

COMPLIANCE MANAGEMENT SYSTEM
GRUPO LANTANIA

CODE OF ETHICS

lantania 

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CODE OF ETHICS

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1. INTRODUCTION

Grupo Lantania (hereinafter "**Lantania**") is understood as the group of companies that belong, directly or indirectly, as subsidiaries (100% of its share capital) or investees (at least 50% of its share capital without reaching 100% of its share capital) to GRUPO LANTANIA, S.A., parent company, therefore, of Lantania, a business corporation that operates in the infrastructure, construction, water, energy, conservation and services sectors, both nationally and internationally, through the aforementioned subsidiaries and investees.

The international expansion carried out and ongoing requires the imposition of compliance commitments on each and every one of the subsidiaries and participated legal entities worldwide, whether incorporated or acquired.

Being aware that the legal systems of each country incorporate different legal, regulatory and normative aspects and different supports for criminal liability of legal entities, Lantania has decided, on the one hand, to establish common standards in normative compliance ("**Compliance**") matters in all the companies that make it up worldwide, and, on the other hand, to implement and maintain, in each of them, a comprehensive compliance model (hereinafter, the "**Integral Compliance Model**") that corresponds to each particular legal system of each country where it operates.

Among these common standards, which must be complied with in each of the companies that integrate Lantania, is this code of ethics (the "**Code of Ethics**").

Thus, in the year 2025, Lantania has decided, on the one hand, to establish the aforementioned Compliance standards at international level, and, on the other hand, to update and expand the existing Compliance resources in Spain since 2019 (a criminal compliance policy, a criminal and anti-bribery compliance management system manual, based on the spanish standard UNE 19601, as well as an anti-corruption policy, a code of ethics, a whistleblower channel and a disciplinary system, under the protection of a compliance committee), converting them into an integral system of prevention and management of legal and criminal risks (the Integral Compliance Model) to be established in each and every one of the companies that form part of its corporate perimeter in Spain, according to the specific existing legal system.

At Lantania, integrity, honesty, fair dealing and full Compliance with all applicable laws, rules and regulations have guided its practices and actions. Since then, Lantania's directors, management, employees and collaborators have upheld and fulfilled this commitment in their daily responsibilities, contributing to Lantania's reputation as one of its most important assets.

This Code of Ethics is, therefore, the living document that reflects the ethical principles of the beliefs, values and behaviors of all members who are part of Lantania, serving as a guide when making decisions and guiding our conduct at work.

It is a document that must be known, respected and complied with, therefore, by all members of Lantania, being available to each of them, assuming the commitment to comply with it.

2. PURPOSE AND SCOPE OF APPLICATION

The purpose of Lantania's Code of Ethics is to establish the guidelines that must govern the ethical behavior of all its shareholders, partners, directors, managers, employees, collaborators, business partners and those other persons whose activity is expressly subject to it (members of Lantania, its scope of application), with regard to the relationships and interactions that Lantania maintains with all its stakeholders (shareholders, partners, directors, managers, employees, collaborators, customers, suppliers, public administrations, public and private institutions and society in general).

Lantania's Code of Ethics reflects the principle of due diligence applied by Lantania for the prevention, detection and elimination of irregularities related to non-Compliance with laws, rules and regulations in all areas affecting Lantania, including its internal rules.

As part of Lantania's comprehensive legal and criminal risk prevention and management system ("**Compliance Management System**") or Integral Compliance Model, it is under the supervision of a global compliance supervisory body (the "**Global Compliance Supervisory Body**") of Lantania.

The nature of this Code of Ethics is not intended to cover all possible situations that may occur in Lantania, but to provide a frame of reference against which to measure any activity. In this regard, Lantania's various stakeholders should seek advice from the above body should they have any doubts regarding its content.

