



BUSINESS PARTNERS CODE OF CONDUCT



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INDEX

1.	INTRODUCTION	4
2.	PURPOSE AND SCOPE	4
3.	FUNDAMENTAL PRINCIPLES OF CONDUCT	4
3.1.	Integrity, Professionalism, and Legal Compliance	4
3.2.	Conflicts of interest.....	5
3.3.	Anti-Bribery and Anti-Money Laundering	5
3.4.	Fair competition	5
3.5.	Fiscal responsibility.....	6
3.6.	Confidentiality	6
3.7.	Human and labor rights.....	6
3.8.	Training	7
3.9.	Health and safety	7
3.10.	Transparency	7
3.11.	Quality management and environmental respect	7
4.	GOVERNANCE.....	8
5.	ETHICS CHANNEL (INTERNAL REPORT SYSTEM)	8
6.	NON COMPLIANCE.....	8
7.	ENTRY INTO FORCE, DURATION, COMMUNICATION, AND REVIEW	9

1. INTRODUCTION

Since its foundation, CLECE and its subsidiaries ("CLECE", "the Organisation" or "the Company") have committed to maintaining strong relationships with all stakeholders. This commitment is grounded in ethical principles that guide CLECE's corporate culture and operations.

We pride ourselves on the quality of our work, our professionalism, and our core values. We promote ethical behaviour across all markets in which we operate, emphasizing transparency and honesty as the cornerstones of our success.

CLECE views its suppliers, contractors, and business partners ("business partners") as essential to achieving our goals of growth, profitability, and service excellence. We strive to build relationships based on trust, mutual respect, transparency, confidentiality, and fair competition.

This code of conduct ("Code") sets out our business philosophy and ethical commitments, integrating our vision, strategy, corporate social responsibility, and legal and ethical standards.

2. PURPOSE AND SCOPE

This Code establishes the conduct expected from all individuals or entities entering into commercial agreements with CLECE, including their supply chains.

It outlines the fundamental principles guiding interactions between CLECE and its business partners and aims to promote a compliance culture across these relationships, and the wider society, by way of developing the rules and internal procedures applied to the operations.

Business partners must acknowledge this Code or confirm they adhere to a comparable internal Code of Conduct. CLECE may request supporting evidence of compliance when necessary.

3. FUNDAMENTAL PRINCIPLES OF CONDUCT

Business partners will ensure that all their actions are aligned with the principles and values advocated by CLECE in its Code of Ethics and, in particular, with the basic principles of conduct contained in this Code.

3.1. Integrity, Professionalism, and Legal Compliance

Business partners must act with integrity, transparency, and professionalism, respecting the Organisation's interests and striving for excellence in all services provided.

They must comply with all applicable laws of the place where they carry out their business activities, both in spirit and letter, observing ethical behaviour in all their actions.

3.2. Conflicts of interest

For the purposes of this Code, a "conflict of interest" is defined as a situation or circumstance in which external business, financial, economic, family, political, or personal interests could compromise the business partner's objective judgment, actions or duties to CLECE. The existence of a conflict of interest may arise unexpectedly (unintentionally and circumstantially), which is why it must be properly managed.

Business partners are obligated to behave in accordance with the principles of ethical conduct and zero tolerance for any wrongdoing. In matters where there may be some type of conflict of interest that could violate their independence or compliance with applicable regulations, they must take the necessary measures to avoid making decisions affected by a potential conflict of interest.

Any business partner who becomes aware of the existence of a conflict of interest in the performance of their obligations to CLECE must report it through the Ethics Channel (or Internal Information System). See section 5.

3.3. Anti-Bribery and Anti-Money Laundering

As a member of the United Nations Global Compact, and in accordance with its Comprehensive Compliance Management System, CLECE declares its opposition to influencing the will of external parties to obtain any benefit through unethical practices.

In this regard, no business partner is permitted to offer and/or receive illegal payments or bribes, gifts, donations, or advantages with entities, individuals, public authorities, or private companies that, due to their value, nature, or context, could reasonably affect the course of business, administrative, or professional relationships.

Likewise, no business partner may participate in money laundering operations or transactions, such as the acquisition, possession, use, conversion, or transfer of assets knowing they originate from criminal activity, with the intention of concealing their illicit origin or disguising the legal consequences of the operation.

3.4. Fair competition

CLECE is firmly committed to respecting honest and fair competition and recognizes the importance of complying with competition regulations and fostering a culture of compliance throughout the organization.

For this reason, business partners, within the scope of their relationships with CLECE, must not engage in any practices contrary to free competition.

