



Sener

Code of Conduct

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I. Purpose and applications

The people and entities that make up SENER Group recognize that reputation is one of the most valuable assets in their professional activity. The Group's long-term sustainability and success essentially depends on the proper conduct of each and every one of its administrators, executives, employees, partners, and suppliers. They must therefore behave in accordance with high standards of professional excellence and personal ethics regardless of their level of responsibility or the geographical area in which they work.

At SENER Group, we want our business success to be based on technical excellence and excellent service aimed at satisfying clients and the community. We aim to always work responsibly, in compliance with the law in order to prevent damages and harming people and the environment. As a result, we continuously use our values and history as a reference.

Sener expects all its partners to respect and comply with existing standards, exercising the values of the company in the performance of their professional activity. A good example in professional conduct is the driving force behind the company's values and the best way to put the principles at the heart of this Code of Conduct into practice. This responsibility applies to everyone, although managers and work coordinators have a greater responsibility.

This Code of Conduct (hereinafter "Code") has been drawn up for this purpose. It summarizes expected behavioral guidelines, illustrates the ethical principles we should follow

II. Mission, vision, and values

SENER Group's mission is to develop innovative, sustainable engineering solutions and applications that contribute to social progress

The Group's professional activity must result in profitable economic performance that enables the adequate remuneration of its employees, shareholders, and financial supporters. Said performance should enable investments to be made that contribute to the Group's future growth and sustained development.

SENER Group aspires to grow as a multidisciplinary, industrial, engineering group that is recognized as a leader, to develop projects that represent ambitious technological challenges, and to advance its internationalization. SENER Group's motivation transcends merely undertaking current and immediate projects; it also involves the continuous

in our work, and establishes rules that must be observed by all those who work for or collaborate with SENER Group. Including all the aspects and nuances of the ethical/responsible behavior expected from SENER Group and its people in a Code of this nature is impossible. Therefore, any rules set out here must not be misconstrued as being exhaustive.

The scope of application for this Code extends to SENER Grupo de Ingeniería S.A. and to all the companies in which it is a majority shareholder, their respective subsidiaries, and any entities that fall into these categories in the future. Each company in the Group must be able to develop its own specific regulations in line with the general guidelines set out in this Code.

The Code likewise directly applies to everyone in these Group companies, whether administrators, executives, or employees. For the purposes of this Code, this group of companies and people will hereinafter be referred to as the "SENER Group".

Furthermore, SENER Group undertakes to promote the application of the fundamental principles and values included in this Code, both to company activities for which SENER Group is a minority shareholder, and to third party business partners.

desire to gain a deeper understanding of technology and progress with engineering solutions and their industrial applications.

SENER Group and each of its employees must uphold the values described below at all times:

People: SENER Group believes in people, recognizes their contributions, and confidently supports them as they carry out their roles. SENER Group promotes the professional and personal development of its members.

Commitment to quality, the environment, and safety: The Group is committed to undertaking any project, supplying any technical service, and carrying out all engineering, construction, and manufacturing activities in its clients' best interests. The Group is also committed to

quality, personal safety and security, and respect for the environment.

Client satisfaction: SENER Group must always be proactive to satisfy or exceed its clients' expectations.

Results-oriented: SENER Group has demanding objectives that require everyone's commitment and effort in order to be achieved. In addition to measuring the success of the Group's activity, economic performance represents the financial basis for future investments in the company's development.

Innovation: SENER Group creates innovative, state-of-the-art solutions that generate greater value for clients. SENER Group values the imagination and experience of its employees, enables them to act on their own initiative, and organizes their teamwork so that their ideas may be converted into solutions with high differential value.

Independence: SENER Group protects the freedom of its employees and entities so that they may carry out their work without any restrictions, other than those that are strictly professional.

Commitments: SENER Group is reliable and fulfils its pledges, pacts, and agreements.

