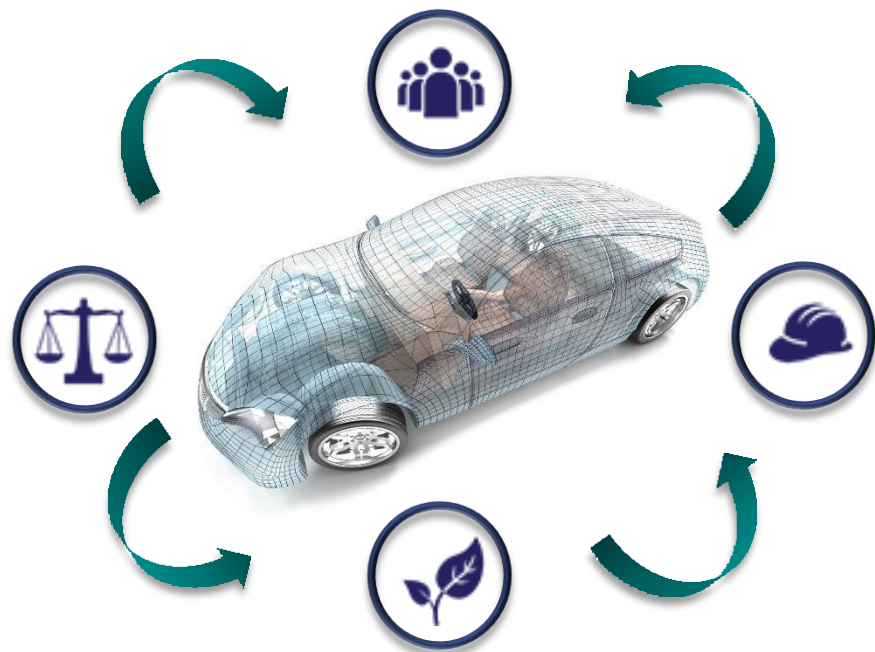


 **CABLERIAS  
GROUP****CODE OF ETHICS  
AND CONDUCT**

December 2022

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## 1. Introduction

This Code of Ethics and Conduct is an explicit statement of the values, principles and rules that should guide the conduct of everyone who is part of the company CABLERIAS GROUL, S.L. Its aim is to ensure the responsible development of their professional activity, both regarding their relations with other employees and with customers, suppliers, public administrations, and external collaborators.

The Code of Ethics and Conduct provides a set of rules and guidelines governing conduct, and each professional that is part of the organization must be made aware of them.

In this way, this document is intended to prevent criminal or illicit behavior, or any other conduct that is simply contrary to the company's ethical standards, establishing reference guides as well as monitoring and control mechanisms to ensure its compliance.

Consequently, all professionals currently employed by CABLERIAS GROUP, S.L. — together with those who might join the company in the future— must know and respect the Code of Ethics and Conduct and must express through a confirmation process their knowledge and commitment towards the rules set forth in this document. This Code will be disseminated through training activities and will also be permanently available on the corporate Intranet.

## 2. Applicability

This document is valid both in Spain and abroad, and it is mandatory for everyone who is part of the Company to be aware of it and to comply it, regardless of the type of contract or employment agreement that determines their relationship with the organization, the position they hold in it or the place where they carry out their duties. Likewise, when establishing business relationships with other entities, it shall be considered. One of the selection criteria shall be that such companies follow behavior and management principles similar to those contemplated in this Code of Ethics and Conduct.

Furthermore, CABLERIAS GROUP, S.L. will promote and encourage among its suppliers, customers and external collaborators the adoption of behavioral guidelines that agree with those outlined this document.

### 3. General Principles of Cablerias Group, S.L.

CABLERIAS GROUP, S.L. corporate culture advocates a constant commitment to quality in the work carried out for customers; a professional performance and in strict compliance with current legislation in order to prevent any illegal activity from being carried out; a responsible performance during the development of its industrial and commercial activity; an impartial approach, ensured by acting with objectivity and professionalism without accepting the influence of conflicts of interest or any other circumstances that could question its integrity; a transparent conduct, informing its customers in a clear, precise and satisfactory manner about all significant aspects related to the products and services manufactured, commercialized or rendered by the Company; and confidentiality, respecting and safeguarding any private, undisclosed or sensitive information to which it may have access as a consequence of carrying out its business activity.



