

CODE OF ETHICS

KONECTA

Madrid, July 4, 2023

Konecta



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1.- TITLE I. INTRODUCTION

This Code applies globally to all Konecta entities and is endorsed by the general management of the company. Each individual within the company is responsible for promoting the principles and commitments contained in this Code at Konecta.

Notwithstanding the foregoing, the scope of activity and application of the Code of Ethics may, in addition, be extended to all the physical persons and/or legal entities connected in business, or professionally, with Konecta.

This General of Ethics is applicable to all the members of the administrative bodies and employees of Konecta.

It must therefore be complied with by Konecta senior managers, members of the administrative bodies and employees, regardless of their position or function within the organisation or their geographical location.

Hereinafter, these persons shall be jointly known as "Persons subject to the Code".

Similarly, employees with staff under their supervision shall:

- Encourage compliance by example.
- Verify that their team knows, understands and applies the Code of Ethics.
- Support their employees in case of ethical conflicts, so that they can make the best decision and make them aware of their obligation to know and apply the Code of Ethics.

The Compliance Department shall ensure the proper dissemination of the Code of Ethics to all employees, clearly stating their duty to know and apply this Code. This Code shall also be communicated to people who, for any of the reasons listed above, are subject to the rules thereof.

The Compliance Department shall be responsible for following up on the effective knowledge and respect to the Code of Ethics.

Persons subject to the Code must be acquainted with the content of the Code of Ethics and collaborate to facilitate its implementation and compliance in Konecta.

Persons Subject to the Code must participate in all the training actions to which they are summoned, in order to obtain adequate knowledge of the Code of Ethics for its correct application.

2.- TITLE II. KONECTA'S GENERAL ETHICAL PRINCIPLES

The ethical principles of the organisation, its good corporate governance and the professional ethics of the Persons subject to the Code constitute the pillars upon which Konecta's activity is based.

All the actions performed by the Persons subject to the Code, as a consequence of their connection with Konecta, must be guided by ethical values, among which are the following:

Equal opportunities and non-discrimination

A basic principle of conduct in Konecta is providing the same opportunities in access to work and in professional promotion, ensuring at all times the absence of situations of discrimination for reasons of sex or sexual orientation, race, religion, origin, civil status or social condition.

Consequently, the Persons subject to the Code who are involved in processes related to recruitment, selection and/or professional promotion, shall be guided by objectivity in their actions and decisions.

Equal opportunity shall be promoted at all times and it be a basic objective to identify those persons best suited to the profile and needs of the position to be covered.

The current HR Framework Policy in the Company establishes the lines of action in this matter.

Respect for people

Harassment, abuse, intimidation, discrimination, lack of respect and consideration, or any other physical or verbal aggression, are unacceptable and shall neither be permitted nor tolerated at work. Konecta shall also ensure non-discrimination of people, especially of those with disabilities and fully reject any behaviour contrary to these principles.

Persons subject to the Code with staff under their supervision in Konecta's different departments or business areas, shall, with the means available to them, promote and ensure that said situations do not occur.

All Persons Subject to the Code and especially, those who perform management and organisational functions in Konecta, will always promote, and at all professional levels, relations based on respect for the dignity of others, participation, equality and reciprocal collaboration, favouring a respectful work environment to achieve a positive working climate.

Work-life balance

In order to develop the Company's Corporate Social Responsibility principles to improve the quality of life of employees and their families, Persons subject to the Code shall promote a working environment compatible with personal development, helping the members of their teams to balance, in the best way possible, the requirements of work with the needs of their personal and family life.

Occupational health and safety

Konecta, aware of the importance of the safety and health of its employees, establishes the achievement of physical, mental and social well-being within the preventive culture of the Company as a fundamental pillar.

For this reason, Persons subject to the Code shall, at all times, respect the preventive measures implemented by the Company in the area of safety and health, taking on the procedures in terms of Risk Prevention established by the organisation, and complying with the preventive functions associated with their position, as indicated in the Konecta Prevention Plan.

