

Rule 9 - Code of Conduct.

1. INTRODUCTION

1.1. Purpose

The Code of Conduct of SOLTEC POWER HOLDINGS S.A. and SOLTEC ENERGÍAS RENOVABLES, S.L. (hereinafter, the Group) aims to establish action guidelines and standards for the daily work of all directors, managers and workers in aspects relating to relationships with stakeholders, ensuring transparent, efficient and effective management of resources, being honest with clients, vendors and institutions, as well as exercising social and environmental responsibility.

This Code of Conduct is part of and the basis supporting the Corporate Compliance Program implemented by the Group with the aim to prevent, avoid and detect criminal offenses committed within the business area in compliance with the Criminal Code and the Tax Compliance program.

The Group's Code of Conduct is based on the definition of the Group's Mission, Vision, Values and Principles, establishing itself as an action guideline that ensures adequate professional performance by employees, adapting and accommodating to both existing regulations in the country where the Group operates, as well as to In-house Policies and Protocols.

1.2. Scope

The Group's Code of Conduct is based on a set of values, principles, ethical stands and guidelines intended to guide the activities of directors, managers and in general of all Group personnel (hereinafter, the "employees"), regardless of the type of contract that determines their employment relationship, the position they hold or the location where they perform their work.

In addition to this Code of Conduct, it is also required to comply with other specific protocols and instructions.

In case of non-compliance with or non-respect for this Code and other procedures and protocols in the areas of Corporate Compliance and Tax Compliance, applicable sanctions under the employment law and Labor Agreement will be enforced, including the removal or dismissal of the infringing person in the worst cases.



SOLTEC also promotes and encourages its suppliers and collaborating companies to adopt the behavioral guidelines indicated in this Code of Conduct.

The Group commits to disseminating this Code of Conduct, keeping it duly updated and providing the means needed for effective implementation and development.

Individuals entering the Company in the future shall expressly accept the full content of this Code, which will be attached to their Employment Contract.

1.3. Mission

The Group is convinced that our role is to comply with the commitments that as a socially responsible company we undertake with both people and technological innovation & environment.

Through the development of our activities and the generation of efficient photovoltaic energy we strive to have a clean, sustainable and fairer planet.

That is why the Group's Mission refers to the objectives set, which reflect the Group's goal in terms of our work and relationships with all stakeholders. Such objectives are as follows:

- Promoting and cooperating to maximize renewable energy implementation worldwide.
- Fostering excellence and quality, satisfying clients and meeting sectoral renewable energy needs.
- Meeting our ethical commitment.
- Providing our employees with a work environment that is adequate and favors integration.

Supporting ongoing research and technological innovation as a way to develop more efficient products and services and to improve environmental protection. In our opinion, that is the only option to yield quality products which are competitive and unique in the demanding renewable energy market.

1.4. Vision

The Group's Vision reflects the Soltec's firm commitment and ambition to consolidate itself as a photovoltaic market leader, being recognized for its efficiency, innovation, transparency, customer focus, business ethics and ongoing commitment to the community through the development of increasingly competitive products known for technical quality and the use of state-of-the-art-technology.

2. PRINCIPLES AND VALUES GUIDING THE CONDUCT OF THE GROUP'S RELATIONSHIP WITH EMPLOYEES

The activities of all Groups employees should always be commensurate to the needs of our stakeholders (shareholders, vendors, clients, governmental agencies and the community), guided by this Code of Conduct and the following values:

2.1. Teamwork.

We work in an environment of mutual collaboration and continuous learning, ensuring professionalism in all our actions. In this regard, the Group's goal is to optimize our capacity to generate ideas that can be rolled out through the integration of different points of view and teamwork.

2.2. Client-oriented.

Our work aims to ensure efficient results, anticipate scenarios and proactively respond to the changes of today's globalized, ever-changing world.

2.3. Non-conformity.

The Group works and carries out its activities with a clear intention to improve continuously, as that is the only way to provide our clients with optimal products satisfying the high standards of our society.

2.4. Respect.

Our premise is to attain our objectives being aware of how our decisions and actions affect people and the environment. The group also participates and contributes in the development of the regions where we operate, addressing local needs in our aim to look for a more sustainable world.

2.5. Trust

As a Group's value, trust is two-fold: trust in oneself and the team. We aim to build trust that permeates through all our professional actions as a way to create a reputation we can be proud of.