3. PRINCIPLES OF ACTION

Lantania expects all parties affected by this Code of Ethics to comply, at all times, with the following values and principles of ethical conduct:

| | |
|---------------------------------------|--|
| INTEGRITY | Acting ethically, loyally, honestly and in good faith. |
| HONESTY | Rejection of corruption in all its forms, public and private, active and passive. |
| RESPECT | Tolerance and defense of people's diversity in any aspect. |
| TRANSPARENCY | Providing stakeholders with timely, reasonable, proportionate and adequate access to relevant, truthful, clear and complete information on its activities, policies and management. |
| REGULATORY COMPLIANCE | Full Compliance with all regulatory provisions, including internal standards, and requirements for suppliers and collaborators. |
| OCCUPATIONAL HEALTH AND SAFETY | Commitment to protect employees' occupational health and safety, making occupational risk prevention the tool that supports them. |
| SUSTAINABILITY | Promote its continuity over time, reinforcing our commitment to environmental protection and social welfare, maintaining relationships with stakeholders based on ethics and transparency. |
| CONTINUOUS IMPROVEMENT | Promote the development and retention of talent and knowledge and establish efficient measures of their sustained progress. |
| SOLIDARITY | Work as a team, always looking for the global interest, through collaboration between areas and with customers and suppliers. |

4. RULES OF CONDUCT

4.1. Compliance with laws, regulations and standards.

All members of Lantania undertake to comply with applicable international, national, generic and industry-specific laws, regulations and standards, as well as Lantania's internal rules.

The above commitment is integrated into Lantania's value chain, and Lantania may carry out verification processes to ensure Compliance with this Code of Ethics.

4.2. Work environment, discrimination and harassment

Since we spend so much of our lives at work, it is essential to enjoy a work environment based on mutual trust, and where mistakes are seen as part of learning.

We encourage teamwork and we all share successes and mistakes, because at Lantania there is no fear of making mistakes and we recognize and value the ideas and contributions of others.

Our attitude towards work must be one of active cooperation and respect for others, seeking excellence in the performance of our work.

Likewise, Lantania fosters a corporate culture based on loyalty, trust and solidarity among all.

Lantania respects the personal dignity, privacy and personal rights of each employee and is committed to maintaining a workplace in which there are no situations of discrimination or harassment of any kind. Therefore, employees and collaborators must not discriminate with respect to origin, nationality, religion, race, gender, age, political ideas or sexual orientation, nor must they engage in any type of verbal or physical harassment.

In this sense, Lantania considers diversity, equity and inclusion as fundamental principles, promoting a professional environment in which all people should be valued and respected for their talents and abilities, regardless of gender, age, origin, beliefs, sexual orientation or condition.

Lantania ensures fair selection, promotion and career development processes and fosters diverse teams that reflect the plurality of the society in which it operates and serves.

4.3. Confidentiality

We value and protect our confidential information and respect the confidential information of others.

Confidential information is information that is not public knowledge from time to time. It includes trade secrets, business plans, unique elements of products and services, insights into customer behavior, business ideas, designs, published economic and financial data and any information about Lantania's strategy and operations, the disclosure of which to third parties could be damaging to Lantania and any of its constituents. We must ensure, at all times, the proper use and protection of Lantania's internal information.

In this regard, it is of utmost importance:

- ▶ Out of respect for other colleagues and oneself, protect the confidentiality of records of the most sensitive personal data at all times.
- ▶ As it is a conduct not only legally prohibited, but also socially reprobated, not to manipulate or use information of Lantania or persons and groups treated or suppliers for personal gain, or third parties or to cause harm to anyone.
- ▶ For being not only unethical but also against intellectual property, not to use for private purposes, or transmit to others, technologies, brands, methodologies and any type of information belonging to Lantania, even if they have been obtained or developed by the employee or collaborator in his or her work environment.
- ▶ Keep the most absolute professional secrecy, not discussing any confidential information about the people and groups treated with third parties, even with their own family members or other members of Lantania that are not assigned to the professional work performed. This commitment to professional secrecy shall also apply in the event of leaving Lantania. Special care must be taken not to discuss with members of the work team, in public places such as elevators or restaurants, issues related to the people and groups treated.
- ▶ Take diligent care that any information relating to persons and groups treated does not pass on to any person, keeping the working papers and data relating to all of them, so that no one who is not authorized by Lantania to obtain this information can have access to it.
- ▶ Not to provide copies of reports, opinions or certifications related to professional work to any private or official person, regardless of the reason for the request, except in the

case of persons from Lantania responsible for the work team assigned to the persons and groups treated.

