



# **CODE OF ETHICS AND PROFESSIONAL CONDUCT**



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## 1 INTRODUCTION

Grupo IGNIS (or the “Company”) undertakes to carry out all aspects of its activity fulfilling the highest legal and ethical standards. To this end the Company has implemented this Code of Ethics and Professional Conduct (hereinafter, the “Code”) as way to prevent and detect the commission of unlawful acts.

This Code is conceived on the grounds of the mission, vision and values of the Company and aligns with the rest of policies and internal codes of Grupo IGNIS.

All employees, managers, directors of Grupo IGNIS or anyone acting in its name and in general, any member of Grupo IGNIS (hereinafter, the “Employees” or in singular the “Employee”) will adhere to the Code and all other policies and internal codes previously approved by the Company for the sake of avoiding and detecting the commission of any unlawful act.

Grupo IGNIS shall make available for all Employees this Code which shall be subject to the necessary actions for its communication, implementation, training and awareness.

## 2 SCOPE OF APPLICATION

The Code is targeted at Employees during the exercise of their activities regardless of their type of contract defining their professional and/or employment relationship or of the place where they carry out such activity.

Compliance with this Code is mandatory for all Employees and its observance does not exempt from the fulfilment of all other standards to be applied pursuant to the current legislation of the areas where Grupo IGNIS operates.

Provisions contained in this Code and in other Group policies are subject to the regulations governing each country. Should there be any discrepancy between this Code and other Group policies and the regulations governing each area the issue shall be referred to the Compliance Officer of Grupo IGNIS.



## 3 ETHICS AND CONDUCT COMMITMENTS

Please find below the principles of action Grupo IGNIS undertakes to respect and which therefore demands to its Employees in the exercise of their professional and commercial activity.

### 3.1 Business ethics and integrity

<i>Money laundering and financing of terrorism</i>	<ul style="list-style-type: none"><li>✓ Fulfilment of the principles and obligations of the national and international legislation applicable on anti-money laundering and financing of terrorism.</li><li>✓ Identification and knowledge of business partners (suppliers and other third parties contracted) and, if applicable, their beneficial owner.</li><li>✓ Avoidance of any business relation with individuals or entities not fulfilling the obligations with respect to anti-money laundering and financing of terrorism in each country or failing to provide appropriate information with respect to their compliance.</li></ul>
<i>Corruption and bribery</i>	<ul style="list-style-type: none"><li>✓ Compliance with the principles and obligations of national and international regulations applicable to corruption prevention.</li><li>✓ The development or offer, promise or provision directly or indirectly of any payment in cash, kind or any other benefit to any public official, client or partner or any third party with the intention of unlawfully obtaining or maintaining businesses or other advantages is forbidden.</li><li>✓ The acceptance, reception or request of gifts, courtesies, attentions or any other sort of favour from any public or private person or entity in the development of activities is forbidden unless they are symbolic or insignificant or as a sign of courtesy not involving an undue commercial advantage or favour insofar as they do not exceed the maximum value established by the Anticorruption Protocol of Grupo IGNIS for each time and area.</li></ul>
<i>Prohibition to finance political parties</i>	<ul style="list-style-type: none"><li>✓ The use of the funds or goods of Grupo IGNIS as a contribution to political campaigns, candidates or political parties is forbidden.</li><li>✓ The use of the position within Grupo IGNIS or of its goods to influence in third-party's decisions with respect to the support of a specific candidate or political party is forbidden.</li></ul>



<i>Unfair competition</i>	<ul style="list-style-type: none"><li>✓ Meeting regulations on Protection of Competition of all countries where it develops its activity as well as the international regulations applicable.</li><li>✓ Acting according to the principles of loyal competence and respect exercising the best business practices and complying with all applicable legislation to avoid any forbidden practice.</li></ul>
<i>Loyalty and conflict of interests</i>	<ul style="list-style-type: none"><li>✓ Promoting the interests of the Company.</li><li>✓ Within the professional and corporate scope, failing to put personal interests before the interests of Grupo IGNIS or its clients.</li><li>✓ The use of information or business opportunities obtained from the normal development of activities of Grupo IGNIS to obtain a benefit (financial or of any other nature) for oneself, a close relative, close friend or work colleague is forbidden.</li></ul>
<i>Taxation</i>	<ul style="list-style-type: none"><li>✓ Promoting responsible taxation in compliance with the applicable regulation avoiding fraudulent fiscal practices.</li></ul>
<i>Exhaustive and transparent information</i>	<ul style="list-style-type: none"><li>✓ Offering products and/or services adapted to the needs and circumstances of our clients or potential clients.</li><li>✓ Providing true information on products and/or services provided, easing the understanding of the terms, conditions, benefits, risks and costs of products and/or services.</li></ul>



## 3.2 Working practices

Grupo IGNIS undertakes to fulfil the fundamental principles and rights included in the Universal Declaration of Human Rights as well as the rights at work included in the International Labour Organization Declaration on Fundamental Rights and Principles at Work (OIL, 1998) with all ancillary conventions regardless of the country of operation.

