



CODE OF CONDUCT



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INTRODUCTION

The purpose of this Code of Conduct (hereinafter the "Code") is to reflect the corporate culture of Haizea Wind Group ¹(hereinafter "HWG"), based on ethics, understood as a way of acting individually and collectively in compliance with applicable external and internal standards. Likewise, the Code seeks to facilitate the development of daily operations in an ethical, serious, professional and honest environment in accordance with the principles of good governance, good faith in contracts and full respect for the law.

Corporate ethical culture

Corporate ethical culture is a fundamental element within HWG's Criminal Risk Prevention System, evidenced by the express commitment of all Obligated Subjects (as defined below) to comply with applicable legislation and corporate values and principles within HWG.

The administrative bodies of the companies that make up HWG are responsible for ensuring the ethical culture. To this end, they apply the principle of due control to prevent and detect bad practices, including especially those that may constitute a criminal offence.

For this reason, the administrative bodies of the companies that make up HWG are responsible for disseminating and promoting the culture of compliance in each of them, channelling this message from above to all Obligated Subjects. Only in this way can the importance of the design, establishment and management of the Criminal Risk Prevention System for the sustainability of HWG be transmitted to the entire corporate structure.



SCOPE OF APPLICATION

This Code applies to all HWG members:

- To all employees , ²managers , and heads of departmental units, regardless of their professional category and geographic location.

¹ Haizea Investments and its dependent companies, Haizea Bilbao, Haizea Tecnoaranda, Haizea Grupo WEC (Composed of Haizea WEC Fundificación SL, Haizea WEC Mecanizado SA, Haizea Gestión Superficial, SL, Conecta *Logistics & Engineering* SL, WEC *Business & Technology Center* , AIE) , Haizea Breizh and Haizea Sica.

²Any natural person who maintains an employment relationship with any of the HWG companies, regardless of their employment arrangements.

- To the **representatives** ³, **administrators** and members of the administrative bodies (members of Committees, Directorates or similar collegiate body that performs management or direction functions) of the companies that make up HWG.

From now on, we will refer to all of them as the “ **Obligated Subjects** ”.

To this end, HWG will implement an appropriate training policy, in accordance with the level of risk associated with each job.

In addition, compliance with the Code will be required by subcontracting companies, intermediaries, agents, external consultants and any other third party that has business, commercial or service provision relations with HWG when they lack internal procedures or codes of conduct equivalent to those implemented internally at HWG (hereinafter, “ **third parties** ”).

Obligated Subjects have the obligation to know and comply with the Code, as well as to collaborate with its compliance, being proactive when it comes to showing and promoting ethical behavior among their own colleagues in their work environment, supporting others if necessary and communicating, through the **HWG Internal Information System** ([Internal Information Channel \(CII\)](#)), any fact or suspicion of behavior contrary to this Code and the rest of HWG's internal policies and procedures.



ETHICAL PRINCIPLES AND COMMITMENTS

HWG is firmly committed to the highest principles of ethical conduct and compliance with applicable national and international laws. This translates into the following principles:

- Culture of regulatory compliance, strict respect for the applicable rules and behavior that govern its activity.
- Honesty and integrity through ethical, transparent and upright actions that combat corruption and fraud in all their forms.
- Professionalism and excellence in service delivery.
- Responsibility in the use of means and resources.
- Sustainability and commitment to the environment.

Compliance culture

³All persons who hold powers of representation of any of the companies that make up HWG and those persons who, de facto or formally, have powers of administration of any of the companies that make up HWG.

HWG carries out its activity in strict compliance with the provisions established in the applicable legal system (general and sectoral), as well as the internal regulations (Policies, procedures, etc.) that govern its actions in the different areas. To this end, it provides the necessary means and training so that the applicable rules and principles of conduct are known and understood.

HWG attaches particular importance to, among others, the standards relating to:

➤ **Human Rights :**

All Obligated Subjects are obliged to comply with and respect the Human Rights of people, especially those related to health, physical and emotional integrity, dignity and freedom, and to refuse to participate directly or indirectly in any activity that could cause harm to them. In this sense, Obligated Subjects must comply with and respect the Fundamental Rights and Public Freedoms included in the Universal Declaration of Human Rights, as well as in the Spanish Constitution.

