

exolum

Code of Conduct

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1. Letter from the Chairwoman and the CEO

The Code of Conduct you are just Reading is the basic document that reflects our corporate culture, it is based on our values of safety, leadership, innovation and trust in the EXOLUM GROUP and constitutes the key piece that governs the activities and decisions of all the Members who are part of the EXOLUM GROUP. At the same time, the Code of Conduct vehicles our wish to provide our customers with the most efficient and reliable solution in a safe and environmentally responsible way.

To this end, in this Code of Conduct we define the relevant behavior patterns that must govern our activities, not only within our internal interactions but also in those we establish with our Business Partners and particularly, with our customers.

For all these reasons, we count on your commitment and support to ensure adherence to this Code of Conduct and excellence and integrity of our sector, guaranteeing the maximum quality and professionalism in the provision of our services.

As a token of our commitment, the members of the Board of Directors wish to be the first to adhere to the Code of Conduct by sharing its content with all of you.

EXOLUM GROUP enjoys and excellent reputation, and it is each of us responsibility to keep it like this. I encourage you to carefully read the Code of Conduct and to consult it as a reference guide on a regular basis.

Thank you very much for your involvement.

Grupo Exolum
Chairwoman

CEO

2. Aim

The aim of the Code of Conduct (hereinafter, “**the Code**”) of the EXOLUM GROUP (also referred to as “**the Organisation**”) is to establish the rules of conduct that are to govern the behaviour of all the employees, executives and directors thereof (hereinafter, the “**Members of the EXOLUM GROUP**” or “**Members of the Organisation**”) in the course of their professional activities on a daily basis and in the business relationships of the Members, both internally and externally, with the market and with competitors.

In addition, the guiding principles and rules of conduct outlined in this Code aim to provide all Members of the Group and Business Partners or Third Parties and business partners (hereinafter “*Business partners*”), with whom the EXOLUM GROUP engages within the scope of its professional activities, regardless of the country where they operate, with certain universal rules of conduct in line with the strictest ethical principles, taking into account the cultural setting in which they work and based on due compliance with local legislation.

The Code sets forth guidelines for conduct that are to govern the daily professional work of the Members of the Organisation, and it represents an essential control mechanism for the detection and mitigation of irregular activities within the Group, including potential situations entailing criminal risks. In this regard, the Group has created a communication and reporting channel to be used in case of questions about the interpretation of the terms of this Code, or if any potentially irregular activity is observed, and the Group’s Compliance and Data Protection Lead has been tasked with monitoring and supervising this document.

3. Scope

3.1 Scope

This Code applies to all executives and directors of the companies in the EXOLUM GROUP, including investee entities it controls or whose management and/or operation it is responsible for, within the limits set in the relevant regulations. In addition, the Group shall promote principles and guidelines that are consistent with the values and commitments described in this Policy among all investee entities over which it does not have effective control.

All Members of the EXOLUM GROUP shall be conversant with and abide by this Code of Conduct and the *Organisation’s* other internal rules, and are obliged to participate in any training activities they are invited to attend.

Therefore, even though this Code of Conduct applies to the Members of the EXOLUM GROUP, it may be extended, in whole or in part, to *Business partners*, when the specific circumstances of the case so require. In addition to being conversant with this Code, they shall accept the provisions of the Code set out herein or represent that they have their own Code aligned with the guiding principles and rules of conduct laid down by the EXOLUM GROUP in this document.

3.2 Activities concerned

The activities covered by this Code are all the activities the EXOLUM GROUP currently performs, or may perform in the future, in the course of its business operations.

This document therefore applies to all areas and functions performing these activities, irrespective of whether there are specific policies in place to regulate the performance of the activities.

4. Mission, vision and values

4.1 Mission - A reflection of what we are

The EXOLUM GROUP is a company engaged in infrastructure management using the latest technology to provide customers with the most efficient and reliable solutions in a safe and environmentally responsible manner.

