

PRP.01 TRAGSA GROUP CODE OF ETHICS

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PRP.01 TRAGSA GROUP CODE OF ETHICS**1. PRESIDENT'S STATEMENT**

The Tragsa Group, in its constant commitment to transparency, good corporate governance, business ethics and a culture of compliance, has in recent years developed a business model as an institutionalised in-house provider for public administrations, based on compliance with the law, quality public service, integrity, professionalism and a policy of zero tolerance towards the commission of crimes and offences in business, which has placed it at the forefront of the public sector in this regard.

Within its Corporate Social Responsibility Policies, prevention of criminal risks has been the main rule of conduct, always adopting its model of prevention of existing legislative and organisational changes. For this reason, the first Code of Ethics was approved in 2012; it was amended in 2015, 2020 and 2021, and is now being amended again to take account of the new realities and regulatory changes arising from the entry into force of Law 2/2023, of 20 February, regulating the protection of persons who report regulatory offences and the fight against corruption, which requires the adaptation of all the documents that make up the Criminal Risk Prevention Model. The Group's corporate governance separates the Group's own business management activities, which are based on the control of legality that must be carried out by bodies that are not directly involved in the Group's day-to-day business.

As a result, this Code establishes a set of principles and guidelines of conduct designed to ensure the ethical and responsible conduct of all Group professionals in the performance of their activities. It also aims to establish the values and good practices that must govern the conduct of the Group as a whole, TRAGSA and its subsidiary TRAGSATEC, as well as the conduct of all those directly or indirectly linked to these companies, in the performance of their duties and in their professional relationships. Everyone must comply with the CSR, rejecting any behaviour or conduct that is not ethically responsible or that violates current regulations by committing any unlawful act.

The strategic business vision adopted in the Code aims to address the CSR objectives: to adopt a more solidary approach at all levels within the company's environment - ethical, social, environmental and economic solidarity - and to integrate strategies for other objectives that are not purely economic in nature. It also aims to raise awareness among all the Group's employees and stakeholders of the importance of maintaining conduct that not only strictly respects current legislation, but also contributes to the development of a more transparent and upright company, establishing mechanisms for action in the event of irregularities or inappropriate behaviour that may be detected, and protecting the people who report them under the terms established in Law 2/2023, of 20 February, regulating the protection of people who report breaches of regulations and the fight against corruption.

In this context, the quality of Tragsa Group companies cannot be overlooked as institutionalised in-house providers of technical services to the General State Administration, the Autonomous Communities, the Autonomous Cities of Ceuta and Melilla, the Island Administrations and Councils, the Provincial Councils of the Basque Country, the Regional Councils and the public entities dependent on any of them that have the status of

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contracting authorities, provided that the requirements established in paragraph 2,d), of section 2 of article 32 and in paragraphs a) and b) of section 4 of the same article are met. As a member of the Spanish public sector, its objective is to develop its activity with the same quality and vocation of service with which it has acted since its creation more than forty years ago, and at the same time to become a benchmark of ethical action, not only at the national level, but also at the international level.

In short, the objective pursued by the Tragsa Group is to achieve CSR using a tool called the "Code of Ethics",

2. TITLE ONE. PURPOSE AND SCOPE OF APPLICATION

Article 1. Purpose

The purpose of this Code is to integrate social, ethical and environmental concerns into the company's policies, because of that, improving the application of current social and environmental regulations that are closely linked to the company's activities, in the interests of greater efficiency and business quality.

This Code of Ethics sets out the Group's purpose, vision and values and serves as a guide for all professionals who have a relationship with the Group in a complex and changing business environment.

The Code of Ethics embodies the Group's commitment to the principles of business ethics and transparency in all areas of activity, and establishes a set of principles and guidelines of conduct aimed at ensuring the ethical and responsible behaviour of all Group professionals in the performance of their activities.

Tragsa Group applies the principle of due diligence in the prevention, detection and resolution of irregularities of a criminal or other nature, and undertakes, among other things, to regularly analyse the risks in this area, ensure that employees are aware of the existing risks, define responsibilities for compliance with the Code, and establish channels for communication and rapid resolution of irregularities committed within the company. The company has implemented the appropriate procedures that enable it to respond to possible irregularities.

