GENERAL CODE OF CONDUCT

QUADRANTE GLOBAL, S.A.U.

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VERSION TABLE

Version	Date	Type	Brief description of change
V_1	2/2/2017	Approval	
V_2	18/01/2018	Amendment	Amendment of the OCI structure. Change of reporting channel.
V_3	05/03/2020	Amendment	Names of the data protection (LOPD) documents that have changed have been updated.
V_4	30/12/2020	Amendment	Change of name and logo.
V_5	01/03/2024	Amendment	Replacement of the Reporting Channel with the Internal Information System
V_6	14/10/2024	Amendment	Review of the document. Introduction of inclusive language.
V_7	04/03/2026	Amendment	Change of name and logo.
V_8	30/05/2026	Amendment	Change of style and format
V_9	01/10/2026	Amendment	Change of style, format, logo and corporate name

1 INTRODUCTION

1.1 Purpose, mission and vision

The General Code of Conduct (hereinafter, the "Code" or the "GCC") aims to provide the workforce, collaborators, suppliers, clients and, in general, any entity or person that has a professional and/or economic relationship with **QUADRANTE GLOBAL, S.A.U. and any of its subsidiaries** (hereinafter, "the Entities") with the guidelines that should govern their conduct, in order to achieve a compliance environment based on respect for current legislation and internal procedures, as well as on the requirement of ethical, responsible, professional and diligent behavior in which integrity, honesty and loyalty take priority.

It also responds to the need to **prevent criminal or unlawful conduct,** by virtue of the new criminal-prevention obligations imposed in the field of the criminal liability of legal entities. In certain areas that require detailed or specific regulation, the GCC will be supplemented by regulatory compliance procedures and protocols or good business practices.

QUADRANTE GLOBAL, S.A.U. and any of its subsidiaries are focused on the continuous pursuit of cost-optimized and sustainable solutions, with technical excellence. We seek to assist our clients exceptionally, creating value in a professional, diligent and socially responsible manner, in accordance with the strictest ethical principles and based on our values: excellence, high standards and determination, respect, cooperation, integrity and flexibility.

Our vision is to become a leading engineering consultancy at national and international level, focused on overcoming the global sustainability challenges of the energy transition, positive mobility and the development of Sustainable Cities, acting globally while we transform ourselves from within to face and take advantage of the disruption of the construction industry.

1.2 Scope of application

The GCC applies to the members of the governing bodies and to all employees and collaborators of "the Entities", regardless of their hierarchical level or geographical or functional location.

Those professionals of "the Entities" who, in the performance of their duties, manage or lead teams of people must also ensure that the professionals reporting directly to them know and comply with the GCC, and must lead by example, acting as role models of conduct.

Likewise, and to the extent that it affects them, the GCC also applies to external collaborators, suppliers and clients with whom professional and/or economic relationships are maintained.

In the case of participation in Consortia, Temporary Joint Ventures (UTEs) or Joint Ventures, the representatives of "the Entities" in them must ensure the adoption of values similar to those of this GCC.

This Code has been approved by the Board of Directors and shall be mandatory for the persons and entities mentioned in this section until it is repealed.

2 OUR VALUES AND PRINCIPLES

2.1 Values

These are the pillars on which all our activity rests.

2.1.1 Excellence, high standards and determination

We undertake, with every piece of work, to exceed our clients' expectations, anticipating their needs with innovative, efficient and sustainable solutions, and responding to every problem with determination, encouraging excellence in our workforce.

2.1.2 Integrity

Integrity is the basis of all the commitments we make, ensuring transparency in communication, responsible decision-making, honesty and integrity in our relationships and the defense of an ethical culture of safety and general well-being.

2.1.3 Respect

The defense of Human Rights and fundamental freedoms, as well as of the Environment, is present throughout our structure, with decision-making based on sustainability, fairness, non-discrimination and equal opportunities.

2.1.4 Collaboration

We believe that success is the result of collaborative work, and we therefore involve all affected parties in our projects, rejecting individualism.

2.1.5 Flexibility

We are a flexible and versatile team of professionals, adapting to the local contexts in which we work and to the changes that arise in an agile and simple manner.

3 ETHICAL PRINCIPLES OF QUADRANTE GLOBAL

These are the rules of conduct that all employees and persons related to us must know and apply when performing their duties.

3.1 Fairness, equal opportunities and non-discrimination

We promote a culture of **zero tolerance for any type of discrimination**, whether on grounds of race, color, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political opinions, religion or any other personal, physical or social condition of our professionals, upholding fairness in relationships and equal opportunities.