- ▶ Return at the end of the treatment of individuals and groups, and in any case at the end of the employment relationship, all documentation relating to them. It is expressly forbidden to use for private purposes or outside Lantania of any material or information relating to the work and internal or external projects of the same.
- ▶ No copies will be made of the software or documentation of the persons and groups treated, unless expressly authorized by them, as long as it is necessary for the development of the relationship.
- ▶ Deliver or return the material documentation and equipment that have been provided by Lantania after the end of the contract period. Lantania will withdraw all access rights.

4.4. Conflicts of interests

We should all avoid situations where the personal interests of Lantania members conflict with the interests of Lantania.

The best way to deal with a conflict or potential conflict is to inform the Global Compliance Supervisory Body as soon as possible of what is happening, which allows the conflict to be analyzed and resolved.

Therefore, we must not participate in negotiations with persons and groups treated, suppliers and other entities with whom we have a family relationship (spouse, children, siblings, parents, aunts and uncles, etc.), where a situation of influence is exercised from which personal benefits other than those of Lantania may be derived.

4.5. Use and protection of social assets

Lantania makes available to its members, affected by this Code of Ethics, sufficient resources for the performance of their professional activity, committing to a correct and appropriate use of them, observing due diligence in their custody.

Therefore, the aforementioned resources may not be used for personal or extra-professional use or for the performance of activities that are not related to the interests of Lantania.

In this sense, the persons affected by this Code of Ethics:

- ▶ They shall use Lantania resources such as cars, telephones, tablets, laptops, internet access, email or any other application for the performance of their job functions. Lantania reserves the right to audit the proper use of these resources.
- ▶ The information that Lantania makes available to the employed personnel will be treated in accordance with the procedures established by the organization, being expressly prohibited the storage of any type of Lantania information on local computers, external storage devices (USB disks, USB keys and any other type of device) and sending it through electronic networks or other means. The information must be stored in the folder structure created for such purposes on Lantania's servers.
- ▶ Lantania prohibits the use of hacking tools in the organization, being expressly forbidden the installation, configuration and use of such tools by employees.
- ▶ The computer equipment made available to employees is the property of Lantania and the installation of any unauthorized software is expressly prohibited. Any software you wish or need to install must be authorized by Lantania. Only authorized personnel may perform installations, uninstallations and configuration of software.
- ▶ They may not use for personal gain the trademark, logo or any other industrial or intellectual property right of Lantania. However, use of the logo is permitted only to show current or past professional affiliation with Lantania, in unambiguously appropriate contexts, such as professional profiles or on resumes.
- ▶ They may not disclose, store, disseminate, download or distribute material that is threatening, false, defamatory, obscene or that may in any way constitute a crime or adversely affect the reputation and good image of Lantania, without prejudice to freedom of association.

4.6. Family members and family reconciliation

Lantania wants to ensure that the workplace is fair for everyone and is not affected by favoritism of any kind. In this way, recruitment decisions will be fair and objective.

Immediate family members and partners of employees may be hired as employees, consultants, collaborators or contractors only if their selection is based on their qualifications, performance, skills and experience, and provided that this does not give rise to a conflict of interest.

These principles of fair hiring, which may not contradict the provisions of the Workers' Statute and the applicable Collective Bargaining Agreement, shall apply to all aspects of the employment relationship, including remuneration, promotions and transfers, as well as in the event that the relationship develops after the respective employee has joined Lantania.

In addition, Lantania will make it easier for its employees to reconcile work and family life.

4.7. Bribery and corruption

Lantania repudiates all forms of bribery and corruption. Corruption is illegal and therefore unacceptable, and Lantania's policy is zero tolerance in all matters relating to corruption.

Employees, directly or through intermediaries, must not offer or promise a personal or improper financial or other favor to obtain or obtain a business or other advantage from a third party, whether public or private. Nor must they accept such an advantage in exchange for preferential treatment from a third party, and they must refrain from any activity or conduct that could give rise to the appearance or suspicion of such conduct or an attempt thereof.