Leadership: SENER Group's leadership must set an example, demonstrate initiative, and show the constructive way in which it takes on important challenges and manages risks. The company must always be identified as a single global team, with all its employees and entities sharing the same motivation to achieve established objectives.

Ethics and social responsibility: SENER Group requires ethical behavior and responsibility in all its actions and initiatives, with special emphasis on the development and integration of people, quality, occupational health and safety, environmental protection, and promoting sustainable social development.

III. What you should know about the Code of Conduct

What is SENER Group's Code of Conduct?

SENER Group's Code of Conduct is a tool aimed at formally setting out the values, references, and rules that should guide the behavior of the natural and legal persons that are part of the Group. The Code aims to help to establish corporate behavior that is accepted and followed by everyone.

The Group's culture and values must guide interpersonal relationships within SENER as well as those with clients, suppliers, external partners, public and private institutions, and the community.

Inevitably, this document is broad by nature. Some of its sections will specifically be implemented through regulations and procedures that are either already in place or that will be established for SENER Group and/or each one of the companies for which it is shareholder.

Why is the Code of Conduct important?

This Code is a fundamental part of SENER Group's policies because it seeks to ensure that SENER Group activities are undertaken with honesty and integrity, because it defines some qualities that characterize us, and because it helps project a coherent image of what SENER Group aspires to be.

What can I do if I have a question or concern?

Any questions that may arise about the interpretation or application of this Code should be discussed with your immediate superior or, alternatively, with the managers who appear in Section V of this Code.

How is compliance with the Code enforced?

Those who currently form part of SENER or who join the team in the future must accept all values, principles, and rules set out in this Code.

SENER Group must make the necessary means available to disseminate and monitor compliance with the rules contained in this Code. SENER Group employees are responsible for being conversant with, understanding, and applying the Code.

No one, regardless of their level or position in the organization, is authorized to ask a member of SENER Group to violate the provisions in this Code. No one in SENER Group may justify misconduct that violates this Code on the grounds of following the orders of a superior or unawareness of the Code.

Disciplinary action will be taken against any breach of the provisions of this Code, in the correct manner as proposed by the Corporate Compliance Body according to the existing disciplinary regime within the company defined in the Workers' Statute and applicable collective bargaining agreements. In the event of a serious offense, said action must be approved by SENER Group's Board of Directors.

How do the various laws and regulations in different countries fit in with our Code?

The requirements of the Code take precedence except in cases where the rules defined herein conflict with a law or regulation that applies to a geographical setting or certain area of activity.

IV. SENER Group's commitment

The principles that govern this Code are inspired by SENER's sense of mission and by the values that inspired its creation and development set forth above. These principles define a way of working and serving our customers, and extend far beyond regulatory compliance.

SENER Group undertakes to carry out its business and professional activities in accordance with the current legislation in each one of the countries and territories in which it operates. In that regard, SENER Group employees are expected to comply with the applicable laws, regulations, rules, requirements, and specific policies of the Group.

SENER Group employees must avoid any conduct that, although not in violation of the law, may damage SENER Group's reputation and/or negatively affect its interests. No one in SENER Group must consciously cooperate with third parties to violate any law, or engage in any action that compromises compliance with the applicable legislation in each case.

IV.I. SENER Group and its employees

Respect for people

SENER Group is committed to protecting internationally recognized human rights.

SENER Group rejects any form of physical, psychological, or moral harassment, abuse of authority, and any

other conduct leading to an intimidating/offensive environment, or one in violation of human rights. SENER Group employees must treat others in their working environment with respect regardless of their hierarchical level. They must promote a pleasant, healthy, and safe working environment.

The same respectful, considerate treatment must be given to clients, associates, subcontractors, suppliers, consultants, and anyone with whom a professional relationship is maintained. An effort must be made to base all relationships on mutual collaboration.

SENER Group employees have the duty to work loyally, by putting their effort and talent into undertaking their professional activity in the best possible way.

