



Business Partner Code of Ethics and Conduct



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BUSINESS PARTNER CODE OF ETHICS AND CONDUCT

Since its foundation in 1958, the Elecnor Group and all of its employees have been and continue to be committed to pursuing their professional activities in keeping with the highest ethical standards and current legislation in the countries in which it operates; a commitment that is at one with its business culture and philosophy and the solid values that underpin the manner in which it does business and engages with the environment.

Elecnor Group Business Partners are key actors in the company's meeting said commitment, constituting as they do an extension of the same and a vital link in its activity chain.

For these purposes, "Business Partner" is understood to mean those physical individuals or legal entities that, by virtue of a commercial agreement, contribute in specific manner to the provision of the Group's services or the execution of the Group's projects.

Accordingly, it is the will and obligation of the Elecnor Group to spread among its Business Partners its commitment to ethical conduct and integrity in business, the defence of human, social and labour rights, employee occupational health and safety and the prevention of accidents at work, environment protection and quality.

This "Business Partner Code of Ethics and Conduct for the Elecnor Group", which is based on the Elecnor Group's Code of Ethics and Conduct (available on its corporate website www.grupoelecnor.com) constitutes an essential Elecnor Group tool to encourage its Business Partners to conduct their professional pursuits in accordance with the best business practices and the highest ethical standards, and considering the principles established in the corporate policies and rules that make up the Elecnor Group's Corporate Governance System.

Ethics and Integrity

The Elecnor Group considers ethics and integrity to be core, inescapable principles, in addition to underpinning sustainable business relationships, thus explaining its commitment to pursuing its business activities pursuant to exemplary ethical conduct. Legislation will be fully complied with in any country or territory where the Elecnor Group does business, without exception.

Accordingly, the Elecnor Group expects the following of its Business Partners:

- Fully observe current legislation and regulations in those countries where they pursue their activities
- Pursue their activities in accordance with the highest ethical standards, avoiding any unethical practices or conduct, even when these entail no liability under the applicable legislation
- In all circumstances, refrain from practices that may be considered in any way as corrupt or involving bribery and, particularly (albeit not exclusively):
 - Refrain from offering, promising or conceding, either directly or indirectly, any payment in cash or in kind, or other benefit, to a natural or corporate persons in the service of a public or private authority or entity, political party or candidate for a public office, to obtain or maintain unlawful business deals or other advantages
 - Refrain from offering, promising or conceding, either directly or indirectly, any payment in cash or in kind, or other benefit, to a natural or corporate person, so that the said person may abuse their influence, whether real or apparent, to obtain any business deal or other advantage from a public or private authority or entity

- Refrain from offering, promising or conceding, either directly or indirectly, any payment in cash or in kind, or other benefit, to a natural or corporate person, when it is known or it may be suspected that all or part of the money or of the payment in kind will be offered or delivered, either directly or indirectly, to a public or private authority or entity, political party or candidate for a public office, for the purposes indicated in the two previous paragraphs
- Refrain from offering, promising or conceding payments to facilitate or speed up processes, consisting in the handing-over of money or other object of value or any other benefit in exchange for ensuring or speeding up some formality or action by a judicial, public administration or official body
- Observe the principle of free and fair competition and avoid conduct that restricts it and, particularly:
 - Refrain from negotiating or entering into agreements or engaging in concerted or consciously parallel practices between competitors that may restrict competition (e.g., fixing prices or other trading conditions, sharing markets or customers, limiting or controlling production, etc.)
 - Refrain from manipulating public or private tenders, whether through Temporary Business Associations (UTEs), consortia or joint ventures or unjustified subcontracting, making offers of cover, accompaniment, courtesy, etc., or any other means
 - Refrain from carrying out actions that could involve abuse of a dominant position
 - Refrain from engaging in acts of unfair competition
- Guarantee the confidentiality of all the information, whether technical or economic, that has been obtained by them in the course of the business relationship with the Elecnor Group.

Defense of Human, Social and Labour Rights

The Elecnor Group fully subscribes to the United Nations Universal Declaration of Human Rights, placing particular emphasis on equality of opportunities regardless of people's characteristics, the abolition of child labour and forced labour and respect for the rights of ethnic and indigenous minorities. Moreover, the Elecnor Group fully observes the labour rights in force in the countries where it operates and defends and promotes freedom of association and collective bargaining.

Accordingly, the Elecnor Group expects the following of its Business Partners:

- Support and respect the protection of internationally acknowledged basic human rights
- Provide for effective systems for the identification, assessment, prevention, monitoring, management and, where appropriate, remediation of the main adverse human rights impacts of their activities
- Ensure non-discrimination on the grounds of race, nationality, social status or origin, age, sexual or gender orientation or identity, ideology, religion, disability or any other circumstance open to discriminatory acts

- Promote and guarantee a work environment in which the dignity and safety of persons is respected, avoiding any threat or expression contrary to the said dignity and safety and, especially, the different forms that harassment may take (job-related, sexual, physical, moral and psychological)
- Reject forced labour in all its forms, any abuse of authority and the use of child labour
- Respect the rights of local communities, particularly as regards the most vulnerable groups, such as ethnic minorities and indigenous peoples, fostering initiatives and continuous engagement
- Maintain labour practices and conditions in relation to its employees that observe all national and international reference standards
- Acknowledge freedom of association and assembly and the right of their employees to collective bargaining
- Ensure the right to privacy of all those persons with whom they interact and the confidentiality of all the personal data they hold.

