

## **APPENDIX 1**

# **CODE OF ETHICS AND PROFESSIONAL CONDUCT**

# CODE OF ETHICS AND PROFESSIONAL CONDUCT

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## INTRODUCTION

The Code of Ethics and Conduct developed by ORBIS TECNOLOGÍA ELÉCTRICA S.A. constitutes an express declaration of the values, principles and standards that should guide the conduct of all our employees and managers, for the responsible development of their professional activity in all their relationships with other employees, managers, customers, suppliers and external collaborators, shareholders, public and private institutions, and society in general.

In this way, the Code is intended to prevent the commission of criminal behaviour and any illicit behaviour by the persons bound by this Code in the performance of their professional activity, establishing the necessary monitoring and control mechanisms to guarantee compliance.

The conduct criteria contained in this Code do not pretend to contemplate all situations or circumstances with which the employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. can be found, but establish general guidelines of conduct that will guide them in their way of acting during the performance of their professional activity.

All the employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. can and should consult their hierarchical superior or the Compliance Unit with any questions about the interpretation of the conduct guidelines that appear in this Code or through the Consultation and Complaint Line, without prejudice to the dissemination, communication and training tasks to the employees.

In ORBIS TECNOLOGÍA ELÉCTRICA S.A. no employee will be discriminated. All forms of physical, sexual, psychological or verbal harassment or abuse of its employees, as well as any conduct that creates an intimidating or offensive environment.

## SCOPE OF APPLICATION AND VALUES

Compliance with this standard **is mandatory** for all administrators, managers and employees (and therefore all group companies, if any) regardless of the type of contract that determines their employment relationship, the position they occupy and the place where carry out their work as well as all those people who have been temporarily transferred to ORBIS TECNOLOGÍA ELÉCTRICA S.A. to provide professional services.

Likewise, third parties that are habitually related to ORBIS TECNOLOGÍA ELÉCTRICA S.A. among others: suppliers, collaborators, agents.

When establishing business relationships with other companies or professionals, one of the selection criteria will be taken into account that they have assumed behavioural and management principles similar to those outlined in this Code.

This Code of Conduct is the basis and foundation of the Organization and Management Model and Criminal Risk Prevention Program, and its implementing regulations.

Employees violate their duty of loyalty to the Company if they engage in conduct that may violate the stated rules and regulations. No employee shall be obliged to comply with orders or instructions contrary to the law or this Code. If such a situation occurs, the employee may go to the Regulatory Compliance Unit by any of the indicated channels.

When the commission of irregular conduct is detected as a consequence of the normal exercise of the functions of control, prevention or internal audit of ORBIS TECNOLOGÍA ELÉCTRICA S.A., the person who detects or becomes aware of the irregular conduct will notify the Regulatory Compliance Unit through any of the means that are provided at any time.

Employees are obliged to participate in the mandatory training and updating courses in the knowledge and application of the Organization and Management Model and the Criminal Risk Prevention Program organized by the Regulatory Compliance Unit.

General values:

Respect for the legality, human rights and ethical values.

Respect for people: avoid harassment, intimidation, abuse, disrespect.

Equal opportunities, professional development and non-discrimination.

Team spirit: trust, collaboration and loyalty.

Transparency and impartiality in decision making.

Excellence: rigour, talent and passion.

Innovation: imagination, creativity and courage.

Adaptability: resilience, pragmatism and austerity.

Integrity: Honesty and transparency. Ethical and good-faith behaviour.

## **INTERNAL CONDUCT AND BEHAVIOUR GUIDELINES**

### **EQUAL OPPORTUNITIES AND NON-DISCRIMINATION.**

In ORBIS TECNOLOGÍA ELÉCTRICA S.A., we promote the professional and personal development of all our employees, ensuring equal opportunities

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through their action policies. All employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. will enjoy equal opportunities for the development of their professional careers. In ORBIS TECNOLOGÍA ELÉCTRICA S.A. we do respect the principle of non-discrimination based on race, sex, ideology, nationality, language, religion, sexual orientation or any other personal or social condition of our employees.

### **CONFIDENTIAL INFORMATION.**

ORBIS TECNOLOGÍA ELÉCTRICA S.A. considers information and knowledge as one of the main and essential assets for business management, so they must be the object of special protection.

Information is one of our main assets, essential for the management of our activities. For this reason, an information security policy has been developed whose objective is to preserve the integrity, availability and confidentiality of the same and in this way, minimize the risks derived from its disclosure and misuse.

