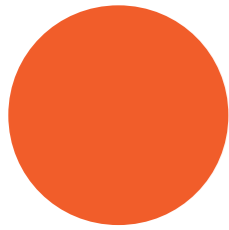


# Code of ethics





## A Word from the Chairman

Alex Belaustegui

TECNALIA published its first Code of Integrity in 2016, aimed at communicating our values and principles while defining the core standards of conduct that should govern our activities.

This Code of Ethics builds on the previous code and is in line with the Mission, Vision, and Values set out in the Strategic Plan 2021-2024; it has been developed based on TECNALIA's commitment to strengthen our ethical culture from within the organisation and to guarantee the legal and regulatory compliance of all our professionals in all regions.

On behalf of the Board of Trustees, we would like to confirm our commitment to ethical behaviour in all relationships and interactions with stakeholders. We will always act with integrity, honesty, transparency, consistency and professionalism, in line with our organisation's values.

The Code of Ethics is a way of translating these values into daily practice, setting out a series of internal behavioural guidelines on how to maintain relationships with third parties and society as a whole.

TECNALIA's research has a real impact on companies and on society, generating benefits in terms of quality of life and progress. This is made possible by the talented people that make up TECNALIA and the way in which they behave, building relationships of trust both inside and outside the organisation, based on integrity and respect for the highest ethical standards. These are the principles on which the new version of our Code of Ethics is based.

I would like to thank you all in advance for making this Code your own and contributing to its respect.

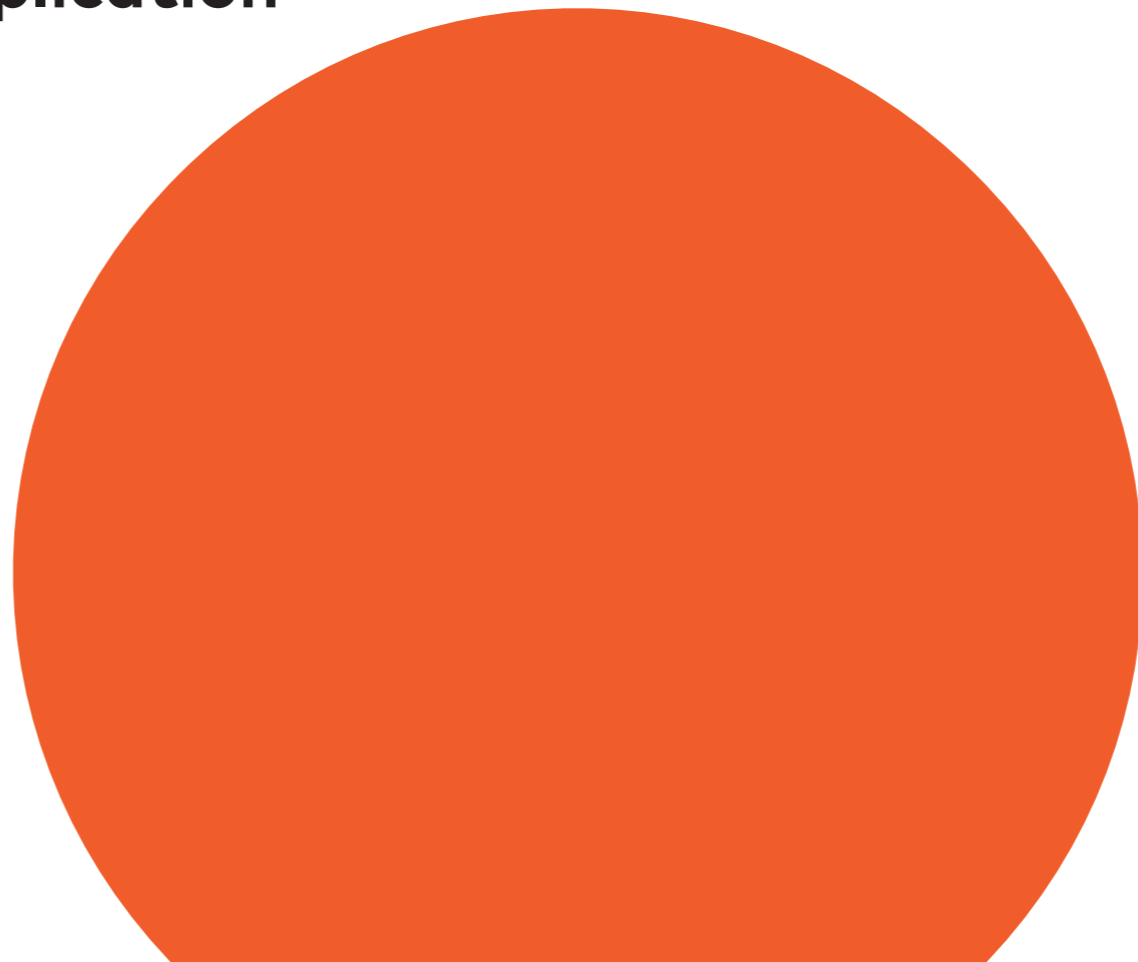
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# 01

**Purpose, scope and  
field of application**



# 01 Purpose, scope and field of application

The purpose of TECNALIA's Code of Ethics is to develop the values, principles, standards, and behavioural guidelines that shall govern and direct the professional activities of everyone who is a part of TECNALIA Research & Innovation ("TECNALIA" or the "Organisation"). This Code of Ethics applies regardless of the type of contract or agreement that individuals may have with TECNALIA, and therefore applies to the Board of Trustees, Governing Bodies, TECNALIA's employees, and the employees of invested companies in which TECNALIA has a significant influence on how such companies are managed (collectively referred to as "TECNALIA Group Professionals").

