

## **TECNATOM GROUP CODE OF CONDUCT (TGCC)**

**Key: DC 03 i**

**REV.: 3**

**N. of Pages: 15**

---

## **REASON FOR DOCUMENT REVISION**

### **Revision 0:**

- Initial issue of the document

### **Revision 1:**

- Error correction.

### **Revision 2:**

- Amendment of corporate's Mission and Values as passed by the Board of Directors as well as greater specificity in paragraph 3.16.

### **Revision 3:**

- Biennial update of the Code of Conduct as per paragraph 7:
  - Inclusion of commitments and responsibilities in relation to the use of social networks.
  - Adaptation to the Law 1/2019, of February 20th, on Business Secrets

## INDEX

		<u>Page</u>
1	INTRODUCTION .....	5
1.1	DEFINITION .....	5
1.2	NATURE AND PURPOSE .....	5
1.3	SCOPE OF APPLICATION.....	5
2	VISION, MISSION AND VALUES.....	5
2.1	VISION .....	5
2.2	MISSION .....	6
2.3	CORPORATE VALUES.....	6
3	GENERAL PRINCIPLES .....	6
3.1	COMPLIANCE WITH LEGAL STANDARDS.....	6
3.2	RESPECT FOR PEOPLE .....	7
3.3	HONESTY .....	7
3.4	PROFESSIONALISM .....	7
3.5	COMMITMENT TO HUMAN AND LABOUR-RELATED RIGHTS .....	7
3.6	PROFESSIONAL DEVELOPMENT .....	8
3.7	RESPECT FOR THE ENVIRONMENT .....	8
3.8	COMMITMENT TO SAFETY AND MAINTENANCE OF A SAFETY CULTURE.....	8
3.9	SAFETY AT THE FACILITIES.....	9
3.10	QUALITY OF SERVICES AND PRODUCTS .....	9
3.11	CORPORATE IMAGE AND REPUTATION .....	9
3.12	TECNATOM GROUP RESOURCES .....	10
3.13	TRANSPARENCY, INTEGRITY AND SECURITY OF INFORMATION.....	10
3.14	COMMUNICATION.....	10
3.15	IRREGULAR PAYMENTS .....	11
3.16	GIFTS AND PRESENTS .....	11

3.17	SOCIAL NETWORKS.....	12
3.18	CONFLICTING INTERESTS AND LOYALTY TO THE GROUP .....	12
3.19	BUSINESS OPPORTUNITIES.....	13
4	GROUP ENVIRONMENT .....	13
4.1	SHAREHOLDERS .....	13
4.2	CLIENTS .....	13
4.3	SERVICE PROVIDERS AND SUPPLIERS.....	14
4.4	COMPETITORS .....	14
5	COMMUNICATION AND DISSEMINATION OF THE TECNATOM GROUP CODE OF CONDUCT.....	14
5.1	INTERNAL AND EXTERNAL DISSEMINATION.....	14
6	INFRINGEMENT OF THE TECNATOM GROUP CODE OF CONDUCT .....	14
7	UPDATING OF THE TECNATOM GROUP CODE OF CONDUCT .....	15
8	ACCEPTANCE OF THE TECNATOM GROUP CODE OF CONDUCT .....	15
9	APPROVAL OF THE TECNATOM GROUP CODE OF CONDUCT .....	15

## 1 INTRODUCTION

### 1.1 DEFINITION

This Tecnatom Group Code of Conduct (“TGCC”) sets out the commitments and responsibilities of an ethical nature that are to be assumed and respected to in the performance and management of its business and business activities.

### 1.2 NATURE AND PURPOSE

The TGCC is, therefore, a guideline to ensure suitable performance and behaviour by all the Tecnatom Group professionals in decision-making and is based on its corporate vision, mission and values, the aim being to respond to the expectations of the stakeholder groups in order to maintain the high degree of trust that they place in the Tecnatom Group.

The following are considered to be stakeholder groups, among others: the shareholders, employees, collaborators, clients, suppliers, competitors, trade unions, Administration (state, regional and local) and any other entities or organisations with which the Tecnatom Group has business relations.

### 1.3 SCOPE OF APPLICATION

Compliance with the present TGCC shall, therefore, be mandatory for all the Tecnatom Group members, as the former is defined in article 42 of the Spanish Code of Commerce, regardless of the position they may occupy or the place in which they may work.

