



Code of Conduct



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1. PURPOSE.

Ineco's Code of Conduct is based on respect for the 10 Principles of the United Nations Global Compact and the definition of **Ineco's** Values and its Policy on Corporate Social Responsibility, which it fulfils and which serves as the guidelines for ensuring the correct professional conduct of employees.

Its objective is to identify and share the set of principles and rules of conduct that are assumed and implemented to achieve ethical and responsible management in the development of **Ineco's** services and products, and in the relationships it establishes with different interest groups:

- Loyalty to the organisation
- Relationship of professionals with other stakeholders
- Relationship between professionals
- Administrators and structure staff

1.1. Loyalty to the organisation.

Reputation and loyalty to the company

Each employee represents the interests and image of **Ineco** during their professional activities and any conduct considered prejudicial to these interests shall be avoided by following the principles established in this Code.

Ineco's employees shall put any professional conflicts of interest before their own or third party personal interests. They will always state the company's position, not their own.

Confidentiality

When performing their duties, **Ineco's** employees will respect all professional secrets arising from their relationship with the company's clients and undertake not to disclose or publicise any information or documentation to which they have access as a result of their professional relationship with **Ineco** and which could compromise the latter's interests.

Dedication

Each employee should perform their work efficiently, making good use of the time and all resources offered to them by the company, striving to give their best in all processes in which they participate and complying with the procedures established for each activity. During the stipulated workday, they will be responsible for using their time for professional purposes.

Non-concurrence

Whilst employees are working for **Ineco**, they shall not provide any services that can or may compete with the sector or company activities, or that are likely to compete directly or indirectly with same, unless express authorisation to do so has been given.

Use of the company's resources

Employees shall make rational and appropriate use of the company's resources intended for performing professional activities and shall avoid using them for purposes not related to their contractual relationship with **Ineco**, taking responsibility for their protection.

Safety, Health and Environment

All staff are obliged to know and comply with the preventive safety and health measures that apply to their jobs, using the equipment supplied to them by **Ineco**.

They shall also be familiar with **Ineco's** environmental policy and incorporate it in all company procedures.

1.2. Relationship of professionals with other stakeholders.

Relationship with clients

Members of staff shall act correctly with the organisation's clients in order to achieve the highest levels of quality, excellent service and development of long-term relationships based on confidentiality, objectivity and continuous dialogue with a view to gaining mutual trust.

Relationship with suppliers and partner companies

Dealings with suppliers and partner companies seek to establish relationships based on trust and mutual benefit.

Relationships with suppliers and partners are governed by the principles of integrity and honesty and based on merit and capacity, weighing up the quality of the product or service against the cost of same. Therefore, professionals involved in selection decisions shall ensure transparency, impartiality and objectivity in each procedure followed to select contractors, suppliers and external workers.

Relationship with the media, social networks and public events

All dealings with the media, networks or any type of public event involving Ineco's employees require authorisation from their superiors and the person responsible for communication at the company and the utmost discretion.

Relationship with the international environment

Ineco's employees shall strictly comply with current laws, customs and cultures of countries where the company develops its activities (*See Zero Tolerance Policy for Corruption and Zero Tolerance Procedure for Corruption*).

Legality

Compliance with the law is an unconditional requirement for **Ineco**, which undertakes to act in accordance with the law in force in all its activities. All employees will be familiar with the laws concerning their work and Management will provide the necessary instructions and advice.

Transparency and truthfulness of information

Ineco's staff undertakes to disclose the information, both internally and externally, in a transparent, honest and truthful way. No incorrect, incomplete, inaccurate information or that which could be confusing for the recipient (*See Information Transparency and Veracity Policy*) shall be intentionally presented to or placed at the disposal of the company at any time.

All information relating to the company shall comply with the following requirements; veracity, objectivity, opportunity, integrity, accuracy, verifiability and clarity.

Gifts, compensation and bribes

All acts of corruption, bribery, acceptance or delivery of payment, or facilitation in all its forms, active and passive, whether by act or omission, or by creating or maintaining favourable or illicit relationships are prohibited, as indicated in Ineco's Catalogue of Prohibited Behaviours. (*See more detailed information in section 2.5. Gifts Policy*).

1.3. Relationship between professionals.

Respect for people.

Regardless of the responsibilities that each person assumes in the company, they must treat others with respect, fostering relationships and a friendly working environment, avoiding situations in which they might intimidate or offend people's rights.