TECNALIA's Code of Ethics shall also apply to third-parties that have professional or business agreements with the Organisation (such as outsourcing, subcontractors, collaborators, partners, etc.); these third-parties are expected to behave in a way that is consistent with this Code of Ethics, despite the fact that some parts of it will not apply, such as those relating to processes and procedures that are exclusively internal to TECNALIA. In these cases, specific clauses from the Code will be transferred to the corresponding agreements, which must be accepted.

This Code of Ethics is intended to inspire and oversee the professional behaviour of everyone it applies to. Specifically, the Code of Ethics forms part of TECNALIA's internal regulatory system, which is mandatory for all members of the Board of Trustees and the Governing Bodies, and for all TECNALIA Group professionals.

The Code of Ethics has been developed based on TECNALIA's commitment to strengthen its ethical culture from within the Organisation and to exercise due diligence over its professional staff, ensuring regulatory compliance in each of the regions where it operates.

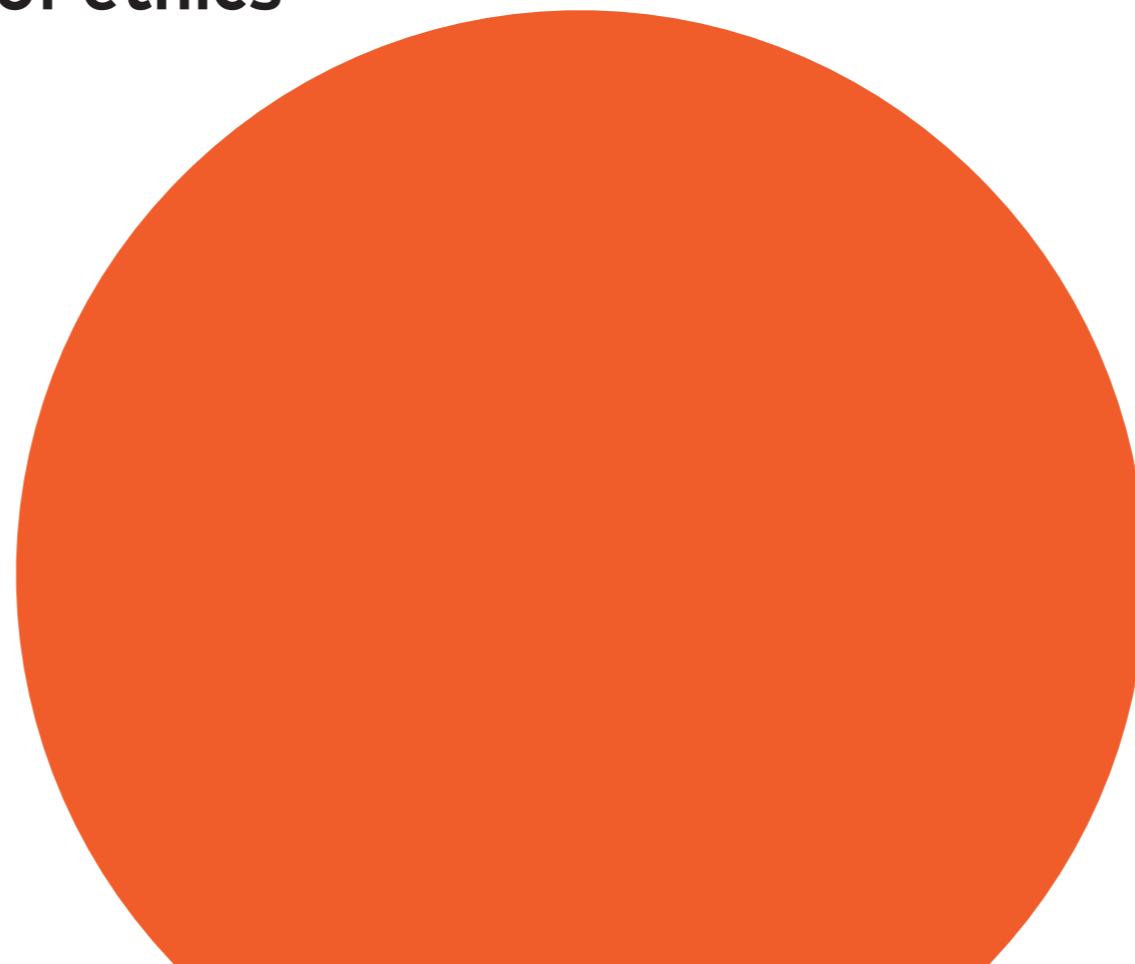
In this sense, TECNALIA's Board of Trustees has created a structure and a model for the prevention, detection and investigation of non-compliance with the Code of Ethics and applicable standards, which is carried out through the Ethics and Compliance Committee (ECC).



**Our common goal is for professionalism and integrity to be second-nature at TECNALIA and for each of us to contribute to it and strengthen these values in our culture.**

# 02

**Values and principles  
that inspire the code of ethics**



## 02 Values and principles that inspire the code of ethics

TECNALIA is made up of a team of people who behave HONESTLY, TRANSPARENTLY, and COHERENTLY, in line with our Organisation's VALUES set out below, creating an environment of TRUST both inside and outside of TECNALIA.

### CUSTOMER

We put ourselves in our CUSTOMER's shoes to understand the keys to their business and to work together on solving their PROBLEMS and CHALLENGES, making a greater IMPACT through a relationship based on TRUST.