### **3.1. Legality and Responsibility**

CABLERIAS GROUP, S.L. strictly complies with the laws and regulations applicable to it. For this reason, all individuals subject to this Code of Ethics and Conduct shall carry out their professional activity in accordance with the law. They shall also fully respect the commitments and obligations undertaken by the Company in its contractual relations with third parties, as well as the usages and good practices set forth in this document.

In the same way, the Company's senior managers, directors, middle managers and attorneys-in-fact shall be familiar with the regulations affecting their respective areas of activity and shall ensure that professionals reporting to them are adequately briefed and trained to enable them to understand and comply with the legal obligations applying to their duties, along with the requirements and recommendations laid out in the Company's internal rules and regulations.

### **3.2. Personal Integrity**

It is essential that all those who provide their services to CABLERIAS GROUP, S.L. perform the inherent duties to their respective jobs with absolute professionalism and honesty.

Likewise, the organization's collaborators must avoid being influenced by motivations, considerations, or personal or third-party interests that could lead to conflicts of interest, illegal or inappropriate behavior.

### **3.3. Transparency and Confidentiality**

The conduct criteria included in this Code constitutes a solid basis for obtaining an environment of mutual trust between CABLERIAS GROUP, S.L. and its customers, suppliers, and external collaborators. This is achieved through adequate protection and confidentiality of the data and information available to the company as a result of the business activities carried out.

As such, those subject to this Code must undertake a firm commitment to provide complete, objective, and truthful information to customers, suppliers, external collaborators, public entities and institutions with which CABLERIAS GROUP, S.L. interacts within the scope of its activities.

### **3.4. Quality and Effort**

Since the Company started its activity in 1984, the commitment to offer its customers the highest quality and the care for the smallest details have been essential and differential factors in the trajectory of CABLERIAS GROUP, S.L. These facts have allowed the Company to be a referent in the market and to deserve the lasting trust of the most relevant customers, to whom the Company provides its services in all five continents.

Thus, this commitment to quality and this effort guarantee —above and beyond the search for profitability or economic benefit— have been from the beginning the guiding principles of the Company's activities, inspired and driven by its founder. The staff of CABLERIAS GROUP, S.L. must assume as their own these essential principles of the organization's corporate culture, and therefore act at all times in accordance with them, adapting their performance to the highest standards of quality, whatever their function within the organization is, and devoting maximum effort to meet and exceed the expectations of customers.

## 4. General Guidelines for Conduct

Each and every person subject to this Code of Ethics and Conduct shall have the obligation to apply the values, rules and principles contained in said Code in their interaction with other individuals also subject to the Code, customers, suppliers, public organizations, institutional entities and external collaborators with whom CABLERIAS GROUP, S.L. interacts through its activities. In particular, the guidelines of conduct outlined in the following subsections must be fulfilled.

### 4.1. Respect for the Law and Ethical Values of Cablerias Group, S.L.

CABLERIAS GROUP, S.L. assumes the compromise to develop its professional activities according to the legislation applicable in each of the places where they are held.

The fact that certain infringements are generalized violations in the business practice of competition or that they are usually consented to by the competent authorities shall not constitute justification for the perpetration of legal infringements.

Additionally, any person bound by this Code who is investigated or prosecuted in the framework of a criminal proceeding for any fact related to his/her professional activity, or who is affected by such proceedings as a witness or in any other capacity, must immediately inform his/her superior and the entity or person in charge of the Criminal Compliance function within the Company.

### 4.2. Respect for People

The Company has a large team of more than 1,015 people, which constitutes one of the most important assets of the organization.

The Company's professional performance must be carried out by integrating and involving people, respecting and valuing the opinions expressed in the different work teams so as to achieve the intended goals.



Besides, all action to be carried out by CABLERIAS GROUP, S.L. and the people within its organization shall scrupulously respect the human rights and public freedoms included in the Universal Declaration of Human Rights.

