



CODE OF CONDUCT

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CODE OF CONDUCT OF INECO

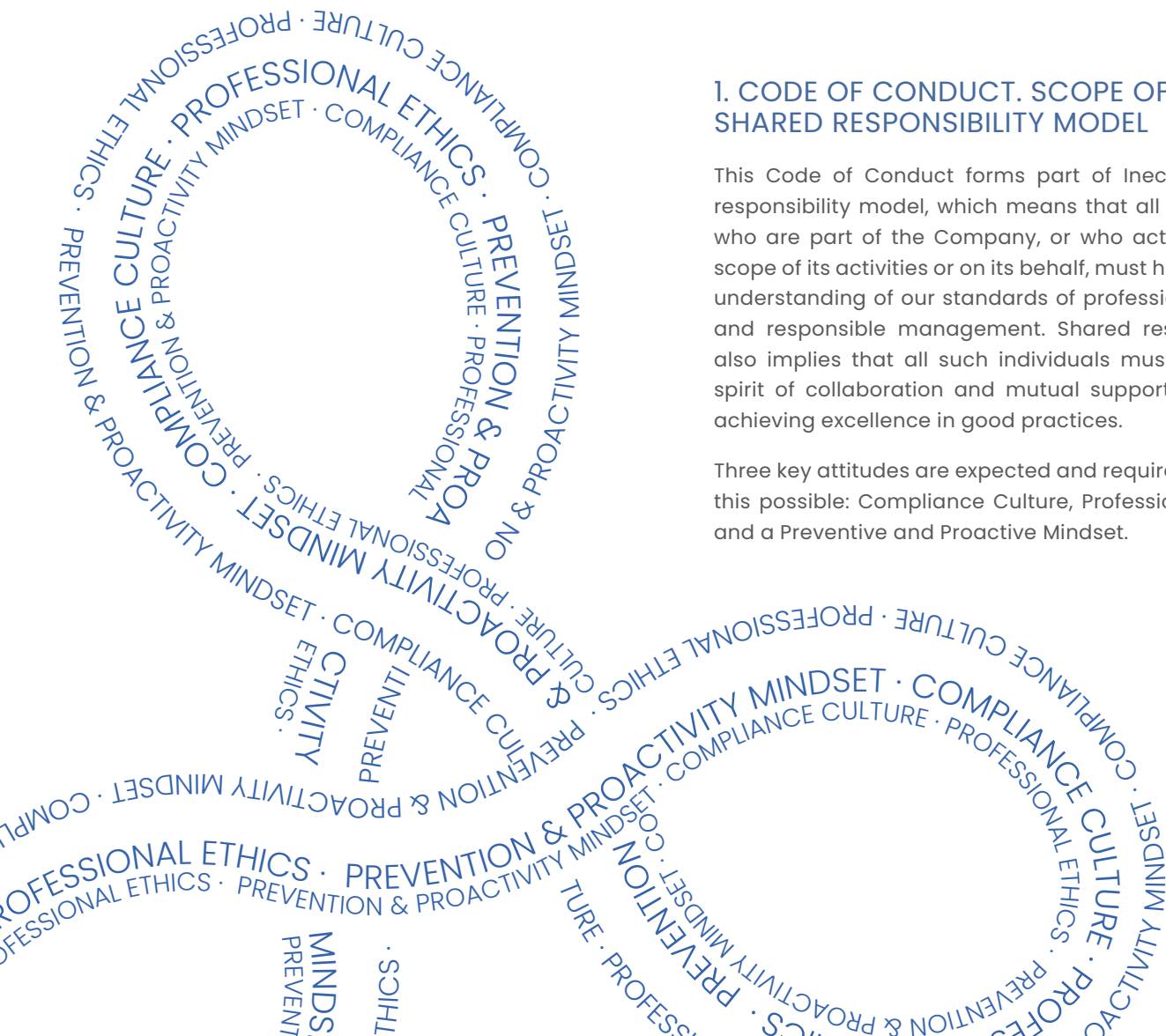
As a public company and an in-house service provider to the Public Administration, Ineco expresses its ethical commitment to corporate social responsibility and sustainability through various internal instruments. These take the form of policies, manuals, and procedures.

However, an organisation is, above all, the people who make it up. For this reason, it is essential that all employees demonstrate the same level of commitment.

1. CODE OF CONDUCT. SCOPE OF THE SHARED RESPONSIBILITY MODEL

This Code of Conduct forms part of Ineco's shared responsibility model, which means that all individuals who are part of the Company, or who act within the scope of its activities or on its behalf, must have a clear understanding of our standards of professional ethics and responsible management. Shared responsibility also implies that all such individuals must uphold a spirit of collaboration and mutual support aimed at achieving excellence in good practices.

Three key attitudes are expected and required to make this possible: Compliance Culture, Professional Ethics, and a Preventive and Proactive Mindset.



2. EXPECTED AND REQUIRED CONDUCT

In the exercise of their professional functions

Employees must act with professional ethics, a sense of responsibility, and a clear commitment to achieving quality and excellence in their work. They shall perform their duties while avoiding any form of competition with the Company, in accordance with their employment contract. Accordingly, they are prohibited from providing services that may compete with the Company's business activities, unless expressly authorized to do so. This also entails the duty to work diligently during working hours, making efficient use of the time and resources made available by the Company exclusively for work-related purposes.

In the performance of their duties, Ineco personnel must comply with the applicable internal procedures that complement this Code, as well as with the relevant technical standards applicable to their position.

Furthermore, it is essential that all personnel pay due attention to occupational health and safety measures, particularly to training related to the prevention of occupational risks.

