



CODE OF ETHICS

VALUES THAT REFLECT OUR CORPORATE CULTURE





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1. Object and purpose

- This document constitutes an express declaration of Aldesa’s values and principles.
- It is a guide to our behaviour guidelines in the development of our professional and business operations.
- With this Code, we guarantee the collective application of Aldesa’s commitments, effective compliance with human and labour rights, and the integration of all Aldesa members, without exceptions.
- The principles and values set out here are the foundations that form Aldesa’s business culture, which is why its internal policies and procedures are in line with this code.
- Finally, it seeks to prevent the commission of criminal behaviour and any illicit behaviour by persons bound by this Code, establishing the necessary monitoring and control mechanisms to ensure compliance.

- Integrity, honesty, ethics and efficiency in all Aldesa’s actions.
- Spirit of improvement and continuous improvement in professional performance.
- Responsible loyalty to clients, to the people of Aldesa, to the community and to the shareholders.
- Transparency in the dissemination of information, which will be appropriate, true and verifiable.

These are the foundations of our corporate culture, and from them we develop the principles that form the pillars that provide strength and guarantee the fulfilment of these values.

2. Scope of application

The Code of Ethics shall apply to all members of Aldesa, whatever their position or level, the subsidiary to which they belong, including the companies in which the group has management control, regardless of their activity or geographical location. Therefore, the professionals belonging to the Aldesa Group to whom other codes of ethics or of conduct of a sectorial nature are additionally applicable or derived from the national legislation of the countries in which they carry out their activity do not exempt them from compliance with this code.

4. Our basic principles of behaviour

4.1. RESPECT FOR THE LAW

The monitoring and compliance with the legal regulations in force, forms part of the business responsibility, therefore, all the people who work in Aldesa must maintain in the development of their professional activities a strict respect for the legal regulations in force in all the territories where Aldesa acts.

Malicious and fraudulent conduct that intentionally violates current legislation will not be tolerated.

4.2. ETHICAL INTEGRITY

Personal integrity and ethics are very valuable assets for Aldesa, they are the way to generate sustainable values for the company, and therefore all members of Aldesa must exercise their activity with objectivity and professionalism.

4.3. RESPECT FOR HUMAN RIGHTS

At Aldesa we believe that the only way to carry out our professional activity is to maintain a scrupulous respect for the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights, and all the members of Aldesa must share this belief and commitment.

3. Our corporate values

What are the corporate values that govern Aldesa?

At Aldesa, we know that without a good foundation any work will fall apart, which is why our professional conduct and our way of doing things must always be governed by:



5. Our **corporate principles**

5.1. PROMOTING ALDESA'S REPUTATION

Aldesa has a solid reputation thanks to its extensive experience and a technical team that is solvent and loyal to the organisation; the commitment to the values and expertise that make up Aldesa's culture is the cement that allows this asset to be maintained over time.

Thus, each and every one of the members of Aldesa must participate in the task of strengthening the name of the organisation, and are responsible for ensuring its good reputation.

5.2. LOYALTY TO GRUPO ALDESA AND CONFLICTS OF INTEREST

At Aldesa we work to safeguard the interests of all the agents involved in the development of the activity, through the implementation of appropriate procedures and measures for the identification and resolution of possible conflicts of interest.

Thus, all the members of Aldesa must put the interests of the organisation before their own interests in the exercise of their profession.

6. Our **principles** in **internal relations**

6.1. WORKING AREA

Trust and respect for personal dignity, are principles that must prevail in the work environment with full rejection of any manifestation of physical and psychological harassment, so Aldesa will not tolerate any abuse of authority, or any other conduct that could generate an intimidating, offensive or hostile work environment; therefore its members must strive to create environments in which cordiality and teamwork prevail, generating work environments that are pleasant, rewarding, safe and that encourage people to give the best of themselves.

6.2. EQUAL OPPORTUNITY AND NON-DISCRIMINATION

Equal opportunities and the commitment to provide the means to help all employees in their professional and personal development is one of the pillars of Aldesa's corporate culture.

