



Promise of **excellence**

CODE OF ETHICAL CONDUCT

V. 1.0





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INDEX

CODE OF ETHICAL CONDUCT	1
1. PURPOSE	6
2. SCOPE AND RESPONSIBILITY	6
3. APPLICABLE SET OF RULES	7
3.1. COMPLIANCE WITH LAWS AND REGULATIONS.....	7
3.2. ANTI-LABOR POLICIES.....	7
3.3. CHILD LABOUR POLICIES	7
3.4. ANTI-CORRUPTION POLICIES	7
3.4.1. BAN ON CORRUPT PRACTICES.....	7
3.4.2. GIFTS AND HOSPITALITY	8
3.4.3. FOREIGN AGENTS, CONSULTANTS AND INTERMEDIATES.....	8
3.4.4. INTEGRITY PROGRAMS.....	8
3.5. GENDER EQUALITY POLICIES	8
3.5.1. FAIR SELECTION, RECRUITMENT AND PROMOTION.....	8
3.5.2. TRAINING FOR WOMEN AND MEN	9
3.5.3. SUPPORT FOR THE EXERCISE OF MOTHERHOOD AND FATHERHOOD ...	9
3.5.4. ERADICATION OF PREGNANCY REJECTION	9
3.5.5. TASK ALLOCATION AND GENDER STEREOTYPING.....	9
3.5.6. PAY EQUITY.....	9
3.5.7. ABOLITION OF DISCRIMINATORY LANGUAGE	9
3.6. POLICY AGAINST SEXUAL HARASSMENT AND ABUSE OF AUTHORITY ..	10
3.7. ANTI-DISCRIMINATION POLICY	10
3.8. OCCUPATIONAL HEALTH AND SAFETY POLICY.....	10
3.9. ENVIRONMENTAL COMMITMENT	10
3.10. QUALITY AND SAFETY POLICY APPLIED TO PRODUCTS AND SERVICES	11
3.11. CONFIDENTIAL INFORMATION POLICY.....	11





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4.	COMMUNICATIONS, REQUESTS, COMPLAINTS AND DENUNCIATIONS	12
5.	RESEARCH.....	12
6.	PENALTIES	12
7.	CONTROL AND MONITORING OF COMPLIANCE TO THIRD PARTIES.....	12
8.	MANAGEMENT RESPONSIBILITY	12
9.	CODE INQUIRIES.....	13

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1. PURPOSE

GECI ESPAÑOLA S.A. is a global organization operating in countries throughout the world.

The headquarters of our Group is registered in Spain and therefore we are subject to European and Spanish legislation. In addition, we must comply with any other related legislation that may apply to our activities in the countries in which we operate.

GECI ESPAÑOLA S.A., after several years of establishing ethical conduct in each of its specifications, has decided to implement this Code of Ethical Conduct to promote that all people and companies linked to any GECI Group company have a guide to behaviour in accordance with ethical and legal principles, as well as preventing and avoiding unsafe, intimidating, abusive, fraudulent and/or corrupt labour behaviour, which is discriminatory in any way (whether by age, gender, ethnic origin, disability, sexual orientation or any other). Likewise, this Code promotes safety in operations, respect for the environment and occupational health and safety.

2. SCOPE AND RESPONSIBILITY

This is a Group policy and applies to all persons within the Group, as well as any third party acting on our behalf or in our name, such as contractors, agents and intermediaries, potentially our joint venture partners (depending on the circumstances) and, exceptionally, suppliers (where they provide services for or on behalf of GECI ESPAÑOLA SA, rather than simply supplying goods or services to GECI ESPAÑOLA SA). Where appropriate, specific procedures apply which are complementary to this code.

The Code provides guidance for the behavior of all employees, including management and owners.

All employees are required to comply with this code and we encourage them and other external stakeholders to notify the Group of any suspected problems.

If applied in another country by subcontractors, a copy of this Code, translated into the local language, must be displayed in a place accessible to all workers and persons involved in the project in question.

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3. APPLICABLE SET OF RULES

3.1. COMPLIANCE WITH LAWS AND REGULATIONS

The policy of GECI ESPAÑOLA, SA, its subsidiaries and controlled entities, as well as its directors, officers, employees and other persons acting on its behalf, must comply, as a minimum standard, with all applicable laws and regulations of the countries or territories in which they operate, especially in relation to integrity issues. Where there is no applicable legislation on these matters in the countries where they operate, they should follow the guidelines described in this code of ethical conduct.

3.2. ANTI-LABOR POLICIES

GECI ESPAÑOLA, S. A. will not allow any form of forced labour or work against will in its subcontractors. They may not demand any "deposit" from their workers or withhold personal identification documentation.

Subcontractors shall recognise the right of their workers to leave their jobs with reasonable notice, in accordance with the applicable law in the country where the contract is to be signed, if such a right exists.

3.3. CHILD LABOUR POLICIES

GECI ESPAÑOLA, S. A. and its subcontractors will not hire minors. GECI defines a minor in the working environment as a person under the age of 16. If local legislation sets higher age limits, this limit will be respected.

