



Code of Ethics
and Conduct for
Suppliers,
Subcontractors
and Collaborators

ELECNOR GROUP CODE OF ETHICS AND CONDUCT FOR SUPPLIERS, SUBCONTRACTORS AND COLLABORATORS

Since its foundation in 1958, the Elecnor Group and all of its employees have been and continue to be committed to pursuing their professional activities in keeping with the **highest ethical standards and current legislation** in the countries in which it operates; a commitment that is at one with its business culture and philosophy and the solid values that underpin the manner in which it does business and engages with the environment.

Elecnor Group suppliers, subcontractors and all other collaborators are key actors in the company meeting these commitments, constituting as they do an extension of the same and a vital link in its value chain. Accordingly, the Elecnor Group wishes to **spread among its suppliers, subcontractors and collaborators its business philosophy**

and its commitment to ethical conduct and integrity in business, the defence of human, social and labour rights, employee occupational health and safety and the prevention of accidents at work, environment protection and quality.

This “*Elecnor Group Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators*”, which is based on the *Elecnor Group Code of Ethics and Conduct* (available on its corporate website (www.elecnor.com)) for any person or organisation related to, or with a legitimate interest in, the same), constitutes an essential Elecnor Group tool **to encourage its suppliers, subcontractors and collaborators to conduct their professional pursuits in accordance with only the best business practices and the highest ethical standards.**



Ethics and integrity



Respect for human,
social and labour rights



Health and safety



Environment protection



Quality

ETHICS AND INTEGRITY



Ethics and integrity are considered by the Elecnor Group to be core, inescapable principles, in addition to underpinning sustainable business relationships, thus explaining its commitment to pursuing its business activities pursuant to exemplary ethical conduct. Legislation will be fully complied with in any country or territory where the Elecnor Group does business, without exception.

Accordingly, the Elecnor Group expects its suppliers, subcontractors and collaborators to:

- Fully observe **current legislation and regulations** in those countries where they pursue their activities.
- Pursue their activities in accordance with the **highest ethical standards**, avoiding any unethical practices or conduct, even when these entail no liability under the applicable legislation.
- Refrain under any circumstance from practices that may be considered in any way as **corrupt or involving bribery** and, particularly to (albeit not exhaustively):

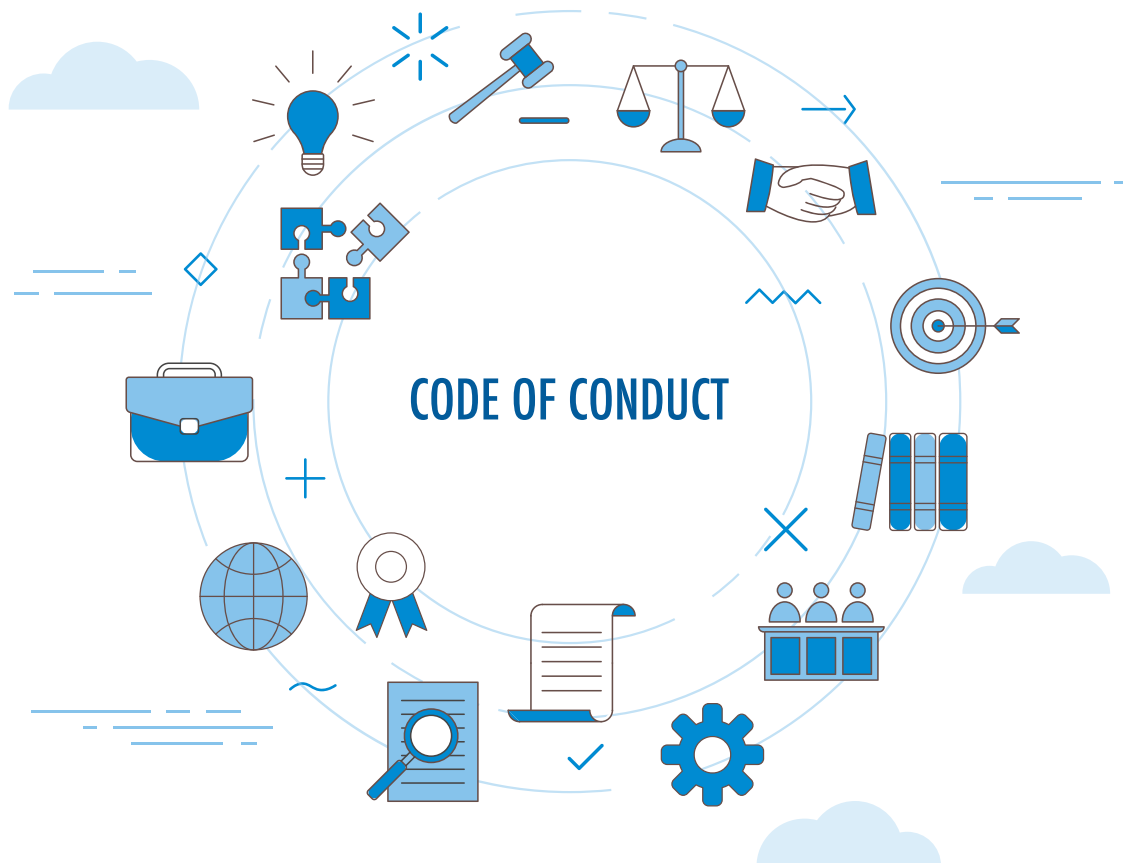
- Refrain from offering, promising or conceding, either directly or indirectly, any payment in cash or in kind, or other benefit, to a natural or corporate persons in the service of a public or private authority or entity, political party or candidate for a public office, to obtain or maintain unlawful business deals or other advantages.