Tecnatom Group’s Professionals are the directors, managers, employees, temporary personnel, representatives, agents, collaborators and any other persons representing any Tecnatom Group company, in Spain or abroad.

## 2 VISION, MISSION AND VALUES

### 2.1 VISION

#### **Vision.**

Tecnatom Group’s Vision is **“To be admired by our customers for the knowledge and technology we provide”**.

## 2.2 MISSION

### Mission.

Tecnatom Group's Mission is **“To make our customers’ facilities operate in an excellent, safe, and efficient manner”**.

## 2.3 CORPORATE VALUES

Corporate values are one of the foundations supporting Tecnatom Group, as a result of which they are an inalienable commitment. Consequently, all its professionals undertake specially to respect, fulfil and promote them and to point out and correct any behaviour that runs contrary to them.

Tecnatom's Corporate Values are as follows:



## 3 GENERAL PRINCIPLES

### 3.1 COMPLIANCE WITH LEGAL STANDARDS

Tecnatom Group shall act at all times in compliance with the current legislation and take into consideration internationally accepted ethical customs and practices.

Professionals of the Tecnatom Group must exercise great care in their activities in order to ensure that they are within the legal framework of the country in which they are performed, and shall seek advice in the event of any doubt.

### 3.2 RESPECT FOR PEOPLE

All professionals of the Tecnatom Group shall treat their colleagues, managers and collaborators with respect, striving to create a working environment where respect and fellowship occupy an overriding position.

Tecnatom Group will reject any type of discrimination for reasons of race, ethnic background, nationality, age, gender, sexual orientation, religion, political opinion, health status or personal or physical condition.

### 3.3 HONESTY

Professionals of the Tecnatom Group shall promptly respect, in the field of their activities and business, the applicable current regulations, as well as this TGCC and the internal regulations; the achievement of objectives and defence of the interests of the Tecnatom Group shall not under any circumstances serve as a justification for dishonest conduct or behaviour.

Furthermore, Professionals of the Tecnatom Group shall act in all cases within the framework set in Tecnatom Group's Anti Bribery Program (*Plan de Tolerancia cero con la Corrupción*) as well as in Tecnatom, S.A.'s Crime Prevention Model (*Modelo de Prevención de Delitos*).

### 3.4 PROFESSIONALISM

"Professionalism" is one of the Tecnatom Group's basic principles through which to achieve excellence and an adequate working environment.

Tecnatom Group understands "professionalism" to be honest, respectful, upright and responsible behaviour, the efficient performance of its professionals and open and sincere communication.

All Tecnatom Group's professionals shall endeavour to abide by the established procedures and shall disseminate the lessons learned from their experience.

All Tecnatom Group's professionals shall collaborate with one another in order to achieve a more efficient process in their work.

In their work the Tecnatom Group's professionals shall work optimising the use of their time and maintain a favourable attitude towards functional availability.

### 3.5 COMMITMENT TO HUMAN AND LABOUR-RELATED RIGHTS

Tecnatom Group's activities and business shall be carried out in accordance at all times with the Universal Declaration of Human Rights <http://www.un.org/es/universal-declaration-human-rights/> and

the Tripartite Declaration of Principles of the International Labour Organisation [http://www.ilo.int/empent/Publications/WCMS\\_124924/lang--es/index.htm](http://www.ilo.int/empent/Publications/WCMS_124924/lang--es/index.htm).

Tecnatom Group recognises the rights of ethnic minorities in those countries in which it carries out its business and completely rejects child labour and forced or obligatory labour.

All Tecnatom Group's professionals shall be recruited legally and no case shall illegal contracting or labour be accepted.

All Human Resources policies shall be rigorous and objective and compatible with the present TGCC.

### 3.6 PROFESSIONAL DEVELOPMENT

Tecnatom Group shall favour the training of its professionals, promoting professional competence, multi-faceted skills and flexibility.

Besides, all Tecnatom Group's professionals shall participate actively in the training plans undertaken by the Group, in order for each, individually and collectively, to achieve the highest possible degree of development.

Performance assessment shall be promoted with regards of all Tecnatom Group's professionals.

### 3.7 RESPECT FOR THE ENVIRONMENT

Tecnatom Group is actively committed with the conservation of the environment, fulfilling or going further the regulations in force governing such subject.

In order to achieve such objective, Tecnatom Group's professionals shall:

- Take into consideration at all times respect for the environment and the prevention of pollution, striving to reduce environmental impact.
- Use technology, carry out processes and follow methods of action that are at all times respectful to the environment, thus favouring sustainable development.