➤ **The dignity of people :**

HWG does not tolerate harassment, abuse of authority, or conduct that creates an inappropriate or discriminatory work environment. As set out in the HWG Anti-Harassment Protocol, all Obligated Subjects must reject and prevent intimidation, harassment of any kind, whether psychological or moral, and/or *mobbing*, as well as any conduct that may create a detrimental work environment, abuse of authority, lack of respect or consideration, or any other act of physical or verbal aggression. Obligated Subjects must treat each other fairly and equitably, and must demonstrate full respect for the diverse cultures, religions, sexual orientations or identities, opinions and marital status of people.

➤ **The rights of workers, including the prevention of occupational risks :**

HWG considers the occupational health and safety of workers to be essential to achieving a comfortable and safe working environment, with the continuous improvement of working conditions being a priority objective. Therefore, Obligated Subjects will at all times respect the preventive measures applicable in matters of occupational health and safety, using the resources established by the organization and ensuring that the members of their teams carry out their activities in safe conditions.

No subcontracting will be carried out with companies that do not respect the rights of workers, the provisions relating to health, safety and hygiene at work, including those relating to the prevention of occupational risks, or that have hired personnel whose employment situation does not comply with the provisions of current legislation.

➤ **Dedication :**

Parties shall work subject to the provisions of their contracts and the regulations applicable to them. HWG shall be governed by applying strictly professional criteria, requiring its employees to be serious, dedicated, responsible and loyal.

Obligated Subjects may carry out other professional activities outside of those carried out for HWG, except in cases where exclusivity is contractually agreed. Any activity carried out that could conflict with the activity that the Obligated Subject carries out at HWG must be communicated to the hierarchical superior as soon as it is identified.

However, Obligated Subjects must give priority to the exercise of their functions in HWG and may not provide professional services to other entities or companies competing with or in their purchasing and/or subcontracting chain, whether paid or not, regardless of the relationship on which they are based. Any exception to this point will require authorization from the HWG company to which the Obligated Subject belongs.

The participation of Obligated Subjects as trainers in external courses or seminars will require express authorization from the hierarchical superior.

Honesty and integrity: against corruption and fraud in all its forms.

Obligated Subjects shall make their best efforts in the optimal exercise of their functions and shall develop a correct, impartial and honest professional conduct, in accordance with the principles of this Code and the provisions of the **Anti-Corruption Policy and the Sponsorship Policy of HWG**. For this reason, the administration and management of HWG has been entrusted to the most suitable persons due to their knowledge, qualities, experience and leadership capacity in accordance with the principles of good governance.

HWG is fully committed to preventing corruption by taking the necessary measures to avoid situations in which Obligated Subjects, in particular, directors and managers, may be involved in corruption processes or criminal investigations.

In any case, Obligated Subjects must observe the following rules of conduct:

➤ **Relations with Public Administrations :**

The relationship with public administrations and representatives is the exclusive responsibility of persons formally designated for this purpose, in full compliance with administrative legislation, particularly that relating to public procurement, subsidies and other public aid and transparency of Public Administrations.

➤ **Political or associative activities :**

HWG is inspired by a principle of political neutrality. The association, membership or personal collaboration of the Obligated Subjects with political parties or with other types of entities, institutions, foundations or associations with public purposes that exceed those of HWG or contributions to them, will not imply the assumption of commitments for HWG.

➤ **Donations and sponsorships :**

Donations and sponsorships are made with the prior authorization of the Compliance Committee, which must analyze and evaluate these contributions and, if appropriate, approve or deny them.

➤ **Supplier Relations :**

Obligated Parties must avoid any kind of interference that may affect their impartiality or objectivity in their relations with suppliers. In addition, exclusivity relationships must be avoided whenever possible.

➤ **Customer Relations :**

HWG employees and representatives must compete in the marketplace with the utmost effort, but always in a fair manner. HWG and its representatives must never provide false information about products and services, even if this means losing a sale.