2.6. Proactivity

As a Group's value, proactivity reflects how we should undertake our roles, showing

dedication, discipline and preventing problems.

Compliance Body

The Group has created a body carrying out the roles of Compliance Officer (also called Compliance Body), which has the following duties: (i) addressing doubts arising from the daily application of this Code and other protocols and procedures comprising the Corporate Compliance and Tax Compliance Program; (ii) making random controls to ensure compliance; and (iii) receiving and managing complaints or information relating to alleged non-compliance.

All Group professionals and other addressees are aware that in case they have knowledge of conducts contrary to this Code, specific protocols/instructions and the law enforced by the Group, primarily in terms of possible wrongdoing, they need to inform the Compliance Body, which should then process the complaints received, usually via this designated email account: canaldenuncia@soltec.com. The Group or the Compliance Offices will inform of other requirements or characteristics of this speak-up channel.

In addition to this values associated to employees, other Group values of a more corporate nature are client-orientation, solvency, transparency, innovation as a driver of positive change and equality (social justice), as well as taking care of our collaborators (Our Energy, Our People).

3. RESPONSIBILITIES AND RELATIONSHIPS OF THE GROUP

3.1. Relationships with stakeholders

The Group's stakeholders are its employees, customers, suppliers, external collaborators, shareholders, public and private institutions, and society in general.

3.2. Employees

The Group's employees act honorably at all times. They must therefore be aware of responsibilities assumed within this Code:

- To read, be familiar with and understand the Code, as well as the policies, principles and procedures included in order to ensure their adherence to all requirements.
- To comply with each of the points included in the Code.
- To ensure that other collaborators or groups to which this manual applies comply with and are committed to the Code.

- To demonstrate in their day-to-day activities their commitment to our principles and set an example for other collaborators.
- To avoid any situation that may give rise to unlawful practices.
- To collaborate with audits by providing the information requested and giving a true view of the situation.
- To ask for help when the course of action is not clear.
- To notify your manager if they become aware of or suspect failure to comply with this Code through the mechanisms in place to uphold the Code.

3.2.1. Personnel Selection

We believe the best way to increase competitiveness on the market is to incorporate employees that have the skills and attitudes necessary to comply with the Company's expectations and short-term goals. Therefore, our selection process is carried out using tools that meet our requirements for technical and ethical reliability, while respecting the principle of non-discrimination and promoting equal opportunities.

3.2.2. Establishment of the employment relationship

We guarantee that all our employees are contracted through a legal employment contract and we reject any practice that goes against this principle.

We have action protocols and procedures in place to prevent and take action when there is any indication of discrimination, harassment or intimidation towards employees.

We facilitate the personal and professional growth of our entire team through development/evaluation processes.

We promote training among our employees by establishing customized plans in accordance with the organization's specific needs from a fair and objective point of view.

We promote a collaborative approach among our employees, creating an ideal environment where people can express their ideas and make decisions that help the organization achieve its overall goals.

3.3. Relationships with public authorities and institutions

3.3.1. Regulatory compliance

3.3.1.1. Respect for laws and human rights

As a responsible company, the Group is committed to respecting and complying with numerous laws, regulations and other legally binding rules that are applicable thereto.

Group employees therefore undertake to respect the prevailing legislation in countries in which they carry out their activities, and not to act in any way that may harm the company's interests.

The Group may be held legally responsible for violating these laws and other legally binding rules, and for any other unlawful activity of its employees and, therefore, the Group expects all of its employees to act in a lawful, ethical and professional manner in carrying out their roles.

The Group's commitment to comply with legislation in all areas, at each of the locations in which it carries on its business activities, is an imperative, essential prerequisite for maintaining and improving the trust of citizens and society.

With regard to all professional conduct, Group employees will make an effort to do not only what is required by law, but what is right, strictly respecting the Human Rights and Civil Liberties included in the Universal Declaration of Human Rights.

3.3.1.2. Money laundering and the financing of terrorism

The Group is firmly committed to the fight against money laundering, in order to avoid the financing of terrorism, and faithfully adheres to the recommendations of the Financial Action Task Force (FATF). The Group therefore does not establish commercial relationships with any persons or entities that do not comply with obligations regarding money laundering and the financing of terrorism in each country or that do not provide adequate information in relation to complying with such obligations.