SENER Group is a family-friendly business and takes into account the measures needed to achieve a work/life balance.

Non-discrimination and equal opportunities

SENER Group accepts and enforces compliance with equal opportunity principles for everyone. In particular, equal treatment and opportunities must be given to men and women in selection processes, internal promotions, working and employment conditions, occupational health, and organization of time and work. SENER Group does not tolerate discrimination of any kind on the grounds of race, color, nationality, age, gender, religion, social background, disability, or other factors unrelated

to undertaking professional activities. Likewise, SENER Group enforces compliance with the provisions of the International Labour Organization regarding minors, and does not allow child labor, forced labor, or work under duress of any kind.

The selection and promotion of SENER Group employees is aimed at integrating and retaining people with great talent and professional ability. We value the internal promotion of our professionals and, in order to maintain this principle, we establish training plans to encourage the professional development of our employees.

Those holding management or leadership positions must facilitate and take responsibility for their colleagues' professional development.

Healthy, safe working environment

SENER Group is committed to excellence in health and safety. The Group adopts and maintains the tools, processes, and measures needed in all its projects to ensure personal health and safety when undertaking its professional activity.

SENER Group aspires to avoid all workplace accidents. In order to achieve this, we set very demanding objectives, procedures, and working conditions regarding safety that are continuously evaluated, reviewed, and improved.

SENER Group employees must share this aspiration, take on these objectives, be familiar and comply with occupational health and safety rules, and look out for their own safety and the safety of others, including clients, suppliers, partners, and anyone who could potentially be affected by SENER Group's activities.

SENER Group promotes the extension and application of its occupational health and safety policies and rules, to the extent possible in each case, to the relevant work areas of the clients, partners, and supplier companies with which it works. Irresponsible behavior in the area of health and safety by clients, partners, or suppliers must be reported to the management of the corresponding Group company so that potential solutions may be examined.

Teamwork, collaboration, and dedication

Teamwork is an essential part of work within SENER Group. Efficient organization and collaboration systems are adapted to each case in order to provide clients with the best service and make the most of the company's resources, knowledge, and talent.

SENER Group employees must have a collaborative spirit, by providing knowledge or resources to other organizational units and people in the Group that may facilitate the achievement of objectives and promote Group interests.

Confidentiality of information

The information generated and collected by SENER Group is one of its most valuable assets, and also plays a key role in business development. It must therefore be kept particularly secure.

Without prejudice to the confidentiality restrictions applicable in each case, SENER Group employees must convey all information they must communicate, both internally and externally, in a truthful and complete manner. Under no circumstances must they knowingly provide incorrect or inaccurate information that may mislead the recipient.

No one in SENER Group may disclose or distribute technological, commercial, organizational, or economic information, or information of any other kind, that belongs to SENER Group or to third parties, without prior authorization. They must make use of this information solely in the terms permitted in relation to performing their job. In cases where the information is restricted or of a confidential nature, they must implement all the protective procedures established in each specific case.

SENER Group complies with current legislation on data protection, and thereby appropriately protects the personal data entrusted to it by its clients, suppliers, partners, candidates in selection processes, and the people in SENER Group itself. Exceptions to this rule must only be made due to legal requirements and/or pursuant to court rulings.

Corporate reputation

SENER Group considers its corporate reputation and image to be very valuable assets since they are essential in developing and maintaining the trust of the people in the Group as well as that of shareholders, clients, suppliers, authorities, and the general community.

As such, SENER Group and its people must avoid any situation that may compromise or put at risk the company's reputation. If this is not possible, the issue must be handled with the help of the management team.

The Group must enforce respect for and the correct/appropriate use of the logo and corporate image of SENER Group and each company for which it is shareholder. Said enforcement should be applied to SENER Group employees, associates, contractors, and any other partners.