### COLLABORATION

We are an OPEN organisation with a common PURPOSE. We believe in COLLABORATION, in the broadest sense, is the best way to find solutions to the complex problems and future challenges facing our customers and society.

### SOCIAL COMMITMENT

We have a COMMITMENT to society, which is why we create value to improve it. We aim to TRANSCEND, and we have a MORAL OBLIGATION to work on building a more prosperous society for the future.

### INNOVATION

INNOVATION is in our DNA. We are always looking for BOLD, innovative, and different ways of thinking, doing, and relating to one another. We are creative, and we take risks freely and responsibly.

### EXCELLENCE

We are DEMANDING, we are AMBITIOUS, and we aim to surpass ourselves to be the best. We want to be EXCELLENT; we want to achieve the best outcomes and make an impact on our customers and society.



The Code of Ethics puts these values into practice on a daily basis, as all the actions by those it applies to within the framework of their professional relationship with TECNALIA must always be governed by criteria of **professionalism, integrity** and **self-control**:

- **Professionalism** means acting in a conscientious, responsible, and efficient way, focussing on excellence and service quality.
- **Integrity** means acting in a loyal, honest transparent and objective way, in good faith, and in accordance with TECNALIA'S interests, principles, and values, as defined in this Code of Ethics and developed through the Organisation's internal standards.
- **Self-control** means that any action must be based on three basic premises: (i) the action must be ethically acceptable; (ii) it must be legal; and (iii) it must be of interest to TECNALIA.

The application of these criteria gives rise to a set of rules of conduct. The most important aspects of these rules of conduct are explained in the following sections, and in most cases they are implemented through internal regulations or contractual clauses.

# 03

**Fundamental  
aspects**



# 03

## Fundamental aspects

All business relationships and transactions that TECNALIA takes part in or acts as an intermediary must be carried out in a way that upholds its reputation and credibility. In this sense, ethical behaviour must be observed in all circumstances, avoiding professional relationships or activities that by their very nature could jeopardise TECNALIA's interests or good standing.

TECNALIA's people shall watch over the Organisation's reputation and image, ensuring it is respected by the third-parties it has professional relationships with.

TECNALIA's manager, members of the Board of Trustees, or members of the Organisation's governing bodies shall report internally to General Management or the Board of Trustees in cases that are under investigation, if they have been convicted of a crime, or if they deem themselves to be involved in any behaviour that may affect TECNALIA's reputation.

Anyone to whom this Code of Ethics applies shall strictly comply with all applicable legislation in force, in line with the purpose and tenor of the corresponding regulations, while respecting the Code of Ethics, internal standards, and applicable procedures. They shall also fully respect the obligations and commitments undertaken in contractual arrangements.



**We promote a culture of openness, honesty, tolerance, respect, kindness, fairness, and trust in our relationships between TECNALIA and third parties.**



# 04

**Internal  
behaviour**



# 04

## Internal behaviour

General guidelines on how TECNALIA's professionals are expected to behave are detailed below. Failure to comply with these guidelines may constitute a serious breach of the Code of Ethics.

### COMPLIANCE WITH THE LAW

Everyone to whom this Code of Ethics applies should understand the laws and regulations that apply to their respective areas of activity. They should also ensure that anyone they are in charge of receives suitable training and information to enable them to understand and comply with the legal and regulatory obligations that apply to their job position, as well as any internal regulations.

The Organisation shall develop the policies, procedures, and practice guidelines required to ensure the behavioural principles and standards of conduct set out in this Code of Ethics are implemented.

The Organisation shall also respect and abide by all judicial and administrative decisions, and reserves the right to appeal such decisions at the appropriate judicial level if it believes they are not in line with the law.

### NON-DISCRIMINATION AND EQUAL OPPORTUNITIES

TECNALIA is committed to respecting and protecting people, basing its working relationships on the **principles of mutual respect** and promoting equal treatment and opportunities. As such, TECNALIA:

- Does not allow or tolerate discrimination based on race, colour, nationality, social status, age, gender, marital status, sexual orientation, ideology, political opinion, religion, or any other personal, physical or social condition.
- It rejects all manifestations of physical, sexual, psychological, or moral violence or harassment, and any other form of violence or harassment. It opposes the abuse of authority in the workplace and any other conduct that creates an intimidating or offensive environment that violates the rights of those affected. In response, it promotes specific measures to prevent and respond to such situations through the corresponding protocols and procedures.

### HEALTH AND SAFETY

TECNALIA shall ensure that its professionals carry out their work in a safe and healthy environment. TECNALIA promotes the development of occupational health and safety programmes internally and

encourages other entities its collaborates with to do the same. Likewise, TECNALIA shall take the necessary preventive measures according to current health and safety laws and will ensure that they are complied with (or it shall demand that these measures be taken and monitored by third parties).

All TECNALIA people must understand and comply with occupational health and safety standards, and ensure the safety of everyone affected by their activities.

### COLLABORATION AND TEAMWORK

TECNALIA believes that collaboration and teamwork are prerequisites for achieving the Organisation's objectives and making the most out of its capabilities. Therefore, TECNALIA (and the Organisation as a whole) promotes, facilitates, and encourages collaboration and teamwork among all its people.

Everyone should be collaborative, generous, and focused on our common purpose and goals.

### CONFLICTS OF INTEREST

All professional decisions must be based on the best way to defend TECNALIA's interests, without being influenced by personal relationships or other individual interests.

Any situation in which a personal interest clashes directly or indirectly with one of TECNALIA's interests is considered to be a conflict of interest; a personal interest is one that affects the person in question or a related person.