People between the ages of 16 and 18 are considered young workers. They must not work night shifts or under dangerous conditions.

3.4. ANTI-CORRUPTION POLICIES

3.4.1. BAN ON CORRUPT PRACTICES

It is the policy of GECI ESPAÑOLA, S. A. that the company, its subsidiaries and controlled entities, as well as its directors, officers and employees and other persons acting on its behalf shall not offer, promise, deliver or attempt to achieve, in a corrupt manner, any benefit of any kind, either directly or indirectly, in connection with the conduct of this entity's business.



3.4.2. GIFTS AND HOSPITALITY

Although GECI ESPAÑOLA, S. A. acknowledges that the courtesy of giving and receiving gifts and hospitality of modest value in the course of business is acceptable in principle where permitted by law. The rules established by GECI ESPAÑOLA, S. A. in this respect are:

- Giving or receiving the relevant gift or hospitality must be legal under the applicable law;
- Under no circumstances should they be given or received with a view to anyone gaining any form of improper advantage;
- Gifts and hospitality must be properly recorded in the company's books and accounts;
- The receipt of gifts and hospitality by directors, managers and employees of GECI ESPAÑOLA, SA will also be duly recorded when the value of the gift exceeds 40 Euros;
- All seating must be done in a diligent and verifiable manner.

3.4.3. FOREIGN AGENTS, CONSULTANTS AND INTERMEDIATES

When GECI ESPAÑOLA, S. A. contracts agents, consultants or intermediaries in other countries, it will pay special attention to the technical profile and integrity before formalising the contract.

GECI ESPAÑOLA, S. A. shall inform the candidate agent, consultant or intermediary of these integrity policies.

The written contract between GECI ESPAÑOLA, S. A. and the agent, consultant or intermediary shall include a provision whereby the latter undertakes to comply with our code of ethics at all times.

3.4.4. INTEGRITY PROGRAMS

GECI ESPAÑOLA, S. A. attaches great importance to the proper and adequate compliance with its integrity standards and is committed to ensuring that mechanisms are in place to assist all employees in this compliance.

Consequently, we have included the subjects covered by this code of ethics in our training and awareness programmes, in order to raise awareness among all the staff of GECI ESPAÑOLA, S. A.

3.5. GENDER EQUALITY POLICIES

3.5.1. FAIR SELECTION, RECRUITMENT AND PROMOTION

GECI ESPAÑOLA, S. A. openly and impartially evaluates the skills of women and men, favouring the equitable participation of people who aspire to occupy positions at different levels of government, including command and management.

3.5.2. TRAINING FOR WOMEN AND MEN

GECI ESPAÑOLA, S. A. promotes the equitable participation of women and men in training programs that develop their potential and encourage their professional and personal growth.

3.5.3. SUPPORT FOR THE EXERCISE OF MOTHERHOOD AND FATHERHOOD

GECI ESPAÑOLA, S. A. supports the creation of a work structure that contemplates and reconciles work responsibilities with those derived from maternity and paternity.

3.5.4. ERADICATION OF PREGNANCY REJECTION

GECI ESPAÑOLA, S. A. does not consider maternity to be an impediment to the promotion of women's employment, nor does it condition a woman's employment or permanence on the presentation of a certificate of non-pregnancy or a commitment not to become pregnant.

3.5.5. TASK ALLOCATION AND GENDER STEREOTYPING

GECI ESPAÑOLA, S. A. defends that the tasks can be carried out by both men and women. It does not assign tasks in terms of gender stereotypes, but according to people's competencies, skills and aspirations. This entity seeks to promote the development of a healthy working environment in favour of productivity and gender equity.

3.5.6. PAY EQUITY

GECI ESPAÑOLA, S. A. ensures that the equivalent duties and responsibilities correspond to the same remuneration for women and men.

3.5.7. ABOLITION OF DISCRIMINATORY LANGUAGE

GECI ESPAÑOLA, S. A. does not allow the use of discriminatory or exclusive language, which implies unequal or offensive treatment for women and men in their diversity.





3.6. POLICY AGAINST SEXUAL HARASSMENT AND ABUSE OF AUTHORITY

GECI ESPAÑOLA, S. A. respects the dignity and privacy of women and men, who have the same rights not to be subjected to any kind of violence, whether verbal, physical, psychological or sexual.

3.7. ANTI-DISCRIMINATION POLICY

GECI ESPAÑOLA, S. A. urges all staff to always behave respectfully and courteously when dealing with other people, taking into account their ideas and contributions to fostering a healthy relationship, promoting appropriate and cordial treatment, regardless of gender, age, social or ethnic origin, creed, nationality, sexual preference, political affiliation or hierarchy.

3.8. OCCUPATIONAL HEALTH AND SAFETY POLICY

GECI ESPAÑOLA, S. A. and its subcontractors shall provide their employees with safe and healthy working space, guaranteeing minimum conditions of lighting, ventilation, hygiene, fire protection, safety measures and access to drinking water.

Workers must have clean toilets and drinking water. When conditions require, food preservation facilities should be provided.

The rooms, if provided, will be clean and safe.