This Code of Ethics is binding. All Tragsa Group employees are obliged to know and comply with the Code of Ethics and to report, through the channels provided by the company, any practices that are contrary to the Code and any regulations that may be applicable. The company has established a confidential procedure that enables employees to report irregularities or bad practices within the business environment. This procedure complies with the requirements of Law 2/2023, which regulates the protection of persons who report regulatory infringements and the fight against corruption. The procedure covers both internal reporting channels and the management of information. Commissioning bodies, suppliers, and collaborators must adhere to this requirement when providing their services.

PRP.01 TRAGSA GROUP CODE OF ETHICS**Article 2. Scope of Application**

The Code of Ethics is applicable to all professionals within the Group, including employees and members of management, administration, and governing bodies of all affiliated entities, regardless of their hierarchical level or geographical location, whether in national territory or abroad.

The Code is intended for stakeholders with whom the Tragsa Group maintains relationships. The purpose of this document is to regulate the conduct of all individuals associated with this company, whether directly or indirectly, in the performance of their duties and in their professional relationships.

Article 3. Effects

The purpose of this Code of Ethics is to inform all recipients of the standards of conduct that must be considered or respected. Furthermore, managers and directors must promote the business ethics culture outlined in this code to ensure that ethically reprehensible behaviours do not occur. However, if they do occur, it is important that appropriate tools are readily available and known to communicate them to the relevant authorities responsible for investigating such incidents. This will help to eradicate any behaviour that goes against the values outlined in this document.

3. TITLE TWO. CODE OF CONDUCT**Chapter One. General Rules****Article 4 Regulatory Compliance**

All employees of Tragsa Group must comply with current legislation, regardless of their location or place of work, and respect all applicable regulations while providing their services. Similarly, the Group will honour the commitments and obligations it has made in its relationships with third parties, both domestically and internationally.

All Group executives must know the legislation that affects their work areas of activity and services and ensure that their employees comply with laws and regulations, and that they receive appropriate information and training that allows them to understand and comply with those duties.

The Tragsa Group's performance is based on the rejection of any conduct that may contravene current legislation. This includes the implementation of internal procedures and mechanisms to minimise risks, including the risk of committing offences.

The Group will respect and comply with any judicial and/or administrative resolutions issued, without prejudice to

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the right to appeal, before as many bodies as appropriate, such decisions or resolutions when deemed not in accordance with Law and contravenes its interests.

The Tragsa Group is committed to applying internal policies and measures that comply with data protection principles. This includes designing and processing personal data of employees, customers, suppliers, and other interested parties in a way that ensures availability, integrity, confidentiality, traceability, and authenticity. We protect against unauthorised or illegal processing, as well as loss, destruction, or accidental damage, through the application of appropriate technical and organisational measures.

Article 5. Compliance with Ethical Professional Conduct

The conduct of Group employees must be professionally upright, acting in a responsible, productive, efficient, loyal and honest manner, and subject to the principle of confidentiality. All in accordance with the interests of the Group and the terms of this Code, so that any action they take is based on four basic principles: (i) the action is ethically acceptable; (ii) it is legally valid; (iii) it is desirable for the Company and the Group; and (iv) one is willing to take responsibility for it.

Article 6. Employee's Responsibility to Safeguard Material Provided by the Group.

The Tragsa Group equips its employees with the essential resources to perform their professional duties.

Employees must use the Group's resources responsibly and protect them from loss, damage, theft, or inappropriate use that could harm the Group's interests.

Group assets must be used for the performance of employees' duties and may not be used for their own benefit or for the benefit of third parties outside the Group.

The Group will establish criteria for the use of digital devices in accordance with privacy and data protection standards. The applicable digital rights will be guaranteed.

Employees must not use company equipment to install illegal programs or applications or those that could damage the image or reputation of the Group, in relation to computer systems. Users must not use the equipment to access, download or distribute any offensive or illegal content, or content that may cause damage or harm to the data, computer programs or electronic documents of others, or hinder or interrupt the operation of another's computer system.