**Related people** are the following:

- Spouse or partner in a similar relationship.
- Family members up to the third degree of consanguinity or affinity.
- The spouses of ascendants, descendants, and siblings.
- Entities external to TECNALIA in which the person in question or a related person holds an administrative or managerial position (either directly or through an intermediary) or receives remuneration for any reason, while also having a significant direct or indirect influence on the financial and operational decisions of such entity.

# 04

## Internal behaviour

Everyone to whom this Code of Ethics applies must therefore observe the following **general principles of action** for dealing with conflicts of interest:

- **Independence:** always act professionally and remain loyal to TECNALIA, regardless of personal interests or those of third-parties, avoiding situations in which personal interests are put before those of TECNALIA.
- **Self-restraint:** refrain from influencing decision-making in situations that may constitute a conflict of interest with TECNALIA, abstain from attending such decision-making meetings, and avoid accessing confidential information that may affect such a conflict.
- **Communication:** report any conflicts of interest to your immediate superior, in writing, and prior to making any decisions on such matters or carrying out any transactions, so that TECNALIA can deal with the matter in the most appropriate way.

These principles of action particularly apply to conflict of interest situations that constitute, or can be reasonably expected to constitute, a permanent and systematic conflict of interest between TECNALIA and the person in question (or related person).

Furthermore, personal, political, charitable, or similar activities shall not prevent the people to whom this Code of Ethics applies from fulfilling their obligations to TECNALIA; such activities shall not constitute a conflict of interest or be detrimental to TECNALIA. Under no circumstances may such activities be carried out on behalf of TECNALIA without express authorisation.

### PERSONAL BUSINESS OPPORTUNITIES AND OTHER ACTIVITIES

Business opportunities are understood to be investments or any other operation related to TECNALIA's assets or activities, that the people to whom this Code of Ethics applies have become aware of through their professional activities related to the Organisation, when such an investment or operation has been offered to TECNALIA, or when TECNALIA has an interest in it.

The people covered by this Code of Ethics may not take advantage of business opportunities for their own benefit or that of their related people, unless General Management or the Board of Trustees has authorised the person to take advantage of such a business opportunity beforehand.

TECNALIA respects the freedom of its professionals to engage in financial, business, or professional activities, provided that they are legal, do not affect their professional activity within the Organisation, and do not compete with the Organisation's interests or create actual or potential conflicts of interest.

The people to whom this Code of Ethics applies may not use TECNALIA's name, or use their position as one of TECNALIA's people to carry out transactions on their own behalf or on behalf of related people.

### USE OF TECNALIA'S RESOURCES AND THOSE OF OTHER ENTITIES

The people covered by this Code of Ethics who have access to assets, services, and resources provided by TECNALIA or other entities (including, by way of example, furniture, telephones, computer equipment, photocopiers, software, internet, intranet, data storage systems, e-mail, and other devices and equipment) must use them responsibly and efficiently. The reasonable use of these resources for personal matters is permitted, provided any specific instructions and procedures are followed in this regard.

TECNALIA provides internet access and e-mail accounts that its professionals must generally only use for professional purposes. While the internet and e-mail may occasionally be used for personal matters, in such cases individuals shall not have a reasonable expectation of privacy in such cases. That is, the Organisation may access the contents of electronic devices and professional e-mail mailboxes when there has been improper conduct or a serious breach of the Code of Ethics or applicable legislation.

Unless specifically authorised, no one may use the equipment provided by TECNALIA to access *on-line* services, or to install or download programmes, applications, or content that go against TECNALIA's internal rules in this regard, or that may harm the reputation or the security of its systems or those of other entities. It is also forbidden to install programmes for personal use.

TECNALIA provides certain professionals with a corporate credit card to pay for professional expenses, so that its people can carry out their work more effectively, within a framework of trust in the professional's correct use of the credit card; it may not be used for personal expenses under any circumstances. Professionals given corporate credit cards must submit an expense authorisation form and supporting documentation on time and in due form; any potential errors regarding expenses incurred for personal reasons must be reported.

# 04

## Internal behaviour

TECNALIA provides corporate vehicles and fuel cards to certain professionals for their work, which are mainly used for professional activities. In this regard, specific policies and procedures must be complied with, along with applicable legislation and road traffic regulations. Professionals must submit receipts and supporting documentation relating to fuel card expenses. TECNALIA allows professionals to use the corporate vehicle for personal purposes in certain circumstances.

### MASS MEDIA, SOCIAL MEDIA AND PUBLIC EVENTS

TECNALIA's people may not use the Organisation's media resources for purposes other than professional ones, nor may they be used to express personal opinions that are not TECNALIA's official stance. TECNALIA's people must respect this Code of Ethics and follow the principles of prudence and institutional loyalty when using social media.

If the people covered by this Code of Ethics use social media in a personal capacity, they shall refrain from appearing to officially represent TECNALIA; nevertheless, they must still respect applicable legal regulations and be aware that their opinions or comments could harm TECNALIA's image even if they are made in a personal capacity.

Special care must be taken when mentioning any form of employment relationship with TECNALIA, respecting all aspects covered in this code, particularly those regarding discrimination, defamatory comments or opinions made in bad faith, intellectual and industrial property, and the disclosure of confidential information relating to customers, suppliers, or on internal TECNALIA matters.

Professionals are prohibited from using TECNALIA's name, image or trademark to create websites or to register on social media or forums under TECNALIA's name.

### PERSONAL DATA

The Organisation is highly committed to ensuring the utmost respect for the intimacy and privacy of the people it deals with. It has an obligation to treat their personal data responsibly, ensuring due compliance with the corresponding legal, technical, and organisational requirements to guarantee the rights and freedoms of the data subjects are respected.