Under no circumstances will they engage in sexual harassment, abuse of authority, offence or any other form of aggression and hostility that may lead to a climate of intimidation, which is clearly repudiated as forbidden behaviour in Ineco's Catalogue of Prohibited Behaviours.

Non-discrimination

All professionals from the organization are obliged to stringently respect Human Rights and Public Freedoms contained in the Universal Declaration of Human Rights as well as the legal systems of the countries in which they perform their activity in each corporate department.

Discrimination in recruitment, remuneration, access to training, promotion, dismissal or retirement based on sex, age, religion, race, social origin, disability, nationality, membership of workers' organizations, political affiliation, sexual orientation and any other personal or social characteristic.

Cooperation and collaboration.

Each company employee will aspire to be efficient at their job, actively cooperating with other organisational units.

They will also act in a spirit of cooperation and collaboration, participating in teamwork and providing other units of the organization with the knowledge and resources that can facilitate the achievement of the company's objectives and interests.

1.4. Management and structure staff

Ineco's administration, management and other staff, in particular, must comply with the following in the exercise of their administrative and management duties:

Knowledge and communication

- Act ethically and responsibly at the workplace.
- Comply and ensure compliance with Ineco's Code of Conduct by explaining and establishing the appropriate mechanisms to guarantee its application.
- Immediately inform their superior of any facts or situations that could lead to or cause a conflict between the interest of the company and the particular interest of the executive board and refrain from intervening in their resolution.
- Transfer to the Compliance Committee information on any behaviour or action that could constitute criminal charges, observed in any person from the company.

Fundamental rights

- Recognize the rights of association, unionisation and collective bargaining.
- Ensure occupational safety and hygiene, making every effort to maximize the prevention of occupational risks.
- Do not allow any form of violence, harassment or abuse at work.
- Respect, support and promote equal opportunities, not discriminating against employees because of race, religion, age, nationality, sex or any other personal or social condition alien to their conditions of merit and ability.

Confidentiality

- Maintain the confidentiality of the background, data and documents to which they have access by reason of the exercise of their functions, even after having ceased in them.
- Respect the privacy and confidentiality of employee information by requesting and using only data necessary for the effective management of their competencies or whose inclusion was required by the applicable regulations, making responsible use of same. Always comply with the laws in force on protection of personal data and digital rights guarantees in all cases.

Professionalism

- Subordinate personal interests to those of the company when acting on behalf of and in representation of the latter and not to use social assets for their own benefit except with the due transparency or prior authorization from the relevant social body, and with compensation considered adequate in the market.
- Be constantly focused and demonstrate the effort needed for regular follow-up of the questions raised by corporate administration, gathering enough information for this and the collaboration or assistance that it considers appropriate
- Not to provide professional services or work for entities outside Ineco without mandatory authorization.

Economic-Financial

- Guarantee the veracity of the economic information registered in the general file follow-up model and in all works that are under their responsibility or tutelage.
- Reflect with truthfulness, accuracy and honesty, on the economic and financial situation of Ineco both in management and informative instruments.
- Schedule and make payments according to the established regulations, with the maximum possible diligence and without establishing any discrimination.
- Not to make any investment or transaction for themselves, or for the persons associated with them that they have become aware of during the exercise of their jobs, if such investment or transaction would have been offered to **Ineco**, or if the latter had an interest in it, unless they have dismissed it.

Contracting, training and promotion

- Choose employees and subordinates according to the principles of merit and ability and only in the interest of the company.
- Ensure that all professionals and employees of Ineco that are not of Spanish nationality have the corresponding official authorization to perform remunerated work, making sure of the identity of each one and checking the veracity of said information before contracting them.
- Encourage the development, training and professional promotion of employees based on circumstances and valuations of an objective nature.
- Associate the salary and promotion of Ineco's employees with their merit and ability.

Diversity and conciliation

- Treat employees with dignity, respect and fairness, taking into consideration their different cultural backgrounds.
- Seek to integrate people with disabilities and handicaps into the workplace, removing all barriers in the company for their integration.
- Facilitate the participation of employees in the company's social action programmes.
- Seek to conciliate work in the company with the personal and family life of the employee.

The Code of Conduct is complementary to the "Catalogue of Prohibited Behaviours" contained in the "Organisation and Management Model for Crime Prevention".

2. SCOPE.

Compliance with this Code of Conduct is incumbent upon all **Ineco** employees during the performance of their duties and responsibilities in all professional fields in which they represent the company.