Environmental Protection and Social and Environmental Responsibility policies

Persons subject to the Code, within the scope of their responsibilities, must be actively and responsibly committed to the protection of the environment, respecting the legal requirements, and striving to reduce the environmental impact of their activities.

Colective rights

Persons subject to the Code shall respect the legally recognised rights to organise themselves, the rights of association and of collective bargaining, as well as the activities that are carried out by the workers' representative organisations, according to their legally attributed functions and responsibilities, with whom they shall maintain a relationship based on mutual respect.

3.- TITLE III. GENERAL GUIDELINES

Persons subject to the Code shall use their technical and professional capacity, the appropriate sound judgment and care in the performance of the tasks assigned to them. They shall act to ensure compliance with the existing legal system and develop an appropriate, honest and loyal professional conduct in line with their duties, refraining from engaging in illegal or immoral activities to attract business to Konecta.

In particular, and notwithstanding said general rule, Persons subject to the Code shall:

- Be subject to the applicable external and internal regulations, according to the type of functions they must perform.
- Respect the internally established policies and procedures.
- Observe the rules relating to occupational safety and health, with the aim of preventing and minimising occupational risks.
- Protect intellectual property, trademarks and licenses, both belonging to Konecta and to the other companies with which we interact.
- Protect Konecta's available resources.

Persons Subject to the Code shall always act in the interest of Konecta, making appropriate use of the means at their disposal and avoiding actions that may cause it harm. They shall abstain from using business opportunities of interest to Konecta in their own benefit.

4.- TITLE IV. GUIDELINES OF CONDUCT FOR SPECIFIC SITUATIONS

POTENTIAL CONFLICTS OF INTEREST

General Guidelines

In general, it is understood that there is a personal conflict of interest when a situation where the private interests of a person are considered to interfere with the performance of their job functions. Therefore, Persons subject to the Code shall always act diligently to ensure the impartiality of their actions towards efficiency and professionalism.

Persons Subject to the Code shall abstain from participating (whether in decision-making or in functions of representation of Konecta) in transactions of any type carried out by a Konecta entity in which any personal interest, or interest of any associated person, concurs.

Quality commitments

Konecta implements a Quality Management System based on the ISO 9001 and the COPC standard, oriented towards:

- Providing services that meet Konecta's requirements and expectations.
- Ensuring the internal communication of clients' requirements.
- Having a training plan accessible to all Konecta staff.
- Equipping all services with a quality control mechanism to secure compliance with the requirements agreed with Konecta.
- Encouraging the participation of the staff in the management, development and implementation of the Management System.
- Ensuring compliance with the applicable laws and regulations, as well as with any other commitment voluntarily made.
- Maintaining permanent contact with clients and suppliers with a view to jointly collaborate in the improvement of the services provided.

These commitments shall materialise in specific goals and targets within a continuous improvement process, in line with their resources and impacts.

Relationship with suppliers and clients

Suppliers:

Persons Subject to the Code and, in particular, those who participate in decisions regarding the procurement of supplies or services, or setting the Company's economic conditions, shall avoid any type of interferences that may affect their impartiality or objectivity with regard to said decisions.

The procurement of external supplies and services shall be done in accordance with the established internal procedures. Relations between Persons subject to the Code and suppliers shall be respectful, legal and ethical, and their selection shall be governed by criteria of objectivity and transparency.

All the suppliers who work, or wish to work, with Konecta must comply with the Company's Code of Ethics for Suppliers, its corporate policies, as well as current regulatory, labour, tax, risk prevention and environmental legislation, and agree to respecting human rights.

Suppliers must state their obligation to comply with the Code of Ethics in their agreements with subcontractors.

Konecta suppliers hereby commit to informing Konecta of any deviations with regard to compliance with the Code of Ethics. They shall communicate any available information available by e-mail to: lineaeticakonecta@grupokonecta.com.