You must not allow anyone to be discriminated against on any of these grounds. If this occurs, you must report such conduct immediately to the Control Body through the Internal Information System, as explained in this document.

3.2 Respect for people

We uphold the utmost respect for **Fundamental Human Rights and Public Freedoms.**

Harassment, abuse, intimidation, lack of respect and consideration, or any type of physical or verbal aggression are unacceptable and will not be permitted or tolerated in "the Entities".

We must all promote respect for people, especially those who hold **management and/or responsibility positions**, as they must set an example by fostering relationships based on respect for the **dignity of others, participation, fairness and mutual collaboration**, encouraging a **respectful and inclusive** working environment, in order to achieve a positive work and professional relationship climate.

In short, behave towards your colleagues as you would like them to behave towards you.

You must avoid any form of harassment (whether sexual, work-related or personal) and any type of behavior that creates an intimidating, hostile, humiliating or offensive working environment.

If you become aware of, or have indications or suspicions that, this type of situation is occurring, you must report such conduct to the Control Body in accordance with the provisions of this document.

3.3 Objectivity in recruitment, hiring and promotion

The Group promotes **equal treatment and opportunities,** both in access to employment and in promotion, hiring conditions and relations between professionals.

Professionals involved in selection, hiring and/or professional promotion processes must be guided by objectivity in their actions and decisions, respecting diversity.

If you take part in selection processes, you must assess candidates solely on the basis of their academic and professional merits, ensuring that their qualities fit the needs of the Group.

3.4 Professionalism

We uphold integrity, honesty, professionalism and loyalty in the day-to-day performance of the activities of our position, regardless of hierarchical position.

You must therefore base your responsible decision-making in your daily professional activity on these values.

Deception and malicious conduct will not be tolerated.

3.5 Occupational health and safety

We pursue continuous improvement of working conditions, adopting all preventive measures required under current legislation, since occupational health and safety is one of our priorities, offering the workforce training on the risks of their jobs and the measures they must follow to prevent them.

In your day-to-day work you must promote, respect and comply with occupational health and safety rules, looking after your own safety and that of your colleagues and reporting any risk situation that may arise to the Control Body as established in this document.

3.6 Protection of the environment and of communities

We have an active and responsible commitment to the conservation of the environment, and we therefore consider it essential that all collaborators, within the scope of their responsibilities, act with full respect for legal requirements and follow the recommendations and procedures established to reduce the environmental impact of the activities carried out by "the Entities", while at the same time seeking to minimize any negative impact we may generate on the communities in which we operate, contributing to their development.

3.7 Rules of conduct

The Code sets out rules of conduct that all professionals connected with "the Entities" must know and follow in order to carry out their duties in accordance with common ethical principles. It does not anticipate every possible situation that may arise in practice, but establishes a series of general guidelines intended to guide the conduct of professionals and, where applicable, to resolve any doubts that may arise in the course of their professional activity.

Each of the persons connected with "the Entities" must respect these guidelines. Any doubt that may arise about the interpretation of this GCC must be raised with the Control Body.

4 GENERAL GUIDELINES

4.1 Regulatory compliance and ethical conduct

Persons connected with "the Entities" must know and comply with both current legislation (laws, regulations, circulars of regulatory, supervisory and self-regulatory bodies) and the internal rules applicable to their activity and/or professional or business relationship.

You must carry out the technical work assigned to you with the utmost respect for technical and administrative legislation, as well as for the instructions, recommendations and customs and practices of the respective Professional Associations.

You must report any doubt, suspicion or incident that may involve an ethical or regulatory breach to the Control Body through the reporting mechanism defined in this GCC.

Likewise, if you are investigated, charged or accused in criminal court proceedings, you must inform the Control Body of this situation as soon as you become formally aware of it.

4.2 Responsibility

Professionals of "the Entities" must perform their duties diligently, efficiently and with a focus on providing a quality service.

You must perform your professional duties with rigor and prudence, making decisions within the scope of your responsibilities and respecting the common rules, protocols and ethical principles. In carrying out your professional activity you must:

i. Listen to your other colleagues, keeping them informed of all decisions and listening to all their opinions when making an important decision.
ii. Acquire the training necessary to carry out your duties, in the same way that you must train your collaborators and encourage their participation in projects.
iii. Report any relevant fact that you believe may have a negative consequence for the Group.

4.3 Commitment and non-competition with "the Entities"

It is the obligation of all professionals and collaborators to act loyally, objectively, honestly and in line with common interests, using all the means placed at their disposal and avoiding actions that may cause it harm of any kind, whether economic or reputational.