In the performance of their professional responsibilities, members of the Ineco team shall respect the duty of professional confidentiality arising from their relationship with clients. They also undertake not to disclose any information or documentation to which they may have access as a result of their employment relationship with Ineco and whose disclosure could compromise the Company's interests.

In Their Relations with Ineco as an Organisation

Employees, as well as other collaborators and agents engaged through a commercial or business contractual relationship, must act with loyalty, particularly in all matters that could compromise Ineco's reputation, credibility, and standing in the marketplace. To this end, particular importance must be given to the proper management of conflicts of interest, the confidentiality of communications, and information security.

Whenever a member of the Company participates in any form of public communication, whether in a physical setting (such as an event, conference, or interview) or through digital channels (for example, social media), in connection with their professional activities at Ineco, they must obtain the appropriate authorization and coordinate with the department responsible for Communications. While respecting the

right to freedom of expression, the Company's right to protect its reputation must also be safeguarded against the dissemination of false, defamatory, or unlawfully disparaging statements that may directly or indirectly affect its commercial reputation. Due care must likewise be exercised in the handling of confidential information.

Intangible assets generated using Ineco's resources (including documents, methodologies, designs, models, software, and similar materials) are the property of Ineco unless otherwise expressly agreed. Their use or external disclosure requires prior authorization and strict compliance with confidentiality obligations.

The confidentiality of team-related information must be respected. Only the data strictly necessary for the effective performance of one's duties, or whose collection is required by applicable regulations, should be requested and used, and such data must be handled responsibly. In all cases, actions must be conducted in compliance with the applicable laws governing the protection of personal data and the safeguarding of digital rights.

Ineco professionals must ensure the accuracy and reliability of the financial information recorded in the general corporate management system and in all work, projects, or activities under their responsibility or supervision.

With Respect to Suppliers, Clients, Public Administrations, Business Partners, and Other Third Parties

These relationships must be based on integrity, impartiality, transparency, and fair competition, always within the framework of applicable laws and regulations. Bribery, improper gifts, and preferential treatment for any reason whatsoever are strictly prohibited in order to preserve Ineco's independence at all times. Likewise, obtaining or granting undue advantages to contractors or subcontractors, or making use of privileged or insider information, is not acceptable. Any manipulation of recruitment, professional development, or third-party contracting processes that compromises the principles of merit, competence, equal opportunities, objectivity, and impartiality shall also be considered a very serious misconduct.

In Relations with Individuals

Ineco is, above all, the people who make up the organisation. Relationships among all individuals who form part of the organisation or work within its sphere of influence must be based on the utmost respect for inherent human dignity, equality, and the prohibition of any form of discrimination. Loyal and good-faith cooperation is a critical element in fostering a safe, diverse, inclusive, and professional work environment. This includes, without limitation, all forms of harassment (whether sexual or non-sexual), humiliating or intimidating behaviour, abuse of authority, and any infringement of a person's physical or moral integrity or freedom, regardless of the nature of their contractual relationship with Ineco. Any breaches and corresponding disciplinary measures shall be governed by the provisions of the Collective Bargaining Agreement for Engineering and Technical Studies Companies.

These commitments also apply to relationships with third parties in the context of projects, site visits, meetings, international travel, and digital environments. The common foundation of this required standard of conduct is the Fundamental Rights enshrined in the Spanish Constitution, together with internationally recognised Human Rights.

With Respect to the Environment, Human Rights, and Sustainability

A responsible and preventive approach to environmental protection, human rights, and sustainability must be incorporated into the performance of each individual's duties and responsibilities, to the extent relevant to their role. This involves identifying material risks in these areas, avoiding adverse impacts within projects, and seeking guidance whenever doubts arise, in order to act consistently with the Corporate Social Responsibility Policy and other complementary procedures.

With Respect to Information, Digital Transformation, and Artificial Intelligence

The secure and responsible use of digital tools and any new technologies is required, in accordance with the relevant internal procedures and guidelines. Information confidentiality and security, as well as the protection of personal data, constitute the primary risks in this area. Any suspected vulnerability must be reported immediately to the Support Service (CAE) through the corporate intranet and should not be addressed independently by the individual concerned.

Respect for the right to digital disconnection is guaranteed in accordance with Article 20 bis of the Spanish Workers' Statute.

Advice or guidance obtained through Artificial Intelligence tools for regulatory or compliance-related purposes must never be used as the sole basis for final decision-making. Such decisions must always be subject to human review and oversight through the appropriate consultation channels.

The management, registration, and processing of rights and interests relating to intellectual property shall always be conducted in accordance with the procedures established by Ineco for this purpose.

Enhanced Due Diligence for Management and Corporate Staff

To the extent that management and corporate staff hold responsibilities that extend beyond purely technical and professional matters, including responsibilities related to resource and talent management, they are expected to exercise enhanced due diligence in ensuring compliance with this Code of Conduct and the Corporate Model. They are also expected to facilitate effective compliance by ensuring that the personnel under their supervision have access to all necessary tools and resources.

In this regard, they are expected to foster, within their respective areas and professional teams, and in coordination with other units, a cooperative environment that promotes a culture of compliance and integrity. They must also ensure that Ineco's economic and financial situation is reflected truthfully, accurately, and honestly, both in management instruments and in reporting systems.

In addition, team leaders must promote a working environment in which collaboration, the sharing and transfer of knowledge, open dialogue, and initiative are actively encouraged.

International Operations

The Ineco team shall at all times comply with the laws and regulations in force in each country in which it operates, while respecting cultural diversity. Furthermore, all employees and collaborators are responsible for respecting and promoting internationally recognised Human Rights standards in their cross-border operations, in accordance with the United Nations Guiding Principles on Business and Human Rights.



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