The supplier shall remain up to date with the modifications and updates of the General Code at all times. Konecta shall publish the Code, as well as any other modifications or updates thereof on its website: www.grupokonecta.com.

Clients:

Persons Subject to the Code shall act in the interests and aims of Konecta clients, always respecting Konecta's own interests and aims to achieve mutual benefit. The implementation of improvements shall be sought to achieve efficiency in services and better performance.

Respect for the principles that govern the conduct of the Persons subject to the Code shall be considered essential:

- Respect for good contractual faith between the parties, and
- Maintenance of professional secrecy and confidentiality of relations.

All Konecta clients shall be treated equally, without granting any privileges or favourable treatment. Persons subject to the Code agree to strive for excellence and offer high quality services, in which the safety and satisfaction of clients rests assured.

Gifts and commissions

Soliciting or accepting any type of payment, commission, gift or compensation for services provided by Konecta is prohibited, as well as gaining advantage from the position held in the Company for personal benefit.

No Person Subject to the Code may solicit or accept any type of payment, commission, gift or compensation in relation to their professional activity in Konecta deriving from customers, suppliers, intermediaries, or any other third party.

Not included in said limitation:

- a) Presents or objects of low value (less than €150)
- b) Normal invitations that do not exceed the limits considered reasonable in the usual, social and courtesy uses.
- c) Occasional gifts related to specific and exceptional causes (such as Christmas or wedding gifts), as long as they are not in monetary form, and are within modest and reasonable limits.

Except where, due to their frequency, characteristics or circumstances, these deliveries, promises or offers could be interpreted by an objective observer as actions aimed at affecting the impartial criteria of the receiver, shall be rejected and made known to the Compliance Committee.

No Person Subject to the Code may, either by themselves or through another person, borrow money or receive any other type of financial facility from clients, suppliers, intermediaries, counterparts, or any other third party, unless said operations take place in the framework of a commercial relationship with a financial entity or are the result of family relations.

CONTROL OF INFORMATION AND CONFIDENTIALITY

General duty of secrecy and confidentiality

In general, Persons Subject to the Code must maintain professional secrecy with regard to all non-public data or information they know as a result of the practice of their professional activity, whether from, or in reference to, clients, suppliers, Konecta, other employees, directors, or any other third party.

As a result, and notwithstanding the foregoing general rule:

- Said data or information must be used exclusively for the performance of their professional activity in Konecta; they may only be provided to other professionals who need to know it for the same purpose, and shall abstain from using it to their own benefit.

- The information relating to other employees, directors and board members, including, as applicable, that which is related to remunerations, evaluations and medical examinations shall be protected with the same standards as the confidential information of Konecta clients.
- Likewise, technologies, methodologies, know-how and industrial, commercial or strategic secrets belonging to the Company, its clients or suppliers shall not be disclosed or transferred to third parties upon access to information that represents a lawful trade secret.
- This duty of secrecy shall persist on the protection of personal data and business secrets, in the terms provided in the legislation.
- The indications in the foregoing paragraphs are understood, notwithstanding compliance with the requirements formulated by competent authorities, according to 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 all people, both of employees and of any other people to whose data the Company has access as a result of its activity, which must encompass the personal, medical, and economic data, or of any other nature, that in any way may affect the private and personal sphere of its owner.

Konecta has a Privacy and Confidentiality Framework Policy, as well as internal procedures to establish and disseminate Konecta's basic and general rules on the protection of personal data, ensuring, in any case, strict compliance with the applicable legislation.

All personal data will be treated in an especially restrictive way, so that:

- Only the Persons subject to the Code duly authorised by their functions have access to said data to the extent deemed necessary.
- Computer processing and use is done as to ensure its security, veracity and accuracy, the right to privacy of people, and compliance with Konecta obligations that are applicable according to regulations.

EXTERNAL RELATIONS AND RELATIONS WITH AUTHORITIES

Dissemination of information

Unless when dealing public information, Persons subject to the Code shall refrain from transmitting, on their own initiative or, at the request of third parties, any information or confidential news about Konecta or about third parties to the mass media, referring, in all cases, to the Communication Department.