Employees must not reveal, disseminate and use reserved and confidential information for unauthorized uses or outside the social interest, as they constitute a lack of loyalty to ORBIS TECNOLOGÍA ELÉCTRICA S.A., with the sole exception of those cases that legally oblige or enable such dissemination. Employees must prevent any sensitive information from being known to competitors.

ORBIS TECNOLOGÍA ELÉCTRICA S.A. complies with current legislation on data protection, protecting the personal data entrusted by its clients, employees, candidates in selection processes or other people. Likewise, it undertakes to request and use exclusively data that are necessary for the effective management of its business.

### **USE AND PROTECTION OF ASSETS.**

Each of the employees is responsible for the correct use and protection of the assets and resources provided by ORBIS TECNOLOGÍA ELÉCTRICA S.A. These include the intellectual property, facilities, equipment, machinery and financial resources of ORBIS TECNOLOGÍA ELÉCTRICA S.A.

Employees will not use these resources for personal or extra-professional uses and for the performance of activities that are not directly related to the interest of ORBIS TECNOLOGÍA ELÉCTRICA S.A., also taking responsibility for the protection of those entrusted to him about his work, observing the utmost care in their custody.

The use of files or programs from external sources that may pose serious risks to the security of your computer is prohibited. ORBIS TECNOLOGÍA ELÉCTRICA S.A. or constitute an infringement of intellectual property.

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ORBIS TECNOLOGÍA ELÉCTRICA S.A. makes available to its employees the necessary resources for the performance of their professional activity. For this reason, the use of unauthorized software and the performance of downloads or any other behaviour that entails the risk of introducing viruses or any other dangerous element for computer security, for example, making unauthorized copies, or the improper use of external devices (pen drive, removable disks, etc.)

### **CONFLICT OF INTERESTS.**

All the people and employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. will only serve the interests of the Company and, consequently, they will refrain from carrying out any private activity or of merely personal interest that could lead to the appearance of conflicts of interest. Employees must always act, in the fulfilment of their responsibilities, with loyalty and in defence of the interests of ORBIS TECNOLOGÍA ELÉCTRICA S.A.

### **HEALTH AND SAFETY AT WORK.**

ORBIS TECNOLOGÍA ELÉCTRICA S.A. promotes the adoption of health and safety policies at work and adopts preventive measures, providing a work environment that respects the health and dignity of employees, and undertakes to update the occupational risk prevention measures permanently, as well as to scrupulously respect the applicable regulations on this matter in all places where it carries out its activities.

All employees are responsible for observing strict compliance with health and safety regulations, being able to communicate through the Inquiry and complaint line, the violation or non-compliance of measures that affect the safety and health at work of employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A.

Likewise, they must make responsible use of the equipment assigned to them when they carry out risky activities, and they will disseminate knowledge among their colleagues and subordinates promoting compliance with risk protection practices.

### **PERSONAL AND PROFESSIONAL DEVELOPMENT**

ORBIS TECNOLOGÍA ELÉCTRICA S.A. encourage and promote the balance and conciliation between personal and professional life of the employees, valuing the benefits that for the employee and the Company entails the existence of a balance between the professional and personal responsibilities of the employees, therefore Measures aimed at reconciling these two areas are promoted.

**GUIDELINES FOR CONDUCT AND BEHAVIOUR IN THE MARKET**

**FINANCIAL RECORDS**

Employees must ensure that all operations and transactions with economic significance appear clearly and accurately in the accounting records.

In particular, employees will refrain from:

1. The registration of operations in off-the-books media not registered in official books;
2. The non-registration of operations carried out or their bad consignment;
3. The record of non-existent expenses, income, assets or liabilities;
4. The entry of notes in the accounting books with an incorrect indication of its object;
5. The use of false documents; Y
6. The deliberate destruction of accounting documents before the deadline provided by law.

Likewise, ORBIS TECNOLOGÍA ELÉCTRICA S.A. will ensure full compliance with the applicable tax regulations, counting on external advisers specialized in the matter.

**RELATIONSHIPS WITH CLIENTS.**

ORBIS TECNOLOGÍA ELÉCTRICA S.A. promotes the commitment to quality by acting under the best recognized and standardized national and international practices, all employees having as their objective the achievement of the highest levels of quality and excellence in the provision of customer services, seeking long-term development of relationships based on trust and mutual respect.