HWG's goal is to communicate clearly and accurately so that clients understand the terms of contracts, including performance criteria, schedules, pricing and responsibilities. Employees, as well as their agents and representatives, will not cooperate under any circumstances with any form of corruption.

HWG does not collaborate with any organization or individual that violates the general rules of business ethics or engages in unfair competition practices or violations of industrial or intellectual property rights.

➤ **Gifts :**

HWG prohibits Obligated Subjects from carrying out any practice that could entail the acceptance or offering of illegal advantages or incentives for the purpose of influencing the making of a decision of any kind by companies or persons belonging to the public or private sector, specifically, and without limitation, gifts, promises, bribes, excessive attentions or hidden commissions.

However, this limitation will not include (i) promotional items of little value and (ii) normal invitations or hospitality that do not exceed the limit of three hundred euros (€300) established by HWG.

Obligated Subjects who give or receive such entertainment from third parties are expected to do so with good judgment in each case, taking into account the specific circumstances, including the type of gift or entertainment, its purpose, its form, the positions of the persons giving or receiving it, the context in the business, reciprocity, applicable rules and social custom. In any case, they will be avoided during open negotiation processes.

➤ **Conflicts of interest :**

conflict of interest " exists when the decision to be taken in the professional field is influenced not by valid business criteria, but by personal and family interests seeking an individual benefit that in turn causes harm to HWG.

HWG cannot accept the existence of a conflict of interest between the Obligated Subjects, therefore, they will abstain from participating (whether in decision-making or in representation, management or administration functions) in transactions of any kind that are linked or related in any way to their personal or family interests, always having to inform the Compliance Committee of this situation through the HWG Internal Information System (Internal Information Channel (CII)). Consequently, and without prejudice to the aforementioned general rule, the Obligated Subjects:

- They will not give special treatment or conditions of work or of any kind based on personal or family relationships; and
 - They may not acquire, either directly or through related persons, assets or property belonging to HWG, except in transactions that are the result of an open and public offering process. The same restrictions will apply in the event of the transfer to HWG of assets or property belonging to Obligated Entities or persons related to them.
- **Tax compliance :**
Avoiding the application of undue tax advantages and facilitating, diligently and as soon as possible, the tax information that the Authorities may request.
- **The rigorous application of any public aid or subsidy funds received by the entity for the purposes for which they were granted .**
- **Bills :**
Care will be taken to ensure that expenditure is strictly in line with needs. Special attention will be paid to the collection and calculation of allowances.
- **Promoting neutrality in competition :**
HWG undertakes to act in accordance with the provisions of the Anti-Competition and Unfair Competition regulations, both national and European law, within the scope of its activities. In particular, HWG undertakes to avoid all those actions that, included in said regulations, are considered by the legislator as prohibited conduct. In determining the prices and conditions of the operations in which it intervenes, it will comply with the applicable regulations according to the type of operation, with full respect for competition law.
- **The rules regarding safety in the use of the products and services provided by HWG .**

Obtaining information, privacy and duty of confidentiality

Obligated Subjects, in the optimal exercise of their functions, must comply with the legally established obligations of privacy and confidentiality, as well as with the following provisions:

- **Media :**

Obligated Parties shall refrain from transmitting, on their own initiative or at their request, any information or news about HWG or third parties to the media. In case of doubt, they shall contact the Compliance Committee.

➤ **Use of social networks :**

Obligated Subjects shall avoid behaviour that may pose a reputational risk to HWG or any of its member companies, taking special care with the information they share about HWG.

➤ **Professional secrecy :**

Obligated Subjects shall maintain strict professional secrecy regarding any data or information they become aware of as a result of the exercise of their professional activity, whether it comes from or refers to clients, to the HWG company itself of which they are a part and its activities, to other employees or to directors or administrators of this or any other third party.

Even though they do not fall within the scope of this Code, HWG's external advisors to whom confidential information is provided are required to agree to confidentiality and are warned that their use is prohibited under the terms of this Code.

confidential information " means :

- Any information that, not being public in nature, affects HWG's business in its broadest sense, such as customer details, market, financial data, methods or processes and,
- information provided to HWG by third parties that is subject to confidentiality commitments.

