



# Code of conduct



## Code of conduct

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## Code of conduct

### Introduction

#### Purpose

The purpose of the Code of Conduct of SOLTEC GROUP (hereinafter the Group) is to establish the guidelines and lines of action of all its directors, executives and employees for their daily operations, regarding their relationship with all its stakeholders, with a transparent, effective and efficient management of resources, being honest with clients, suppliers, institutions and being socially and environmentally responsible.

This Code of Conduct is part of and the basis for the Corporate Compliance Program implemented within the Group in order to prevent, avoid and detect the perpetration of criminal offences in the corporate environment, in compliance with the Spanish Criminal Code and the Tax Compliance Program.

The Code of Conduct of the Group is based on the definition of the Mission, Vision, Values and Principles of the Group, and constitutes the action guidelines that guarantee the employees' appropriate performance of professional duties. It adapts and adjusts to the current legislation in the country where the Group operates and to the Internal Policies and Protocols.

#### Scope

The Code of Conduct of the Group contains a series of mandatory values, principles, ethical rules and guidelines for behavior aimed at the directors, executives and in general at all the staff of the Group (hereinafter "employees") in the performance of their duties, regardless of the type of contract establishing the employment relationship, the position they hold, or the place where they work.

Besides this Code of Conduct, the employees shall also observe the regulations established in certain mandatory protocols and specific instructions.

In the event of breach or noncompliance with this Code or any of the procedures and protocols on Corporate Compliance and Tax Compliance, the corresponding penalties shall be imposed as established by Labor Law and the applicable Collective Bargaining Agreement or, in serious instances, dismissal or termination of employment for the infringing person.

Moreover, the Group shall promote and encourage the implementation of guidelines for behavior established in this Code of Conduct among its suppliers and collaborating companies.

The Group undertakes to disseminate this Code of Conduct, to keep it updated and to provide the necessary tools for its effective implementation and development.

The persons who join the Company in the future shall expressly accept the entire content of this Code, which shall be annexed to the Employment Contract.

## Mission

The Group is convinced that our duty is to honor the commitments that we, as a socially responsible company, make to people, technologic innovation and the environment.

By performing our operations, we wish to contribute to making our planet a clean, sustainable and fairer place through efficient production of photovoltaic power.

For these purposes, the Mission of the Group refers to the objectives that we set for ourselves and constitutes the expression of what the Group seeks in its work and its relationship with all the stakeholders. In particular it means:

- Encouraging and cooperating in favor of the implementation of renewable energy worldwide to the greatest possible extent.
- Promoting excellence and quality among the clients and satisfying all their needs in the field of renewable energy.
- Honoring our ethical commitment.
- Providing an adequate work environment which facilitates integration for all our employees.

We support constant technologic innovation and research as a way to develop more efficient products and services and to improve environmental protection. In our opinion, this is the only way to offer quality, competitive and unique products for the demanding market of renewable energies.

## Vision

The Vision of the Group shows its aspiration and strong commitment to become leaders in the solar photovoltaic market through the recognition of its efficiency, innovation, transparency, dedication to the client, business ethics and constant commitment to the community, by developing more competitive and better technical quality products equipped with cutting-edge technology.

## **Principle and values that guide the conduct of the group regarding its employees**

The Vision of the Group shows its aspiration and strong commitment to become leaders in the solar photovoltaic market through the recognition of its efficiency, innovation, transparency, dedication to the client, business ethics and constant commitment to the community, by developing more competitive and better technical quality products equipped with cutting-edge technology.

## Teamwork

We work in an environment of mutual collaboration and constant learning, and we guarantee the professionalism of all our actions. In this way, the goal of the Group is to optimize our capacity to generate ideas which can be brought to life through the integration of different points of view and teamwork.

## Client orientation

Our work is focused on guaranteeing efficient results, anticipating situations and responding proactively to the changes that we face in such a globalized and dynamic environment every day.

## Non-conformity

The Group works and performs its operations with a clear vocation of constant improvement, which is the only premise that makes it possible to offer our clients an optimal product, which meets the demanding needs of our society.

## Respect

Our premise is to reach our goals while being aware of how our actions and decisions impact on people and the environment. Moreover, the Group participates in and contributes to the development of the communities where it operates, by meeting the local needs, in search of a more sustainable world.