In the event of scenarios where possible conflicts of interest arise in customer relationships and in which any member of the ORBIS TECNOLOGÍA ELÉCTRICA S.A. , you should first contact your hierarchical superior and, if not, the Consultation and Report Line that will provide you with all the collaboration, support and coverage to manage and resolve this conflict situation.

**RELATIONSHIPS WITH SUPPLIERS, CONTRACTORS AND COMPANIES COLLABORATORS**

ORBIS TECNOLOGÍA ELÉCTRICA S.A. will establish with its partners in common businesses a collaborative relationship based on trust, transparency in information and the sharing of knowledge, experiences and skills - within limits allowed by the legislation on competition - to achieve common objectives and benefit mutually.

## ORBIS TECNOLOGÍA ELÉCTRICA S.A.

All employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. who participate in the selection processes of contractors, suppliers and external collaborators, must act with impartiality and objectivity, applying quality and cost criteria, and avoiding the collision of their interests with those of ORBIS TECNOLOGÍA ELÉCTRICA S.A.

The contents of this Code of Ethics and Conduct that apply to contractors, suppliers and external collaborators will be included in the collaboration or service provision contracts that are formalized in each case.

### **RELATIONSHIP WITH GOVERNMENTS AND AUTHORITIES.**

ORBIS TECNOLOGÍA ELÉCTRICA S.A. manifests its political neutrality and undertakes to faithfully and respectfully comply with all legal obligations to which it is subject in any country or territory where it carries out its activity.

Employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. will avoid any conduct that, even without violating the law, could damage their reputation with the community, the government of the country or other organizations, and produce adverse consequences for their business. No employee will collaborate with third parties in violation of any law, or participate in actions that compromise respect for the principle of legality.

They must act with honesty and integrity in all their contacts or transactions with the authorities and employees of governments and administrations, ensuring that all the information and certifications they present, as well as the statements they make, are truthful, clear and complete.

Likewise, employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. will not obstruct requests for information by public officials or the fulfilment of any other function that they perform in the legitimate exercise of their powers, provided that they are protected and comply with applicable laws.

### **ANTI-CORRUPTION MEASURES:**

Principle of zero tolerance with corruption. ORBIS TECNOLOGÍA ELÉCTRICA S.A. declares against influencing the will of people outside the Company to obtain any benefit through the use of unethical practices. Nor will it allow other persons or entities to use these practices with its employees.

#### **Bribes.**

All employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. must act following applicable laws and, in no case, may they resort to or tolerate bribes from third parties towards the Company, its employees or vice versa.

ORBIS TECNOLOGÍA ELÉCTRICA S.A. prohibits the use of any form of illicit payment, with means of any nature that entails a material or moral advantage for the recipient, be it a public entity or a company or private



person, to obtain any advantage or favourable treatment in its relations with third parties.

Employees are also prohibited from accepting bribes for their benefit. Nor may payments be made to political parties, unions or similar entities in terms that are not expressly allowed by the legislation of the country in which it operates.

**Gifts and hospitality.**

Employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A., because of the position they occupy, they will not be able to accept gifts, hospitality, services or any other kind of favour from any person or entity that could affect their objectivity or influence a commercial, professional or administrative relationship.

Likewise, employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. may not offer, directly or indirectly, gifts, services or any other kind of favour to clients, partners or any other person or entity that maintains or may maintain relationships with the Company, to unlawfully influence such relationships.

**PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING.**

To prevent and avoid carrying out money laundering or terrorist financing operations arising from criminal or illicit activities, employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. should pay special attention to those cases in which there are indications of lack of integrity of the people or entities with which they do business.

**PERSONAL DATA PROTECTION.**

ORBIS TECNOLOGÍA ELÉCTRICA S.A. declares to have adopted all the necessary and adequate security measures as established in the EU Regulation 2016/679 and Organic Law 3/2018 on the Protection of Personal Data and guarantee of digital rights and has established all the technical means at its disposal to avoid the loss, misuse, alteration, unauthorized access or theft of the data we process.

Employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. will not reveal personal data obtained from customers, suppliers, employees, public administrations and the general public.

Additional and detailed information on Data Protection can be consulted at any time in the Legal Notice and Privacy Policy of our website Web page <https://orbis.es/aviso-legal-y-politica-de-privacidad>

**RESPECT FOR THE ENVIRONMENT**

Preservation and respect for the environment are one of the basic pillars of ORBIS TECNOLOGÍA ELÉCTRICA S.A., which is manifested in compliance with the best environmental practices in all its activities.