3.3.1.3. Corruption and bribery

Group employees may not make or offer, either directly or indirectly, any payment in cash, in kind or any other benefits to any public official with the intent of illegally obtaining or maintaining business activities or other advantages.

Furthermore, Group employees cannot accept, under any circumstances, presents, gifts, hospitality or any other type of favor from any private organization or person in the development of their work, unless they are symbolic, petty or a sign of courtesy.

The Group requires its employees to strictly comply with all anti-corruption regulations applicable and, in this regard, they may not offer, either directly or indirectly, any benefit or service to customers, shareholders or any other person or entity that has or may have a relationship with the Company, for the purpose of unlawfully influencing such relationships, provided that it is not justified by any financial transaction.

3.3.1.4. Rules regarding gifts.

In general, the Group's Anti-Corruption Policy establishes that:

- Group professionals may not offer, promise or deliver gifts, handouts, personal benefit, financial compensation or any other unjustified donation or advantage to any third party outside of those cases provided for in the Anti-Corruption Protocol, and in accordance with the procedures and requirements established for authorization and control.

However, it would be considered acceptable to give gifts (i) when they are of a symbolic nature and not of a relevant amount, (ii) provided that they correspond to normal commercial practices and customs, and (iii) provided that they are not intended to unduly influence the award or contracting of a good or service.

In this regard, the Group sets a quantitative limit of €1,500 for commercial promotion work, so that any expenses exceeding that amount must be authorized in writing by the Group's Sales Department and justification must be provided. Despite having established this limit for express approval, the Group audits all expenses incurred in relation to this section, for the purpose of clarifying or taking action on alleged non-compliance.

Any questionable case must be consulted with the Compliance Body, with the knowledge of the Governing Body, which will determine whether or not this offer, promise or delivery is appropriate. In this regard, training will be provided to those who carry out commercial promotion work by means of the direct channel of communication they have with the Compliance Body through the email address consultascompliance@soltec.com to determine the Group's position with regard to these cases.

- Group professionals cannot accept, in general, any gift, handout, bonus, personal benefit, financial compensation or unjustified advantage from any customer, supplier, competitor, individual or legal entity in general that claims to fulfill any of these conditions with regard to the Group. However, acceptance by Senior Management and the Governing Body of articles of a symbolic nature will be permissible, applying in this regard the limit of €1,500 set in relation to the delivery of gifts.

Other members of the Group may only accept such gifts and donations if they are immediately linked to a business transaction (e.g. receiving an invitation to lunch from a supplier as part of a routine visit or for obtaining approval, accepting promotional gifts from the supplier, such as notebooks, pens, key rings, etc.

Nevertheless, it should be kept in mind that the Group's international scope means that it has suppliers and customers from many different countries. This may mean that, in view of the different cultural sensitivities, the refusal of a gift may be interpreted negatively and, therefore, the gift may be received but the member of senior management that they organically report to must be informed immediately. This will also be the case where, without prior notice, the supplier or the customer sends a gift to the Group's premises. In both cases, and in other cases that could be considered similar, these gifts will be assigned to the Group's Wellbeing Program, and the issuer of the gift will be notified.

However, any member of the Group who receives an offer valued at more than €1,500 must notify the Compliance Body so that it can be inventoried, although any questionable case, regardless of the amount involved, must be consulted with the Compliance Body, with the knowledge of the Governing Body, which will determine whether or not such offer, promise or delivery is appropriate.

If, for any reason, a gift with a value of more than €1,500 is received, it should be delivered to the Compliance Body, which, if possible, will donate the gift within 3 months to a non-governmental organization and file the receipt issued by that organization. If this is not possible, these gifts will also be assigned to the Group's Wellbeing Program.

In any case, it is expressly forbidden to provide suppliers with a personal address or any other address other than that of the Group's facilities for the receipt of gifts.

Invitations to social events, seminars or any other type of event may also be accepted provided that the value of accessing such events is less than €200 per person and provided that attendance at such events does not entail a financial consideration for the employee or for the Group. If assistance is remunerated, it will require prior authorization from the Compliance Body.

3.3.1.5. Prohibition against contributions to political parties.

The use of the Company's funds or assets, both directly and indirectly, for the benefit of or as a contribution to political campaigns, candidates or political parties is prohibited. The employee must immediately notify the Company's Legal Department before using the Company's funds or assets as a contribution to political campaigns, candidates or political parties.