You must devote yourself exclusively to the performance of the duties inherent in your position and refrain from providing professional services, whether paid or unpaid, to other competing entities or companies or to individuals or legal entities to which "the Entities" provide services and/or with which they collaborate, whether directly or indirectly (through intermediary entities or persons), without express authorization.

Likewise, you must refrain from using for your own benefit business opportunities that are of interest to "the Entities", as well as from disclosing any information that may be classified as a trade secret or confidential and/or restricted information.

Documents that are subject to intellectual property rights owned by "the Entities" or by third parties and that are in your possession for work reasons must never be used for purposes unrelated to the company's activity and your job duties, unless authorization to do so has been obtained.

4.4 Conflicts of interest

You must refrain from acting where there is a personal, family or friendship situation, or any other type of circumstance, that may affect your objectivity and the interests of "the Entities". Nor may you exert influence over the persons responsible for making decisions on matters affected by the conflict of interest.

If you find yourself, or believe you may find yourself, in a situation of conflict, you must inform your line manager and the Control Body.

4.5 Gifts and hospitality

None of our professionals may accept or request any type of gift, present or remuneration in connection with their professional activity from any client, supplier, intermediary or other third party. As an exception to this general rule, professionals may accept:

i. Gifts or presents of little economic or symbolic value.
ii. A gift of a promotional or advertising nature.
iii. Courtesy gestures or occasional business hospitality, provided that they are of reasonable value.

These limitations also apply to any person connected with the professional or acting on the professional's behalf.

Therefore, you must not accept gifts, presents, services, goods, tickets to shows or sporting events, trips, discounts, etc. or anything else of value. You must never accept money or equivalents (gift cards). Attendance at seminars or any other training activity, as well as professional breakfasts or lunches, shall not be considered a gift or present, unless the cost, place or context is disproportionate to its purpose.

In carrying out your activity, you must comply with the **Anti-Corruption Policy** of "the Entities", which sets out the guidelines to follow in this area.

When you are in doubt as to what is acceptable, you must decline the offer and, in any case, consult your Area Director.

4.6 Transparency of information

We report truthfully, appropriately and consistently on our actions, transparency of information being one of our fundamental principles.

The information must reflect all the transactions, facts and other events in which "the Entities" participate. The economic and financial information, in particular the annual accounts, shall faithfully reflect their economic, financial and asset position.

No professional connected with "the Entities" may conceal or distort information in the accounting records and reports of the Entity.

You must carry out your professional activity by accounting for, recording and documenting all transactions, income and expenses without omitting, concealing or altering any data or information. Likewise, you must perform your duties so that "the Entities" duly comply with their tax and financial obligations, avoiding any practice involving unlawful evasion of the payment of taxes.

4.7 Use of IT systems

You must know and strictly comply with the rules established in "the Entities" regarding:

i. The permitted and prohibited uses of the Internet and email.
ii. The guidelines for the control and monitoring of such tools.
iii. The use of personal and corporate devices by employees.
iv. Matters relating to corporate image, social media or instant messaging.
v. The processing of personal data in accordance with current legislation.

These rules are set out in the **Information Systems Use Policy**.

You must use the company's IT and communication equipment and systems **exclusively for carrying out your work activity** and you must at all times ensure their proper use and protection.

You may not use this equipment and these systems for personal purposes, subject to any exceptions that may be established by the legislation in force at any given time or territory, nor to harm or damage third-party IT systems.

The use of unauthorized software is prohibited, as is making downloads that are not expressly permitted, since both behaviors may infringe intellectual property and/or put the security of the system at risk.

4.8 Confidentiality and data protection

Our professionals must keep secret any non-public data or information that they become aware of in the course of their professional activity, whether it relates to clients, to companies of the Group, to other employees or managers, or to any other third party.

Such data or information shall be treated as confidential, and you must therefore use it exclusively for professional purposes; that is, if you have access to confidential information, you must respect the obligation of secrecy towards other members of staff whose work does not require the information in question.

We make available to all our professionals sufficient security measures to guarantee the confidential processing of data, so that you must adopt the necessary measures to collect, store and access it without any internal or external risk of unauthorized access, manipulation or destruction, whether intentional or accidental.

All communications (by post, fax, email, etc.…) sent by any professional of "the Entities" may only be addressed to their final recipient and may not be addressed to third parties without the express authorization of the recipient.

If you become aware of, or have indications that, any confidential data or information is being disclosed to third parties or is being put to private use, you must report it immediately to the Control Body.

On termination of the employment relationship you must return all confidential information, including documents and storage media or devices, including the computer terminal. The obligation of confidentiality continues after the professional relationship with the Entity has ended.