### 3.8 COMMITMENT TO SAFETY AND MAINTENANCE OF A SAFETY CULTURE

Tecnatom Group considers the establishment of a solid Safety Culture to be essential in each and every one of its activities and business operations, in which due consideration shall be given to Nuclear Safety, with those responsible acting as role models for others, recognition is given to a job well done, especially in relation to safety, and where special emphasis is given to:

- A questioning attitude, teamwork, conservative decision-making.
- Professional competence, learning, on-going improvement, the feedback of lessons learned.



- Effective communication, supervision of work, establishment of means and resources suitable for the safe performance of work and the rejection of complacency.

### 3.9 SAFETY AT THE FACILITIES

Tecnatom Group is aware of its commitment to its workers and accepts the identification, assessment and prevention of occupational risk as an objective of its management, the aim being to minimise such risk and establish adequate working conditions.

Since Tecnatom Group's professionals health is a subject of special importance, it will not only meet legal provisions in relation to the prevention of occupational risk but will also promote health and prevention policies in order to improve them.

All Tecnatom Group's professionals shall become involved in the implementation of and compliance with the Occupational Risk Prevention Management Systems corresponding to the different companies belonging to the Group.

All Tecnatom Group's professionals are entitled to effective protection in relation to occupational health and safety, being as well responsible for correct use of the protective resources and equipment provided for them.

In the specific case of professionals leading teams, they shall ensure that the members of such teams abide by all the measures set out in this respect.

### 3.10 QUALITY OF SERVICES AND PRODUCTS

The activities of the Tecnatom Group are aimed at satisfying the needs and interests of its clients, responding to those suggestions that might enhance the improvement of its services and products quality. Hence, Tecnatom Group directs its research, development and commercialisation activities towards attaining high standards of quality in its services and products.

### 3.11 CORPORATE IMAGE AND REPUTATION

All the Tecnatom Group's professionals shall behave in a professional, upright and honest manner, thereby ensuring the preservation of its good name, taking into account the importance of its image for the achievement of its Mission and the creation of value for its shareholders.

All Tecnatom Group's professionals shall undertake to use wherever applicable, the Tecnatom Group's Corporate Identity Manual.

In fulfilling the above, the Tecnatom Group's professionals shall dress with decorum, avoiding the use of garments and footwear inadequate for the working environment and wearing, where appropriate, corporate clothing on its own or client's premises.

Likewise, all the members of the Tecnatom Group staff shall take care with their verbal expressions and gestures, avoiding behaviours that are rude or unsuitable for working

environments, controlling noise and its impact on the place of work, especially in common areas in which other organisations might be affected.

Similarly, and in areas concerning the Tecnatom Group, public demonstrations of affection shall be avoided, these being limited to those conventionally established as greetings.

### **3.12** TECNATOM GROUP RESOURCES

Resources of the Tecnatom Group shall be used in an efficient and responsible manner, using them in all cases in accordance with their intended purpose.

Consequently, assets belonging to Tecnatom Group shall not be used for any particularly unsuitable purposes.

### **3.13** TRANSPARENCY, INTEGRITY AND SECURITY OF INFORMATION

Information is one of Tecnatom Group's most important assets and as such requires suitable treatment and protection.

Tecnatom Group's professionals shall in all cases provide complete, transparent, understandable and accurate information, such that when using it, those to whom such information is addressed may take autonomous decisions with full understanding of the interests at stake, the alternatives and the key consequences.

Tecnatom Group's professionals shall keep all information classified or for internal use only to which they may have access, either directly as a result of performance of their habitual task or activity or accidentally, being own information, or belonging to a third party in the strictest secrecy and confidence; likewise, they shall take the necessary measures to ensure the confidentiality of the business secrets to which they get access to This shall be applicable particularly in those cases in which the information used is sensitive and especially subject to specific controls on use and distribution.

Tecnatom Group's professionals shall show maximum respect for proprietary and/or copyright information belonging to Official Bodies and for that belonging to their information suppliers and shall involve themselves in the implementation of the Information Security Management System.

### **3.14** COMMUNICATION

The Tecnatom Group considers communication to be not only a management tool that contributes to increasing the levels of motivation and commitment of its professionals and to creating a positive working environment, but also a key element in day-to-day work performance, the quality of the work carried out, achievement of the objectives of the organisation and the professional and even personal development of the employees.