4.2 Vision - Of the future we want to build

To be the global infrastructure company most highly rated by employees and customers for what it does and how it does it, in an innovative, sustainable and responsible way.

4.3 Values - Our way of being and doing

Values translate the Mission and Vision into the way the EXOLUM GROUP does things, and guide its decisions and conduct; the EXOLUM values are as follows:

- Safety: The health and safety of people, and the care and protection of the environment, are a priority for the EXOLUM GROUP.
- Leadership: The EXOLUM GROUP promotes shared leadership that fosters entrepreneurship and inspires us to tackle the challenges of the future with enthusiasm and commitment.
- Innovation: The EXOLUM GROUP promotes brilliant ideas and creates action plans to pave the way for future innovations.
- Trust: The EXOLUM GROUP believes in people and in what they do, and creates a culture of tolerance and respect.

5. Guiding principles

This Code outlines universally accepted ethical principles and rules of conduct inspired by the Group's Mission, Vision and Values. It is intended to serve as a reference for all Members of the Group in the course of their professional activity, but it does not describe all the situations or circumstances Members may find themselves in.

The Group believes that all its Members follow the above principles when they engage in their professional activities and that they always perform these activities within a framework of action based on ethics, honesty and good faith.

This Code also incorporates and adopts the universal principles of the United Nations Global Compact, which are attached to this Code as **Appendix I**.

6. Rules of conduct

The rules of conduct that are, in general, to guide the daily professional activities of the Members of the Group and inspire our *Business partners* are as follows:

6.1 Compliance with the law and respect for Human Rights

The EXOLUM GROUP and its Members make a commitment to always act in accordance with the laws in force in the specific jurisdiction in which they engage in their professional activities and in compliance with the Group's internal regulations. Under all circumstances, the EXOLUM GROUP and its Members shall abide by international standards for the protection of the human rights and fundamental freedoms of the individuals that may be affected by its activities, and they shall act with integrity in their relations with *Business partners* and *Third parties*, and not collaborate on activities that are illegal or which could give rise to a legal or reputational risk for the EXOLUM GROUP.

In this regard, the Members of the EXOLUM GROUP shall perform their duties in accordance with the Group's Guiding Principles and based on ethical behaviour in line with the Company's Mission, Vision and Values and with the United Nations Global Compact. Furthermore, the Group uses the following international guidelines as a reference for ethical conduct: the Universal Declaration of Human Rights¹, the Tripartite Declaration of the International Labour Organization², and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises³.

The Group is committed to respecting freedom of association and the effective recognition of the right to collective bargaining, rejecting all kinds of exploitation, especially child labour.

All Members of the Group have at their disposal the mechanisms⁴ required for keeping them informed of the regulations that apply to the performance of their job, and the Group shall endeavour to always keep this information up to date.

The EXOLUM GROUP is also committed to exercise due care so that respect for Human Rights is guaranteed along its value chain.

6.2 Health and safety in the workplace

The EXOLUM GROUP shall provide a safe, stable environment for its employees, placing at their disposal measures to prevent occupational risks and foster health in the workplace. The EXOLUM GROUP undertakes to strictly comply with the regulations in this regard in all jurisdictions where it conducts business. To this end, the EXOLUM GROUP has a Safety Management System and an Occupational Risk Prevention Plan in place focused on minimising or properly controlling risks and managing all the prevention-related regulations that apply to the Group.

All Members of the Organisation are required to be conversant with and comply with the health and safety protection rules that apply to their job, and to use the safety measures that the EXOLUM GROUP places at their disposal for their own safety, that of their colleagues and that of any other person concerned.

The Organisation shall endeavour to ensure that health and safety rules are observed in its workplaces and outside them when working jointly with other companies. In addition, *Business partners* that work with the Group are required to conduct themselves in accordance with these principles.