- Refrain from offering, promising or conceding, either directly or indirectly, any payment in cash or in kind, or other benefit, to a natural or corporate person, so that the said person may abuse their influence, whether real or apparent, to obtain any business deal or other advantage from a public or private authority or entity.

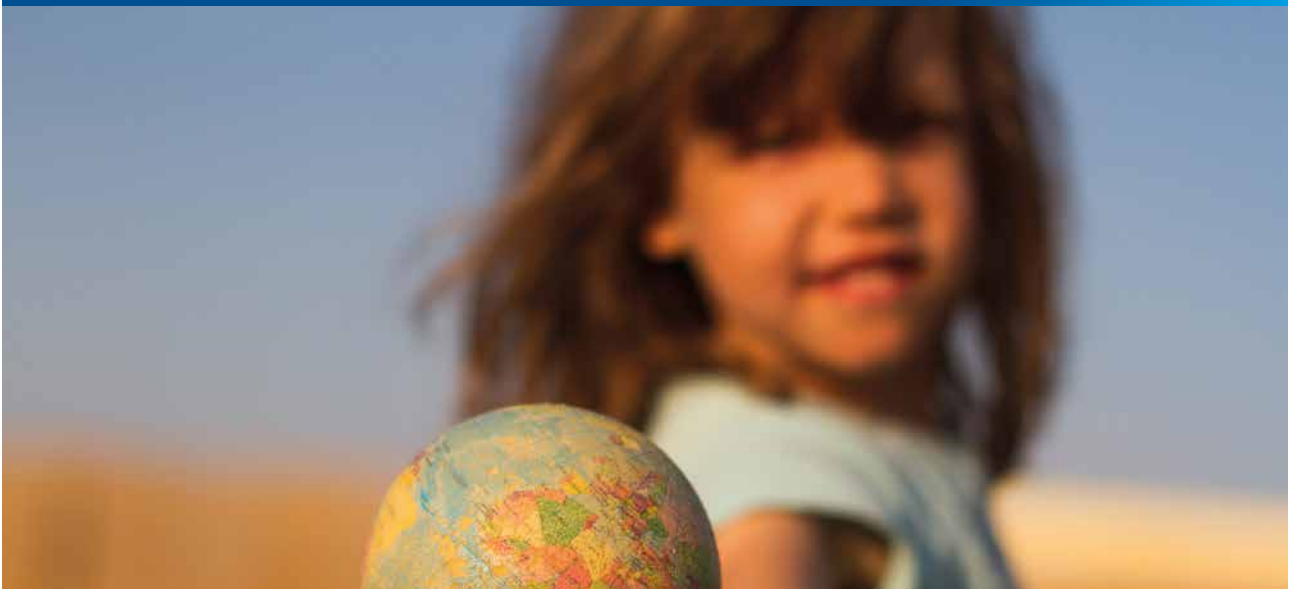
- Refrain from offering, promising or conceding, either directly or indirectly, any payment in cash or in kind, or other benefit, to a natural or corporate person, when it is known or it may be suspected that all or part of the money or of the payment in kind will be offered or delivered, either directly or

indirectly, to a public or private authority or entity, political party or candidate for a public office, for the purposes indicated in the two previous paragraphs.