Relationship with authorities

Persons subject to the Code shall maintain an attitude of respect and collaboration with the representatives of the authorities in the framework of their responsibilities, always within the legal framework, and under the principles and values described in this Code.

Political or associative activities

Association, membership or collaboration with political parties or with other types of entities, institutions or associations with public purposes by Persons subject to the Code shall be done in a way that stresses their personal character and avoids any involvement with Konecta.

Persons subject to the Code who could possibly be elected to public office, shall assess, prior to accepting the position, the existence of incompatibilities or restrictions between these functions and those performed for Konecta, as to determine whether to inform the Human Resources Department.

Konecta does not intend to limit or restrict the fundamental rights and civil liberties of Persons subject to the Code.

KONECTA ASSETS

Persons subject to the Code shall ensure that Konecta assets do not suffer any impairment. Likewise, they undertake to protect and care for the assets at their disposal or to which they have access, and use them in a manner appropriate for the performance of the professional duties for which they have been handed: e.g., laptop computers, mobile phones, etc.

They shall ensure that expenditures are strictly adjusted to the needs, and comply with all internal procedures established by Konecta to protect its assets. They shall not engage in any acts of divestment, transmission, assignment or concealment of any property owned by Konecta, with the purpose of eluding the fulfilment of the responsibilities thereof, with regard to creditors.

MEASURES AGAINST CORRUPTION AND PREVENTION OF MONEY LAUNDERING IN BUSINESS

Konecta shall refrain from carrying out any transaction with natural or legal persons allegedly related to illicit capital movements and, in general, with all those where there are doubts about the legality of their activities, prioritising the ethical principles of the Company to the achievement of any commercial goals to be obtained through business and contracts.

Konecta shall establish the necessary controls based on the reality of the business, under the general principals contained in the Policy Against Corruption and Money Laundering, which shall provide the basis for establishing the appropriate procedures and manuals to prevent corruption and money laundering.

Persons subject to the Code must ensure compliance with the policies and procedures aimed at preventing and controlling money laundering and the financing of terrorism in the performance of their activities, for which the following should be taken into account:

- Ensuring that the clients linked to the Company meet our quality and character requirements, and have a recognised moral integrity, as well as a lawful and transparent activity. Clients' economic capacity must be consistent with their activity and with the movements or transactions in the entity.
- When becoming aware of suspicious activity by either a client or a supplier, and it is decided that the business relationship between said person and the Company should not be extended, immediate notice should be given to the higher level officials, in order to unify the criterion, prevent unfavourable impacts and report the case to the competent authority.
- Ensuring compliance with the rules to prevent and control behaviours related to this phenomenon and thereby, avoid risks in the operation of the Company.

ACCOUNTING OBLIGATIONS AND FINANCIAL INFORMATION

Accounting obligations

Konecta's financial information shall be prepared with reliability and rigor, ensuring that:

- a) The transactions, facts and all other events included in the financial information effectively exist and have been registered at the appropriate time.
- b) The information reflects the totality of the transactions, facts and all other events in which the entity is a party concerned.
- c) The transactions, facts and all other events are registered and assessed in conformity with the applicable regulations.
- d) The transactions, facts and all other events are classified, presented and disclosed in the financial information, in accordance with the applicable regulations.
- e) The financial information reflects, on the corresponding date, the rights and obligations through the corresponding assets and liabilities, in conformity with the applicable regulations.

The financial information includes all the accounting and economic information that Konecta presents in the Mercantile Registry.

Internal controls

All internal control procedures established by Konecta to ensure correct accounting of the transactions and their appropriate reflection in the financial information published by Konecta shall be complied with.

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

TAX OBLIGATIONS

Persons subject to the Code shall prevent any practices involving the illegal circumvention of the payment of taxes to the detriment of the public finances.

