must be communicated through the Information Channels available on Konecta's corporate website (<https://konecta.integrityline.com>) in order to prevent unfavourable repercussions and send the relevant reports to the competent authority.
- Ensure compliance with regulations to prevent and control conduct related to this phenomenon, thereby avoiding risks in the company's operations.

Konecta will establish the necessary controls based on the reality of its business, with the Policy on the Prevention of Corruption, Bribery and Money Laundering setting out the general principles in this area and laying the foundations for establishing the appropriate procedures and manuals to prevent such conduct.

For further information, refer to the Policy on the Prevention of Corruption, Bribery and Money Laundering.

Accounting obligations and financial information

Accounting obligations

Konecta's financial information will be prepared with reliability and rigour, ensuring that:

- The transactions, events and other occurrences covered by the financial information actually exist and have been recorded at the appropriate time.
- The information reflects all transactions, events and other occurrences in which the entity is involved.
- The transactions, events and other occurrences are recorded and valued in accordance with applicable regulations.
- The transactions, events and other occurrences are classified, presented and disclosed in the financial information in accordance with applicable regulations.
- The financial information reflects, at the relevant date, the rights and obligations through the corresponding assets and liabilities, in accordance with regulations.

Financial information includes all accounting and economic information that Konecta submits to the Commercial Registry.

Internal controls

All internal control procedures established by Konecta shall be complied with to ensure that transactions are correctly recorded and accurately reflected in the financial information published by Konecta.

When preparing financial information, the areas of Konecta responsible for each activity must ensure that they have complied with the controls established by Konecta and that the information provided is correct.

Tax obligations

Persons subject to the Code shall avoid all practices that involve the unlawful evasion of tax payments to the detriment of the Public Treasury.

Persons subject to the Code shall in all cases avoid the use of opaque structures for tax purposes, understood as those in which, through the interposition of shell companies in tax havens or territories that do not cooperate with the tax authorities, they are designed for the purpose of preventing the tax authorities from knowing the ultimate person responsible for the activities or the ultimate owner of the assets or rights involved.

The Board of Directors or equivalent body shall be informed of the tax policies applied by Konecta.

For further information, refer to the Fiscal policy.

Computer systems and information technologies

Rules of the Code of Ethics in the use of information and communication technologies

Persons subject to the Code shall strictly comply with the rules established in the procedures, manuals and circulars of Konecta's Technology, Systems and Communications Department.

They shall provide special protection for computer systems, taking extreme security measures.

They must comply with the specific rules governing the use of email, Internet access or other similar means made available to them, and under no circumstances may they be used inappropriately.

The creation, membership, participation or collaboration by persons subject to the Code in social networks, forums or blogs on the Internet and the opinions or statements made therein shall be carried out in such a way that their personal nature is clear. In any case, persons subject to the Code shall refrain from using the image, name or trademarks of Konecta to open accounts or register on these forums and networks

For further information, refer to the Policy on Information System Security and Cybersecurity Information Systems.

Digital ethics

Konecta recognises the fundamental role of technology in achieving its objectives. It therefore assumes responsibility for ensuring that the technological products and services it uses — including artificial intelligence environments — are aligned with strict respect for

and compliance with the law, as well as with the main global ethical recommendations on the use of technology.

This involves, among other things, implementing the principles of equality, non-discrimination, transparency, privacy, and security in all phases of the design, development, implementation, and/or maintenance of the company's technological developments. In this way, technology will support teams in their decision-making, always respecting the principles of action set out in this Code.

To this end, persons subject to the Code shall:

- Ensure that they act in accordance with the company's ethical commitments when using or being involved in the design, development, implementation or maintenance of technological solutions, services or products, including those involving artificial intelligence.
- Use artificial intelligence environments certified by the company in accordance with permitted uses.
- Communicate, in accordance with internal procedures, any non-compliance they detect in relation to the use of technological services or products.

For further information, refer to IA policies; on Information Systems Security and Cybersecurity Information Systems; and Privacy and Confidentiality.

Intellectual and industrial property rights

Persons subject to the Code shall respect the intellectual property and right of use corresponding to Konecta in relation to courses, projects, programmes and computer systems; equipment, manuals and videos; knowledge, processes, technology, know-how and, in general, other works and projects developed or created at Konecta, either as a result of their professional activity or that of third parties. Therefore, their use shall be carried out in the exercise of professional activity at Konecta and all supporting material shall be returned when requested.