Employees should be aware that offering or giving improper benefits in order to influence the decision of the recipient, whoever the recipient may be, may not only result in disciplinary sanctions but may result in criminal charges. Improper benefits can include anything of value to the recipient.

4.8. Commercial favors, gifts and similar

Employees may not be influenced by receiving favors or attempt to improperly influence others by giving favors.

A business favor is a gift (either in cash or in kind) that we have provided to someone or that has been given to us by someone in our professional environment and context and that has the basic objective of modifying or influencing decisions or behaviors.

Exchanging gifts and entertainment can help Lantania's business relationships and even, if between colleagues, improve working relationships, but they can also cause a conflict of interest between personal interests and professional obligations.

Therefore, the exchange of gifts or favors must not be intended to unduly influence the decisions of individuals and groups treated or suppliers, just as we will require that the decisions of employees are not affected by the fact that they have received business favors.

When receiving or offering gifts or entertainment, the most important thing is to communicate openly with management, act sensibly and think about how others will perceive it.

In this regard, employees may only offer or accept reasonable and symbolic favors and gifts that are appropriate under the circumstances and shall not accept them if such behavior could create the impression that it constitutes improper influence with respect to the relevant business relationship.

For all these reasons, we must:

- ▶ Ensure that all gifts and invitations we offer or receive are appropriately symbolic and do not damage Lantania's image.
- ▶ Inform our suppliers of our gift policy, and in turn, know their policy with respect to these matters.
- ▶ Always inform our superior of any favor we have received.

On the contrary, we should not:

- ▶ Accepting money or commissions, and not allowing any immediate family member to accept anything from anyone with whom Lantania has a business relationship.
- ▶ Accepting gifts or favors that are considered illegal, violate the law, or violate good customs.
- ▶ Accept a gift if, with it, one could feel committed.

- ▶ Accepting a gift or entertainment that could be considered wasteful.
- ▶ Accepting gifts that influence or give the appearance of influencing our business decisions.
- ▶ Accepting a gift or favor as part of an agreement to perform something in exchange for it.
- ▶ Participate in any activity knowing that the person giving the gift would be in violation of your entity's policies.

4.9. Privacy and Personal Data Protection

Privacy is a right of all members of Lantania, so it is committed to respecting the confidentiality of the personal data of its employees.

It is the obligation of Lantania and its members:

- ▶ Ensure that individuals from whom we collect data know what type of information we are collecting, what it will be used for, and how they can contact Lantania if they have questions.
- ▶ Collect only the personal data that is necessary.
- ▶ Destroy or modify erroneous or incomplete data.
- ▶ Ensure that such data is stored securely and lawfully.
- ▶ Do not provide this data to any person who is not authorized to do so.
- ▶ Respect the right to privacy of all members of Lantania.

Therefore, Lantania and its members should not:

- ▶ Collect "sensitive" information (especially data on health, ethnic origin, sexual orientation, political ideology and religion), without the consent of the person concerned or unless otherwise required by law.
- ▶ Providing personal data to third parties unless we have written authorization from the person concerned.

- ▶ Keeping that information longer than is necessary to cover the reason the consent was given.

4.10. Occupational Risk Prevention

Lantania is committed to complying with its obligations in terms of occupational risk prevention, with the aim of protecting and preserving the occupational health and safety of its workers. In addition, Lantania will require that the above commitment is fulfilled, unequivocally, by all its contractors and subcontractors.

This commitment translates into zero tolerance for negligent behavior in occupational health and safety matters, and the implementation of an adequate model for the organization of preventive activities.

We must all be aware of and comply with occupational health and safety protection and occupational risk prevention regulations and ensure our own safety, as well as that of other colleagues, customers and suppliers who visit our facilities.

4.11. Prevention of Money Laundering and Financing of Terrorism

Lantania undertakes to avoid any collaboration with persons or entities that may be involved in money laundering or terrorist financing.

The persons affected by this Code of Ethics shall refrain from proposing, promoting or facilitating Lantania's involvement in commercial transactions, commercial or of any other nature when they know or have reasonable suspicions that their purpose is to introduce funds from criminal activities into the economic system by concealing their origin.