ORBIS TECNOLOGÍA ELÉCTRICA S.A. undertakes to conduct its activities in such a way as to minimize negative environmental impacts and achieve a high level of security in its processes, facilities and services; paying special attention to the protection of its employees, suppliers, customers and the local environment.

Conserving natural resources, promoting energy-saving, and spatial planning are fundamental pillars, requiring all staff to comply with environmental guidelines.

## **INTERNAL CONTROL OF CRIMINAL LIABILITY.**

Internal control of crime is a priority objective for ORBIS TECNOLOGÍA ELÉCTRICA S.A., committed to the task of prevention, detection and avoidance of any illegal activities carried out within the scope of its responsibilities, on its behalf or its behalf and for its benefit, by any of its employees.

## **REGULATORY COMPLIANCE UNIT**

ORBIS TECNOLOGÍA ELÉCTRICA S.A. Compliance Unit is an autonomous and independent body that is made up of representative members from various areas appointed by the Board of Directors, and whose main functions are:

- Implement, control, supervise, evaluate and improve the crime prevention and detection model.
- Watch over the principles, values and guidelines of conduct outlined in this Code.
- Ensure the proper operation and management of the inquiry and complaint line

To ensure the effectiveness of this Code of Conduct, ORBIS TECNOLOGÍA ELÉCTRICA S.A. has created the Regulatory Compliance Unit, which will have the necessary authority, resources and means to implement and enforce the measures of the Regulatory Compliance Model that are adequate to detect, prevent and avoid the commission of criminal, civil, or criminal offences, commercial, administrative and tax attributable to the legal person, as well as for the appropriate reaction if they have occurred.

The commission of any possible crime by an employee of ORBIS TECNOLOGÍA ELÉCTRICA S.A. and for its benefit constitutes an infringement of the Code of Conduct that the Company will duly sanction, without prejudice to any other responsibilities that may be required of the offender and other infractions of the Regulatory Compliance Model not classified as a crime referred to in the Code of Conduct or the integral norms of said Model.

Any employee who knows a situation of risk of criminal offence or the Code of Conduct and other rules included in the Organization Model of ORBIS TECNOLOGÍA ELÉCTRICA S.A., may communicate it to the Regulatory

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Compliance Unit through the inquiry and complaint line or by any other valid means for this purpose. In case of doubt about the origin of a specific action, the manager or employee will make the appropriate consultation through the channel above.

## **INQUIRY AND COMPLAINT LINE - WHISTLEBLOWING**

Employees of ORBIS TECNOLOGÍA ELÉCTRICA S.A. They must reveal illegal behaviour, irregularities and breaches of the Code and the Model of which they are aware.

The doubts, questions and complaints that are made through the Complaint Line contribute to the detection of possible crimes and constitute a way for the Code of Ethics to be fully valid, serving to improve the preventive system continuously.

No employee should think that he is acting in the interest of the Company when he conceals an event or incident that violates the law or the Code of Ethics and Conduct.

The Inquiry and Complaint Line is a corporate tool designed to facilitate the confidential and secure formulation of any query about the scope and applicability of this Code of Conduct and, in general, of the Regulatory Compliance Model, as well as to report or report situations of infraction or risk about the guidelines and behaviours regulated in the Code of Conduct or the Regulatory Compliance Model as a whole.

The Inquiry and Complaint Line procedure guarantee confidentiality in the treatment of the complaints that are processed and the identity of the complainant, in full compliance with the legislation on data protection, a reliable and objective analysis of the possible infringement and the maximum respect for the rights of the people allegedly involved in it.

The Regulatory Compliance Unit and the Compliance Officer are responsible for the operation of the Inquiry and Complaint Line, as well as for the analysis of complaints and queries made through it, for which purpose it may request the collaboration of other bodies, departments, areas or people of ORBIS TECNOLOGÍA ELÉCTRICA S.A.

We have created and maintain the consultation and complaint line through which you can contact us, even anonymously, the commission within ORBIS TECNOLOGÍA ELÉCTRICA S.A. or in the action of third parties that contracted with us, of acts or conducted that could be contrary to the general or sectorial regulations that were applicable.

**Complaints may be directed to the email address [rrhh@orbis.es](mailto:rrhh@orbis.es)**