- Refrain from offering, promising or conceding payments to facilitate or speed up processes, consisting in the handing-over of money or other object of value or any other benefit in exchange for ensuring or speeding up some formality or action by a judicial, public administration or official body.
- Observe the principle of **free and fair competition** and avoid conduct that restricts it and, particularly to:
 - Refrain from negotiating or entering into agreements or engaging in concerted or consciously parallel practices between competitors that may restrict competition (e.g. fixing prices or other trading conditions, sharing markets or customers, limiting or controlling production, etc.).
- Refrain from manipulating public or private tenders, whether through Temporary Business Associations (UTEs), consortia or joint ventures or unjustified subcontracting, making offers of cover, accompaniment, courtesy, etc., or any other means.
- Refrain from carrying out actions that could involve abuse of a dominant position.
- Refrain from engaging in acts of unfair competition.
- Guarantee the **confidentiality** of all the information, whether technical or economic, that has been obtained by them in the course of the business relationship with the Elecnor Group.



DEFENCE OF HUMAN, SOCIAL AND LABOUR RIGHTS



The Elecnor Group fully subscribes to the United Nations Universal Declaration of Human Rights, laying particular emphasis on equality of opportunities regardless of people's characteristics, the avoidance of child labour and forced labour and respect for the rights of ethnic and indigenous minorities. Moreover, the Elecnor Group fully observes the labour rights in force in the countries where it operates and defends and promotes freedom of association and collective bargaining.

Accordingly, the Elecnor Group expects its suppliers, subcontractors and collaborators to:

- Support and respect **the protection of internationally** acknowledged basic human rights.
- Ensure **non-discrimination** on the grounds of race, nationality, social status or origin, age, gender, ideology, religion, disability or any other circumstance open to discriminatory acts, encouraging equal opportunities and respect for diversity.
- Promote and guarantee a work environment in which the **dignity and safety of persons** is respected, avoiding any threat or expression contrary to the said dignity and safety and, especially, the different forms that **harassment** may take (job-related, sexual, physical, moral and psychological).
- Reject **forced labour** in all its forms, any abuse of authority and the use of **child labour**.
- Respect **the rights of local communities**, particularly as regards the most vulnerable groups, such as ethnic minorities and indigenous peoples, fostering initiatives and continuous engagement.
- Maintain **labour practices and conditions** in relation to its employees that observe all national and international reference standards.
- Acknowledge **freedom of association and assembly** and the right of their employees to **collective bargaining**.
- Ensure the **right to privacy** of all those persons with whom they interact and the **confidentiality** of all the **personal data** they hold.

HEALTH AND SAFETY



Employee health and safety is paramount for the Elecnor Group. The Elecnor Group fosters the adoption of occupational health and safety policies and implements the preventive measures necessary to guarantee the health and safety of its employees and sub-contractors, not confining itself merely to compliance with the legislation in place, especially in countries or jurisdictions that are less developed in this sphere, and providing a working environment that is respectful of employees' health and dignity. The Elecnor Group occupational health and safety strategy primarily seeks to reach the "Zero Accident" target.

Accordingly, the Elecnor Group expects its suppliers, subcontractors and collaborators to:

- Incorporate occupational health and safety into **their activities and tasks**.
- Provide their employees with **material resources** to ensure their safety.
- **Train their employees and ensure that they are made aware** of these occupational health and safety measures and that they implement them.
- Have **preventive measures** in place and implemented to avoid occupational health and safety risks and responses to tackle emergency situations for potential accidents during the working day.
- **Report** immediately any **accident, injury, illness or unsafe condition** that may arise or be detected within the framework of their business relationship with the Elecnor Group.