3.5. Fiscal responsibility

Business partners must ensure compliance with current tax regulations in every territory in which they operate, avoiding the concealment of relevant information, illegal tax evasion, improper tax benefits, or obstruction of tax inspections. They must also cooperate with tax authorities by providing required tax information in accordance with applicable law.

3.6. Confidentiality

CLECE considers compliance with information security and data protection laws to be of vital importance. Professional standards and applicable contractual conditions require that information accessed in the course of business activities be kept confidential.

Therefore, CLECE's business partners must uphold their duty of confidentiality regarding all information learned as a result of their current or future business relationship with CLECE. The disclosure or transfer of confidential or non-public information is strictly prohibited unless there is express written authorization from a duly authorized person (either within the Organization or by legal/judicial mandate).

To fulfil this obligation, business partners are responsible for complying with national and international regulations on the protection of intellectual and industrial property rights, trade secrets, and data protection.

In this sense, business partners commit to adopting sufficient security and cybersecurity measures to protect such information and ensure that all their members, within the scope of their relationship with CLECE, comply with this duty.

3.7. Human and labor rights

CLECE adheres to the United Nations Global Compact, which works in the areas of Human Rights, labour regulations, the environment, and anti-corruption.

It is essential that business partners, regardless of the country they operate in or the sector they belong to, act diligently and responsibly and adopt adequate due diligence measures in relation to human rights, including nationally or

internationally recognized labour rights.

They also commit to the highest level of commitment to people by guaranteeing fair working and remuneration conditions, non-discrimination (all forms and all protected characteristics), the prevention of any form of harassment, respect for workers' rights in strict compliance with applicable labour laws, the promotion of equity through equal opportunity, the eradication of child labour and forced labour, rejection of any activity linked to human trafficking or slavery, and the right to freedom of association and collective bargaining.

3.8. Training



CLECE is committed to continuous training for the personal and professional development of all its employees to achieve optimal performance in their roles.

Business partners are expected to foster a culture of training to support the personal and professional development of their members, enhancing performance, quality, and job satisfaction, while also ensuring compliance with this Code.

Specifically, business partners commit to raising awareness among their members of the values contained in this Code.

3.9. Health and safety

CLECE views its Health and Safety Policy as a fundamental pillar in all activities, decisions, and instructions across all organizational levels. This policy is seen as an effective tool in managing personnel and protecting their health.

Accordingly, business partners commit to complying with applicable laws in this area, ensuring a safe and healthy work environment for their members, and adhering strictly to health and safety regulations.

3.10. Transparency

Business partners must maintain transparent and honest communication with CLECE, while fostering cooperation and dialogue.

Likewise, business partners commit to providing truthful, necessary, complete, and timely information about the progress of activities related to their performance.

3.11. Quality management and environmental respect

Respect for the environment, flora, and fauna is a core value at CLECE. The company is committed to environmental conservation and pollution prevention to minimize the environmental impact of its activities.

CLECE promotes, in line with its Environmental Policy, the implementation of best practices in this area.

Business partners must ensure compliance with environmental regulations relevant to their activities and commit to adopting appropriate measures to ensure environmental respect, combat climate change in their operations, and minimize potential adverse environmental impacts.

4. GOVERNANCE

CLECE maintains a constant commitment to sustainable development, serving society in an ethical responsible manner. An appropriate corporate sustainability strategy must also be based on other pillars, such as economic, social, legal and reputational factors.

In relation to the foundations of CLECE's governance, the Board of Directors has appointed a Compliance Body with powers of initiative and oversight, which ensures the functioning and implementation of the wider Compliance Management System.

This body acts as the guarantor of supervision, monitoring and control in matters of governance, including CLECE's relationships with its business partners.

5. ETHICS CHANNEL (INTERNAL REPORT SYSTEM)

CLECE has an Ethics Channel (Internal Reporting System), accessible to third parties, allowing any interested or collaborating party connected to the Organisation, in good faith, to anonymously (if desired) and confidentially, any conduct that constitutes a violation of laws, internal regulations, or the principles and values outlined in this Code.

The Ethics Channel is available at:
https://whistleblowersoftware.com/secure/commitment_clececareservices

6. NON COMPLIANCE

Failure to comply with the provisions of this Code places CLECE at risk and may result in legal action.



Accordingly, business partners are expressly required to immediately report any suspected breach or violation of the principles outlined in this Code through the

Ethics Channel.

Any violation of this Code will trigger an immediate response from the Organization, based on applicable regulations, and may lead to the adoption of appropriate legal measures, proportionate to the nature and severity of the incident.

7. COMMENCEMENT, DURATION, COMMUNICATION, AND REVIEW

This Code enters into force on the date of its approval or subsequent updates. It will be published and distributed to ensure general awareness, and will be available for reference and consultation via CLECE's corporate website.