In this regard, **personal data shall be:**

- Processed in a lawful, fair, and transparent way for the data subject.
- Collected for specific, explicit, and legitimate purposes, and not further processed in a way that is incompatible with such purposes.
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Precise, and kept up to date as required, with reasonable measures being taken to delete or correct personal data that are inaccurate for the purposes for which they are processed, without delay.
- Stored in such a way that the data subject may not be identified for a longer period than necessary based on the purpose for which the personal data are processed; personal data may be stored for a longer period provided that they are processed exclusively for archiving purposes in the public interest, for scientific or historical research, or for statistical reasons.
- Processed in a way that ensures suitable data security, which includes protection against unauthorised or illegal processing, loss, destruction, or accidental damage, by applying appropriate technical and organisational measures.

People covered by this Code of Ethics with access to such information must act in compliance with the code and applicable legislation; they must also follow any protocols or instructions implemented by the Organisation in this regard from time to time.

People covered by this Code of Ethics must be discrete and safeguard the intimacy of the individuals they deal with for professional reasons and/or whose personal data they have access to as part of their job.

# 04

## Internal behaviour

### CONFIDENTIAL AND CLASSIFIED INFORMATION

Non-public information that belongs to TECNALIA or that TECNALIA is in possession of and belongs to third parties, shall generally be considered confidential information for internal use, and the content of such information may not be disclosed to other people or entities.

TECNALIA shall implement mandatory internal regulations regarding the use of electronic devices for professional activities. The people covered by this Code of Ethics are responsible for using the necessary information security measures made available to them, and for applying applicable procedures to protect internal, confidential, and classified information stored in physical or electronic format against any intentional or accidental internal or external non-consensual risks to access, manipulate, or destroy such information. As such, the people covered by this Code of Ethics shall keep the content of their work confidential in their relationships with third parties.

Disclosing or using confidential or classified data for individual purposes infringes the Code of Ethics.

Any reasonable indication that confidential or classified information has been leaked must be reported by those that become aware of the fact through the appropriate channels.

The duty of confidentiality shall survive the termination of the relationship between TECNALIA and an individual; any confidential information contained in a physical or technological device shall be returned to TECNALIA in such cases.

### DONATIONS, CONTRIBUTIONS, AND SPONSORSHIPS

Donations, contributions, and sponsorships may not be requested or offered (including the provision of free space) if they may be misinterpreted as an attempt to obtain any unlawful consideration or undue advantage. In this regard, all initiatives must be approved by General Management or the Board of Trustees and be properly documented and recorded.

In any case, donations must have a legitimate purpose, they may not be anonymous, they must be formalised in writing, and financial donations must be made by any form of payment in which the person or entity receiving the funds can be identified.

No donations shall be made to political parties, nor may spaces be assigned to them for free on behalf of TECNALIA.

### ACCURACY OF ACCOUNTING RECORDS AND BOOKS

Any payments made by TECNALIA shall be evidenced with the corresponding commercial documents, such as contracts, invoices, and agreements, which must have been approved by the bodies set up for this purpose.

Cash payments shall be avoided, and if they are carried out, they must comply with the maximum legal limits and be justified by the corresponding documentary evidence. Payments by bearer cheque are prohibited.

Payments to accounts in countries or territories in non-cooperative jurisdictions for tax purposes, unless documents are provided that justify the need to make such a transaction based on legal circumstances and within the law.

TECNALIA's accounting records and books must accurately reflect all transactions and allow accurate financial information to be prepared. Information shall not be hidden from auditors or tax entities under any circumstances. Influencing, coercing, manipulating or deceiving such entities is strictly prohibited.

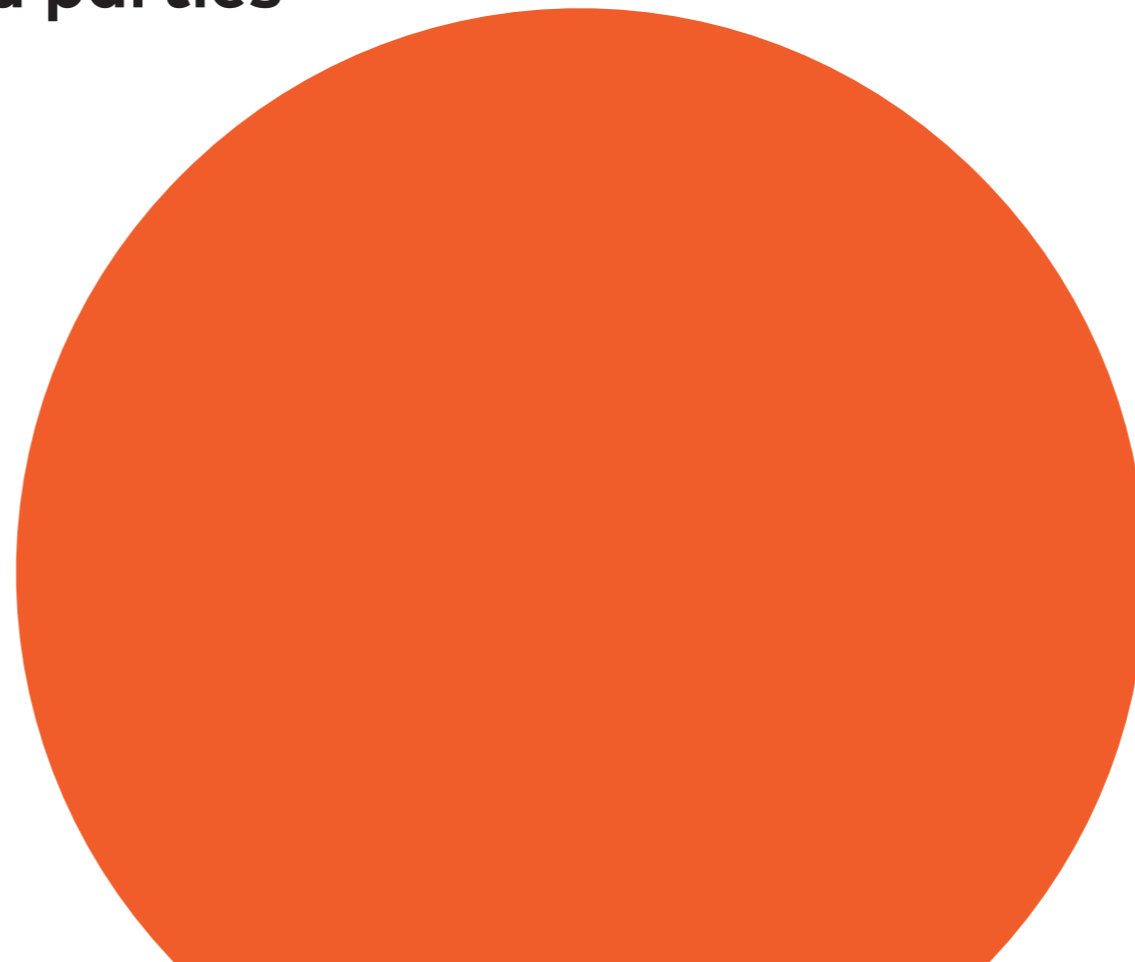
TECNALIA's financial information, and particularly its financial statements, must give a true and fair view of the organisation's economic, financial, and equity position according to generally accepted accounting principles and applicable international financial reporting standards. To this end, no member of TECNALIA shall conceal or distort information in the accounting records and books, or in supporting auxiliary documents.