Persons subject to the Code shall prevent at all times the use of opaque structures for the purpose of tax benefits, understood as those in which, by means of an interposing vehicle corporations in tax havens or territories not cooperating with tax authorities, knowledge by the tax authorities ultimately responsible for the activities or the ultimate holder of the assets or rights involved, is prevented.

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

CORRUPT CONDUCT

Corruption of public officials

The delivery, promise or offer of any type of payment, commission, gift or compensation to any authorities, public officials or employees, or directors of public companies or bodies is prohibited, whether made directly or indirectly through people or companies associated with them or intermediaries, or whether made to a public official, employee or another person, indicated by said person. This prohibition refers both to the public authorities, officials or employees of Spain, and to those of any other country.

Said deliveries, promises or offers are prohibited, whether made directly by a Konecta Company, or indirectly through partners, collaborators, agents, intermediaries, brokers, advisors or any third parties.

Except where, due to their frequency, characteristics or circumstances, these deliveries, promises or offers could be interpreted by an objective observer as actions aimed at affecting the impartial criteria of the receiver, the following items shall not be included in this prohibition, as long as they comply with the guidelines established in the Konecta protocol regarding this subject:

- a) Objects of advertising of small value.
- b) Normal invitations that do not exceed the limits considered reasonable in the usual, social and courtesy uses.
- c) The occasional attentions due to specific and exceptional causes (such as Christmas gifts), as long as they are not in monetary form and are within modest and reasonable limits.
- d) Invitations to sports or cultural events sponsored by Konecta, on the conditions established by corporate policy on this subject.

Persons Subject to the Code must reject and make known to the Compliance Committee any request by a third party for payments, commissions, gifts or compensations for the elements mentioned in the first paragraph.

Agents, intermediaries and advisors

The use of agents, intermediaries or advisors in transactions or contracts in which, in any way, a public administration, a public body or a public company intervenes, either of Spanish or foreign nationality, shall require the adoption of the following measures:

Where possible, entities of known prestige in the market or industry concerned shall be used as agents, brokers or advisors and, if feasible, top-level companies, especially when the remuneration of the agent, broker or advisor is linked to the success of the transaction or contract.

Due diligence mechanisms shall be implemented to gain knowledge, as deemed reasonable, about the persons involved and their collaborators, to choose those deemed most suitable, and to reasonably verify their trustworthiness and ensure that they shall not engage in activities that may involve risks, economic damage or compromise the reputation and good image of Konecta.

Corruption between individuals

The delivery, promise or offer of any kind of payment, commission, gift or remuneration to any employees, managers or administrators of other companies or entities, whether made directly or indirectly through individuals or companies linked to them, is prohibited to avoid favouring Konecta over its competitors through breach of their obligations in terms of the hiring of products, services or sale of goods.

Said deliveries, promises or offers are prohibited, whether made directly by a Konecta company or indirectly, through partners, collaborators, agents, intermediaries, brokers, advisors or third parties.

Except where, due to their frequency, characteristics or circumstances, these deliveries, promises or offers could be interpreted by an objective observer as actions aimed at affecting the impartial criteria of the receiver, the following items shall not be included in this prohibition:

- a) Objects of advertising of small value.
- b) Normal invitations that do not exceed the limits considered reasonable in the usual, social and courtesy uses.
- c) The occasional attentions due to specific and exceptional causes (such as Christmas gifts), as long as they are not in monetary form and are within modest and reasonable limits.
- d) Invitations to sports or cultural events sponsored by Konecta, on the conditions established by corporate policy on this subject.

Persons subject to the Code must reject and make known to the Compliance Committee any request by a third party for payments, commissions, gifts or compensations for the items mentioned above.

COMPUTER SYSTEM AND INFORMATION TECHNOLOGY

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 newsletters of Konecta's Technology, Systems and Communications Department.

They shall grant special protection to computer systems, implementing the security measures designed for them to the fullest extent.

They must comply with the specific rules regulating the use of e-mail, access to internet, or similar means made available, preventing any improper use thereof.