Health and Safety

Employee health and safety is paramount for the Elecnor Group. The Elecnor Group fosters the adoption of occupational health and safety policies and implements the preventive measures necessary to guarantee the health and safety of its employees and sub-contractors, not confining itself merely to compliance with the legislation in place, especially in countries or jurisdictions that are less developed in this sphere, and providing a working environment that is respectful of employees' health and dignity. The Elecnor Group occupational health and safety strategy primarily seeks to reach the "Zero Accident" target.

The Elecnor Group therefore expects the following of its Business Partners:

- Incorporate occupational health and safety into their activities and tasks
- Provide their employees with material resources to ensure their safety
- Train their employees and ensure that they are made aware of these occupational health and safety measures and that they implement them
- Have preventive measures in place and implemented to avoid occupational health and safety risks and responses to tackle emergency situations for potential accidents during the working day
- Report immediately any accident, injury, illness or unsafe condition that may arise or be detected within the framework of their business relationship with the Elecnor Group.

Environment Protection

The Elecnor Group is fully committed to using the appropriate means and making the best efforts to prevent its actions from damaging the environment and to complying with applicable environmental legislation in the various jurisdictions in which it operates. Most especially, the Elecnor Group wishes to contribute actively and decisively to the construction of a sustainable, low-carbon future by generating power from renewable energy sources, implementing energy

efficiency measures, reducing greenhouse gas emissions (carbon footprint) and through proper environmental management.

The Elecnor Group therefore expects the following of its Business Partners:

- Pursue their corporate activities in keeping with the principle of maximum responsibility and respect for the environment and full compliance with the laws and other general provisions protecting the environment in those countries where they operate
- Take a preventive approach and foster initiatives that promote greater environmental responsibility, seeking greater efficiency in their activities, facilities, equipment and work resources
- Use effective systems to identify, assess, prioritise, prevent, control, manage and, where appropriate, remediate the main environmental impacts generated by their activities in terms of the consumption of natural resources, emission, waste, hazardous substances and dumping management
- Use, in the event that they damage the environment, all the resources required to restore it to its condition prior to the event that caused the impact
- Collaborate with the Elecnor Group in the pursuit of its goals to reduce greenhouse gas emissions (carbon footprint) and implement measures to this end.

Quality

The Elecnor Group seeks full customer satisfaction by anticipating their needs and exceeding their expectations and expects its Business Partners to likewise commit to the quality of the products and services provided and respect the set delivery and execution deadlines.

SCOPE OF AND COMPLIANCE WITH THIS CODE OF ETHICS AND CONDUCT

The principles of this Code apply to all Elecnor Group Business Partners.

The Elecnor Group reserves the right to conduct checks on compliance by its Business Partners with this Code of Ethics and Conduct either by requesting certain accrediting documentation or by conducting audits, both directly using its own resources or via independent third parties contracted for this purpose.

The Elecnor Group will consider the possibility of requiring its Business Partners to implement corrective actions for practices or conduct that could imply a breach of the provisions of this Code, reserving the right, in the event of non-compliance with them and, in any case, when the circumstances so advise due to their nature or seriousness, to suspend or terminate the contractual relationship with its Business Partners.

Likewise, Business Partners shall report any irregular practices related to non-compliance with or violation of the conduct set out in this document that they witness in the course of their business relationship with the Elecnor Group through the Elecnor Group's ethics channel, which they may also use to contact the Group to resolve any queries regarding the interpretation of these principles. These communications shall be sent via the digital platform accessible from the 'Ethics Channel' section of the Elecnor Group website or directly via the following [link](#) or to PO Box No. 72 48008 Bilbao, Vizcaya - Spain, for the attention of: 'Ethics Channel'.

ACCEPTANCE

The confirmation and acceptance of this Code of Ethics and Conduct for Business Partners of the Elecnor Group implies that, in the context of their relationship with the Elecnor Group:

- It is familiar with the contents of this Elecnor Group Business Partner Code of Ethics and Conduct and undertakes to comply with it, both on behalf of the signatory company and well as its directors and employees, in the context of its relations with the Elecnor Group.
- It undertakes to promote and require that its main suppliers, subcontractors and collaborators contracted within the context of its relations with the Elecnor Group (i.e., indirect Business Partners of the Elecnor Group) conduct themselves in keeping with, and observe, the principles, values and commitments established in this Code of Ethics and Conduct for Business Partners of the Elecnor Group.

This declaration of confirmation and acceptance must be made by the Business Partner's legal representative or by a person with sufficient knowledge, capacity and authority to accept on behalf of the Business Partner the commitments set out in this Elecnor Group Business Partner Code of Ethics and Conduct.

In those cases in which the Business Partners are subject, by their own internal regulations, to principles of action of a similar nature to those contemplated in this Code, the Elecnor Group, after the corresponding verification of their alignment with the principles of this Code, may exempt said Business Partner from the express acceptance of this Code, reserving the possibility of requesting, for the appropriate purposes, information on compliance with and monitoring of the aforementioned principles of action.

Last review (Board of Directors): December 2025