Regarding the disclosure of this information, two assumptions must be distinguished:

- When the disclosure of confidential information is necessary for the performance of an activity, all possible precautions and measures must be taken to protect its confidential nature;
- When such confidential information also concerns a third party, it may only and in any case be disclosed with the approval of such third parties.

- **Personal data** : Obligated Subjects who, by reason of their position, handle personal data according to the applicable legislation, may only use such data in accordance with the provisions of said legislation; and they will do so in compliance at all times with the provisions of the **HWG Personal Data Protection Policy** , as well as the rest of the internal procedures implemented in each of the companies that comprise it. Likewise, the processing of personal data must be in accordance with the purpose for which it was collected, strictly applying the criteria of security, truthfulness and accuracy resulting from the applicable legislation, ensuring the utmost respect for privacy. Data relating to remuneration, evaluations and medical examinations will be treated with special care.

- **Files and records** : files, documents and records, whether computerised or not, constitute important assets of the Group, and appropriate precautions must therefore be taken to avoid any risk of loss, destruction, unauthorised use or modification thereof. Files, documents and records must be used, stored and organised in accordance with HWG's internal rules and the applicable regulations in force at any given time, which will be made known to the Obligated Subjects at the time of their incorporation and throughout their relationship with HWG.

The provisions of the three preceding sections are understood without prejudice to the attention to requirements formulated by competent authorities according to the applicable regulations.

Responsible use of media and resources

Obligated Subjects shall observe the following commitments:

- **Assets** :
They will protect and care for the assets they have or to which they have access, not using them more than is necessary for their functions and refraining from any disposal or encumbrance without the appropriate authorization.
- **Email and other means of communication** :
They shall not make inappropriate use of email, Internet access or other similar possibilities made available to them by HWG. Connections and communications made through the Internet, email and similar means must always be for strictly professional purposes, and personal or extra-professional use is prohibited. It is absolutely forbidden to send or access information of an illegal nature, as well as any other information that carries xenophobic, racist, sexist or discriminatory connotations. In particular, among other actions, the installation or display of screensavers, photos, videos or animations within the work environment that may be offensive or offend the sensibilities of other employees or collaborators of HWG will be prohibited.
- **IT and telematics** :
Computer and telematic means must be used for strictly professional purposes, and personal or non-professional use thereof is absolutely prohibited. All security, confidentiality and use regulations for computer and telematic means established by HWG must be respected. For its part, HWG will have the power to control and review the use of computer and telematic means made available to Obligated Subjects and which are its exclusive property.
Once the contractual relationship with HWG has ended, the Obligated Subjects will not be able to access any of the computer and telematic means, and must return any that may be in their possession.
- **Software** :

software resources and systems, taking extreme security measures and ensuring compliance with internal security regulations, in particular, prohibitions on the installation and downloading of software and applications unrelated to the professional activity of the HWG Obligated Subject.

➤ **Intellectual property and industry/ and trade secrets :**

Before using such information, they must check whether, in accordance with applicable laws and with the licenses and authorizations obtained by the HWG company in question, they can effectively make use of any intellectual or industrial property rights. Likewise, they will not use the image, name, trademarks or any distinctive uses of HWG except for the proper development of their professional activity. HWG will protect its industrial and intellectual property rights and will respect the rights of third parties in this area.

Through the capacity for innovation and the work of the Obligated Subjects, HWG generates ideas, services, strategies and business opportunities, which play a key role in its competitiveness, and therefore they must be protected from being known and disclosed. The Obligated Subjects will respect the intellectual property and the right of use that corresponds to HWG in relation to the courses, projects, knowledge, processes, technology, *know-how* and, in general, other works and projects developed or created in HWG, whether as a result of their professional activity or that of third parties. Therefore, they will not use them outside of it and will return all the material on which they are based when required to do so.

Likewise, enhanced diligence and care measures must be adopted when dealing with information related to the industrial and intellectual property rights of clients or third parties.

Reproduction of third-party material protected by intellectual or industrial property rights, as well as the use of *software* and computer programs without the corresponding license, is strictly prohibited.