Therefore, Aldesa does not allow any type of discrimination on the grounds of gender, race, sexual orientation, religious beliefs, political opinions, nationality, social origin, disability or any other circumstance that could be a source of discrimination.

Therefore, the members of Aldesa shall promote the principles of equal opportunities and nondiscrimination and shall contribute to generating diverse and integrated work environments.

6.3. PROFESSIONAL DEVELOPMENT AND TRAINING

Training is a strategic tool in Aldesa, which is why it develops training programmes as a means of contributing to this purpose of learning, training, updating knowledge and skills of Aldesa's staff, contributing to the professional development of the company's staff, and generating environments of cooperation and teamwork.

6.4. OCCUPATIONAL HEALTH AND SAFETY

Another of our most important pillars is the principle that health and safety in the workplace is paramount, which is why there is a strong commitment to providing the necessary means to minimize risk at work, both for our own staff and for our subcontractors. It is everyone's commitment to actively ensure that this principle is complied with, in strict compliance with the applicable legislation in force, wherever the activity is being carried out.

6.5. ERADICATION OF CHILD AND FORCED LABOUR

Aldesa undertakes to respect all the provisions of the International Labour Organisation (ILO) and the Global Compact issued in the fight for the eradication of child and forced labour, and will ensure the monitoring of this commitment.

6.6. RIGHT TO UNIONIZE

All persons in Aldesa have the right of association and free syndication, and Aldesa will collaborate with the means necessary for the exercise of this right.

6.7. PRIVACY OF PERSONAL DATA

For the correct management of the business and compliance with current legislation, it is necessary for Aldesa's employees to provide the necessary information for this purpose. Aldesa will consider reserved and confidential, the information that is of a non-public nature and will take the necessary measures to preserve its integrity, availability and confidentiality, in accordance with the legislation in force on data protection.

6. 8. USE AND PROTECTION OF GRUPO ALDESA ASSETS AND RESOURCES

The correct use and protection of the assets and resources provided by Aldesa is a guarantee of the security of the organisation's assets, and facilitates the correct management and distribution of the same. Therefore, Aldesa will ensure compliance with this principle by all its employees.

7. Our principles in marker relations

7. 1. TRANSPARENCY AND ACCURACY OF INFORMATION

Aldesa undertakes to transmit information about the organisation in a complete and truthful manner that enables shareholders, analysts and other interest groups to form an objective opinion about Aldesa. This principle is the highway by which a solid reputation is achieved.

7. 2. MANAGEMENT OF OPERATIONS TO PREVENT ILLICIT PAYMENTS

Aldesa will not allow any type of payment or operation of an illicit nature to be carried out with the means and/or funds of the organisation. And for this purpose it has a Compliance Policy and internal procedures for the responsible use of its funds and means by all the members of Aldesa.

7. 3. CONFIDENTIALITY

Information is one of the main assets of Aldesa for the management of its activity; therefore, the organization is governed by the principles of integrity, confidentiality, availability and minimization of the risks of disclosure and misuse of information, both internally and externally.

7. 4. RESPECT FOR FREE COMPETITION AND MARKET BEHAVIOUR

Aldesa is committed to competing in the markets by promoting free competition for the benefit of the communities and users, and to complying with the laws established in this respect in the various countries where it operates, avoiding any action that involves abuse or transgression of free competition.

7.5. RELATIONSHIP WITH SUPPLIERS AND CONTRACTORS

At Aldesa, the principle of impartiality and objectivity prevails in the selection of suppliers and contractors, giving priority to those who comply with and share similar values to those established in this Code of Ethics, in its Compliance Policy and in its Anti-Corruption Policy.

8. Our principles in relation to the community

8. 1. ENVIROMENTAL PROTECTION

At Aldesa we are aware of the importance of carrying out our activity while ensuring compliance with environmental legislation, which is why Aldesa's actions are based on the principle of protection and respect for the environment, with the aim of preserving the natural surroundings.