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Chapter Two. Social Standards**Article 7. Good Credit from the Tragsa Group**

The Group must ensure that the name of the Tragsa Group is used correctly and appropriately by entities that carry out orders on behalf of public administrations and public sector entities, as well as by external suppliers and professionals, in order to maintain the corporate image and identity.

The Group will not engage in negative comments or activities that aim to harm external professionals or organisations, without prejudice to defend its legitimate interests.

Article 8. Commitment to Human Rights and Labour Rights

The Group is committed to upholding human and labour rights as recognised by domestic and international legislation.

The Group values the freedom of association and collective bargaining, as well as the national rights of the countries where it operates. It is committed to appreciating the differences in each area of operation as a contributor to both its activities and society.

PRP.01 TRAGSA GROUP CODE OF ETHICS**Article 9. Principle of Non-Discrimination and Equal Opportunities**

The Group promotes non-discrimination based on race, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political opinions, religion or any other personal, physical or social condition of its professionals. The Group also ensures equality of opportunities among them.

The Group will promote equal treatment of women and men in terms of access to employment, training and the promotion of professionals, and working conditions.

The Group strictly prohibits any abuse of authority and all forms of harassment, including physical, psychological, or moral, as well as any other behaviour that could create an intimidating, offensive, or hostile work environment for individuals. If you experience or become aware of any harassment, you must report it immediately to the Compliance Officer using the internal information system channels, as outlined in the PRP.06 "Procedure for action and decision in the event of possible unlawful acts and breaches of regulations in the TRAGSA Group".

Article 10. Confidentiality of Information

The Group must safeguard the confidentiality of internal information, particularly that which is obtained through the internal information system channels, in accordance with the provisions of Law 2/2023, of 20 February, which regulates the protection of individuals who report regulatory breaches and the fight against corruption, as well as the 'PRP.06 Procedure for action and decision in the event of possible unlawful acts and regulatory breaches in the TRAGSA Group'. The Group must fully respect the right to the protection of personal data from the outset. At the same time, it will ensure a balance between confidentiality and internal communication to promote integration and unity within the Group.

Cautions will be taken regarding the use of other people's confidential information, ensuring that it is obtained legally and by fully legitimate means, respecting the conditions of confidentiality.

The duty of maintaining confidentiality regarding information must be upheld even after the professional terminates their duties within the Group.

Chapter Three. Labour Regulations**Article 11. Reconciliation of family life with work activity**

The Group respects the personal and family life of its employees and will promote reconciliation policies to balance between family life and their work responsibilities.

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Article 12. Right to Privacy and Protection of Personal Data of Employees

The Group respects the privacy rights of its employees, in particular regarding personal data. Personal data cannot be processed or transferred to third parties without the express consent or clear affirmative action of the individuals concerned, except in cases where it is necessary to comply with a contractual or legal duty, or to fulfil judicial or administrative resolutions, or if there is another legal basis that supports it.

The Management of the Group shall comply with the requirements of personal data protection legislation regarding communications received from employees, professionals associated with the company, and other interested parties related to the areas in which it operates..

Regarding personal data, the exercise of the rights of access, rectification, cancellation, opposition, portability, limitation of individualised decisions, as well as the exercise of any claims that may arise before the Data Protection Delegate and/or the Supervisory Authority shall be guaranteed.

Article 13. Health and Safety at Work

The Group will have occupational health and safety policies, adopting any necessary and preventive measures to reduce accidents and occupational diseases.

Employees will pay special attention to the rules regarding occupational health and safety, for the purposes of preventing and minimising workplace hazards.

The Group will promote the application of rules and policies on occupational safety and health by the contractors with which it operates. To achieve this goal, the specifications approved by the contracting bodies of the Tragsa Group must include the duty for contractors to comply with the relevant health and safety legislation. This requirement is an essential condition for executing the contracts, especially when it is deemed necessary based on the contract's purpose.

Additionally, measures must be taken to protect the reporter from any infringement to prevent retaliation.