SENER Group employees must be especially careful when participating in any public event and must have the required prior authorization to make media announcements or participate in professional conferences, seminars, or any other event or publication that may be publicly circulated, when appearing as SENER Group employees or when disclosing corporate information.

Use of property, assets, and resources

SENER Group provides people in the Group with the resources they need to carry out their work.

What is an asset, resource, or property of the Group? Any physical assets (e.g., buildings, facilities, equipment, office tools or supplies) or intangible assets (e.g., information systems and software, securities, patents, trade secrets, designs, models, rights, inventions, processes, domains, information protected by trademarks or copyright) considered to be company property. SENER Group employees must use these Group resources honestly, responsibly, securely, and appropriately when performing their jobs, complying with any rules that may apply in specific cases. Likewise, they must protect these assets and ensure that none of them are stolen, damaged, destroyed, or misused at the expense of the interests of SENER Group, its clients, suppliers, and/or associates.

SENER Group especially acknowledges the value of intellectual property in all its forms, including know-how, patents, designs, trademarks, commercial benchmarks, and trade secrets. The Group actively protects its own industrial and intellectual property rights and respects those of third parties. The intellectual property generated in projects, development, consultations, and other work carried out by the Group and its people will always be the property of SENER Group, unless explicitly stated otherwise by contracts in specific cases.

Conflicts of interest. Corruption and bribery

No one in SENER Group may give or accept presents or gifts with the intention of obtaining or retaining business or special treatment when performing their jobs. Specifically, no one in SENER Group may accept any kind of courtesies that influence, may influence, or are thought to influence their professional decision-making.

In other cases, the giving and acceptance of presents and gifts will be permitted under the following conditions:

- a) They are not illegal;
- b) They are gestures of common courtesy;

- c) They have symbolic rather than economic value or are of little economic value;
- d) They are generally accepted commercial practices in the specific setting or are specifically authorized by SENER Group.

Invitations to hotels, restaurants, public events, shows, social gatherings, and/or other similar events must be interpreted in the context of the provisions of this Code, and according to the corporate procedures developed for this purpose, also taking into account the nature of the personal attention given to the recipient of the invitation.

When in doubt regarding what is acceptable, the offer should be turned down, or, when appropriate, discussed beforehand with your immediate superior or with the Compliance Area through the Ethics Hotline, as explained in section V.II of this Code.

Professionals in SENER Group may not make or offer any payments in cash, in kind, or any other benefit, to anyone at the service of any entity (whether public or private), political party or candidate for public office, with the intention of obtaining or retaining business or other benefits (for the benefit of the company or themselves).

When contracting consultants and commercial agents, the specific procedures that are established to this end must be followed in all SENER Group companies. The Finance Department in each Group company keeps a centralized record of all consultant and commercial agent contracts that are in effect at any given time. Any contracts that are not recorded as such are not valid or binding for SENER Group. The Group's Financial Department must be notified, by each company for which the Group is shareholder, of all identified cases of consultants and commercial agents who are not recommended. This information must be made public and distributed among the various Group companies.

Any employee who undertakes or seeks to undertake any professional activity that may come into conflict with the Group's activities or that violates his or her contractual conditions, either in the public or private sector, requires prior authorization in writing from his or her superior. This authorization can optionally be provided by the company.

When contracting government officials or representatives, whether they are in office or retired, SENER Group must comply with all applicable laws, regulations, and directives including any temporary restrictions that may have been set, and avoiding any potential conflict of interest.

Hiring employees from competitors in order to access confidential information, intellectual and industrial property, or patent-protected secrets of the source company of the person being hired is not allowed.

Everyone at SENER Group must be aware of and respect applicable laws in all these areas, which may vary considerably from one country to another.

Money laundering and irregularities in payments

SENER Group expresses its firm commitment to refrain from undertaking financial practices that could be considered irregular during the course of its relationships with clients, suppliers, competitors, authorities, etc.