8. 2. CORRUPTION

The principle of zero tolerance for acts of corruption is a pillar of our integrity, honesty and ethics, which is why at Aldesa no action or behaviour that could involve an act of corruption will be admitted, whether in the public or private sphere. For this reason, it has an Anti-Corruption Policy in which it expresses its strong commitment to this principle, and with specific control procedures in the prevention and detection of these actions.



8. 3. PREVENTION OF MONEY LAUNDERING

Aldesa will only establish commercial relations with clients and partners on the basis of its professional competence, and will not admit the payment of its sales or services through funds which are known to be the result of criminal activities, governing in all cases the principle of collaboration with the competent authorities in this area.

8. 4. COMMITMENT TO SOCIETY

Aldesa is aware of the inequalities that exist in the world, and in particular in some countries where it operates, and therefore bases its actions on the principle of proactivity to generate value for these communities, such as through the promotion of infrastructure in the poorest regions.

9. Monitoring and control

9. 1. KNOWLEDGE

All persons bound by this Code have the obligation to know its content and the values on which it is based, to respect it and to support its fulfilment by all the members of Aldesa.

The monitoring of these principles and values is essential for Aldesa, and for this reason, participation in the improvement of this code is encouraged throughout the organisation, through suggestions, doubts or criticism, to the Compliance Committee, which is the competent body for ensuring the effectiveness of this Code and promoting both its dissemination and the specific training required for its correct application.

The importance of compliance with this Code in Aldesa's activity means that the necessary material and human resources must be available to achieve this objective.

9. 2. COMPLIANCE COMMITTEE

The correct implementation and monitoring of our Code of Ethics is fundamental for a strong corporate culture shared by all, which is why Aldesa has entrusted the Compliance Committee, as the body with the best powers to carry out these functions, with the task of overseeing and supervising compliance with this code.

9. 3. ETHICS MAILBOX

Aldesa has an Ethics Mailbox, regulated in its Compliance Policy, as the internal means through which any person, whether internal or external, can raise their concerns confidentially, in accordance with applicable legislation.

It is the means by which employees who know or suspect a violation of legislation, of these ethical rules, or of Aldesa's internal policies and procedures, inform the organisation of these facts, in compliance with their obligations as a member of Aldesa.

It is also the means by which to express doubts, queries and suggestions for improvement in the corporate culture and internal compliance systems of Aldesa.

This means constitutes an essential tool within Aldesa's internal compliance system and its use is highly valued, and therefore any retaliation against an employee or third party who has made use of the mailbox in good faith is prohibited, even if the investigations carried out show that there are no indications of facts which under the obligations of this code and the company's policies represent a violation of Aldesa's principles and are punishable.

9. 4. DISCIPLINARY PENALTIES

No member of Aldesa should think that he or she is acting in the interests of the company when he or she carries out, collaborates in, or hides a fact or incident that violates the law or this Code, even though these actions may bring economic benefits to the organisation.

Thus, Aldesa will exercise the legal or disciplinary measures it deems appropriate, in accordance with current legislation, to prevent breaches of the law, of this code or of the organisation's internal policies and procedures, and will ensure that no inappropriate behaviour occurs by incorporating any corrective measures that may be necessary.

10. Entry into force, updates and revisions

This Code of Ethics shall come into force on the fifth working day following the date of approval by the Board of Directors of Grupo Aldesa, and shall remain in force until said Board approves its updating, revision or repeal. The Code shall be reviewed and updated as often as the Board of Directors of Grupo Aldesa so indicates.

Once approved, this Code will be communicated and disseminated to all members of Aldesa.

11. Annexes

ANNEX 1: EMPLOYEE CONDUCT POLICY

ANNEX 2: CONDUCT POLICY FOR BUSINESS PARTNERS
(Under development)

Chile

Colombia

Denmark

Guatemala

Hungary

India

Mexico

Norway

Peru

Poland

Portugal

Romania

Slovakia

Spain

Uruguay



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