At all times, Grupo IGNIS and its Employees shall behave consistently with the guidelines of the United Nations Global Compact, the Principles governing companies and Human Rights, OECD Guidelines for corporations as well as the provisions of all other internal regulations of Grupo IGNIS dealing with issues related to human rights and working practices.

<i>Prohibition of forced labour and trafficking in persons</i>	✓ No form of forced labour will be tolerated including bonded labour, debt bondage, forced labour in prison, slavery or trafficking in persons.
<i>Prohibition of child labour</i>	✓ No form of child labour according to the provisions of Convention 138 of the International Labour Organization (OIL) and the principles of the United Nations Global Compact will be permitted.
<i>Employment conditions</i>	<ul style="list-style-type: none"><li>✓ Rejection of humiliating and degrading treatment, i.e., among others, physical punishment, sexual or racial harassment, verbal or power abuse or any other form of harassment or intimidation.</li><li>✓ Ensure that working hours and remuneration of Employees satisfy their basic needs and of their families receiving remuneration according to the duties developed as well as the respect of legislation and OIL standards applicable to working hours, minimum salary and social security.</li><li>✓ Provision of legal contracts to all employees rejecting any practice far from this principle.</li><li>✓ Meeting the requirements provided in national legislations with respect to security and health at work adopting the appropriate measures to guarantee the security and health at work.</li><li>✓ Ensure the respect of the right to holidays, rest and conciliation of personal, family and professional life as well as the development of actions aimed at the wellbeing of all employees.</li></ul>



	<ul style="list-style-type: none"><li>✓ Carry out training initiatives to qualify and train employees to carry out duties safely, unfold and adapt to the different needs in the performance of their duties.</li></ul>
<i>Freedom of association and collective bargaining</i>	<ul style="list-style-type: none"><li>✓ Guaranteeing trade union freedom, right to association and collection rights of professionals not involving any sort of damage, retaliation or discrimination.</li><li>✓ Protecting in any case the right to strike and the right to collective bargaining, protecting the freedom of operation of workers' organizations pursuant to the statutes and standards without the interference of authorities.</li></ul>
<i>Inclusion and diversity</i>	<ul style="list-style-type: none"><li>✓ Promoting and respecting actively an inclusive work environment fostering diversity in its different dimensions such as: skills, cultural, gender, generational or with respect to sexual orientation.</li></ul>
<i>Equal treatment and opportunities</i>	<ul style="list-style-type: none"><li>✓ Fostering equal treatment under a policy of zero tolerance of abusive or hostile conducts such as discrimination by race, sex, sexual orientation, beliefs, ideas, religion, social origin, disability, nationality, age, memberships or any other unlawful criteria as per the current legislation or harassment at work or of any other type.</li><li>✓ Guaranteeing equal opportunities between Employees ensuring the selection and promotion of Employees on the grounds of their merits and capacity and receiving the same salary for works with the same value.</li></ul>
<i>Professional development and team spirit</i>	<ul style="list-style-type: none"><li>✓ Easing professional growth of the whole team.</li><li>✓ Promoting a collaborative methodology between our Employees creating an ideal environment where people may express their ideas and make their own decisions to aid the organization in the accomplishment of global goals.</li></ul>



### 3.3 Relations with Public Authorities

<i>Collaboration with Public Authorities</i>	<ul style="list-style-type: none"><li>✓ Collaborating with any public body or entity either administrative and/or judicial for it to develop its duties within a framework of collaboration and respect without prejudice of keeping confidentiality always pursuant to its legal system.</li></ul>
<i>Management of subsidies</i>	<ul style="list-style-type: none"><li>✓ Guaranteeing the veracity of the documentation filed before administrations or institutions.</li><li>✓ Maintaining full collaboration and dialogue with administrations or institutions responsible.</li><li>✓ Diligently managing the funds received guaranteeing and evidencing their traceability from the collection of the funds to their application for the purposes for which they were assigned.</li></ul>





### 3.4 Conflicts of interest

For these purposes, a conflict of interest is understood as a case in which the personal interests of employees subject to Grupo IGNIS Policies directly or indirectly collide.