GECI ESPAÑOLA, S. A. and its subcontractors shall take the necessary measures to prevent accidents and damage to workers' health, minimising, as far as possible, the risks inherent in the job. Including in these measures the provision of individual protective equipment, where collective measures are insufficient to ensure the safety of workers.

GECI ESPAÑOLA, S. A. and its subcontractors will provide their workers with regular training in occupational safety and health. Appropriate records shall be kept of training courses given. The management must also designate a person responsible for health and safety with sufficient authority and decision-making capacity.

3.9. ENVIRONMENTAL COMMITMENT

GECI ESPAÑOLA, S. A. and its subcontractors shall maintain a constant commitment to environmental protection and shall comply with the standards and requirements established by local and international legislation.

Likewise, subcontractors must commit to complying with the environmental standards established by GECI ESPAÑOLA, S. A. The Commission shall adopt the measures necessary to implement these rules, including, where applicable, impact reduction and compensation measures.



3.10. QUALITY AND SAFETY POLICY APPLIED TO PRODUCTS AND SERVICES

GECI ESPAÑOLA, S. A. operates in sectors where any incident on the products or services released, however minimal, can have serious consequences for the integrity of people and infrastructures. For this reason, this entity, its personnel and subcontractors will maintain a continuous commitment to quality and safety in the operations carried out during manufacture, assembly, repairs and service provision.

Whenever possible, the correct functioning of the equipment should be verified prior to release, or otherwise validated in a safe test (or real controlled) environment.

GECI ESPAÑOLA, S. A. has established procedures to avoid FOD (Foreign Object Damage) in the areas of production and released equipment. Likewise, procedures have been established to avoid counterfeit products or those that are doubted to have been approved by the clients to whom they are addressed.

3.11. CONFIDENTIAL INFORMATION POLICY

SPANISH GECI, S. A. In addition, its employees and subcontractors have an obligation to preserve the integrity and confidentiality of the information they receive as a result of their business relationships.

The obligation of confidentiality shall remain after the conclusion of your relationship with GECI ESPAÑOLA, S. A. and shall include the obligation to return any company-related material that employees or subcontractors may have in their possession.

A Confidentiality Agreement will be signed between the disclosing and receiving parties to complement the provisions.

4. COMMUNICATIONS, REQUESTS, COMPLAINTS AND DENUNCIATIONS

There is an express channel of communication with the HR manager to communicate, report or denounce any event related to the issues addressed in this code of ethical conduct.

It should be stressed that no one who reports a genuine concern will be subjected to any harm or disadvantage and, in fact, these communications and those who make them may be protected by law.

The e-mail address of HR to which any communication, request, complaint or claim can be directed is rrhh@geciweb.com.

5. RESEARCH

GECI ESPAÑOLA S.A. will investigate any report made internally. We will designate an independent and appropriate senior person or team (either legal or with legal counsel) to investigate the suspicious action, who will report to the senior management of the business unit and where appropriate to Group Management. All reports will be handled confidentially as far as possible and the author may choose to remain anonymous or not.

The recommended actions will be taken taking into account the outcome of the investigation, including disciplinary steps where appropriate, action to correct any behaviour that violates this policy or GECI ESPAÑOLA S.A.'s Code of Conduct, and consideration of whether to inform the relevant authorities.

GECI ESPAÑOLA S.A. will assess in each case the termination of its commercial relations with third parties involved in the acts under investigation when they constitute a crime.

6. PENALTIES

GECI ESPAÑOLA, S. A. considers that any breach of the company's integrity standards is a serious matter that may cause substantial damage to its reputation and business interests. Consequently, breaches of the company's published rules will be treated as a disciplinary matter, which, depending on its nature, may be considered serious and lead to a warning or to the dismissal of the person concerned.

7. CONTROL AND MONITORING OF COMPLIANCE TO THIRD PARTIES

Subcontractors must authorise GECI ESPAÑOLA, S. A. and/or designated third parties to monitor appropriate compliance with this code. To this end, they will provide the means and access to facilities and documentation necessary to ensure this verification.

8. MANAGEMENT RESPONSIBILITY

This Code of Ethical Conduct has the full support of the Board of Directors of GECI ESPAÑOLA S.A. and the senior management team. The senior management of GECI ESPAÑOLA S. A. and

the operating companies are responsible for implementing this Code, conducting due diligence on our third parties and monitoring and conducting risk assessments on our controls.

In addition, the senior management of each business is responsible for:

- The effective implementation of this code;
- the effective implementation of any specific divisional procedure;
- effective internal and external communication of this policy;
- provide training to all employees and relevant third parties on the application of this policy; and
- review and update this policy as appropriate.

9. CODE INQUIRIES

When the application of this code is unclear, advice should be sought from your immediate supervisor or the Senior Management of your business unit. In cases of uncertainty, your unit management can consult Marcos Rodríguez at GECI ESPAÑOLA S.A. Risk and Assurance (Tel: +34 956 85 59 57, email: mrodriguez@geciweb.com).

The Code of Ethics and Conduct is periodically updated in response to new regulatory requirements, improvements arising from compliance reviews and best practices. See the website (www.geciweb.com) for the current version.



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