1 <https://www.un.org/es/universal-declaration-human-rights/>

2 https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_ent/documents/publication/wcms_124924.pdf

3 <https://www.oecd.org/daf/inv/mne/MNEguidelinesESPANOL.pdf>

4 Via the intranet, internet and/or by requesting the relevant information from their line manager.

6.3 Non-discrimination. Rejection of harassment in the workplace. Equality at work

Non-discrimination and rejection of harassment

All Members of the EXOLUM GROUP must promote a pleasant, respectful working atmosphere. Cordial relations and cooperation among all Members, *Business partners and Third parties* they have contact with shall be encouraged.

The Group will not tolerate any form of abusive, hostile or offensive behaviour, or discrimination based on race, gender, sexual orientation, beliefs, ideology, religion, social background, disabilities, nationality, age or circumstances of any other nature among any of its Members, regardless of their rank or qualifications. Similarly, the Organisation rejects all forms of sexual and psychological harassment and any kind of abuse of power.

All incidents of harassment, hate and violence shall be reported immediately using one of the channels, at the reporter's discretion, made available by the EXOLUM GROUP, which are described in the Protocol for the Prevention of Sexual and Gender-based Harassment.

a) Written communications:

- Via the internal communication channel (Code of Conduct Mailbox)

b) Oral communications (for Inquiries or Reports):

- Via Global People.
- Via the Workers Representation.
- Via the Technical Commission of Equality.
- Via the *Compliance and Data Protection Lead*.

Equal opportunities in employee training and development

All employees will be afforded the same opportunities for professional development, and decisions about promotions shall be based solely on merit.

The Organisation carries out awareness-raising activities that are designed to identify, assess and plan for its staff training needs, and the Group's employees are committed to using these opportunities to the fullest.

All employees will have equal opportunities for their professional development; hence promotion decisions will be based only on their training, merit, capability and effort and when required on their leadership skills, which will be always objectively assessed and measures of balance between employees' personal and professional lives will be facilitated.

6.4 Sustainability and protection of the environment

The EXOLUM GROUP is firmly committed to preserving, protecting, and improving the environment, contributing to the conservation of natural resources and areas of ecological, landscape, scientific or cultural interest. Accordingly, in the course of its activities, the Organisation endeavours to minimise the negative effects on the environment by adopting rules and procedures that take their inspiration from the best practices in this field. The EXOLUM GROUP and all its Members and partners shall strive to use resources efficiently and to comply with environmental and safety legislation, attempting to identify and prevent potential risks in all phases of the business, including the management of operations at all facilities and workplaces. All Members of the EXOLUM GROUP are obliged to immediately report to the Compliance and Data Protection Lead all environmental risks that may materialize.

Furthermore, the EXOLUM GROUP is committed to the Environmental, Social and Governance principles (ESG), which serve as the basis for setting and reviewing environmental targets and furthering continuous improvement.

To this end, the Organisation has an Environmental Management System covering all aspects of the Organisation that impact the protection of the environment against the risks posed by the Group's own and directly related activities.

6.5 Zero tolerance for corruption

As set out in the Anti-Corruption Policy, the Group shall not, under any circumstances, tolerate corrupt practices, bribery or extortion, and, in this respect, EXOLUM declares that it is opposed to influencing the will of people outside the Organisation, whether foreign or domestic, or in the public or private sector, to directly or indirectly obtain a benefit through the use of unethical practices.

Members of the EXOLUM GROUP may not receive, request or accept, directly or indirectly, gifts or hospitality from any individual or entity in the public or private sector, whether foreign or domestic, that could compromise their independence when making decisions that are inherent to the exercise of their profession.

By the same token, they are not allowed to offer, promise or give presents or free gifts, whether directly or indirectly, or repay any kind of favour in ways that are not socially acceptable in an attempt to illegally or improperly influence commercial, professional or administrative decisions or relations.

In all cases giving or accepting cash will be prohibited, regardless of the amount.

