



CODE OF ETHICS



INTRODUCTION

Grupo Lantania, S.L. (the "Company" or "LANTANIA"), within its Criminal Compliance Policy, has voluntarily assumed the commitment to approve this Code of Ethics ("Code of Ethics"), which will be published on the organisation's website and intranet.

The Code of Ethics includes the mission, aim and values of the Company and its fundamental objective is to promote a culture of compliance not only in terms of the regulations applicable to the organisation but also the values that the Company applies as part of its identity.

SCOPE

This Code of Ethics is addressed to all the members of the Company and its external collaborators, third parties or business partners who might be legally or contractually bound to its compliance. Controlled or affiliated organizations are also obliged to comply with the obligations under this Code of Ethics.



MISSION, AIM AND VALUES

Our **MISSION** is to make large transport, water and energy infrastructures a reality to improve the quality of life and build a cleaner and more sustainable world, generating value for our customers, employees and shareholders.

LANTANIA's AIM is to be a world reference in helping clients in the creation of large infrastructures through innovation, the use of advanced technology, service and quality.

The **VALUES** that represent and distinguish us as a company are the following:



Integrity and transparency

3

LANTANIA defends transparency as a fundamental value that is reflected in the design of our headquarters. We demand compliance with applicable regulations and procedures so that the information we handle internally and externally is true and accurate. It is expressly forbidden to alter, omit or hide any circumstance that might have any legal or economic impact on the company.

Our Company is committed to the communities in which it operates, contributing to their sustainability by distributing the corresponding profit.

Our integrity means that any type of embezzlement and fraud against the Public Treasury, Social Security, employees or third parties is expressly prohibited. We, always comply with our commitments and honour our contracts.

We apply due diligence to our collections and payments, which, by way of example, means we reject large cash payments, and we do not charge amounts for services or goods not provided or delivered or in conditions different from those agreed or in an amount excessively higher than that indicated by the market.



Excellence

4

Excellence requires us to be cautious in the processes of incorporating both tangible and intangible assets, in such a way that the contribution is made under appropriate criteria, avoiding conflicts, influences or corruption that distort the process and reduce the Company's ability to provide excellent service.

We believe that the quality of our work is a fundamental factor in fulfilling our aims, in view of which we seek the maximum satisfaction of our clients, having implemented a quality management system based on the ISO 9001 standard. Parties linked to the Code of Ethics must comply with the obligations resulting from this quality management system, the established processes and procedures, in what affects them, and must, in the same way, communicate through the channels enabled for this purpose, any breach of which they are aware.

LANTANIA respects intellectual and industrial property rights, such as works, trademarks, tradenames, models and patents. Parties linked to the Code of Ethics must act accordingly, and it is expressly forbidden to obtain some benefit from the shareholders without their express authorisation. Consent is also required when accessing or disclosing third party personal or family data.

Confidentiality is required within the framework of our activity. The members of our Company must make proper use of the information.

Parties bound by the Code of Ethics must use the Company's assets in an appropriate manner, especially with regards to data protection. It is mandatory to comply with the rules and regulations relating to data protection and the internal regulations stipulated for better adaptation of the aforementioned regulations.



Responsibility

All parties bound by the Code must comply with the laws applicable and any voluntarily assumed principles. Respect for Fundamental Rights and public freedoms included in the United Nations Universal Declaration of Human Rights is a basic requirement of the Company.

LANTANIA defends free competition and rejects behaviours that could distort the market. It is expressly prohibited to:

- Offer, give, request or receive unjustified gifts, benefits or advantages or to dispense favours to someone when purchasing or selling goods, or when hiring services or in business relations.
- Offer or give gifts or compensation of any kind to a public authority.
- Influence by taking advantage of any situation derived from their personal relationships with a public authority.
- Alter the prices that would have resulted from free competition by reaching exclusive deals in tenders, bids and public auctions with other market agents, for example.
- Spread news or rumours that are known to be inaccurate or false.
- Disclose privileged or confidential information.

Our commitment to the environment is part of our mission, which is to build a cleaner and more sustainable world. It is not insignificant that Environmental Policy is included in the policies approved by the governing body and that the Company has an ISO 14001 environmental management system, appropriate to our context. The parties bound by the Code of Ethics are obliged to comply with the requirements of the aforementioned system and are obliged to report any breaches of which they are aware.

LANTANIA complies with laws or other general provisions that protect the Environment.



Team work

LANTANIA complies with applicable labour laws and the principles derived from the Declaration of Fundamental Principles and Rights at Work, the United Nations Global Pact and the International Labour Organisation Conventions.

It is expressly prohibited to:

- Impose or maintain conditions that suppress or restrict workers' recognised rights.
- Hire workers without notifying the social security system.
- Employ foreign citizens or minors without a work permit and offer misleading working conditions.
- Discriminate in employment and prevent the exercise of freedom of association or the right to strike.

6

LANTANIA considers it essential to protect the people who carry out their activity in the company, for which it provides the necessary means for workers to carry out their activity under the appropriate health and safety measures, thus complying with the requirements of the OHSAS 18001:2007 standards.

Workplace and/or sexual harassment is expressly prohibited, as is any form of discrimination or incitement to hatred or hostility, for reasons of gender, race, sexual orientation, religious beliefs, political opinions, nationality, origin, disability or any other circumstance susceptible to being a source of discrimination. We believe in equal opportunities and we have an Equality Plan.



Enthusiam

We associate this value with the loyalty that is required from the individuals bound by this Code; loyalty to the company itself, among members of the organisation, to the client, the providers, regulators and the communities in which services are provided.

We are obliged to avoid situations of conflict of interest by reporting any suspicion of corruption.

Our level of accountability means no form of corruption or bribery is allowed. In this we have to be especially vigilant, due to **LANTANIA's** activity.

WHISTLEBLOWING CHANNEL

A whistleblowing channel has been developed to control the premises established in the Code of Ethics and to implement an authentic culture of regulatory compliance.

8

Therefore, all parties bound by the Code who might have indications or suspicions of any conduct contrary to the principles, values, processes or procedures recognised in the management systems implemented by the company or in this Code, should use said channel in accordance with those collected in the whistleblowing channel published on the intranet, and where appropriate, provided to third parties.

The body that has been entrusted with supervising the functioning of the criminal compliance management system, the criminal compliance body, is responsible for processing communications and solving cases that may end with the imposition of a series of measures from reprimands to disciplinary dismissals, depending on the severity of the case as well as any sanctions to be applied in the event of non-compliance by those who are not members of the organisation.

Channel users will not be subject to reprisals, discrimination or disciplinary action.

The communications, and where appropriate, the cases that are processed will be confidential, without prejudicing our obligations of protecting the rights corresponding to companies and persons accused of acting in bad faith.