ENVIRONMENT PROTECTION



The Elecnor Group is fully committed to using the appropriate means and making the best efforts to prevent its actions from damaging the environment and to complying with applicable environmental legislation in the various jurisdictions in which it operates. Most especially, the Elecnor Group wishes to contribute actively and decisively to the construction of a sustainable, low-carbon future by generating power from renewable energy sources, implementing energy efficiency measures, reducing greenhouse gas emissions (carbon footprint) and through proper environmental management.

Accordingly, the Elecnor Group expects its suppliers, subcontractors and collaborators to:

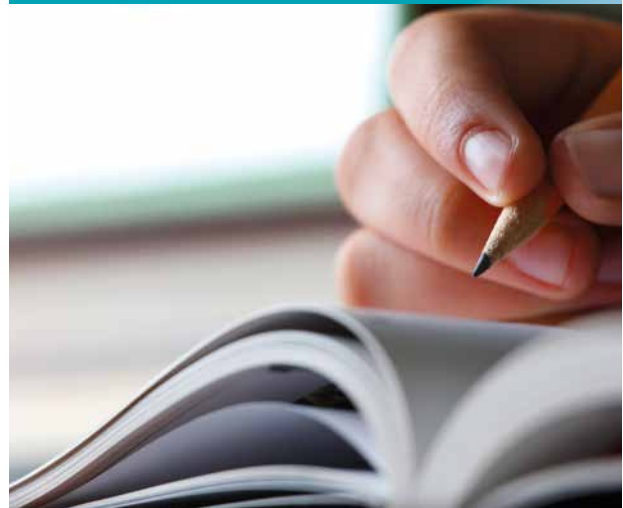
- Pursue their corporate activities in keeping with the principle of **maximum responsibility and respect for the environment and full compliance with the laws** and other general provisions protecting the environment in the those countries where they operate.
- Take a **preventive approach** and foster initiatives that promote greater environmental responsibility, seeking greater efficiency in their activities, facilities, equipment and work resources.
- Use effective systems to identify, control and process the main **environmental impacts** generated by their activities in terms of the consumption of natural resources, emission, waste, hazardous substances and dumping management.
- Use, in the event that they damage the environment, all the resources required to **restore it to its condition prior** to the event that caused the impact.
- Collaborate with the Elecnor Group in the pursuit of its goals to **reduce greenhouse gas emissions (carbon footprint)** and implement measures to this end.

QUALITY



The Elecnor Group seeks full customer satisfaction by anticipating their needs and exceeding their expectations and expects its suppliers, subcontractors and collaborators to likewise commit to the quality of the products and services provided and respect the set delivery and execution deadlines.

SCOPE OF AND COMPLIANCE WITH THIS CODE OF ETHICS AND CONDUCT



These principles apply to all Elecnor Group suppliers, subcontractors and collaborators.

The Elecnor Group reserves the right to conduct checks on compliance by its suppliers, subcontractors or collaborators with this Code of Ethics and Conduct either by requesting certain accrediting documentation or by conducting audits, both directly using its own resources or via independent third parties contracted for this purpose.

The Elecnor Group reserves the right to rescind the contractual relationship with those suppliers, subcontractors and/or collaborators that fail to comply with the ethical principles set forth herein.

Suppliers, contractors, and collaborators can report any irregular practice related to non-compliance with or a violation of the conduct expected under this document using the Elecnor Group ethics channel (codigoetico@elecnor.es), through which it is also possible to submit any doubts regarding the interpretation of these principles.

ACCEPTANCE

By confirming and accepting this Elecnor Group Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators, the supplier, subcontractor or collaborator company, in the context of its relations with the Elecnor Group, acknowledges that it:

- Is familiar with the contents of this Elecnor Group Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators and undertakes to comply with it, both on behalf of the signatory company and well as its directors and employees, in the context of its relations with the Elecnor Group;
- Undertakes to promote and require that its main suppliers, subcontractors and collaborators contracted within the context of its relations with the Elecnor Group conduct themselves in keeping with, and observe, the principles, values and commitments established in this Elecnor Group Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators.

This statement of confirmation and acceptance must be made by the legal representative of the supplier, subcontractor or collaborator company or a person with sufficient knowledge, powers and authority to accept this Elecnor Group Code of Ethics and Conduct for Suppliers, Subcontractors and Collaborators on behalf of the supplier, subcontractor or collaborator company.