The creation, membership, participation or collaboration by Persons subject to the Code on social networks, forums or blogs on the Internet and the opinions or statements made therein, shall clearly state their personal nature. In any case, Persons subject to the Code must refrain from using Konecta's image, name or brands to open accounts or to register on forums and networks.

INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS

In this regard, employees shall respect the intellectual property and the right of use which corresponds to Konecta in connection with the courses, projects, programmes, systems, equipment, manuals, videos, knowledge, processes, technology, know-how, and other works generally developed or created within Konecta, either as a result of their work or of third parties. Therefore, their use shall be limited to the performance of professional activities in the Company and all the material that is used shall be returned when required.

They shall refrain from using Konecta's image, name or brands except for the proper development of their professional activity.

Persons subject to the Code shall also respect the rights of intellectual property held by third parties outside Konecta. In particular, Persons subject to the Code shall not incorporate or use in Konecta any information or physical or electronic documents belonging to another company that has been obtained as a result of the performance of a previous position or without due consent.

STORAGE AND PRESERVATION OF DOCUMENTS

Persons subject to the Code shall strictly comply with the internal procedures for archiving and storing documents.

In any case, the following documents shall be properly stored and kept for the time set out either in the internal regulations, or in the commercial contract signed with the client, in paper or electronic format:

- Documents supporting the accounting entries that reflect transactions made by Konecta.
- Documents supporting the proper delivery of the contracted services by clients during the legally established timeframe.
- Records of all the training courses taught on the Compliance Programme and others.

TITLE V. APPLICATION OF THE CODE OF ETHICS AND INFORMATION CHANNELS

A Compliance Committee shall be appointed to resolve any issues related to the Code of Ethics, the Company's Compliance Policies, as well as to any question which, by its complexity, shall be submitted to its members for interpretation by the Human Resources Department.

This Committee shall ensure a comprehensive and thorough analysis of possible breaches of the Code of Ethics to ensure its accuracy, and its decisions shall be duly substantiated, argued and justified.

In this regard, Konecta employees have a direct communication channel with the Company, called Information Channels, at their disposal, so that anyone can submit timely communication upon detection of any breach or violation of Konecta's Code of Ethics.

Communications may be anonymous and must contain the description of the events involving the infringement of the principles contained in the Code of Ethics, as well as any behaviours suspected criminal or irregular.

Konecta shall make available, in each country where it operates, information channels with the necessary adjustments to comply with the enforceable local regulations.

The utmost respect for the rights of the people involved in an alleged breach, as well as the correct treatment of personal data provided shall be guaranteed, ensuring the exercise of the rights assisting them and the confidentiality of communications received.

No disciplinary action that constitutes retaliation or a negative consequence for reporting in good faith shall be adopted against any Konecta employee. However, appropriate measures (including disciplinary, if any) shall be adopted, in cases where the internal investigation conducted determines that the complaint is false and was made in bad faith. In addition, the attribution of actions, in the full knowledge of their falsehood or in reckless contempt for the truth, may result in criminal or civil liabilities, on the terms set out in the current law.

All departments of the Company have a duty to assist in the analysis of facts when they are so required. They may be requested to provide testimony, collaboration, documentation and technical support related to their professional activity within Konecta.

The Board of Directors shall approve the Code of Ethics and all Compliance Policies developed within the Company, and the Compliance Department shall be responsible for its implementation.

Failure to comply with the Code of Ethics may lead to the labour sanctions set out in the applicable Collective Agreement, the Workers' Statute itself and the applicable labour legislation. Its processing shall follow the legally established channels, such as arranging a hearing to the Works Council or Union representatives, without prejudice to any administrative or criminal penalties, if any, that may result from it and are imposed by the competent authority.

NOTE. This Code of Ethics was revised and approved on July 4, 2023 by the administrative body of Grupo Konectanet, S.L.U. It replaces in all its terms any existing earlier version of the Code, this being the only valid document and application to date.