Professionalism and excellence in service delivery

HWG aims for the highest level of satisfaction among its stakeholders. This satisfaction is achieved by applying the values of excellence, teamwork, innovation and efficiency in the management of its resources for the provision of services included in its corporate purpose.

Exceptional employee quality is a cornerstone of HWG and provides a significant competitive advantage. HWG will therefore make every effort to retain and recruit the most qualified people, maximising their opportunities for success through workplace motivation, training and professional development.

HWG is committed to maintaining a healthy work environment, enriched by diversity and characterized by open communication and ongoing dialogue, as well as honest and fair treatment.

To this end, HWG assumes that the only valid criteria for evaluating its professionals are those that exclusively measure their performance, effort and talent, completely independent of any personal or social condition or circumstance.

Consequently, people involved in selection processes, hiring, assignment of tasks, professional promotion, transfers, dismissals, social benefits, training programs, social programs, permits, etc. will be guided objectively in their actions and decisions, with an open attitude towards diversity, promoting equal treatment and opportunities at all times.

Finally, HWG will be governed at all times by applying strictly professional criteria, requiring its employees to be serious, dedicated, aspire to a job well done, responsible and loyal.

Sustainability through commitment to the environment

Respect for and preservation of the environment are one of the foundations of HWG's actions, which is manifested in compliance in all areas of its activity, through prevention, minimisation of adverse environmental impacts, conservation of natural resources and the achievement of the best environmental practices.

In this sense, HWG must (i) promote the protection and respect for the environment, (ii) integrate this objective into the development of its activity and (iii) promote the development of good environmental practices. To this end, HWG will make efforts to ensure responsible use of resources and to properly manage waste, minimising as far as possible the generation of waste in its economic activity.

HWG is also committed to socio-economic development in its field of activity, especially with its stakeholders. Finally, it embraces the principles of good corporate governance as an element that provides added value to the entity, improving the efficiency of its processes and its relationship with stakeholders, contributing decisively to its sustainability.



INTERNAL INFORMATION SYSTEM

Through the HWG Internal Information System, which integrates the [Internal Information Channel \(CII\)](#)⁴, Obligated Subjects may submit communications regarding (i) any violation or non-compliance with this Code of Conduct and the internal regulations approved by Haizea Wind Group, and (ii) any suggestion, doubt or question regarding its interpretation and application.

Communications made through this will be managed by the SII Manager in accordance with the provisions of the **Internal Information System Policy**, and the Procedure for Managing Information Received from HWG.

⁴ <https://worldlex.net/es/user/r/communication-pipeline/CC28C6/home/>.



COMMUNICATION AND DISSEMINATION

It is the responsibility of the administrative bodies of the companies that make up HWG to disseminate this Code and ensure that all Obligated Subjects are properly aware of and comply with it, interpret it and exercise the rest of the functions attributed to it therein.

It is, in turn, the responsibility of the directors and heads of each departmental unit to ensure compliance with the Code in their respective areas.

The Compliance Committee, by delegation of the administrative bodies of the companies that comprise HWG, will ensure the correct communication and monitoring of compliance with the Code by all employees and persons who for any reason must be subject to its rules.

The HWG company of which each Obligated Subject is a member will keep a record of the training and information on the Code and the documentation that develops it, together with the acknowledgments of receipt.

The Code will be accessible and published on the HWG website for full availability and knowledge by Obligated Subjects and third parties.



DISCIPLINARY REGIME

It is the responsibility of Obligated Subjects, regardless of their role within HWG, to ensure that this Code is respected and complied with. No type of non-compliance with this Code will be tolerated or ignored and no employee who reports suspicious, illegal or contrary activities to this Code may be sanctioned or retaliated against in any way for this reason.

Any person subject to this Code who in any way violates its principles will be subject to disciplinary measures, which may vary depending on the case, the severity of the breach and proportional to it, but which could lead to the termination of the relationship with HWG. All of this without prejudice to any administrative or criminal actions that may also result from this.



APPROVAL AND UPDATE

This Code of Conduct was approved by the governing bodies of the companies comprising HWG on 16.07.2024.

The Code will be duly updated when the applicable regulations so require or, at the initiative of the Compliance Committee, when necessary to meet a specific need.