It is mandatory to reject or return gifts or hospitality that are not permitted under applicable legislation in each jurisdiction where the *Organization* operates or according to ethical principles, internal regulations or commercial and socially accepted practices and those that may negatively impact the image of *EXOLUM GROUP*. In the event that rejection or return may cause a serious offence to the offering party, the employee must inform management who will take the necessary measures.

All gifts and hospitality received by *Members of the Group* coming from the same individual or legal entity must be reasonable and must not exceed an aggregate of 50 Euro on an annual basis and will be recorded in the *Registry of Gifts and Hospitality*.

This Registry, supervised by the *Compliance and Data Protection Lead* must record the origin of the gift or hospitality and the amount of each gift or hospitality.

In case of doubt, *Members of the Organization* will inform *EXOLUM GROUP*, through their supervisor, to decide about the acceptance or presenting of gifts and hospitality which will comply with requirements of internal regulations about institutional relations and corporate identity.

EXOLUM GROUP does not make political contribution of any kind. The *Organization* recognizes the right of free speech of its *Members* and the right to participate in political activities in their private capacity, provided it does not interfere with their professional performance and it does not create a conflict of interest for the *Group*.

Contributions to other nonprofit organizations are exceptionally permitted subject to previous approval of *EXOLUM GROUP* CEO and reporting to the *Compliance and Data Protection Lead*.

Finally, charitable contributions to nonprofit organizations related to corporate social responsibility will be granted according to objective criteria related to the *Organization's* activities and subject to the approval of the *Compliance and Data Protection Lead*.

6.6 Fiduciary duties: conflicts of interest

When performing their professional roles and responsibilities, the Members of the Organisation shall act with loyalty to the EXOLUM GROUP and avoid situations where a conflict arises between their personal interests and those of the Group⁵.

⁵ A conflict of interest arises when a professional decision to be made could be influenced by personal and family-related interests instead of valid business criteria, seeking to benefit the individual and, in turn, causing damage to the company.

The Members of the Organisation shall always put the interests of the EXOLUM GROUP before personal interests, the interests of family members and other persons related to them, including *Business partners* and related third parties. The term “family member” includes, but is not limited to, parents, siblings, persons related by marriage or equivalent partnership and other members living in the same household as the person facing the conflict of interest.

In this regard, the Organisation will respect the participation of its Members in other financial or business activities, provided they are not illegal and do not clash with their responsibilities as Members or with the Organisation’s interests.

In order to make the most adequate decisions, *Members of EXOLUM GROUP* will inform in advance the *Organization* in the event that they themselves or their family members may be impacted by a conflict of interest situation that may compromise their impartiality. Members of the Organization will refrain from representing *EXOLUM GROUP* or act on its behalf in all those situations where they might have a direct or indirect personal interest, unless an express authorization is obtained.

Similarly, the *Business partners* of the EXOLUM GROUP are required to avoid conduct that could compromise their independence, abide by the relevant rules, and take all necessary measures to avoid participating in decision-making where a conflict of interest could exist.

6.7 Dissemination of information: transparency and confidentiality. Personal data protection. Industrial and intellectual property rights

Full, accurate and truthful reporting of corporate information

Truthfulness and transparency in reporting is a major and essential asset for business management of the EXOLUM GROUP; therefore, the Members of the Organisation shall always report, whether internally or externally, as appropriate, information that is truthful, accurate and not misleading.

The information shall adequately reflect the EXOLUM GROUP’s financial position and shall be reported in accordance with the rules governing market operation and good corporate governance that the Group assumes.

Safeguarding classified and confidential information

Confidential information is any information that is not in the public domain, which is generated, processed or acquired by the EXOLUM GROUP or its Members in the course of the Organisation’s business. Accordingly, Members of the Organisation are required to keep information they have access to strictly confidential and not disclose it beyond what is strictly required for the performance of their job. They shall also store it in such a way that it cannot be used inappropriately, either to their own benefit or that of third parties.