They shall not use Konecta's image, name or trademarks except for the proper performance of their professional activities within the company.

Persons subject to the Code shall also respect the intellectual and industrial property rights of third parties outside Konecta. In particular, persons subject to the Code shall not incorporate, use or employ at Konecta any type of physical or electronic information or documentation belonging to another company that has been obtained as a result of the performance of a previous position or without the proper consent.

05

Application of the code of ethics, information channels and whistleblower protection

There is a Compliance Committee responsible for resolving any issues related to the Code of Ethics and the company's compliance policies, as well as any issues that, due to their complexity, are referred to it.

This Committee will therefore be responsible for the Internal Reporting System, ensuring its diligent processing and guaranteeing a thorough and meticulous analysis of possible breaches of the Code of Ethics to ensure its accuracy. Its decisions will be duly substantiated, argued and justified.

In this regard, Konecta employees and its various stakeholders have been provided with a direct channel of communication with the company, called Information Channels, available on the corporate website via the URL: <https://konecta.integrityline.com>, so that anyone can submit the appropriate communication in the event of detecting any type of breach or violation of Konecta's Code of Ethics, in accordance with procedure PG COR 26 Information Channels, available in the same space, which specifies the different channels available and the nature of the communication that can be made through them. In addition, the whistleblower may contact other competent authorities, depending on the nature of the infringement in question.

This channel – the whistleblowing channel – has been created with high security standards in order to facilitate the reporting of any irregularities, ensure the confidentiality and protection of whistleblowers, and optimise the management of communications received.

At any point in the process, communications managers may forward any information they need to know in the course of their duties and responsibilities, as set out in the Compliance and Criminal Risk Prevention Manual, to Konecta's Compliance Committee.

The whistleblower may choose to submit the report anonymously, without providing any identifying information, or may provide their details (name, telephone number and email address). In the latter case, the whistleblower's identity will be kept strictly confidential. The report must contain a description of the events that constitute a violation of the principles set out in the Code of Ethics, as well as any conduct suspected of being criminal or irregular. In each country where Konecta has offices, information channels will be available with the necessary adjustments to comply with the applicable local regulations.

At all times, the rights of the persons involved in an alleged breach will be fully respected, and any personal data provided will be processed correctly, guaranteeing the exercise of their rights and the confidentiality of any communications received.

No disciplinary or discriminatory measures, constituting retaliation or any type of negative consequence, shall be taken against any person, including Konecta employees, for having reported in good faith and selflessly on conduct suspected of being criminal or irregular.

However, appropriate measures (including disciplinary measures, where applicable) will be taken when the internal investigation determines that the report is false and has been made in bad faith. Furthermore, the accusation of facts, with knowledge of their falsity or with reckless disregard for the truth, may result in criminal or civil liability under the terms of the current legal system.

All departments of the company have a duty to cooperate in the analysis of the facts when required to do so. They may be asked to provide testimony, cooperation, documentation and technical support related to their professional activity within Konecra.

Failure to comply with the Code of Ethics will be subject to the corresponding disciplinary measures in accordance with internal rules and procedures, without prejudice to any administrative or criminal penalties that may also result from this and which are imposed by the competent authority.



06

Updating and revision

The Code of Ethics will be reviewed and updated periodically, or when necessary, to adjust it to changes in the business model, or that may occur in Konecta’s field of activity, or as a result of the approval of directly applicable regulations, ensuring its effectiveness and compliance.

NOTE: This Code of Ethics has been reviewed and approved on December 16, 2025, by the highest governing body and replaces any previous version of it, with only this document being valid from this date onwards.

Version Control

Version	Review date	Reviewed	Validated	Approved	Reason for change
3	12/19/2022	Compliance Organization & Procedures	Legal Affairs	Board of Directors	General Code of Ethics Review
4	07/04/2023	Compliance Organization & Procedures	Legal Affairs	Board of Directors	General Code of Ethics Review
5	12/16/2025	Compliance Organization & Procedures	Legal Affairs	Board of Directors	Alignment with legal requirements Alignment with the new format and branding