The Company's policy does not intend to discourage or forbid employees, at its

absolute discretion, to make political contributions in their personal lives, or to participate or spend their own money in political activities in their free time, or to express their political points of view or to devote themselves to any other legitimate political activity which is compatible with local regulations.

However, employees are prohibited from using their position at the Company, or the Company's assets, to attempt to influence the personal decisions of other people that support, or that do not support, a specific candidate or political party.

3.3.1.6. Unfair competition

The Group prohibits any action that entails carrying out unlawful practices involving unfair competition and undertakes to ensure compliance with the antitrust laws applicable in the countries in which it carries on its activities.

In this regard, the Group undertakes to base its actions on the principles of loyalty and respect, by exercising its own good business practices that it has developed throughout the course of its history, and therefore avoid any prohibited business practices.

The Company and its employees must comply with the antitrust legislation of all countries in which it carries on its business activities.

This legislation varies from one country to the next and may be complex. If an employee carries out a function that may be seen as affected by antitrust legislation, this employee is required to be familiar with the prevailing legislation and must submit any questions regarding compliance with such legislation to the Company's Legal Department.

Antitrust legislation prohibits all attempts to monopolize or limit the competition, which includes, by way of example, the sale of products at below their cost, bid-rigging, boycotting groups, price discrimination, price-fixing arrangements for products, or the allocation of customers or geographical territories with the competition.

Certain types of mechanisms for tying sales, which force customers wishing to purchase a product to acquire other products or services, are also prohibited, as well as agreements with distributors or retailers regarding the price at which the Company's products should be sold to the public, and other restrictive covenants.

Failure to comply with antitrust legislation may lead to both civil and criminal sanctions.

The Company must also carry on its business activities in compliance with all prevailing legislation, regulations and standards that affect the manufacturing and distribution of the Company's services.

The Company also complies with all Spanish and foreign laws governing advertisements. As a general rule, these laws prohibit all false, misleading or deceptive advertising in any activities promoting and selling the Company's products.

All advertising or marketing claims made by the Company with regard to its products must be truthful and duly justified.

3.3.1.7. Partnership with public authorities

The Group undertakes to collaborate with any public administrative and/or judicial body or entity, providing any information necessary to enable them to carry out their task in the simplest possible manner, within a framework of collaboration, respect and consideration, while maintaining confidentiality in those cases where it is clearly necessary. In addition, the Group guarantees not to hinder any requests for information made by public officials or compliance with any other function that they carry out in the lawful execution of their powers, provided that they are covered by and in accordance with the law.

4. OBLIGATIONS

4.1. Obligations to third parties and the market

4.1.1. Loyalty to the Company and conflicts of interest

Group employees faithfully assume the obligation to promote the Company's interests and understand they are prohibited from personally benefiting from any opportunities that may arise as a result using the Group's information, or from using such information to the benefit of third parties. Similarly, Group employees undertake not to put their personal interests before those of our customers or the interests of the Group under any circumstances.

A conflict of interest arises when an employee has interests or a relationship, or participates in an activity, that is incompatible or appears to be incompatible with the interests of the Company, or that may affect or give the impression that it may affect the employee's objectivity in carrying out their work.

This also means that the employee may not use any information or business opportunity obtained in carrying out the Company's activities in order to obtain any financial benefit for themselves, for an immediate family member, for an intimate friend or for a coworker.

4.1.2. Personal economic interests

If the employee or an immediate family member has substantial economic interests in a company that supplies, purchases or competes with the Company, there is a conflict of interest with the Company.

Such economic interests are prohibited unless express prior written authorization has been received from the Company's Legal Department.

By way of example, these prohibited economic interests include the following:

- Ownership of shares or other ownership interests, purchase options or debt securities.
- Receiving fees, loans or other payments.
- Holding a position, belonging to the Board of Directors or participating in the

management of an external entity.

- Procurement of any type of right on properties, equipment, materials or any other type of movable assets if the opportunity to invest in such assets is presented to the employee, or an immediate family member, solely or mainly as a result of their position at the Company, or if the employee or an immediate family member may obtain economic benefit due to the position that the employee holds at the Company.

In case of doubt on the acceptability of investing on an external organization, or on their actual ownership, or on a business opportunity, it is necessary to contact the Company's Legal Department and the Compliance Body.