CABLERIAS GROUP, S.L. rejects in a direct way any manifestation of physical, psychological or moral harassment or any abuse of authority, like any other conduct that does not promote a pleasant, healthy and safe working environment.

All individuals subject to this Code have the obligation to treat their colleagues, superiors and subordinates in a fair and respectful manner. Similarly, relations between the Company's employees and/or managers and customers, suppliers, external collaborators, and public and institutional entities shall be grounded on professional respect and mutual collaboration.

CABLERIAS GROUP, S.L. considers of utmost importance the integral development of people. Those who develop management functions within the Company must assume responsibility for their actions and those of their collaborators, enhancing their capabilities through motivation, training and communication. In any case, the relationship with collaborators must always be based on mutual respect.

Recruitment processes shall be governed by equality of opportunity and merit, thereby guaranteeing the absolute absence of discrimination based on any concept or factor of diversity (gender, age, race, etc.). Those appointed by the Company to manage human resources will fully respect the applicable laws.

### **4.3. Effective Equality**

CABLERIAS GROUP, S.L. promotes the professional and personal development of all employees by ensuring equal opportunities. In this sense, the Company does not accept any kind of discrimination in the workplace on grounds of age, sex —including pregnancy or maternity, gender identity and sexual orientation—, nationality and race, religion, political ideology and disability, or any other personal, physical or social condition of individuals.

The selection and promotion of employees shall be based on the competencies and performance of their functions, as well as on the criteria of merit and ability defined in the requirements of the specific job position. Therefore, employees bound by this Code who take part in the selection, hiring or professional promotion processes shall always make decisions based on objective, responsible and transparent criteria.

Moreover, CABLERIAS GROUP, S.L. shall adopt measures and make the necessary adaptations to the job or work environment so that disabled workers can grow professionally on equal terms with the rest of the staff.

#### **4.4. Cooperation and Dedication at Work**

CABLERIAS GROUP, S.L. encourages a cooperative and teamwork environment for a better exploitation of all capabilities and resources within the organization.

For this purpose, personnel must provide all the necessary information for the proper monitoring of their professional activity. They shall avoid concealing errors or non-compliance and shall try to remedy any shortcomings detected in the performance of their duties.

To achieve adequate levels of communication at all levels, CABLERIAS GROUP, S.L. provides people with communication channels that favor and nurture cooperation and dedication at work.

#### **4.5. Responsible Use of Resources**

CABLERIAS GROUP, S.L. provides its employees with the necessary resources to properly carry out their professional activity.

Each employee and external collaborator shall be responsible for the correct use and protection of the assets and resources provided by the Company. These include intellectual and industrial property, facilities, equipment, furniture, financial resources and other elements made available to the persons bound by this Code, which must be used only for professional purposes and never for personal ones.

Likewise, such resources must be protected and preserved from any improper use that could result in damages of any nature for the Company or third parties.

#### **4.6. Health and Safety at the Workplace**

Given the type of production activities carried out by CABLERIAS GROUP, S.L., attention to the health and safety of workers and external collaborators is fundamental.

For CABLERIAS GROUP, S.L. the permanent improvement of working conditions and safety in all its facilities, as well as in the premises of its customers, is a priority. Therefore, the company actively promotes the adoption of the corresponding policies and implements those preventive measures necessary to ensure a work environment that respects the health and safety of its employees.

CABLERIAS GROUP, S.L. encourages its collaborating companies, suppliers and customers to implement its occupational health and safety standards and policies. CABLERIAS GROUP, S.L. has an occupational risk prevention policy that must be known and followed by its workers, subcontractors and any collaborators who carry out work for the Company in its different facilities or in the projects carried out within the framework of its construction and assembly activities.

CABLERIAS GROUP, S.L. also has the collaboration of external suppliers which specialize in the provision of external occupational risk prevention services. Job positions have been designed according to their specific characteristics and risks, and each person is provided with the appropriate training, as well as the corresponding personal protective equipment (PPE).

All personnel must know and comply with the rules for health and safety protection at work. They must ensure their own safety, the safety of other employees, customers, suppliers, collaborators and, in general, of all persons who may be affected by the development of their activities.