<b><i>Loyalty and good faith</i></b>	<ul style="list-style-type: none"><li>✓ Act with responsibility, good faith and loyalty to the Company in compliance with the principles and values of Grupo IGNIS as set out in its Policies and Codes.</li><li>✓ To be guided by freedom of judgement and loyalty to the Company, other Employees and customers, regardless of their own interests and those of their related parties.</li></ul>
<b><i>Abstention and communication</i></b>	<ul style="list-style-type: none"><li>✓ Not participate in or influence decision-making where their personal interests may conflict with those of Grupo IGNIS.</li><li>✓ Refrain from accessing confidential information that is submitted in the context of a process where there is a conflict of interest.</li><li>✓ Communicate any situation that could lead or has already led to a direct or indirect conflict of interest to the person in charge and to the Sustainability and Compliance area for appropriate assessment and management.</li></ul>
<b><i>Conflict of interest assessment</i></b>	<ul style="list-style-type: none"><li>✓ Impartiality and objectivity in assessing the existence of a potential conflict of interest.</li><li>✓ Collaborate in the resolution of possible conflicts of interest.</li><li>✓ Transparency towards any authority, regulatory or supervisory body requiring information regarding conflicts of interest.</li></ul>



## 3.5 Management of information

<i>Confidentiality and privacy</i>	<ul style="list-style-type: none"><li>✓ Guaranteeing confidentiality, the appropriate use and privacy of the information held of Grupo IGNIS, its employees and third parties with which it interacts undertaking to provide the necessary resources to safeguard privacy. All of it without prejudice of legal, administrative or judicial provisions demanded for the filing with entities or individuals or disclosing them.</li></ul>
<i>Use of electronic devices, email and social media</i>	<ul style="list-style-type: none"><li>✓ The use computers and electronic devices made available for purposes alien to the professional use applicable is forbidden.</li><li>✓ The use of emails and any other written document shall exclusively have professional purposes having to be written accurately, exhaustively and professionally.</li><li>✓ Making responsible use of professional social media fulfilling the internal regulations of Grupo IGNIS specially the provisions of the Policy of Use of Technological Resources.</li></ul>
<i>Data protection</i>	<ul style="list-style-type: none"><li>✓ Complying with the obligations provided for in Organic Law on Data Protection (or regulation in force from time to time) as well as the EU and International regulations applicable guaranteeing the recognition of the rights (to information, access, rectification, etc.) legally envisaged.</li><li>✓ It is strictly forbidden:<ul style="list-style-type: none"><li>• The assignment of personal data (either of clients, suppliers, Employees or third parties) to unauthorized individuals.</li><li>• The undue access to such data by unauthorized individuals or for purposes different from the internal professional use.</li></ul></li></ul>
<i>Intellectual and Industrial Property</i>	<ul style="list-style-type: none"><li>✓ Respecting industrial or intellectual property of Grupo IGNIS and of third parties, not making use of third-party creations either in its own benefit or in the benefit of Grupo IGNIS without being certain that the rights allowing their use have been duly acquired.</li><li>✓ It is expressly forbidden to make undue use of brands, patents, <i>know-how</i>, logos, audiovisual content or any other sort of creation.</li></ul>
<i>External communication</i>	<ul style="list-style-type: none"><li>✓ Declarations before the media shall be made without exception following contact with the Communication Department and through those people which may have been specifically authorized for such purpose to guarantee the</li></ul>



	consistency of the communication made and the fulfilment of the policies in force in Grupo IGNIS.
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### 3.6 Environment, quality, security and health

<i>Compliance with the law</i>	<ul style="list-style-type: none"><li>✓ Guaranteeing the fulfilment of specifications, rules and internal codes of Grupo IGNIS as well as the legislation and regulation applicable with respect to Quality, Environment and Safety at work in all services of Grupo IGNIS.</li></ul>
<i>Safe and respectful products and services</i>	<ul style="list-style-type: none"><li>✓ Providing services and products which attending to their nature, are safe and respectful with the environment.</li></ul>
<i>Preventive management focused on continued improvement</i>	<ul style="list-style-type: none"><li>✓ Establishing actions and programs oriented to continued improvement, prevention of pollution and prevention of damages and deterioration of health both in the quality of the services, the protection of the environment and the safety of people.</li><li>✓ Contributing to a better management of the environment boosting awareness, innovation and use of the best technologies available.</li></ul>



## 3.7 Sustainability

<i>Management based on our groups of interest</i>	✓ Contributing to the sustainable development of the society listening to the concerns and expectations of groups of interest, who are answered having as reference the values of Grupo IGNIS.
<i>Contribution to energy transition</i>	✓ Boosting the development of a more efficient and sustainable energy model contributing to a more agile and fairer energy transition.
<i>Management of the supply chain</i>	<ul style="list-style-type: none"><li>✓ Maintaining permanent and transparent contact with all members of the supply chain in order collaborate together in the enhancement of the services of the Group as a whole (both in technical, environmental, quality, risk prevention and social aspects), at the same time and it develops long-term relations based on trust and mutual respect.</li><li>✓ Demanding to all members of the value chain the fulfilment of the specific requirements of the Code of Conduct for Suppliers of Grupo IGNIS.</li></ul>
<i>Action with local communities</i>	✓ Contributing to the sustainable development of local communities where we operate, promoting the respect, participation, local employment and promotion of cultural, environmental and/or social initiatives.
<i>Governance</i>	✓ Promote best governance with balanced and diverse governance bodies to develop their activity in an ethic and sustainable manner.