## Trust

The value of trust is twofold for the Group: self-trust and trust in the team. Therefore, it pervades all the professional actions in which we take part. This is the only way to create a reputation to be proud of.

## Proactivity

The value of proactivity in the Group refers to the way of assuming the duties entrusted, since it is a sign of perseverance, discipline and problem prevention.

## Compliance Body

The Group has appointed a body that is Responsible for Compliance (the so-called Compliance Body). Its functions are: (i) solving specific doubts that may arise on the daily implementation of this Code and the rest of protocols and procedures that make up the Corporate Compliance and Tax Compliance Programs; (ii) carrying out certain random controls to ensure compliance; and (iii) receiving and processing complaints or notifications of purported breaches.

Every professional of the Group and other Recipients are hereby notified that, if they are aware of conducts in breach of this Code, specific protocols/instructions and the law applicable to the Group, particularly regarding possible offences, they must report them to the Compliance Body, who in turn shall receive and process the complaints lodged, as a general rule, via the email address specially created for this purpose: [canaldenuncia@soltec.com](mailto:canaldenuncia@soltec.com). The Group or the person(s) Responsible for Compliance shall inform about the requirements or characteristics of this reporting channel.

Besides these values associated with the employees, the values exhibited by the Group from a corporate approach are client-orientation, solvency, transparency, innovation to move towards positive change and equality (social justice) and caring for our collaborators (Our Energy, Our People).

## Responsibilities and relationships of the group

### Relationship with the stakeholders

The stakeholders of the Group are the employees, external suppliers and collaborators, shareholders, public and private institutions and the society in general.

### Employees

The employees of the Group shall always act in an upright manner. Therefore, it is necessary to be aware of the responsibilities assumed as established in this Code:

- Reading, being aware of and understanding this Code, and the policies, principles and procedures contained herein, with the purpose of guaranteeing the compliance with all its requirements.
- Observance of all the provisions of the Code.
- Ensuring that other collaborators or groups affected by this manual observe and commit themselves to the Code.
- Proving your commitment to our principles daily and setting an example for all collaborators.
- Avoiding any situation that may give rise to illegal practices.
- Collaborating with the authorities by facilitating any requested information and being faithful to reality.
- Asking for help when in doubt about how to proceed.
- Notifying any breach or suspected breach of this Code to your direct superior through the mechanisms in place for protecting the Code.

#### Personnel selection

We believe that the optimal way to improve our competitiveness in the market is to hire employees who possess the skills and attitude needed to meet the expectations and fulfill near future objectives. For this, we develop selection processes with tools that meet the requirements of technical and ethical reliability, while respecting the principle of non-discrimination and promoting equal opportunities.

#### Establishment of the employment relationship

We guarantee that all our employees are hired with a legal employment contract and reject any practices that do not contemplate this principle.

We have protocols and action procedures in place in order to prevent and act if there is any indication of discrimination, harassment or intimidation to employees.

We facilitate the personal and professional growth of all our staff by means of development/assessment procedures.

We promote training among our employees by implementing customized plans in accordance with the specific needs of the company from a fair and objective perspective.

We promote a collaborative methodology among our employees, by creating an ideal environment where people can express their ideas and make their own decisions to help the company reach their global objectives.

## Relationship with the public administration and institutions

### Regulatory compliance

#### Respect for Laws and Human Rights

The Group, as a responsible company, is committed to the respect and compliance with the many applicable laws, regulations and other mandatory provisions.

Therefore, the employees of the Group undertake to observe the legislation in force in the countries where they operate and not to engage in any activity that may result in damage to the company's interest.

The Group may be declared legally liable for any breach of laws or other mandatory legal provisions, and for any other illegal activity of its employees. Therefore, the Group expects its employees to act in a legal, ethical and professional whilst performing their professional duties.

The commitment to comply with the law in all its aspects and anywhere the Group operates is an unavoidable premise and is particularly important to maintain and increase the trust of citizens and society.

During any professional activity, the employees of the Group shall take all necessary steps not only to do what is legal, but also to do what is right and they shall completely respect the Human Rights and Fundamental Freedoms included in the Universal Declaration of Human Rights.