In carrying out your professional duties you must apply the provisions of the **Guide on Confidentiality and Data Protection** and its supporting documentation.

4.9 Intellectual and industrial property

Our professionals must respect intellectual and industrial property rights in relation to projects, programs, IT systems, courses, know-how, etc., as well as client, business or operational information, which may only be used for the benefit of "the Entities".

Likewise, all the results of your professional work belong to "the Entities" and to their clients, and, therefore, all work, ideas, products, etc. are the property of "the Entities" or of the Clients, as the case may be.

i. You must not use the name, image, logo or brand of "the Entities" for any activity unrelated to your professional activity connected with them.
ii. You must also respect the intellectual and industrial property rights in products and services of third parties outside "the Entities".

4.10 Land-use planning and urban development

Our professionals must protect the rational use of land as a limited natural resource and the preservation of its use in the general interest. Therefore, in any case, they must report through the Internal Information System any conduct involving construction, development or building that is not authorizable on non-developable land or specially protected land (land allocated to roads; green areas; public domain assets; and/or places whose landscape, ecological, artistic, historical or cultural value is legally or administratively recognized).

All management or technical assistance work in development, construction or building works shall be carried out with full respect for the urban planning and administrative legislation in force and applicable.

4.11 Natural resources and the environment

"The Entities" and all their personnel must respect the environment and natural resources, as well as any regulations applicable in this area. If they become aware of a breach of regulations that may pose a serious danger to the environment, it must be reported through the Internal Information System.

5 GUIDELINES FOR CONDUCT WITH THIRD PARTIES

5.1 Prevention of corruption

We are totally opposed to any act of corruption, bribery or influence peddling.

You must not, therefore, offer, promise or give, directly or indirectly, any gift, remuneration or benefit of any kind to an authority, public official or private individual with the aim of obtaining an unlawful or unjustified benefit, direct or indirect. Likewise, you must not receive, request or accept, directly or indirectly, an unjustified benefit or advantage in return for improperly favoring another in any transaction related to "the Entities".

You must reject and bring to the attention of the Control Body, on the one hand, any request by a third party for payments, commissions, gifts or remuneration and, on the other hand, any knowledge that a professional of "the Entities" has requested, received, accepted, given or promised any unjustified or unlawful advantage.

In carrying out your duties you must always comply with the **Anti-Corruption Policy** of "the Entities".

5.2 Prevention of money laundering and terrorist financing

You must verify the identity of the client, their professional or economic activity and the origin of the funds, and must comply with and ensure compliance with the regulations on the prevention of money laundering and terrorist financing and with the internal due diligence procedures.

Transactions carried out with funds of "the Entities" must be carried out with due diligence and:

i. Be consistent with the corporate purpose of the company.
ii. Be authorized.
iii. Be documented by means of a contract or order.

iv. The real purpose of the transaction and the stated purpose must be the same.
v. Ensure that the account holder and the party to the commercial relationship giving rise to the payment are the same.
vi. Proportionality between the good or service and the amount invoiced.
vii. The service being paid for must actually have been provided.

In the event of any suspicious transaction or one showing signs of illegality, report it immediately to the Control Body through the Internal Information System.

5.3 Protection of competition

We have a firm commitment to compliance with all legal and regulatory provisions relating to competition regulation, promoting free competition in the market and avoiding any type of conduct that undermines good commercial practices and may cause harm to consumers (prohibited agreements with competitors, abuse of dominant position, unfair acts, economic concentrations, etc.).

You must therefore report any of the above behaviors or other inappropriate or irregular practices in competition matters, whether by employees of "the Entities" or by others connected with them and competitors.

5.4 Relations with clients

We are committed to offering a quality service to clients in which they are given clear and simple information, in line with the principle of transparency.

You must know your client, giving them clear information about the services they are contracting, avoiding any conduct in advertising, marketing and sales that may involve deception or a lack of relevant information.

We undertake to guarantee the confidentiality of our clients' information, limiting its use to strictly professional purposes and undertaking not to disclose it to third parties.

You must therefore always protect confidential information relating to clients, and take special care to avoid disclosing their data to third parties, including your colleagues if they should not have access to it in the performance of their duties.

You must not act in a transaction with a client in which you may have any conflict of interest, whether direct or indirect. Nor may you accept any remuneration from clients for services performed as a professional of "the Entities".

You must ensure that the client with whom you intend to contract meets the standards and requirements demanded by "the Entities", complying with due diligence procedures.