4.1.3. Customers and suppliers

The Group will always maintain a relationship with its customers and suppliers based on mutual transparency.

Group employees must act with integrity with the Company's customers, with a view to continue to improve the quality of their services, and to develop long-term relationships based on trust and mutual respect.

With regards to accreditation, registration and modification of supplier data (with a special focus on banks accounts where payments are deposited), the documents Supplier Accreditation Procedure, Worksite Procurement Management Procedure, Supplier data registration and modification and the Protocol to prevent criminal insolvency and processing of notifications and seizures shall apply.

4.1.4. Management of subsidies

Out of loyalty to administrations and institutions, and of responsibility to the use of public funds, we must be especially diligent, efficient, upright and transparent when it comes to subsidies.

Thus, in addition to fully complying with subsidy regulations, as well as with the specific bases, clauses and provisions associated to each subsidy or financial aid potentially eligible for, Group personnel shall:

- Ensure the integrity and truthfulness of documentation submitted to administrations or institutions.
- Maintain full collaboration between technical personnel, the administration department and Administration Agencies with the aim to participate solidly and effectively in tenders or bids.
- Manage received funds diligently, ensuring and documenting traceability from fund reception until its expenditure.
- Sustain utter collaboration with administrations and institutions (as well as

external auditors), attaching the necessary justifications to their requests.

As a result, documentation management and filing of received subsidies will be maintained so as to comply with the provisions of the previous section.

Furthermore, with the aim to prevent the risk of commission or collaboration in subsidy fraud offenses against the Tax Department and/or the Social Security Agency, and to prove before public Administrations and agencies that work hours and effectively controlled – hence improving efficiency –, all Group professionals (mainly those participating in subsidized projects) shall rigorously and promptly record the hours dedicated to each project.

4.2. Confidentiality obligation

The Group ensures that the confidentiality and privacy of the third-party data it holds is respected, and undertakes to have the means necessary to safeguard the privacy of its collaborators by gathering and processing data in accordance with applicable laws and its professional obligations.

Group employees assume the obligation that they are prohibited from disclosing all confidential and personal information that they may obtain in carrying out their work, without prejudice to any legal, administrative or court orders that may require them to provide such information to any entities or persons, or make such information public, and they will refrain from using this information inappropriately.

4.2.1. Computers and other electronic devices. Use of email

The Company may provide employees with computers and other electronic devices to help them carry out their work. The Company must have full access to all such physical equipment, which will be owned by the Company at all times.

Consequently, if an employee uses a company computer at their private residence or outside their work center, they must take the precautions necessary to avoid theft or damage to the computer.

To the extent permitted by current legislation, the Company reserves the right to monitor, for whatever reason, the use of the assets owned thereby, which includes accessing, inspecting and removing computers, hard drives, electronic files, voicemail, emails and Internet access.

In particular, the employee must take into consideration that any emails and other electronic communications are considered documentation of the Company and therefore the property thereof. These materials may be: (i) the subject matter of orders and requests for information from security bodies, (ii) relevant for internal investigations carried out by the Company, or (iii) used in lawsuits in which the

Company is a party.

The purpose of the email address is to facilitate the sending of information related to the Company. Employees should take into account that emails, as well as any other written document, should only be written when necessary and should be precise, complete and drafted with care and in a professional manner.

Employees should not use their computer to show, receive or send any material that their coworkers may find offensive or that is unprofessional.

4.2.2. Social Media

The Company understands that some employees may decide to publish personal information online through personal websites, Facebook, Twitter, Instagram, blogs, forums, newsgroups or chat rooms, and upload content or make comments on other websites or blogs.

For the sake of simplicity, this policy refers to these platforms, jointly, as “social networks”.

Employees should remember that this policy is applicable to all new devices, platforms or technologies that come on the market, regardless of whether or not these devices or websites are expressly mentioned herein.

The Company recognizes that employees may carry out such activities as a form of personal expression in their free time and on their own devices and systems, but not during working hours or using the Company’s devices or systems.

Those persons that use social networks must take into account a few very simple guidelines:

- The Internet can be endless. Everything that is written online may reach its author in one way or another. Information is frequently and repeatedly backed up and posts published on one forum are normally copied to other forums through retro links and references or copies of these posts.
- Protect confidentiality. Employees must always comply with their confidentiality obligations, and refrain from publishing and discussing private or confidential information belonging to the Company or its customers.
- Every person is responsible for what they publish. Every person that publishes a post on the Internet is responsible for what they write and reveal online, both personally and professionally. The Company reserves the right to keep a file on its employees, to the extent permitted by conventional legislation applicable, with regard to any comments, content or images, appearing in personal posts or those related to their work, that are vulgar, obscene, threatening, intimidating, violent, pornographic or unethical, that constitute harassment, or that infringe on the Company’s policies.