#### Money laundering and financing of terrorism

The Group undertakes to strongly fight against money laundering, with the purpose of preventing the financing of terrorism, by legally abiding by the recommendations of the Financial Action Task Force (FATF). For this purpose, the Group shall not enter into commercial relationships with persons or entities that do not comply with the obligations on money laundering and financing of terrorism in every country or that do not provide the necessary information for their compliance.

#### Corruption and bribery

The employees of the Group shall not make or offer, whether directly or indirectly, any payment in cash, in kind or any other benefit to any public official, with the purpose of illegally obtaining or maintaining business or any other benefit.

Moreover, the employees of the Group shall not, under any circumstances, accept gifts, donations, special benefits or any other kind of favor from any person or private entity during the performance of their professional duties, unless they are symbolic and insignificant or are accepted out of politeness.

The Group requires its employees to strictly comply with all applicable regulations on corruption, and therefore, they shall not offer, whether directly or indirectly, any benefit or service to clients, partners or any other person or entity that has or may enter into relationships with the company, with the purpose of illegally influence said relationships, provided that it is not justified by an economic transaction.

#### Regulations on gifts

As a general rule on the Anti-corruption Policy of the Group:

The professionals of the Group shall not offer, promise or give gifts, donations, personal benefits, economic compensation or any other unjustified benefit or advantage to any third party other than the cases established in the Anti-corruption Protocol and in accordance with the procedures and requirements for authorization and control established in said Protocol.

However, gifts shall be acceptable (i) when they are symbolic and of negligible value (ii) provided that they arise from the usual commercial practices; and (iii) provided that they are not intended to unduly influence the award or contracting of goods or services.

In this vein, for the purposes of seeking out new clients, the Group established the amount of 1,500 euros as a limit. Therefore, any expenses exceeding this amount have to be authorized in written by the Group Sales Management with a justification for said expenses. Despite such limit for authorization, the Group audits all expenses regarding this point, for the purposes of clarifying or taking measures in case of breach.

If there is any doubt, it shall be discussed with the Compliance Body, also notifying the Board of Directors. They will decide if such offer, promise or delivery is adequate. In this vein, the persons who seek out new clients shall be made aware of the direct communication channel with the Compliance Body via the email address [consultascompliance@soltec.com](mailto:consultascompliance@soltec.com) to consult the position of the Group regarding such circumstances.

The professionals of the Group shall not accept, as a general rule, gifts, donations, personal benefits, economic compensation or any other unjustified benefit or advantage from any client, supplier, competitor or natural person or body corporate who wishes to become one of the aforementioned for the Group. It shall be acceptable, however, the acceptance of symbolic items by the Senior Management and the Board of Directors, applying the same limit of 1,500€ fixed for giving gifts.

The rest of the members of the Group may only accept this kind of gifts and benefits if they are immediately linked to a business operation (e.g. an invitation for lunch from a supplier in the context of a routine visit or a visit for approval, accepting gifts from the suppliers such as notebooks, pens, key rings, etc.).

One must bear in mind though that the international outreach of the Group results in it having suppliers and clients from completely different countries. Due to the different cultural sensitivities, rejecting a gift may be viewed negatively. In this case, its receipt is accepted provided that it is reported immediately to the member of the Board of Director who is responsible for them. The same applies for cases when the supplier or client sends a gift to the Group's premises without prior notice. In both instances and in any similar circumstances, these gifts shall be allocated to the WellBeing Program of the Group, and the sender of the gift shall be immediately informed of that.

However, any member of the Group who receives a gift worth over 1,500 euros shall notify the Compliance Body for the purposes of including it in an inventory. Although any dubious gift, regardless its worth, shall be discussed with the Compliance Body, also notifying the Board of Directors. They will decide if such offer, promise or delivery is adequate.

If, for any reason, a gift worth over 1,500 euros is received, it shall be delivered to the Compliance Body, which, if possible, shall donate it to a non-governmental organization

within 3 months and shall keep the acknowledgement of receipt issued by such Organization. If this is not possible, these gifts shall be allocated to the WellBeing Program of the Group.