Lantania shall refrain from possessing, using or transmitting assets that originate from criminal activities and shall not engage in activities aimed at collecting, distributing or providing funds to finance terrorist acts and/or organizations.

4.12. Economic and financial information. Collections and payments

Lantania's economic and financial information, and in particular the annual accounts, shall reflect a true and fair view of its economic, financial and equity reality, in accordance with generally accepted accounting principles and the General Accounting Plan. For these purposes, no member of staff shall conceal or distort the information in the accounting records and reports of Lantania's companies, which shall be complete, accurate and truthful.

In general, payments and collections derived from commercial transactions in cash shall be avoided in excess of what is established by law at any given time, as well as those made by check to bearer. In any case, it shall be ensured that both payments and collections are made by automated bank deposit (transfer, card, etc.).

All payments and receipts shall be clearly and accurately reflected in Lantania's accounting records.

All payments and collections shall be made exclusively with the knowledge of and in accordance with the instructions of the Finance Department. For this purpose, at the internal level, the persons authorized to order transfers and dispose of funds from bank or cash accounts must be clearly identified, so that it is always possible to identify the originator of any payment. The same applies to withdrawals of funds.

Lantania has a sustainable procurement policy that determines that the persons authorized to contract and dispose of funds based on their relevance may be controlled by more than one person.

Special prudence shall be observed and all payments with any of the following characteristics shall be duly controlled:

- (i) Are performed by a company with which you are contracting for the first time.
- (ii) Should be made to an account other than the one normally used by a supplier.
- (iii) To be made to or received from current accounts located in tax havens.
- (iv) The client or supplier is a company whose ultimate beneficiary or owner has not been identified and in any case when it is a company incorporated in a tax haven.
- (v) Constitutes an extraordinary payment not foreseen in the agreement or contract.

4.13. Environment

Lantania develops its activity from a firm commitment to environmental protection, strictly complying with the applicable legislation and applying sustainability criteria in all its operations.

Lantania integrates in its activities the necessary practices to promote pollution prevention, being the fight against climate change, responsible consumption of resources, circular economy, waste management and biodiversity protection, key aspects of our policies, such as corporate sustainability policy and integrated management system ("IMS"), which must be known and assumed by all members of the organization.

In addition, Lantania requires its stakeholders to comply with applicable environmental requirements, thus contributing to strengthen the commitment to sustainability in our value chain.

4.14. Human Rights

Lantania is committed to respecting and promoting human rights, as set out in the Universal Declaration of Human Rights of December 10, 1948 and the UN Guiding Principles on Business and Human Rights of June 16, 2011.

Likewise, Lantania assumes and respects the commitments established in international labor standards (conventions of the International Labor Organization, ILO) and in the European Community and national legislation, regulations and standards in the labor field, with express mention of the prohibition and rejection of forced labor, slavery, child labor and any work that harms the dignity of people.

4.15. Non-Compliance with this Code of Ethics and reporting of illegal conduct or conduct in violation of this Code

It is the responsibility of each member of Lantania to ensure full Compliance with the contents of this Code of Ethics. Doing the right thing and ensuring the highest standards of integrity is the personal responsibility of each of them and cannot be delegated.

Any practice or action that they believe to be inappropriate or even illegal under this Code of Ethics must be reported, through the appropriate channels, to their immediate superior and to the Global Supervisory Body of the Compliance Model.

Complaints that are to be made confidentially will use Lantania's internal reporting system and complaints channel (the "**Internal Reporting System and Complaints Channel**"), an element that is part of Lantania's Integral Compliance Model.

In case of breach of the precepts contained in this Code of Ethics, Lantania will act diligently, applying the contents of the document called "Disciplinary System", which is part of its Integral Compliance Model, to the subjects obliged under labor law, as well as applying all measures and penalties deemed appropriate to other subjects included in the scope of application of this Code of Ethics.

5. APPROVAL AND VALIDITY

This Code of Ethics has been approved by Lantania's management and governing body, following its formulation by the Global Compliance Supervisory Body, coming into force on the date of its cover page, and is reviewed and updated periodically.