SENER Group is committed to carrying out its work in compliance with the regulations that prevent money laundering and funding of terrorism. Specifically, SENER Group and its employees must not:

- a) Convert or transfer goods knowing that they originate from criminal activities or participation in such activities with the intention of hiding or concealing the illicit origin of the goods, or of assisting those who intend to avoid the legal consequences of their actions.
- b) Hide or conceal the true nature, origin, location, disposition, movement or ownership of goods (or rights over goods) knowing they originate from criminal activity or participation in such activity.
- c) Acquire, possess, or use goods knowing, at the time of receiving them, that they originate from criminal activity or participation in such activity.
- d) Participate in any of the above-mentioned activities, conspire to commit such acts, attempt to perpetrate them, or aid, abet, or advise someone to commit them or make it possible for them to be committed.
- e) Deposit, distribute, or collect funds or goods, by any means, directly or indirectly, with the intention of using them, or with the knowledge that they will be used, fully or partially, to commit any terrorism crimes as defined in the Spanish Criminal Code.

IV.II. Clients and suppliers

Fair competition

SENER Group is committed to fair competition and strictly complying with competition laws that apply in any of the countries and markets in which it operates. The legal and natural persons in SENER Group must comply with the decrees, orders, and agreements of the regulatory bodies regarding competition applicable in each case. These laws are complex and their scope may vary from one country to another. In general, they prohibit agreements between companies that could alter competition or the free market, regulate the administration of parent companies, and require specific approval to be obtained before mergers, acquisitions, and the creation of companies, including support from public entities.

These prohibited behaviors include price pacts; bid rigging; the allocation of markets, territories, or customers among competitors; and even boycotting of and discrimination against certain customers or suppliers, unless expressly legitimated.

Likewise, SENER Group undertakes to refrain from advertising that is misleading or denigrates its competition or third parties.

Clients

Clients are essential to SENER Group's development, and we must attain and maintain prosperous, satisfying relationships with all of them.

SENER Group aspires to be distinguished for quality, innovation, and independence as elements that will always form the basis for building excellent services and products, and achieving excellent relationships with our clients that are based on trust and maintained in the long term.

It is important that both the people who have direct relationships with each client, as well as those who work on client projects, make a special effort to understand the specific needs of the client in question and identify the most appropriate solutions in each case to satisfy these needs, without trying to impose choices that could be more beneficial for the Group. A satisfied client is the best guarantee of a long-term, lasting relationship.

Contractors, suppliers, and partners

SENER Group considers its contractors, suppliers, and partner companies to be indispensable agents in achieving its objectives as an organization and for growth. These agents

are essential to the continuous improvement of the quality and competitiveness of SENER Group projects. It therefore seeks to establish relationships with them based on trust, respect, economic efficiency, and mutual benefit.

SENER Group employees who participate in procurement processes for work, services, or supplies are obligated to act with exceptional impartiality and objectivity. This should be done by applying functionality, quality, cost, and deadline criteria, and avoiding clashes between any non-professional considerations or personal interests with those of SENER Group.

SENER Group employees must avoid any kind of interference or influence from third parties that could alter their professional impartiality and objectivity in properly undertaking projects, and in particular in the selection of subcontractors, suppliers, and partners who are best suited to each case. This separation must even be maintained in relation to clients, unless otherwise specified by contract. This obligation especially affects professionals who may make decisions regarding the procurement of supplies and services, and those who may determine the economic conditions of transactions with clients.

Protection of intellectual and industrial property and third party information

In the course of its work and relationships with clients, suppliers, and other partners, SENER Group often obtains or has access to confidential information. The Group must protect said information with the same diligence and care as it applies to its own confidential information.

SENER Group prohibits the introduction and use by the company of protected intangible assets belonging third parties without proper authorization or licensing. SENER Group employees are obligated to respect the legitimate rights of third parties and refrain from intentionally violating or misusing their intellectual or industrial property, trademark, copyrights, etc.