Non-compliance must be reporting immediately, including: fraud or deliberate errors in preparing, keeping, evaluating, reviewing, or auditing the financial statements or records; shortcomings or failures in internal accounting controls; misrepresentations or false statements in any public financial disclosure document (including press releases); failures to fully and truthfully report on TECNALIA's financial situation; and providing information that is organised in a misleading way, or designed to confuse its recipients.

TECNALIA's people that perform financial oversight functions, and their first-degree relatives, are prohibited from contracting tax services or any other type of service with the organisation's auditor, regardless of whether such services would be paid for or not.

# 05

**Behaviour  
in relationships with third parties**



## 05

**Behaviour  
in relationships with third parties****HONEST NEGOTIATION**

TECNALIA aims to offer the highest quality service while competing fairly, promoting commercial and marketing activities based solely on merit and on its own resources, and applying the principles of transparency, truthful information, and the protection of its know-how and that of third parties it has access to. Contractual documents shall be written in a simple and clear way, based on sufficient truthful information that is not misleading. Transparency shall be fostered during pre-contractual and contractual relationships, and information shall be provided on any viable alternatives. TECNALIA has template documents that must always be made available whenever possible. The internal negotiation, review, and contractual approval procedures shall be complied with.

Suppliers shall be selected based on criteria of transparency, impartiality, objectivity, effectiveness, efficiency and the commitment to a culture of ethics and compliance. A weighted assessment shall be made, considering the price, quality, safety, and suitability of the products or services required, avoiding favouritism or criteria unrelated to TECNALIA's interests.

**TRUTHFUL AND COMPLETE INFORMATION**

The information provided to customers, partners, suppliers, and any other entity must be truthful and not deliberately misleading.

TECNALIA and its professionals shall refrain from advertising its services and activities in a misleading way.

TECNALIA does not condone or justify the falsification or tampering of information, nor the deliberate use of false information. Everyone must ensure that information is communicated in a truthful, complete, and comprehensible manner. Incorrect, inaccurate, or imprecise information that may mislead the recipient must never be knowingly provided under any circumstances.

**RESPECT FOR CONFIDENTIALITY**

Data from other parties shall be kept confidential and not disclosed to third parties when carrying out business activities, unless express consent is provided or it must be disclosed to comply with a legal requirement.

Pricing information and documents submitted by suppliers during a selection process shall be treated confidentially and not disclosed to third parties unless express consent is provided by the party concerned or to comply with a legal requirement.

The intellectual and industrial property of third parties must always be respected, as well as any confidential information and information legally classified as a "trade secret".

**RESPECT FOR FREE COMPETITION**

Any behaviour contrary to free competition is prohibited. Behaviour that could be considered as misleading advertising, that disparages competing entities, or that is generally considered unfair competition is also prohibited. Similarly, any behaviour that constitutes or could be seen to constitute collusion, or an abuse or restriction of competition according to antitrust laws is also prohibited.

**REJECTION OF CORRUPTION**

Any interference or influence by third parties that could alter professional impartiality and objectivity must be avoided. All TECNALIA people, either directly or through an intermediary, are therefore prohibited from:

- Receiving, requesting, accepting, offering, or promising an undue benefit or advantage, in breach of the obligations, when buying or selling goods, contracting professional services, and in commercial relations in general, in order to favour third parties granting or expecting such a benefit or advantage.
- Promising, offering, or giving an undue benefit or advantage to the managers, administrators, employees, or collaborators of an entity for themselves or for a third party in exchange for being unduly favoured over other people when buying or selling goods, contracting services, or in commercial relations.