In any event, it is expressly prohibited to facilitate the personal address or any address other than the premises of the Group to suppliers in order to receive gifts.

It is also permitted to accept invitations to social events, seminars or any other kind of event provided that the entry price is less than 200 euros per person and provided that the attendance to said events does not entail a monetary compensation for the employee or the Group. If attendance is paid, it shall need the previous authorization of the Compliance Body.

#### Prohibition to make contributions to political parties

It is prohibited to use the funds or goods of the Company, whether directly or indirectly, for the benefit of or as a contribution to political campaigns, candidates or political parties. The employees shall contact the Corporate Legal Counseling Department before using money or goods of the Company for any purposes related to a political campaign, candidate or party.

The policy of the Company does not intend to discourage or prohibit that the employees, at their own discretion, make political contributions in their personal lives, or that they participate in political life in their free time and at their own expense or that they express their views or that they engage in any other legal political activity that is compatible with local legislation.

However, the employees are prohibited to use their position in the Company or the goods of the Company to try to influence the personal decisions of other persons to support, or not to support a certain political party or candidate.

#### Unfair competition

The Group prohibits any action that implies the perpetration of illegal practices of unfair competition and undertakes to ensure compliance with the laws on protection of competition applicable in the countries where it operates.

In this sense, the Group undertakes to base its actions on the principles of loyalty and respect, by exercising the good business practices which are inherent to it and which the company has developed throughout its trajectory, thus avoiding any prohibited business practices.

The Company and its employees shall comply with the legislation on protection of competition in every country where it operates.

Such legislation is different from one country to another and may be complex. If an employee performs a task that may be affected by the legislation on protection of the competition, said employee has the obligation to be aware of the legislation in force and shall submit their doubt on the matter of compliance with such legislation to the Corporate Legal Counseling Department.

The law on defense of the competition prohibits any attempt to monopolize or limit the competition, which includes, without limiting to, the sale of products below their costs, bid-

rigging, group boycott, price discrimination, fixing the price or cost of products, or allocation of customers or territories with the competition.

Certain types of tying, which force the customer who wants to buy a product to purchase other products or services too, the agreement with suppliers or retailers on the price the Company has to sell its products to the public and other restrictive arrangements are also prohibited.

Breach of the laws on protection of the competition may be subject to both civil and criminal penalties.

Moreover, the Company shall operate in compliance with all laws, regulations and standards in force regarding the manufacture and distribution of the services of the Company.

The Company also complies with all the laws, both national and foreign, regulating advertisement. In general, these laws prohibit false, unproven or misleading advertising for the promotion and sale of the products of the Company.

All advertising or marketing arguments that the Company uses on its products shall be truthful and justified in a reliable manner.

#### **Collaboration relationship with the Public Authorities**

The Group undertakes to collaborate with every public, administrative and/or legal body or entity, by providing all necessary information so that they can perform their duties in the simplest possible manner, within a context of collaboration, respect and cordiality, without prejudice to maintaining confidentiality in cases when it is clearly necessary. Moreover, the Group undertakes not to hinder information requests from civil servants or the compliance with any other tasks they may perform within their legal professional duties, provided that they are within and in full conformity with the law.

## **Commitments**

### **Commitments to third parties and the market**

#### Loyalty to the company and conflicts of interest

The employees of the Group completely assume the obligation to promote the interests of the Company, and the prohibition to personally benefit from opportunities arising from the use of information from the Group or to benefit third parties with it. Moreover, the employees of the Group undertake not put personal interests before our clients' or the Group's interests under any circumstances.

A conflict of interest arises when an employee has some interest or a relationship or participates in an activity which is incompatible or seems incompatible with the interests of the Company, or may affect or seems that it may affect the objectivity of the employee in the performance of their professional duties.

It also means that the employee shall not use any business information or opportunity obtained during the performance of their duties in the Company to gain a financial benefit for themselves, a direct relative, a close friend or a colleague.

### Personal economic interests

If the employee, or one of their direct relatives, has substantial economic interests in a company which supplies, purchases from or competes with the Company, there is a conflict of interest with the Company.

Such economic interests are prohibited unless there is prior express written authorization from the Corporate Legal Counseling Department.