#### 4.7. Image and Reputation

Since its foundation in 1984 and throughout more than three decades of activity, CABLERIAS GROUP, S.L. has built up a solid image and market position, based on its constant commitment to quality, effort and customer orientation developed throughout all its production areas.

CABLERIAS GROUP, S.L. considers its image and reputation as one of its most valuable assets to preserve the trust of its customers, employees, suppliers, public authorities, external collaborators and society in general. Therefore, those who are subject to this Code of Ethics and Conduct must make a correct and appropriate use of the image and reputation of the Company.

CABLERIAS GROUP, S.L. ensures that the information regarding the content of its products and services is always truthful, in accordance with the technical specifications, requirements and characteristics established, so that its image and reputation cannot be compromised.

For their part, employees shall be particularly careful in any public intervention, and must have the necessary authorization to appear before the media, participate in professional conferences or seminars, attend meetings organized by public or private entities, both national and international, as well as to carry out any other action that may have a public disclosure on behalf of and/or as employees of CABLERIAS GROUP, S.L.

The above is also applicable to the intervention of the people subject to this Code in communication platforms on the Internet or social networks. Before posting any content on social platforms, it should be taken into consideration that these are publicly accessible spaces, where the boundaries between the personal and professional sphere are not always clearly delimited, and where any comment, opinion, or publication in general may remain visible indefinitely.

Under no circumstances may comments, opinions or other publications be attributed to CABLERIAS GROUP, S.L., except with the express authorization of the organization to act as its representative.

In the event that any employee of the Company identifies himself/herself on social networks as a member of this organization, he/she must ensure that any comment, opinion or publication is kept within a strictly personal sphere, and this must be expressly stated if necessary, in view of the circumstances of the case. Given that any interaction in social networks could have an impact on the image and reputation of the Company, any publication therein that is related with CABLERIAS GROUP, S.L., directly or indirectly, must comply with the principles and values contained in this Code of Ethics and Conduct. In particular, appropriate language must be used, and due respect for other users of social networks must be maintained at all times, avoiding polemic about issues or topics that may be likely to offend sensitivity or violate dignity, thus negatively impacting the image of the organization.

#### **4.8. Respect for the Environment**

Preservation and respect for the environment is one of the basic pillars of CABLERIAS GROUP, S.L., which is manifested in the fulfillment of environmental practices in all its activities, operating in a responsible and efficient way with the natural resources used in the development of the daily activity. In this sense, the Company has a specific Environmental Department and environmental management policies certified according to the ISO 14001 standard, being periodically audited by external verification companies.

CABLERIAS GROUP, S.L. continuously strengthens its commitment to the environment by carrying out its business activities in a way that respects the environment. It progresses in the maintenance and continuous improvement of its production and assembly systems, and it is also committed to the preservation of biodiversity and the sustainable management of waste.

Thus, the Company is committed to developing its activities in a way that maximizes energy efficiency, minimizes negative environmental impacts and prevents pollution.

CABLERIAS GROUP, S.L. carries out a responsible management of its waste. Particularly, it manages hazardous waste and emissions always complying with the requirements contemplated in the regulations applicable to the different industrial activities carried out, and relying on external service providers specialized in this

matter.

CABLERIAS GROUP, S.L. develops its manufacturing and assembly processes maintaining a firm commitment to sustainable forest management. For this purpose, CABLERIAS GROUP, S.L. provides all the necessary means, both material and human, to avoid the trade and purchase of illegally extracted wood, wood fiber, or wood that comes from forests which conservation is threatened. The Company has FSC and PEFC certifications that guarantee the legal and sustainable origin of the wood used in its production processes.

Individuals subject to this Code must know and assume the environmental policy of the Company, striving to minimize the environmental impact arising from their activities and the use of facilities, equipment and means of work placed at their disposal.

In its relations with suppliers, customers, external collaborators and public authorities, CABLERIAS GROUP, S.L. will transmit these principles and will demand compliance with the environmental procedures and requirements applicable in each case.

#### **4.9. Relationship with Suppliers and External Collaborators**

CABLERIAS GROUP, S.L. considers that suppliers and external collaborators are essential for achieving its growth targets and improving the quality of its industrial and commercial activity. Therefore, it seeks to establish relationships based on objectivity, efficiency, trust, respect, transparency and mutual benefit.