## 05

## Behaviour in relationships with third parties

**BUSINESS COURTESIES AND GIFTS**

The people covered by this Code of Ethics shall not give or accept courtesies or gifts that influence, could influence, or could be perceived to influence decision-making. Furthermore, they shall not offer, give, request, or accept undue advantages or benefits, in exchange for a direct or indirect, present or future, commercial or economic benefit for TECNALIA, for themselves, or for a third party. Offering or promising any kind of direct or indirect undue advantage, and concealing such an advantage, is also prohibited.

Nor may they receive money from potential clients, partners or suppliers (including in the form of a loan or advance); this point is independent of the loans and credits granted by financial entities that work with TECNALIA and that declare such actions to be legal.

Without prejudice to the above points, members of the Organisation may offer or receive courtesies and gifts provided that they comply with the policy specifically developed for such purpose.

As a general rule, gifts or courtesies may only be given or accepted when they relate to awards, acknowledgements, tributes, institutional campaigns in general, or when all of the following circumstances are met:

- It only happens once;
- It is of negligible or symbolic economic value;
- It is a marketing item, in-line with customary business courtesies in the relevant context;
- It is not prohibited by law or generally accepted local business practice.

When there is doubt as to whether a specific gift complies or not, it must be refused, or the internal channels established for this purpose shall be consulted.

**COMMITMENT TO PREVENTING FRAUDULENT OR CRIMINAL PRACTICES**

TECNALIA is firmly committed to preventing its operations from being used to support fraud or crime such as money laundering, the financing of terrorism, smuggling, or other criminal activities. Therefore, the people covered by this Code of Ethics must take all the necessary precautions to report any suspicions that any TECNALIA person or third party related to TECNALIA that may be involved in criminal activity to the Organisation.

**BEHAVIOUR WITH PUBLIC ENTITIES AND POLITICAL ORGANISATIONS**

Relationships with public entities and political organisations must always be lawful, ethical, respectful, and in line with the legal requirements on the prevention of corruption and bribery to fund political parties. The following is therefore prohibited within the scope of TECNALIA's professional activities:

- Making a donation or contribution to a political party, federation, coalition, or electoral group, either directly or through an intermediary.
- Offering or giving a gift or gratuity to an authority, public servant, or person in a public office in exchange for such a person acting against their duties, unduly delaying an action, refraining from carrying out an action, or simply as a reward for being in the position they are in.
- Giving a gift or gratuity in response to a request made by a public servant or person in a public office.
- Directly or indirectly offering, promising, or giving an undue advantage or benefit (monetary or otherwise) to corrupt or attempt to corrupt an authority or public official, for their own benefit or for the benefit of a third party, influencing their actions relating to their public function to obtain or retain a contract, business, or any other competitive advantage when performing international economic activities.



# 05

## Behaviour in relationships with third parties



- Influencing a public servant or authority by taking advantage of any situation arising from a personal relationship with them or with another public servant or authority in exchange for a decision that may directly or indirectly create a benefit for TECNALIA or a third party.
- Offering to influence a public servant or authority by requesting gifts or any other remuneration from third-parties, or accepting an offer or promise to do so.

TECNALIA's people must inform General Management, the Management Committee, or the Board of Trustees before they accept any public position to determine whether there are any potential incompatibilities.

06

**Behaviour  
towards society**



# 06 Behaviour towards society

## TECNALIA AND ITS MISSION TO SOCIETY

TECNALIA seeks to maximise its impact on society in our commitment to create a safer and more sustainable world through our activities. We also aspire to leave a legacy for society.

To do so:

- We use our public funding in the best possible way.
- We aim to influence our customers, allies, and suppliers to expand our social impact.
- We prioritise long-term impact over short-term vision.
- We make decisions that involve criteria to maximise social and environmental benefits, contributing to them in a voluntary and proactive way.

## SUSTAINABILITY

TECNALIA's strategic objective is to contribute to meeting the Sustainable Development Goals (SDG) approved by the United Nations by developing its business activities. It therefore has a model to evaluate its impact on the SDG and action plans to improve its work.

## PROTECTION OF THE ENVIRONMENT

TECNALIA carries out its activities in a way that respects for and protects the environment, complying with or improving on applicable environmental standards, minimising the impact of its activities, promoting actions that help to protect the environment, and developing projects that help to decarbonise the economy.

Some of TECNALIA's activities could have a relatively significant impact on the environment, particularly when handling large quantities of hazardous substances. The people covered by this Code of Ethics carrying out or in charge of such activities must ensure that they understand and comply with applicable environmental regulations (on the storage and handling of hazardous substances, waste, atmospheric emissions, liquid spills, noise, soil contamination, damage to natural assets, etc.).