- Prohibited economic interests include, without limiting to:
- Ownership of shares or title deeds, call options or debt security.
- Collection of professional fees, loans or other payments.
- Holding an office, being a member of Board of Directors or participating in the management of an external entity.

Acquisition of any type of right to real property, equipment, materials or any other personal property if the employee, or one of their direct relatives, is presented with the opportunity to invest in them only or mainly thanks to their position in the Company, or if the employee, or one of their direct relatives, may obtain economic benefit due to the employee's position in the Company.

In the event of doubt on the acceptability of a specific investment in an external entity or on the aforementioned ownership or on a business opportunity, it is necessary to contact the Corporate Legal Counseling Department and the Compliance Body.

### Clients and suppliers

The Group shall always have a relationship with its clients and suppliers based on mutual transparency.

The employees of the Group shall act in an upright manner with the clients of the Company, with the purpose of increasing the quality of its services, and the long-term development of a relationship based on trust and mutual respect.

Regarding approval, registration and change in the data of suppliers (with special attention to the accounts for due payments), the following protocols shall apply: Procedure for Supplier Approval, Procedure for Purchase Management in Works, Regulations for registration and change in the data of suppliers and Protocol for prevention of criminal insolvency and processing official requests, notifications and seizures.

## **Grant Management**

Out of loyalty to the administrations and institutions, and out of responsibility in the use of public funds, we have to be particularly diligent, efficient, upright and transparent with grants.

Therefore, besides fully complying with the regulations on grants and the specific requirements or terms and conditions for each grant or subsidy for which the Company applies, it shall be the personal responsibility of the Group:

- To guarantee the integrity and truthfulness of the documents submitted before the administrations or institutions.

- To fully collaborate with the technical personnel, the Program staff of the Administration and the administration department, for the purposes of having a strong and efficient candidature to the offers or tenders for grants.
- To diligently manage the funds received, ensuring and supplying documentary evidence of traceability from the receipt of the funds to their expenditure.
- To fully collaborate with the administrations and institutions (and with external auditors) and providing them with the corresponding evidentiary documents at their request.

As a result of the above, the due documentary files and management of the grant received shall be implemented and kept in order to comply with the previous section.

Moreover, in order to avoid the risk of committing or collaborating in crimes of grant fraud against the Tax Authorities and the Social Security, and to prove a real control of the incurred working hours before the public administrations and entities – and to improve efficiency -, all the professionals of the Group (particularly those who are involved in the subsidized projects), shall maximize rigor when allocating the hours of real work to the different projects and shall do so promptly.

## Confidentiality Agreement

The Group guarantees the confidentiality and privacy of the data of third parties which the Company has, thus undertaking to have the necessary means available in order to safeguard the privacy of collaborators, by collecting and processing the data in accordance with the applicable laws and the professional obligations.

The employees of the Group agree to the prohibition to disclose any confidential and personal information that they may obtain during the performance of their duties, without prejudice to the legal, administrative or judicial provisions that may require their disclosure to entities or people or to make them public, and they shall not misuse such information.

### Computers and other electronic devices. Use of email

The Company may provide the employees with computers and other electronic devices to help them do their job. The Company shall have full access to all those devices, which shall be the Company's property at all times.

Therefore, if an employee uses a computer of the Company in their private residence or outside the workplace, they shall take the necessary precautions in order to prevent theft or damage.

To the extent permitted by the legislation in force, the Company reserves the right to monitor, on any grounds, the use of its property, even accessing, inspecting and removing the computers, hard disks, electronic mails, voicemail, emails and access to the Internet.

In particular, the employee shall bear in mind that emails and other electronic communications are considered corporate communications, and therefore the Company's property. The aforementioned materials may be: (i) subject to requests and petitions of information from the security authorities, (ii) relevant for internal investigations performed by the Company, or (iii) provided in any legal procedure in which the Company is a party.

The purpose of the email is to facilitate the transmission of information regarding the Company. It is important to bear in mind that emails, as well as any other written means, should be written only when necessary and they must be precise, complete and be drafted carefully and professionally.

The employees shall not use their computer to show, receive or send any materials which their colleagues may find offensive or which is unprofessional.