It is specifically forbidden to download software without the appropriate permission or license, and to install or use programs or applications that are illegal to use on computer equipment provided by SENER Group that could damage the image or interests of the company, clients, or third parties, or that could damage the system.

Export control

SENER Group acquires and provides goods and services to a large group of people and entities throughout the world

and undertakes to abide by applicable export laws and regulations in each case. Before beginning a cross-border action for transferring goods, technology, or information, it must be verified that the company has the relevant authorizations.

IV.III. Society

Commitment and collaboration

The relationships of SENER Group companies with the authorities, regulatory bodies, and governments must always be carried out according to cooperation and transparency principles.

SENER Group's social commitment is evident in all its projects, the objectives of which are always aimed at enhancing public wellbeing.

Furthermore, to carry out its work, SENER Group provides employment opportunities to a wide range of people, always under conditions of dignity, justice, and equality, and with the aim of helping them in their professional growth and development.

In addition to these key activities, our social commitment is also demonstrated by our financial donations and support to volunteer actions. This aid comes directly from SENER Group or the SENER Foundation, and its objectives are especially focused on supporting the training and development of people, with more attention given to groups closely linked to engineering and the communities in which the company operates. The activities are channeled by directly allocating resources and collaboration agreements with representative institutions, which must:

- a) Have any necessary internal (or external, depending on the case) authorizations.
- b) Be undertaken with organizations and institutions that have the appropriate organizational structure to ensure that the activities and resources are properly managed.
- c) Be faithfully reflected in the company's records and books.
- d) Not be used as a means of concealing wrongful payments or bribes.
- e) Not be used to make donations to any political party or in favor of its representatives.

Similarly, SENER Group is committed to complying with its fiscal obligations, making the corresponding payments,

withholdings and payments on account required by the local Tax and Social Security agencies in the different areas in which it operates.

Commitment to the environment

SENER Group expresses its respect and concern for protecting the environment and sustainable development, and is committed to undertaking its work and projects with this in mind and applying the necessary resources to address them effectively.

SENER Group works to continuously improve its environmental quality systems and processes. It seeks to progressively reduce the direct and indirect environmental impact of its activities, thus making its work compatible with environmental protection. SENER Group employees must be familiar with and accept applicable environmental policies and regulations in each case, and strive to minimize the direct and indirect impacts of their activities, as well as the impact resulting from use of the facilities, equipment, and work methods made available to them.

In its relationships with clients, contractors, suppliers, or external partner companies, SENER Group must convey these principles to them and promote the fulfillment of applicable environmental procedures and requirements in each case. With this conduct, SENER Group employees must contribute to creating a healthier work environment.

Similarly, it is committed to avoiding the illegal production, import, export, marketing or use of substances that are harmful to the ozone layer, as well as the risks resulting from the manufacture, handling, transport, possession or marketing of explosives, flammable, corrosive or toxic substances, and asphyxiants, or any other materials, apparatus or devices that may be harmful or breach the established health and safety regulations, jeopardising the life, physical integrity, or health of people or the environment.

SENER Group and its people shall not release nuclear energy or radioactive elements that constitute a hazard to people's life or health.

Unauthorized construction and building

SENER Group and its people shall not perform unauthorised development, construction or building work on land protected from development or land earmarked for roads, green areas, public property, or that which is recognised by the law or government as being of value for its landscape, ecology, art, history or culture, or which, for these reasons, is subject to special protection.

IV.IV. Integrity of records

SENER Group undertakes to promote the integrity and transparency of the markets in which it operates. SENER Group employees must maintain the accuracy and reliability of the information appearing in records, thereby ensuring that the economic, financial, and proprietary information provided to shareholders, partners, and government regulators is accurate, timely, complete, and understandable, and that it complies with generally accepted accounting principles.