You must comply with the **Contracting and Subcontracting Policy**, and the **Anti-Corruption Policy** in your relations with clients.

5.5 Relations with suppliers

We are objective and impartial in the selection and hiring of suppliers (contractors, subcontractors and service providers in general).

i. You must avoid any influence or conflict of interest in the hiring of suppliers or third parties outside "the Entities". You may not receive any remuneration or benefit whatsoever from suppliers or third parties that could influence your objectivity and impartiality in hiring them.
ii. You must guarantee the confidentiality of suppliers' data and must not disclose it to third parties without express authorization.
iii. You must promote awareness of this code of conduct among suppliers.
iv. You must ensure that the third party with whom you intend to contract meets the standards and requirements demanded by the Group, complying with due diligence procedures.

You must comply with the **Contracting and Subcontracting Policy**, and the **Anti-Corruption Policy** in your relations with suppliers.

5.6 Cooperation with the justice system

We have a clear culture of compliance, which entails cooperation with the authorities when required.

You must therefore bring to the attention of Legal Services any request for information that you receive from judicial bodies, Public Administrations or any other public body that is legally empowered to make it, so that it can be answered in due time and form.

6 REPORTING TO THE CONTROL BODY

6.1 Duty to report

Any person connected with "the Entities" (employees, management personnel, directors, clients, third-party collaborators or suppliers, etc.…) who becomes aware of the commission of an allegedly unlawful act or of a breach of this GCC and/or of any other regulatory compliance code or manual, must report it immediately to the Control Body.

This GCC does not cover every situation that may arise in practice, but provides **general guidelines for conduct**, so that, in case of doubt, you must consult the Control Body on how to proceed.

For this reason, "the Entities" have designed an Internal Information System through which conduct that may constitute crimes or a breach of the requirements of this GCC or of the Crime Prevention Model can be reported, which can be accessed at the following address:

https://centinela.lefebvre.es/public/concept/1214926?access=I5FI46prN%2BmyItF750GvaRHPSJMwYGDPtOGPAmSmIiU%3D

It is your obligation to use these communication channels, and any other made available to you by the company, in good faith; do not use them to pursue personal ends or for matters entirely unrelated to their purpose. You should bear in mind that Article 205 of the Spanish Criminal Code punishes slander (the

imputation of a crime made with knowledge of its falsity or reckless disregard for the truth) with different penalties depending on its seriousness, and that Article 208 of the same legal text punishes defamation (attributing untrue facts to a person in order to damage their honor and dignity).

6.2 Safeguards for whistleblowers

"The Entities" will protect the confidentiality of the person making the communication or report. We undertake to prevent, and to protect from retaliation, any whistleblower who in good faith reports the existence of irregular activities.

A Channel Management System has been established with the necessary mechanisms to avoid conflicts of interest with respect to the internal managers of the Internal Information System and the Control Body of the Criminal Prevention Model.

6.3 Handling of reports

To ensure proper handling, a record of all reports received will be kept by the manager of the Internal Information System. This record will comply with the requirements of the regulations on **data protection**, as well as the **guarantee of confidentiality**, in accordance with the provisions of the **Internal Information System Protocol**.

Once a report has been received, its importance, seriousness and nature will be assessed. In turn, the whistleblower must be informed of its handling and may be asked for additional information, always with the maximum guarantees of confidentiality.

Once the basic data from the analysis and the preliminary evidence have been obtained, the following steps are taken:

i. Close the report (if there is no indication whatsoever of its veracity or relevance).
ii. Refer it to the competent department, if it does not relate to an alleged unlawful act or to a breach of this GCC or of any other regulatory compliance code or manual. Repeated conduct of this kind may be considered an abuse or bad-faith use of the channel.
iii. Proceed to investigate it, assigning a case number to the report. The investigation must be carried out respecting the basic constitutional principles.

Finally, each report that is opened requires the adoption of a decision, the content and reasoned grounds of which are set out in a personalized, individual report bearing its reference case number.

6.4 Disciplinary system

Once the decision on the report and the corresponding investigation has been adopted, the disciplinary measures provided for in the **Disciplinary System Protocol**, where appropriate, shall be applied, without prejudice to the possibility of initiating any legal action deemed appropriate for the protection of "the Entities".

6.5 Ethical culture and compliance culture

This GCC sets the ethical standards and parameters of conduct to be followed in carrying out the activities of “the Entities”. Compliance with it will provide strength and consistency to the regulatory compliance environment that has been implemented.

Its implementation, communication and application are directly related to the commitment undertaken by “the Entities” to raise awareness of commitments and responsibilities regarding *Compliance*.