This maxim requires that Tecnatom Group's professionals ensure truthful, transparent and active communications at all levels and in all senses.

### 3.15 IRREGULAR PAYMENTS

The Tecnatom Group completely rejects any type of corruption or irregular payment.

Consequently, it is prohibited to offer, give, request or receive any type of collection or payment without there being some kind of compensation.

Attempts shall be made to avoid payments being made in any country other than that in which the corresponding service is provided, unless contractually documented.

Likewise, it is expressly prohibited to request or make payments from or to persons having political responsibilities or any employee of the Public Administration.

Tecnatom Group's professionals shall remain alert in order to prevent conducts such as that described above from occurring, following at all times the procedures established in this respect in Tecnatom Group's Anti Bribery Program (*Plan de Tolerancia cero con la Corrupción*).

### 3.16 GIFTS AND PRESENTS

No employee or manager of the Tecnatom Group shall accept or offer any gift or favour that might be interpreted as exceeding generally accepted commercial practice or courtesy or that aims in any way to obtain preferential treatment in any activity or business undertaken by the Tecnatom Group.

In particular, it is forbidden to offer any gift to public officials, Spanish or foreign, to persons responsible for the companies and entities with which the Tecnatom Group has commercial relations or to auditors or those in charge of reviewing accounts, or to family members of any of the above, with a view to influencing the independence or impartiality of their judgement or obtaining any preferential treatment in any activity or business undertaken by the Tecnatom Group.

It is forbidden to use any third person to offer or provide the above-mentioned presents, gifts or favours.

It is also forbidden to offer or provide facilitating payments that is, made with the intention of expediting an administrative process.

Therefore, no gifts or presents can be accepted except those considered as normal part of the business relationship, their value be irrelevant or be a part of social conventions. To that purpose, the following rules are established as a guide to determine whether they can be considered acceptable:

- They have to be infrequent
- Of very low value (less than 200€ as a maximum)
- Never in cash or equivalent (present vouchers)
- Independent of any particular tendering or contractual process

If it were necessary to accept any advantage that does not meet the requirements of the preceding paragraph, for any reason, such advantage should be notified to of the Legal Compliance Body.

Compliance with the standard set out above is compulsory in all cases, even in countries in which offering valuable gifts to commercial partners is habitual or customary practice.

Consequently, any Tecnatom Group employees, managers or collaborators who receive gifts that are not authorised by Tecnatom Group's Anti Bribery Program (*Plan de Tolerancia cero con la Corrupción*) shall report this to the Legal Compliance Body for assessment and determination of the pertinence of such gifts.

For their part, gifts, even when offered by the Tecnatom Group as part of its commercial and institutional relations and aimed exclusively at promoting its corporate image, and except when their value is considered to be purely symbolic, must be managed and authorised appropriately and suitably documented.

All Tecnatom Group's professionals will scrupulously observe Tecnatom Group's Anti Bribery Program (*Plan de Tolerancia cero con la Corrupción*).

### 3.17 SOCIAL NETWORKS

The use by Tecnatom Group's professionals of social networks or similar applications must respect this Code of Conduct and, where applicable, the Information Security Practical Manual, abstaining from publishing classified information or information for internal use of the Tecnatom Group, or opinions that may be attributed to said Group or that are contrary to its vision, mission and corporate values.

### 3.18 CONFLICTING INTERESTS AND LOYALTY TO THE GROUP

In the performance of their activities and business, Tecnatom Group's professionals must prevent any situation that might give rise to a conflict of interests between the parties involved.

Tecnatom Group's professionals shall be obliged to inform the Group management of any other professional activity they develop. Such activity shall be respected as long as it does not contravene the interests of the Tecnatom Group and is legal.

Not contravening the interests of the Tecnatom Group means not occupying any post in competitor companies, supplier companies or companies having any type of sway or control over them.

Also incompatible will be activities possibly implying the disclosure or use of information relating to the Tecnatom Group, its associated companies, subsidiaries, clients, suppliers or companies having any type of sway or control over them.

Tecnatom Group's professionals shall be obliged to notify the Group management of any current or future participation in the management bodies of other companies having any type of relations with the Tecnatom Group.

Tecnatom Group's professionals shall take special care in the handling of information, maintaining complete secrecy regarding relations between the said Group and any other parties, in order not to damage the interests of either third parties or the Tecnatom Group.