All Company employees who participate in supplier and/or external collaborator recruitment processes shall be required to act impartially and objectively, applying quality and cost criteria, avoiding at all times the interference of their personal interests. Likewise, decisions to contract services and purchase materials and supplies must be taken on the basis of the Company's quality criteria and with total independence of decision and regardless of any personal, family or economic ties that may cast doubt on the criteria followed in the selection.

CABLERIAS GROUP, S.L. will make its best effort to periodically pay the invoices issued by its suppliers and external collaborators, preventing the promotion or

formalization of contracts which payment foreseeably cannot be assumed.

#### **4.10. Relationship with Customers**

CABLERIAS GROUP, S.L. assumes, leads and promotes a constant commitment to quality so that all staff should aim to achieve the highest levels of quality and excellence in the development of its activities, seeking the long-term strengthening of relationships with customers, which will always be based on the principles of trust and mutual respect. In addition, employees shall safeguard their independence at all times, preventing their professional performance from being influenced by economic, family or friendship ties with clients.

CABLERIAS GROUP, S.L. will carry out an adequate management of all the resources at its disposal to achieve the highest levels of quality in the development of its industrial and commercial activity. To this end, the Company will provide the necessary means and will establish the appropriate arrangements to ensure that the quality policy is implemented by all its staff in accordance with these principles.

CABLERIAS GROUP, S.L. considers of vital importance the trust that its customers place in its organization, so it will try to always maintain an honest, open and warm communication with them.

#### **4.11. Relations with Public Authorities and Administrations**

Relations with national and international institutions, organizations and public administrations shall be governed by institutional respect and shall be developed under maximum collaboration, non-obstruction and scrupulous compliance with their resolutions. Communications, requirements and requests for information must be dealt with diligently and within the established deadlines.

Likewise, the people subject to this document must maintain at all times an attitude of collaboration and transparency with national and international public entities and administrations, as well as before any requirement or inspection that they may carry

out in relation to the Company's activities.

In the event of receiving any judicial or administrative notification related to the activities carried out by CABLERIAS GROUP, S.L., employees must address it as quickly as possible to the people responsible for its management within the organization.

Individuals subject to this Code of Ethics and Conduct may not take advantage of their personal relationships with civil servants or public authorities in order to influence them to obtain a benefit of any kind. When an employee of the Company maintains a personal relationship with a certain civil servant who may intervene — directly or indirectly— in projects, administrative files, procedures, inspections or other matters in which CABLERIAS GROUP, S.L. may have an interest, he/she shall immediately inform his/her immediate superior and the responsible for compliance with the Code of Ethics and Conduct so that they may proceed to adopt the measures deemed necessary in view of the particular circumstances of the case.

#### **4.12. Measures Against Bribery, Corruption, Extortion and Money Laundering**

CABLERIAS GROUP, S.L. firmly and unequivocally rejects any form of corruption, bribery or extortion, and also declares its opposition to influencing the will of people outside the organization in order to obtain any kind of benefit through illegal or unethical practices. In this sense, everyone must act in accordance with the applicable laws and, under no circumstances tolerate bribes, retribution, gifts, promises or pressure from third parties or customers to CABLERIAS GROUP, S.L.

Similarly, it is strictly forbidden for those subject to this Code to make or offer — directly or indirectly— promises or proposals of any kind of commission, gifts or payments in cash or in kind, to any person in the service of public or private entities, political parties or candidates for public office, with the intention of obtaining or maintaining, illicitly, business or other types of advantages. The Company has a Gift Acceptance and Giving Policy that everyone bound by this Code must be aware of



and comply with.

CABLERIAS GROUP, S.L. personnel must act with special prudence and exercise due caution in those cases in which there may be indications of lack of integrity on the part of persons or entities with whom any type of business relationship is maintained. In particular, special attention should be paid to cash payments made by means of bank checks or those made in currencies other than those previously agreed, or which are unusual in view of the nature of the transaction. In such cases, the existence of such irregular payments must be reported through the channels and procedures established in this Code of Ethics and Conduct.