#### Social media

The Company understands that some employees may decide to publish personal information on the Internet via personal websites, Facebook, Twitter, Instagram, blogs, forums, newsgroups or chats, uploading contents or making comments in other websites or blogs.

For the sake of simplicity, this code calls these platforms jointly “social media”.

The employees shall bear in mind that this policy shall apply to any new devices, platforms or technologies that may be marketed, regardless whether or not such devices or websites are explicitly mentioned herein.

The Company agrees that the employees may perform such personal communication activities in their free time and in their own devices and systems, but not during working hours or in the Company’s devices and systems.

Any person who uses the social media shall bear in mind some very simple guidelines:

- The Internet may be everlasting. Anything published on the Internet may lead back to the author, in one way or another. The information is regularly backed-up and posts published in one forum are usually replicated in others through backlinks and mentions or reproductions of such posts.
- Protect confidentiality. Employees shall always comply with their confidentiality obligations, refraining from publishing and commenting private or confidential information from the Company or its clients.
- Each person is responsible for their publications. A person who publishes a post on the Internet is responsible for what they write or show on the Net, both on a personal and a professional level. The Company reserves the right to take disciplinary actions against its employees, to the extent permitted by the applicable legislation, for any coarse, obscene, threatening, intimidating, violent, pornographic, unethical or harassing comments, contents or images, whether on personal or work-related posts, or posts which breach the policy of the Company.
  
- We shall always observe the policy of the Company. Social media shall not be used personally during working hours. It is acceptable if the social media are used in a restricted manner, provided that this activity does not breach the policy of the Group regarding computers, access to the Internet or other devices for other reasons. When using social media for personal matters, the employees shall use their personal email address and not the corporate email.
- It is possible to separate friends from professional relationships in the social media. It is not necessary to include our clients or colleagues in our personal activities on

Facebook, Instagram, Twitter or other similar social media. We should be able to say “no” to the requests from colleagues, professional contacts or clients with total freedom. The employees must be aware of and use the privacy settings offered by the personal accounts on social media.

## Commitment to technical excellence and innovation

We have a team of professionals that stands out for their great ability to innovate and develop highly technological projects. Thanks to this team we are pioneers in the manufacture of state-of-the-art solar trackers.

We have implemented a Quality System to ensure that the activities performed during the entire process are in compliance with the specifications, controls, standards and requirements. We have quality protocols and procedures in place to guarantee the compliance with the quality objectives and regulations so that we can increase customer satisfaction.

During its operations, the Group does not admit any unspecified goods or products which do not meet the administrative and internal requirements of the Company.

## Commitment to quality, environment, safety and health.

The Group guarantees that the services meet the specifications, standards, applicable codes, legislation and applicable regulations regarding Quality, Environment and Safety at work.

We implement actions and programs aimed at constant improvement, prevention of pollution and prevention of damage and deterioration of health, regarding both the quality of services and the respect for and protection of the environment and people’s safety.

We are constantly in contact with all the members of the supply chain, with the purpose of jointly collaborating in the improvement of our services, in technical matters, quality and prevention of occupational and environmental risks.

## Prohibition to consume alcoholic drinks, drugs and narcotic substances.

The Company shall not tolerate the consumption of alcoholic drinks, drugs or other illegal substances. The presence of drugs or other illegal substances in the premises of the Company is a breach of this Code.

The Company is committed to maintain a work environment free from any illegal consumption of drugs and alcohol, and it shall be entitled to take disciplinary measures (including dismissal), to the extent permitted by the applicable regulatory regime, as a result of any breach of this Code.

## Prohibition of sexual harassments and workplace harassment or “mobbing”

The Company provides its employees with equal treatment, regardless of their race, color, creed, religion, gender, country of origin, nationality, sexual orientation, age, disability or any other characteristics foreseen in protection policies.

We do not tolerate any type of harassment to coworkers, clients or suppliers, which includes any type of harassment due to gender, race, color, creed, religion, country of origin, nationality, sexual orientation, age, disability or any other characteristics foreseen in protection policies.

We do not tolerate any type of physical or verbal conduct hindering or interfering with somebody else's ability to perform their job, or creating a hostile work environment, which includes any inappropriate contact, leering, inappropriate language, drawings, communications (whether written, electronic or on the phone) or any other inadequate personal interactions.