In all cases, current legislation in this regard and the EXOLUM GROUP’s internal regulations on information security and protection shall apply.

Protection of personal data, guaranteeing its correct use and privacy of data

The EXOLUM GROUP complies with the data protection legislation in each jurisdiction in which it operates, safeguarding the information provided by Members of the *Organisation*, *Business partners*, candidates in recruitment processes and other individuals.

Members who have access to this information in the course of their professional duties undertake not to disclose the information, guaranteeing the privacy and the trust that has been placed in the Group, and shall respect the legitimate rights of the data subjects.

In all cases, the specifications contained in the internal regulations on governance and the classification of personal data, along with their implementing procedures, shall be met.

Protection of industrial and intellectual property rights

The EXOLUM GROUP protects its industrial and intellectual property rights and respects the rights of third parties in this regard.

Through the innovation and efforts of its Members, ideas, services, strategies and business opportunities are generated playing a key role in the *Organisation's* competitiveness; therefore, they must be protected from disclosure and dissemination.

All creations and innovations developed by the Members of the EXOLUM GROUP in the course of their work belong to the *Organisation*, to the extent prescribed by the applicable laws and regulations.

These industrial and intellectual property rights may come in a wide variety of forms (processes, designs, methods, sales strategies, information about customers, prices, and more). For this reason, the Members of the *Organisation* shall not disclose, make copies of or use these rights to obtain a personal or undue benefit. Similarly, they shall not assign them to third parties without the *Organisation's* prior express consent.

In addition, extra measures of care and diligence shall be taken when dealing with information related to the industrial and intellectual property rights of customers and third parties.

6.8 Use and protection of corporate assets

The EXOLUM GROUP places at the disposal of its employees all the resources they need to be able to carry out the duties inherent to each job efficiently. The resources shall be used efficiently and in accordance with the law, and appropriate measures shall be taken to prevent their loss, theft, damage and deterioration.

Members of the *Organisation* shall work efficiently and safely during their workday to provide the utmost value to the EXOLUM GROUP, maximising the time and resources that the GROUP places at their disposal. Furthermore, they shall use the resources the *Organisation* makes available to them correctly and responsibly, and not use them for personal or non-professional purposes or for activities that are not related to the EXOLUM GROUP's business.

The *Organisation* expressly prohibits downloading or using IT programmes or applications that are not allowed or have been obtained by illicit means. In all cases, the EXOLUM GROUP prohibits the use of any IT programme or application that could damage the GROUP's image or reputation.

The *Organisation* reserves the right to access, review and audit corporate IT resources whenever deemed necessary in order to check and verify that they are being used correctly.

The ownership and exploitation rights over technologies developed by the Members for the EXOLUM GROUP in the performance of their normal duties, or following company instructions, are the sole property of the *Organisation*.

Similarly, Members are reminded of the need to protect the *Organisation's* corporate image when commenting, publishing or disseminating any type of information or aspects relating to the EXOLUM GROUP, its customers and *Business Partners* in all social forums, including social media.

In this regard, Members should be aware that they are representatives of the *Organisation* and, as such, shall ensure that their behaviour, including in social media, is appropriate and consistent with the principles and values of the EXOLUM GROUP, while respecting and protecting the Group's reputation.

6.9 Compliance with applicable tax regulations

One of the EXOLUM GROUP's guiding principles is compliance with applicable tax regulations, respecting the purpose of the rules and always interpreting their contents in a reasonable manner.

In line with its vision and values, the *Organisation* undertakes to report and pay its taxes responsibly in the territories in which it operates, balancing the fulfilment of its tax obligations with the commitment to create value for its shareholders.