The Parties bound by this Code must also be cautious regarding payments requested, or made to, or by third parties not mentioned in the corresponding contracts, as well as those requested, or made to, or received from accounts that are not the usual ones in the relations with a given entity, company, or person. Likewise, special attention will be given to payments requested, or made to, or received from persons, companies, entities, or accounts opened in tax havens and to those payments made to entities in which it is not possible to identify the partner, owner or ultimate beneficiary.

#### **4.13. Avoidance of Conflicts of Interest**

A conflict of interest may arise for any person bound by this Code when this individual intervenes, directly or indirectly, in agreements or activities that constitute direct or indirect competition for CABLERIAS GROUP, S.L., or when he/she holds interests that may affect the impartial and objective performance of his/her activity within the Company.

Anyone bound by this Code must avoid intervening directly or indirectly in situations in which conflicts of interest may arise, and in any case must report this potential conflict to the Company's management board or the organ responsible for the supervision and control model, immediately upon detection or disclosure of the situation of conflict of interest.

Under no circumstances may anyone subject to this Code hold significant

shareholdings in companies that, due to their activity, may be considered direct or indirect competitors of CABLERIAS GROUP, S.L.

#### **4.14. Privacy and Protection of Personal Data**

CABLERIAS GROUP, S.L. is committed to protecting and safeguarding the privacy of individuals, and to strictly comply with current legislation on data protection, thereby ensuring the protection of personal information entrusted by its customers, employees, candidates in recruitment processes, external collaborators and other interested parties.

Consequently, the individuals subject to this Code shall be required to respect the personal and family privacy of all employees, customers, suppliers, external collaborators and any other person to whom they have access in the course of their professional activities. Under no circumstances will information affecting the private or intimate sphere of third parties be disseminated in any form, and only personal data whose collection and processing are essential for the proper performance of the Company's activities will be gathered and handled in the manner indicated by those responsible within the organization.

Personal data processed in accordance with the provisions of this paragraph will be collected and managed in full compliance with the principles and requirements established by the applicable regulations, solely for the purposes for which they were originally collected and with the application of security measures appropriate to their characteristics.

#### **4.15. Accounting and Tax Obligations**

Those bound by this Code who have responsibilities in the preparation and supervision of the tax and accounting information of CABLERIAS GROUP, S.L., must act with the utmost rigor and transparency, ensuring at all times that the Company's tax and accounting information reflects all the rights and obligations of CABLERIAS GROUP, S.L., in accordance with the applicable legislation.

In the same way, the aforementioned responsible parties must comply with the established internal control procedures, in order to ensure the correct accounting of the transactions carried out during the ongoing accounting year. The Company agrees to keep the accounting documentation for the legally required period of time.

In line with the foregoing, CABLERIAS GROUP, S.L. expressly prohibits all conduct aimed at unlawfully evading the payment of taxes or duties to the detriment of the Tax Authorities, the Social Security or any other administrative entity.

#### **4.16. Computer Systems and Information Technologies**

CABLERIAS GROUP, S.L. has a specific Information Technology department, which is in charge of guaranteeing safety in terms of technological risks and the appropriate use of the technological means and resources that the Company makes available to its employees.

Individuals subject to this Code are under the obligation to know and strictly comply with the rules of use and policies established for the use of computer systems and technological means and resources made available to them by CABLERIAS GROUP, S.L., using such means and resources in a suitable way for the purposes for which they were intended, and respecting the obligation to use and periodically renew passwords, prohibiting the use or installation of unauthorized software, infringement of privacy and/or intellectual property of third parties, and other obligations established in the policy of use of ICT means of the organization.

#### 4.17. Confidentiality and Intellectual and Industrial Property Rights

Within the framework of its activities, the Company works with its own designs and developments, and also frequently develops and assembles designs and installations based on those of customers and third parties. The aforementioned designs and developments, whether or not they have been the object of a patent or any other form of legal protection, are in any case elements subject to the intellectual and industrial property rights of their respective creators and developers, and are subject to the strictest obligations of respect and confidentiality. In addition, and especially within the framework of the activities developed in the exclusive furniture business line, the Company carries out works and assemblies for private customers, whose privacy and intimacy must be strictly preserved.