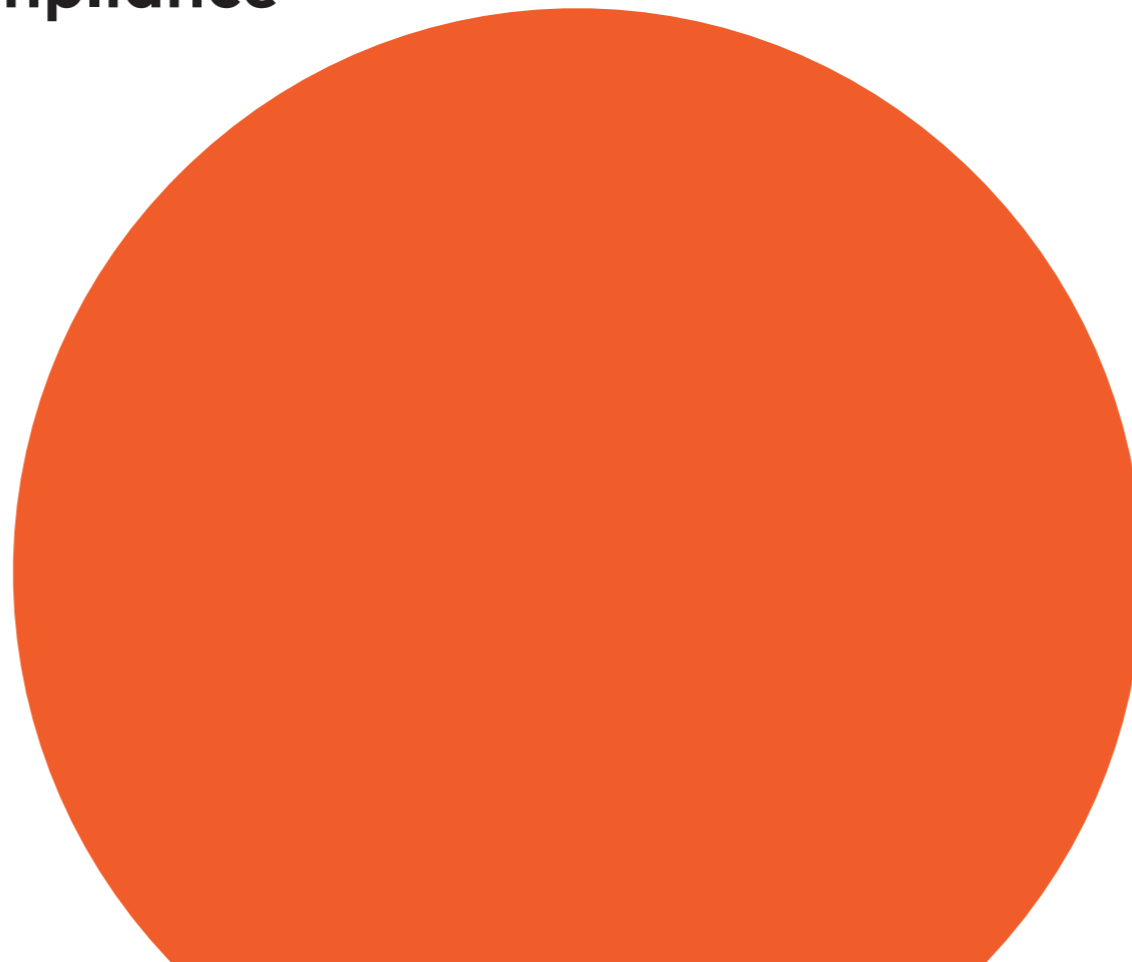
## RESPECT FOR HUMAN RIGHTS

TECNALIA, its suppliers, and related third parties must respect their social environment and internationally recognised human rights, as well as the fundamental labour principles set out in the International Labour Organisation Conventions.

TECNALIA has a special interest in controlling and monitoring compliance with human rights for the organisation's personnel. Specifically, TECNALIA pays close attention to human rights associated with business activities such as the right of association (freedom of association and collective bargaining), the rights of children and young people (ending child labour and forced labour), and the right to fair and just working conditions.

# 07

## Obligations and non-compliance



# 07

## Obligations and non-compliance

### UNDERSTANDING, ACCEPTING, AND COMPLYING WITH THE CODE OF ETHICS

TECNALIA will ensure that everyone to whom this Code of Ethics applies has access to the necessary resources to understand the Code and the regulations and laws relating to their professional functions. Understanding and complying with the Code of Ethics is mandatory for all of TECNALIA's professionals. Ignorance of the Code of Ethics is not an excuse for not complying with it. TECNALIA will provide compulsory training sessions on the Code of Ethics, and the failure to attend could be considered a breach of the Code itself. Behaviours associated with the values described in this Code of Ethics shall be considered during the performance evaluations for TECNALIA's professionals.

Compliance with the Code of Ethics is understood to be without prejudice to observing applicable regulations and all other internal TECNALIA standards.

Regardless of their hierarchical position, no one covered by this Code of Ethics is authorised to violate it or request another person to do so. Nor can ignorance of the Code of Ethics or an instruction from a superior be used as justification.

### CONCERNS, INTERPRETATION, AND PRIORITY

Anyone covered by the Code of Ethics may ask the Ethics and Compliance Committee to clarify any aspect of the Code.

If there is a conflict between the Code of Ethics and legal provisions, the law shall prevail. If there is a conflict between the Code of Ethics and TECNALIA's more specific internal standards, the Code of Ethics shall prevail.

### NOTIFICATION OF NON-COMPLIANCE

TECNALIA has an Internal Information System (Ethics Channel) regulated by a specific policy and procedure to promote compliance with the law and the rules of conduct set out in the Code of Ethics and other internal standards.

### DISCIPLINARY SYSTEM

When it is determined that a member of TECNALIA has acted against the law or this Code of Ethics, the corresponding disciplinary measures shall be taken according to the penalty and sanction system set out in the collective agreement that applies to TECNALIA or corresponding labour legislation.

If there is evidence that any behaviour in breach of the Code of Ethics is also a criminal offence, TECNALIA will report it to the competent authorities.

### VALIDITY

The Code of Ethics shall be in force from the day it is approved by TECNALIA's Board of Trustees in its December 2023 session. The Code of Ethics shall be reviewed regularly and updated if necessary, considering suggestions for improvement made by the Ethics and Compliance Committee which will channel any suggestions made by TECNALIA's professionals and submit them to the Board of Trustees for assessment. The Board of Trustees is the only body authorised to amend and update the Code of Ethics.