- Always comply with the Company's policies. Social networks should not be accessed for personal use during working hours. Limited use of social networks during breaks, lunch breaks or before and after work is acceptable, provided that these activities do not otherwise infringe on the Company's policies regarding computers, Internet access or other devices. When social networks are used for personal matters, employees must use their personal email address, and not that of the Group.
- It is possible to separate friends and professional relationships on social networks. Our personal activities on Facebook, Instagram, Twitter or other similar social networks do not necessarily have to include our customers or coworkers. We must be able to say "no" with complete freedom to any requests received from coworkers, professional relationships or customers. Employees must be aware of and use the privacy control levels offered by personal accounts on social networks.

4.3. Commitment to technical excellence and innovation

We have a team of professionals that are noted for their great capacity for innovation and taking on high-technology projects. Thanks to this team we have become pioneers in the manufacturing of state-of-the-art solar trackers.

We have developed a quality system that ensures that the activities carried out throughout the process are in line with specifications, controls, standards and requirements. We have quality protocols and procedures that ensure compliance with the quality targets, as well as regulations that aim to increase customer satisfaction at all times.

In the development of their work, the Group does not accept merchandise or products which fail to comply with the company's in-house administrative requirements.

4.4. Commitment to quality, the environment, and health and safety

At the Group we ensure that the services comply with any applicable specifications, standards and codes, as well as any applicable legislation and regulations regarding quality, the environment and workplace safety.

We establish actions and programs that focus on continuous improvement, preventing contamination and preventing damage and deterioration of health, both in the quality of the services and with regard to respecting and protecting the environment and people's safety.

We are in constant contact with all parts of our supply chain, for the purpose of

being able to jointly collaborate in improving our services, with regard to technical aspects and quality, as well as occupational risk prevention and environmental matters.

4.5. Prohibition against the consumption of alcoholic beverages, drugs or narcotics substances

The Company will not tolerate the consumption of alcoholic beverages, drugs or any other illegal substances. The presence of drugs or other illegal substances at the Company's facilities constitutes a violation of this Code.

The Company is committed to maintaining a work environment that is free from any illegal consumption of drugs and alcohol, and in response to any infringement of this Code, it may initiate disciplinary proceedings, which may even result in termination, to the extent permitted by conventional legislation applicable.

4.6. Prohibition against sexual harassment, workplace harassment and bullying

The Company treats all of its employees equally, regardless of their race, color, beliefs, religion, gender, country of origin, nationality, sexual orientation, age, disability or any other characteristics included in the protection policies.

We will not tolerate any form of harassment towards workmates, customers or suppliers, which includes any type of harassment as a result of gender, race, color, beliefs, religion, country of origin, nationality, sexual orientation, age, disability or any other characteristics included in the protection policies.

We do not tolerate any type of physical or verbal conduct that hinders or interferes with the ability of others to carry out their work, or that creates a hostile working environment, which includes any inappropriate contact, lewd glances, inappropriate language, drawings, communications (written, electronic or by telephone) or other inappropriate personal interactions.

Management encourages all employees to use the designated speak-up channel report (canaldenuncia@soltec.com) to report any situation of discrimination or workplace harassment to their immediate superior or to the Company's Human Resources Department. If it is the employee's superior that has behaved inappropriately and contrary to this policy, if their superior or manager does not seem to take the appropriate measures, or if they are uncomfortable reporting the situation to their superior, the employee must report the behavior directly to the Human Resources Department without delay.

The Company prefers these complaints to be made in writing, however, verbal complaints will also be accepted. Employees should never tolerate inappropriate behaviors.

4.7. Commitment to corporate social responsibility

We believe in corporate social responsibility and, therefore, we are committed to society and the environment to reduce as much as possible the potential impact that our activities may have. We seek to contribute to the development of society, echoing the concerns and expectations that are brought to us from employees and customers, who we respond to by using our values as a reference.