### 3.19 BUSINESS OPPORTUNITIES

Tecnatom Group's professionals may not take advantage of any business opportunities of which they may learn through their posts and shall in all cases give priority to the interests of the Tecnatom Group.

## 4 GROUP ENVIRONMENT

### 4.1 SHAREHOLDERS

The Tecnatom Group strives continuously to create value for its shareholders.

All the shareholders shall be given equal treatment and shall be provided with truthful, accurate and appropriate information.

### 4.2 CLIENTS

Tecnatom Group's professionals shall become actively involved in the objectives of the Group's clients, in order to ensure in all cases their maximum satisfaction. In this respect, Tecnatom Group's professionals shall:

- Act efficiently and professionally, with dedication, availability and a service-oriented mindset.
- Respect and care for the image of the clients as though they were those of the Tecnatom Group.
- Assume the objectives and interests of the clients as though they were those of the Tecnatom Group.
- Treat all information placed in their care as though it were Tecnatom Group information.

Special diligence shall be applied at the clients' premises as regards commitment to the corporate values of the Tecnatom Group, in order to ensure that the services rendered are a reference for the sector.

Relations with the clients' personnel at the latter's premises shall be limited to the strictly professional, with the necessary cordiality but avoiding excessive familiarity.

The Tecnatom Group will set up systems to measure the degree of satisfaction of the clients.

### 4.3 SERVICE PROVIDERS AND SUPPLIERS

Policies for the selection of service providers, suppliers and other collaborating entities shall be objective and impartial and adhere at all times to the legal framework.

The service providers and suppliers shall adhere to and abide by the standards set out in this TGCC when undertaking actions or activities complementary to those of the Tecnatom Group.

### 4.4 COMPETITORS

The Tecnatom Group undertakes to compete fairly and not to issue any advertising that is deceitful or derogatory with respect to its competitors, thereby avoiding any conduct that might constitute unfair competition.

## 5 COMMUNICATION AND DISSEMINATION OF THE TECNATOM GROUP CODE OF CONDUCT

### 5.1 INTERNAL AND EXTERNAL DISSEMINATION

The organizations responsible for the internal and external communication for the Group will also be responsible for the dissemination of the TGCC and it shall be accessible at least via the employee portal (KEOPS) and the website "www.tecnatom.es".

The Tecnatom Group shall do everything within its power to ensure that this TGCC is known to agents, suppliers, service providers, subcontractors, consultants, intermediaries, distributors, etc. and that they all act in accordance with it.

## 6 INFRINGEMENT OF THE TECNATOM GROUP CODE OF CONDUCT

Tecnatom Group's professionals be obliged to report in a timely manner to the Legal Compliance Body on any infringement or justified suspicion of infringement of the present TGCC that might come to their notice, in order for the said body to carry out an analysis of the background of the case, hearing where appropriate the reporting party and the person allegedly responsible for the infringement and, when considered appropriate in view of the seriousness and transcendental nature of this infringement, issue a report addressed to the General Manager of the Tecnatom Group company in which the infringement has taken place, with a copy to the General Manager of the Tecnatom Group, this report to include a proposal for the adoption of whatever corrective measures and sanctions might be considered appropriate.

Such communications shall be transmitted using the confidential reporting system established for that purpose.

The Tecnatom Group shall in all cases guarantee the anonymity of the reporting party, observing the legal provisions applicable and adopting whatever measures might be appropriate to defend the rights of the Tecnatom Group and the persons involved according to the information provided.

## 7 UPDATING OF THE TECNATOM GROUP CODE OF CONDUCT

This TGCC shall be revised and updated by the Legal Compliance Body at least once every two years.

If it were necessary to update the TGCC, such body shall submit whatever proposals for modification it might consider to be appropriate to the General Manager of the Tecnatom Group.

The approval of the corresponding modifications shall be submitted by the General Manager to the Board of Directors of Tecnatom, S.A.

## 8 ACCEPTANCE OF THE TECNATOM GROUP CODE OF CONDUCT

Tecnatom Group's professionals, present and future, shall accept the present TGCC as worded at each moment of its being in force.

The TGCC shall be attached as an appendix to future Tecnatom Group staff member work, training or collaboration contracts.

## 9 APPROVAL OF THE TECNATOM GROUP CODE OF CONDUCT

The present TGCC shall be submitted by the General Manager of the Tecnatom Group to the Board of Directors of Tecnatom, S.A. for approval.