The recording of transactions and the preparation of financial statements within SENER Group are subject to rigorous checks. This enables compliance with the applicable accounting standards and prevents any kind of fraud in relation to the company's financial information. It is strictly prohibited to create false or misleading records, as well as to keep parallel accounts that are not recorded or to create them dishonestly.

SENER Group employees must accurately and promptly comply with all the internal control procedures established in each of the business units for such purposes.

V. Communications regarding this code

V.I. Body responsible within the Group

All matters related to the Code of Conduct are managed through its Corporate Compliance Body (hereinafter, the "CCB"). Managers from different areas and companies of the Group, whose assignment is approved by the SENER Group's Board of Directors, represent the CCB.

The CCB coordinates all activities, communications and inquiries arising in relation to the Code and its application, such as resolution of incidents and issues, training, handling and investigation of offenses, evaluation procedures, etc., all in accordance with the procedures that apply in each case and respecting the following principles:

- **Independence:** The actions of the CCB are only subject to the authority of SENER Group's Board of Directors through its Audit, Risk Supervision and Compliance Committee.
- **Impartiality:** The CCB guarantees an exhaustive, complete analysis of the circumstances of each inquiry related to this Code, and avoids any kind of arbitrariness in its actions. The resolution of each and every one of the inquiries must always be duly justified.
- **Confidentiality:** : The CCB guarantees that its activities are handled in a discreet and confidential manner, both with regard to the investigations and analyses that are conducted, as well as with regard to the processing of the information compiled. All members of the Area or anyone who collaborates in its processes sign a specific confidentiality agreement in relation to the information they may have access to as a result of their work.
- **Authority:** SENER Group establishes the competence and authority of the CCB to carry out the duties entrusted to it herein. The Area is specifically authorized to require anyone in SENER Group to cooperate in undertaking these duties.

V.II. Reporting information to CCB

Anyone who is aware of situations or events related to offenses, breaches, or conduct that conflicts with this Code should notify CCB through the form provided for this purpose in the "Ethics Hotline" section accessible via the Intranet or the SENER Group's corporate website.

However, the various Group companies may also establish specific communication channels for complaints and suggestions related to the implementation of the Code of Conduct, which will be complementary to the above mentioned channel.

All information sent through the Ethics Hotline will be received and analysed by the appropriate people in the CCB, the only body authorised to perform the preliminary analysis, while maintaining due confidentiality. The CCB will then undertake the necessary measures in accordance with the procedure established for this purpose, in order to give a structured response to the reported information. When appropriate, it will bring them to the attention of the Audit, Risk Supervision and Compliance Committee.

It is assumed that those who send these communications have done so in good faith, and therefore there will not be any negative consequences for them should there not be any actual offenses verified in the conduct that has been reported.

The CCB must process all the information and complaints received, whether the people who have sent them have identified themselves or if they do so anonymously. However, it is always advisable for the person who has reported the offense to identify him or herself, since this facilitates communication and subsequent action while preventing negative interpretations that may sometimes be associated with anonymous complaints.

VI. Entry into force, revision, and development

SENER Group's Code of Conduct enters into force the day it is approved, and will remain in force until its repeal is approved.

This Code will be revised and updated regularly. To do this, suggestions from SENER Group's employees and government bodies will be taken into account, as well as the experiences acquired and the new commitments taken on by SENER Group regarding corporate responsibility and good governance. In this sense, in order to adapt this document to certain regulatory changes, three versions of the Code of Conduct have so far been generated, which were reviewed and approved at the time by the Board of Directors of SENER Grupo de Ingeniería, S.A.:

- First version: approved on 18 December 2012
- Second version: approved on 29 September 2016
- Third version: ad approved opted on 23 July 2019

SENER Group entities shall develop specific procedures to cover areas addressed in this Code of Conduct. Compliance with the Code by all of the companies in which SENER Group is majority shareholder will be verified periodically through both internal and external audits.

SENER IN THE WORLD

www.group.sener