The Group and its Members undertake to avoid the wilful, culpable or negligent commission of tax offences, tax evasion and the obtainment of undue tax benefits, and are aware that any action that could give rise to a tax-related debt or fine for the Group and/or its governing bodies, executives or employees would result in the corresponding financial damage and, in certain cases, reputational damage that would be difficult to repair.

To enable them to comply with these rules of conduct, the *Organisation* has provided its Members with an appropriate framework designed to prevent, detect, manage and mitigate in a timely manner the tax-related risks to which it is exposed.

7. Relations with stakeholders

The EXOLUM GROUP is committed to maintaining good relations with its various stakeholders, endeavouring to report to them in a transparent and smooth manner so as to facilitate the achievement of common goals.

To this end, the Group has a management procedure for handling relations with stakeholders, which is applicable to all activities and organisational levels.

7.1 Relations with shareholders

The criterion that will govern the actions of the EXOLUM GROUP is the creation of value for shareholders by enhancing the value of the company in both the short and long term, ensuring its future viability, growth and competitiveness.

The EXOLUM GROUP shall at all times strive to promote communication with its shareholders and encourage their informed participation at General Meetings.

7.2 Relations with customers

The EXOLUM GROUP and its Members are committed to complying with a quality policy based on meeting the demands and expectations expressed by its customers, to achieve the highest levels of quality and excellence in the provision of services.

Furthermore, Members shall act honestly and responsibly, in such a way as to ensure the fulfilment of the commitments entered into with our customers, receiving whatever suggestions our customers make and thereby making it possible to improve our work day by day.

7.3 Relations with *Business partners*

The Group will select its *Business partners* in accordance with the criteria outlined in the approval procedures.

The Group will promote knowledge of the Code among its *Business partners* and compliance with the Code will be taken into account in official approval and selection processes, as well as in the subsequent assessment of professional performance. Our *Business partners* shall promote the standards of conduct, integrity and ethical behaviour established in the Code, or in their own codes, if comparable, and comply with and enforce the universal principles of the United Nations Global Compact, reporting any breaches through the established channels.

Similarly, the *Business partners* of the EXOLUM GROUP are required to avoid conduct that could compromise their independence by complying with the relevant rules, and taking all necessary measures to avoid participating in decision-making impacted by a potential conflict of interest.

7.4 Relations with public administrations

The relations that the EXOLUM GROUP establishes with the different Public Administrations shall be based on collaboration, mutual respect and transparency, and also on the guarantee of compliance with the law.

Members of the Organisation shall act with honesty and integrity in their relations with public authorities and civil servants, and they shall avoid any behaviour that could be interpreted as an attempt to unlawfully gain some sort of compensation or benefit, whether directly or indirectly, safeguarding the image and reputation of the *Organisation* at all times.

7.5 Relations with competitors

The EXOLUM GROUP shall respect the principle of free competition and shall comply with the antitrust laws in the jurisdictions in which it operates, so as to avoid engaging in acts that could constitute market abuse or an unlawful restriction of competition.

The *Organisation* explicitly prohibits the appropriation of third-party data, documents or IT media which it has knowledge of or access to, and which may contain trade secrets, for the purposes of using them or disclosing them to third parties.

7.6 Relations with society

The EXOLUM GROUP believes that, above all, it should contribute to improving the quality of life and the creation of wealth in the countries where it operates, improving the quality of its services and being sensitive to social change so as to be able to anticipate such changes and evolve as new needs arise in society.

The *Organisation* will contribute to and support research into new technologies that help to protect the environment, working jointly with all institutions whose work contributes to the development of society.

7.7 Relations with employees

The EXOLUM GROUP will apply public policies for furthering equal opportunities in employee recruitment and promotion. Persons in management roles shall facilitate the professional development of their co-workers, thereby boosting the Organisation's growth.

In addition, the EXOLUM GROUP will promote a safe, healthy work environment that enables work/life balance.