The management encourages employees to report, via the Reporting Channel created for that purpose (canaldenuncia@soltec.com), any discrimination or mobbing situation to the direct superior or the Company's Human Resources Department. If the direct superior is behaving in an inadequate manner contrary to this policy, or if said superior or manager is not taking the necessary measures, or if the employee feels uncomfortable reporting to them, the employee shall report the situation promptly to Human Resources.

The Company prefers that said reports are submitted in writing, although verbal complaints shall be admissible. Employees shall never tolerate inappropriate conducts.

## CSR Commitment

We believe in Corporate Social Responsibility. Therefore, we are committed to society and the environment in order to minimize the possible impact that our activity generates. We wish to contribute to the development of society, by echoing the concerns and expectations of our employees and clients, to whom we respond bearing our values in mind.

Our Corporate Responsibility contributes to the sustainable development of the communities where we operate. By promoting respect and diversity in the different work teams, we support and guarantee equal opportunities and contribute to a better management of natural resources and the environment, thus promoting awareness and innovation in energy efficiency and minimizing the impact of our activity.

In this manner, the Group wishes to meet the expectations of our employees, integrating all these purposes in our operating areas globally, in the country and in operational centers.

## Data protection

The personal data collected, stored and/or used by the Group shall be recorded and processed in compliance with the obligations established by the Organic Law on Data Protection (in force from time to time), guaranteeing the rights (to information, access, rectification, etc.) established by the aforementioned Law.

It is completely forbidden to assign personal data (whether from clients, suppliers, employees or third parties) to unauthorized persons, and so is undue access to such data (by unauthorized persons or for purposes other than internal work use). Any person who breaches such prohibition may incur the offence established by article 197.2 of the Criminal Code, besides any liability within the work environment.

## Intellectual and Industrial Property and external communication.

The recipient of this Code shall respect intellectual and industrial property of the Group and of third parties, and shall not use the creations of others, whether for their own benefit or the Group's, without the certainty that the rights authorizing their use have been duly acquired.

It is expressly forbidden to unduly use trademarks, patents, know-how, logos, audiovisual content, or any other type of creation by the Company, which shall only be used for the purposes established by the Group.

Moreover, any statement to the media shall be made, without exception, by those persons expressly authorized for such purpose by the Group, in order to guarantee the uniformity in communications.

## Compliance with the guidelines regarding the securities market

The Group undertakes to comply with the guidelines of the Spanish National Securities Market Commission (CNMV) regarding securities exchange offences and has specific protocols in place to prevent the perpetration of such offences.

## Training Plan

The Group has implemented a Training Plan regarding both Corporate Compliance and Tax Compliance, whose objective is to train and update all the members of the Group in the implementation and functioning of the protocols of said programs, thus

adopting a commitment to continuous training, particularly regarding legislative reforms which may affect the functioning of any of the implemented protocols.

## Compliance with the code of conduct

Compliance with this Code of Conduct is mandatory for all employees of the Group, and for third parties who have voluntarily committed to comply with it. Moreover, the Group shall notify and divulge the contents of this Code of Conduct among all its employees, who shall formally commit to the contents of the Code of Conduct of the Group and shall adapt their professional conduct to the principles and actions herein.

The Group expects a high level of commitment in the compliance of the Code of Conduct from all its employees. All employees may be assessed in their compliance with this Code. Any breach thereof shall be analyzed in accordance with internal procedures and legal regulations.

Any doubt that may arise on the interpretation or implementation of this Code of Conduct shall be discussed with the immediate superior, or where appropriate, with the Human Resources Department.

Any suspicion or awareness of a possible breach shall be reported to the person(s) Responsible for Compliance via the email address [canaldenuncia@soltec.com](mailto:canaldenuncia@soltec.com), through the procedure designed for this purpose, whose most relevant characteristics shall be notified in the Protocol on the Reporting Channel.

## **Validity**

From the date of approval by the Board of Directors, this Code of Conduct of the Group is included in the regulations of the company and shall be effective until it is annulled, revoked or updated.

To approve any update of the Code of Conduct that may be appropriate, any recommendations and proposals from the person(s) Responsible for Compliance shall be particularly taken into account.