Our corporate responsibility contributes to the sustainable development of the communities in which we carry on our business activities, promoting respect and diversity in the various work teams, supporting and ensuring equal opportunities and, in particular, we contribute to better management of natural resources and the environment, promoting awareness and innovation with regard to energy efficiency and minimizing the impacts arising from our activities.

This is how at the Group we hope to fulfill our employees' expectations by integrating all of these goals in our areas of action at a global, country and operating center level.

4.8. Data Protection

Data of a personal nature that is collected, stored and/or used by the Group shall be recorded and treated in compliance with the obligations established in Spain's Organic Data Protection Law (existing regulation at any given time), ensuring the recognition of rights (to information, access, rectification, etc.) set out in such Law.

It is strictly forbidden to transfer personal data (whether from clients, vendors, employees or third parties) to non-authorized individuals. It is also forbidden to grant access to such data (to unauthorized individuals or for purposes other than in-house work-related usage). Failure to comply with this prohibition will result in the criminal offense laid out on article 197.2 of Spain's Criminal Code, aside from other labor responsibilities.

4.9. Intellectual and Industrial Property and External Communication

Code recipients shall respect the intellectual and industrial property of the Group and of third parties, refraining from using other's creations for their own interest or the Group's interest, unless there is certainty that the rights authorizing their usage were lawfully acquired.

It is expressly forbidden to unlawfully use brands, patents, know-how, logos, audiovisual contents, or any other type of creation by the Firm, which should only be used for the purposes indicated by the Group.

On the other hand, statements to the media shall always be made, without exception, by individuals expressly authorized by the group, with the aim to ensure consistent communication outwards.

4.10. Compliance with stock market guidelines

The Group is committed to complying with the guidance of the Spanish National Stock Market Commission in aspects relating to equity crimes, and has specific protocols to prevent crimes of this type.

4.11. Training Plan

The Group has a Training Plan in the areas of Corporate Compliance and Tax Compliance, aimed at training and requalifying all Group members in the implementation and operation of such programs. Furthermore, the Group is committed to ensuring ongoing training, especially in aspects relating to legal reforms that might impact any of the protocols in place.

5. COMPLIANCE WITH THE CODE OF CONDUCT

Compliance with this Code of Conduct will be required of all Group employees and by those third parties that have voluntarily undertaken to comply with the Code. The Group will also notify and distribute among all employees the content of this Code of Conduct, whereby the employees must formally commit to that set forth in the Group's Code of Conduct and must bring their professional actions into line with the principles and actions included herein.

The Group expects a high level of commitment from all its employees regarding compliance with its Code of Conduct. All employees may be evaluated based on compliance with this Code. Failure to comply with this Code will be analyzed in accordance with in-house procedures and legal regulations.

Any questions that may arise regarding the interpretation or application of this Code of Conduct must be brought to their superior or, when necessary, to the HR Department.

Suspicious or knowledge of alleged violations shall be reported to the Compliance Officer by means of the designated procedure and email address (canaldenuncia@soltec.com), providing information on the main characteristics as required by the speak-up channel protocol.

6. VALIDITY



Following its approval by the Governing Body, this Group Code of Conduct shall be integrated into the organization's regulations, remaining in force unless it is canceled, revoked or updated.

To approve Code of Conduct updates, it is important to take into consideration the recommendations and proposals made by the Compliance Officer.



STATEMENT BY THE EMPLOYEE

I, the undersigned, hereby acknowledge to have received a copy of the Group's Code of Conduct (the "Code") and to have read and understood it, and also declare that I will comply with the principles and rules described in the Code.

I also understand that I may contact the Human Resources Department, the Legal Department and the Compliance Body, throughout the entire term of my employment relationship with the Company, to ask any questions that I may have regarding the Code and the application of the principles and rules described therein.

I understand and accept that the Company may change and update this Code at any time and that I may obtain a copy of the most recent version of the Code by requesting it from Human Resources, and that it is my responsibility to review the Code regularly.

I understand and accept that if I have any question with regard to the requirements of this Code, or that if I discover any event of a questionable, fraudulent or illegal nature that constitutes or, to the best of my understanding and in good faith, may constitute a breach of the law, this Code or any other policy of the Company, I must immediately report my questions or concerns.

I accept and recognize that I currently have no knowledge of any infringement of this Code that has not been reported by me in the manner established, or that has not been brought to the attention of the Company by other means.

Name and signature:

Date:

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