### 3.8 Digital disconnection

To ensure an appropriate balance between work, personal and family life, Grupo IGNIS has established the following best practices in terms of digital disconnection:

<b>Meetings</b>	<ul style="list-style-type: none"><li>✓ Meeting times should be between 9:30 and 17:30 as far as possible.</li><li>✓ For these purposes, the specific timetables of Employees working in a time zone other than Spanish time will be taken into account.</li></ul>
<b>Communications</b>	<ul style="list-style-type: none"><li>✓ As a general rule, mails, team messages or any other communications shall be sent between 9:00 and 18:30</li><li>✓ For these purposes, the specific timetables of Employees working in a time zone other than Spanish time will be taken into account.</li><li>✓ In the event that communications are sent outside working hours, a reply will not be required until the start of the new working day, except in urgent situations.</li></ul>

### 3.9 Legal compliance

As a responsible Company, Grupo IGNIS is committed to the respect and compliance of all laws, regulations and other legally bounding standards applicable and expects its Employees to act legally, ethically and professionally in the development of their duties.

The commitment to fulfil the legislation in every place where Grupo IGNIS develops its activity is the utmost and essential premise to maintain and improve trust with citizens and society and to exempt companies from the eventual responsibility consequence of the breach of regulations by Employees.



## 4 COMPLIANCE WITH THE CODE

Employees in the performance of their duties shall not only strive to do what is legally required, but also what is in accordance with the corporate social responsibility of Grupo IGNIS in order to ensure that the principles and standards set out in this Code govern the overall operations and day-to-day running of the Company.

The Company shall implement all resources necessary for everyone to whom this Code applies, to act always honourably assuming the following responsibilities:

- Read, know and understand the Code, as well as all other Grupo IGNIS policies, principles and procedures aimed at developing its commitments, in order to ensure adherence to all the requirements of the Code
- Comply with each of the points contained in Grupo IGNIS's Code, policies, principles and procedures.
- Ensure that other employees affected by this Code and other Grupo IGNIS policies, principles and procedures are committed to and comply with it.
- Demonstrate day-to-day commitment to the principles of the Code and other Grupo IGNIS policies and procedures and set an example to other employees.
- Avoid any situation that could lead to illegal practices or practices contrary to the basic principles of action contained in this Code of Ethics.
- Cooperate with compliance and audit bodies by providing the information requested and being true to the facts.
- Consult the Compliance Officer when in doubt as to how to act in accordance with the provisions of this Code and other Grupo IGNIS policies, principles and procedures.
- Report any incident arising from knowledge or suspicion of non-compliance with this Code and other Grupo IGNIS policies, principles and procedures.

The breach of the provisions in the Code may be the object of legal actions. In the event of breach of the provisions of the Code, the Company and its Employees shall react immediately subject to the framework allowed by the regulation to be applied, implementing all legitimate measures applicable.

The response will be consistent with the seriousness of the facts regardless of the hierarchy of the people involved.



## 5 QUERIES AND COMPLAINTS

Grupo IGNIS makes available to all its Employees, as well as for third parties, the Internal Information System (hereinafter, "Whistleblowing Channel") so that any interested party may report incidents, consultations, doubts or complaints regarding non-compliance with the commitments of this Code, as well as other applicable internal and external regulations.

The Whistleblowing Channel is available on Grupo IGNIS's corporate website for use by all Employees and third parties who require it.

Any Employee who has knowledge or reasonable grounds for reasonable suspicion of a breach of this Code or of conduct or acts contrary to the law should contact the Compliance Officer immediately through the Whistleblowing Channel.

Grupo IGNIS's Whistleblowing Channel complies with the requirements and guarantees established in Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, guaranteeing:

- Confidentiality of information.
- Lack of retaliation against the informant.
- Integrity in the traceability and handling of complaints and/or queries made in good faith.

The Compliance Officer shall initiate an investigation in the event that indications of the commission of an irregularity covered by the Code and/or the applicable regulations are detected and shall notify the informant and, if applicable, the reported person of the initiation of such investigation

## 6 APPROVAL AND OPERATION OF THE CODE

This Code represents an adaptation of the Code approved on 12 November 2021 which it supersedes and has been approved by the Board of Directors of Grupo IGNIS on April 8<sup>th</sup>, 2025.

Since its approval the Code is included in the regulations of Grupo IGNIS being in force until its annulment, revoke or update.





The Code is subject to periodical revision and update processes in order to adjust it to the applicable regulations from time to time, to the social and professional reality and context of the Company.

In the event of any update of the Code the interested parties will be timely informed using the communication mechanisms provided for by Grupo IGNIS.