Therefore, respect for the confidentiality of information and intellectual and industrial property rights is of fundamental importance for CABLERIAS GROUP, S.L. Everyone subject to the Code of Ethics and Conduct must respect the intellectual and industrial property rights that correspond to CABLERIAS GROUP, S.L. in relation to products, services, projects, designs, models, processes and, in general, any knowledge, activity or work developed or created by the Company.

Likewise, people subject to this Code must also respect the intellectual and industrial property rights held by third parties (customers, suppliers, external collaborators, etc.) and to which they may have access within the framework of their activity.

CABLERIAS GROUP, S.L. considers that the elements (designs, models, working procedures, etc.) that make up its *know-how*, which have been developed over more than fifteen years of activity, constitute an essential and strategic factor of its position in the market. For this reason, any information related to these elements, either the ones owned by CABLERIAS GROUP, S.L. or those belonging to third party suppliers and customers, shall be considered strictly confidential.

The people bound by this Code have the duty to handle such confidential information with the utmost respect for its secrecy, adopting the necessary precautions and measures to avoid its accidental disclosure or transmission.

Any non-consensual collection, communication or dissemination, by any means, of confidential information, whatever its medium, is expressly prohibited without the prior and express authorization of its owner.

Violations of these obligations will lead to the imposition of appropriate labor sanctions by CABLERIAS GROUP, S.L., as well as the adoption of timely legal action —both criminal and civil—, in terms of disclosure of trade secrets, infringement of intellectual property rights and unfair competition.

## 5. Acceptance and Interpretation of the Code of Ethics and Conduct

This Code of Ethics and Conduct has been adopted by the respective management teams of CABLERIAS GROUP, S.L., and has been communicated to its employees, who are obliged to comply with it. Furthermore, the obligation to accept the values and principles that guide this Code shall be extended to suppliers, collaborators and contractors of the Company.

Any doubt that may arise in relation to the interpretation or application of this document should be discussed with the immediate superior or, if appropriate, with the responsible entity for compliance with the supervision and control model, which has the obligation to promote knowledge and adherence to the Code, as well as to interpret it in making decisions in case of doubt or discrepancy about its content.

For these purposes, you can contact this department by e-mail: [rrhh@cableriasgroup.com](mailto:rrhh@cableriasgroup.com) and / or telematic mailbox complaints established in the computer equipment of Cablerias Group, S.L.

The entity responsible for compliance with the criminal risk supervision and control model of CABLERIAS GROUP, S.L. is integrated by the Human Resources Director, Ms. María José Somoza Alonso. She has been expressly appointed for this function by the management of the Company, and will act with full autonomy and independence in the exercise of her functions.

## 6. Violations of the Code and Duty to Report Them

Under the provisions of this document, strict compliance with the Law and internal policies are fundamental principles of CABLERIAS GROUP, S.L., which assumes as one of its fundamental objectives to ensure that its employees, managers and collaborators are aware of the importance of mitigating the risks of unlawful or unethical practices within its organization.

No member of CABLERIAS GROUP, S.L., regardless of their level or position, is authorized to request or allow an employee to infringe the law or this Code.

Everyone subject to the Code of Ethics and Conduct is obliged to report to the responsible entity any possible infractions or violations of the Law or the Company's internal policies of which they become aware.

For these purposes, CABLERIAS GROUP, S.L. has enabled a Complaints Channel through the following email: [rrhh@cableriasgroup.com](mailto:rrhh@cableriasgroup.com) and telematic mailbox enabled in all teams Cablerias Group, SL.

Communications received in this mailbox must include the sender's identification (requirement established by the Spanish Data Protection Agency) and a narrative as detailed as possible of the facts, with identification of the alleged offender, providing proof or evidence, if possible. These communications will be processed directly by the responsible entity for compliance, and the confidentiality of the same will be strictly safeguarded.

## 7. Document modification history

Nº EDITION	DATE	MODIFICATION DETAILS	AUTHORSHIP
1	15/01/2021	Document creation	Araitz Otazo Javier Surís
2	20/12/2022	Revision and update	Andrea Garriga Cristina Vede