8. Compliance with the Code of conduct

The values and principles set out in this Code have been adopted by the Group in relation to its stakeholders: *Business partners*, Public Administrations, competitors and society as a whole. The Group will endeavour to make the content of the Code known to all these stakeholders and, in particular, to the Members, to whom these rules of conduct are mainly addressed.

Specifically, as stated in the Criminal Compliance Policy, this Code is binding on all Members of the Group as well as on third parties that have agreed to abide by it.

In this regard, EXOLUM GROUP will react to any violation of its rules in accordance with the applicable regulations applying legitimate disciplinary measures with respect to the principle of proportionality.

9. Our internal communication channel: The Code of Conduct Mailbox.

The Code of Conduct Mailbox is a tool available to all Members of the *Organisation*, *Business Partners* and *Third parties* to help identify possible breaches or violations of the Code of Conduct and the policies and procedures implementing the Code, and to address potential vulnerabilities in order to strengthen the *Organisation's* culture of compliance.

All *Members of EXOLUM* are obliged to keep a collaborative and responsible attitude in the identification of situations of actual or potential breach of the ethical principles and conduct norms contained in the Code of Conduct.

All inquiries, observations or reports related to criminal prevention will be handled by the *Compliance and Data Protection Lead*, according to the Policy governing the use of the Code of Conduct mailbox.

In this regard, the Group has made available to its *Members, Business Partners and Third Parties* several confidential channels of communications. In particular, *EXOLUM GROUP* has the following channels available for inquiries or reports about practices in violation of the internal regulations and values of *EXOLUM GROUP*.

a. Written communication:

- Via this link on the website:
<https://exolum.com/en/sustainability/transparency-ethics-and-integrity/code-of-conduct-mailbox/>
- Via the corporate portal.
- Via the following address:
Compliance and Data Protection Lead
C. Titán, 13
28045 Madrid (España)

b. Oral communication:

- Through the supervisor.
- Through the head of any other department.
- Through a face-to-face meeting with the *Compliance and Data Protection Lead*.

Members of the Group and Third parties must report, in their own name or anonymously, any alleged breaches of the Code that come to their knowledge or, if in doubt, they shall, as a general rule, consult Compliance whenever they notice any suspicious or unusual behaviour that, in their opinion, may represent a potentially irregular act within the Group, including any possible criminal risk situations.

In this regard and as per the Policy for the Use of the Code of Conduct Mailbox, no retaliation will take place against Members who, in good faith, use the confidential channel.

Breach of the rules of this Code of Conduct, may derive in administrative sanctions and civil or criminal liability for the perpetrator, without prejudice of the potential qualification as a labor law infringement under applicable laws.

10. Organisational measures.

The Compliance and Data Protection Lead

The EXOLUM GROUP has a *Compliance and Data Protection Lead* entrusted with the task of crime prevention, who is responsible for putting this Code into effect through the implementation of the various measures provided for in the *Criminal Compliance Management System*.

The *Compliance and Data Protection Lead* is a natural person body that reports to EXOLUM's Audit Committee.

Furthermore, the *Compliance and Data Protection Lead* has autonomous powers of initiative and control, and complete independence in the performance of their duties, as they are not subject to any business constraints that might unduly influence the performance of those duties.

11. Validity

This Code and any amendments that may be made to it shall enter into force after approval by the Board of Directors of the Group's parent, and shall be published on the Corporate Portal or the Group's website. The Code shall remain valid until a resolution is passed to cancel it.

APPENDIX I

The Ten Principles of the United Nations Global Compact

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2:

Make sure that they are not complicit in human rights abuses.

Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4:

The elimination of all forms of forced and compulsory labour.

Principle 5:

The effective abolition of child labour.

Principle 6:

The elimination of discrimination in respect of employment and occupation.

Principle 7:

Businesses should support a precautionary approach to environmental challenges.

Principle 8:

Undertake initiatives to promote greater environmental responsibility.

Principle 9:

Encourage the development and diffusion of environmentally friendly technologies.

Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery.

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