Article 14. Selection and Assessment of Group Employees

The Group, in selecting its employees, will act with full respect for the principles applicable to the protection of personal data. In procedure, the Group will consider academic and professional merit in relation to its needs, while maintaining objectivity in its choices and adhering to the principles of publicity, equality, merit, and capacity.

The Group will assess its professionals rigorously and objectively, considering their individual, collective professional performance and their productivity.

PRP.01 TRAGSA GROUP CODE OF ETHICS**Article 15. Training Policies**

The Group will promote the on-going employee training, objectively and always attending to the needs of the company, always fostering professional careers and equal opportunities.

Article 16. Participation

The Group will encourage its employees to support, assist, and actively participate in activities that facilitate knowledge exchange.

Article 17. Work Environment.

Employees will cultivate a collaborative and cooperative atmosphere to help the company achieve its goals and create a positive work environment.

Article 18. Independence

Employees must be impartial and maintain independent criteria in the context of their activity in the Group, acting with integrity and objectivity.

If an employee becomes aware of any circumstance that could compromise their impartiality or independence, they must inform the Compliance Officer. This will enable measures to be taken to resolve any potential conflict of interest.

Article 19. Conflicts of Interest

A conflict of interest arises when the personal interest of a professional or someone related to them clashes with the interest of any of the Group companies, either directly or indirectly..

Professional decisions shall be based on the best interests of the Group and should not be influenced by personal or family relationships or any other private interests of the Group's professionals.

Professionals with knowledge gained from their work in the company are prohibited from exploiting business opportunities for personal gain or for the benefit of related parties. This applies when the investment or operation has been offered to the Group or is of interest..

Regarding conflicts of interest, the Group's professionals must follow the Conflicts of Interest Policy, which upholds the principles of independence, abstention from intervention, and communication with the Compliance Officer.

PRP.01 TRAGSA GROUP CODE OF ETHICS**Article 20. Gift and Invitation Policy.**

Group employees must not accept any benefit, directly or indirectly, that could be interpreted as anything other than a mere courtesy due to its value. If in doubt, the practitioner should consult the Compliance Officer regarding any matters that may require attention beyond mere courtesy. To achieve this, the Group has developed a Gift and Invitation Policy that establishes the necessary registration and authorisation systems. The policy must be disclosed and is mandatory for all Group personnel.

Article 21. Corruption and Bribery

Group Professionals must not offer or accept any unjustified advantages or benefits, directly or indirectly, to obtain a benefit for the Group, themselves, or a third party. They may not give or receive any form of bribe or kickback, from or by any other party involved, such as public officials, Spanish or foreign, staff of other companies, political parties, authorities, public administrations, suppliers, providers and shareholders.

Bribery is expressly prohibited. This includes offering or promising any type of improper advantage or instrument, as well as engaging in influence peddling..

The Tragsa Group understands corruption as the use of unethical practices to obtain any benefit. In no case will the people of the Tragsa Group resort to unethical practices to influence the will of people outside the company with the aim of obtaining any benefit for the Group, or for themselves. For this purpose, the Group will prepare a specific Compliance and Anti-Bribery Policy to thoroughly regulate all these issues.

In their relations with public authorities and institutions, the employees of the Tragsa Group shall behave in a lawful manner and in line with international provisions for the prevention of corruption and bribery.

The Tragsa Group expressly prohibits making non-contractual or illegal payments to any person or entity, whether public or private, with the intention of obtaining or maintaining business or other benefits or advantages. Additionally, the company does not condone taking advantage of personal relationships with public officials to gain undue advantages.

Article 22. Rules Against Disqualifications

Regarding the exercise of public or private activities by company employees, the legislation on incompatibilities must be considered. In particular, the employees of the company may carry out other activities under the provisions of Law 53/1984, of 26 December, on Incompatibilities of Personnel at the Service of Public Administrations, and Law 3/2015 of 30 March, regulating the exercise of High Office of the General State Administration, requesting, when necessary, the statement of the corresponding compatibility.

PRP.01 TRAGSA GROUP CODE OF ETHICS**Chapter Four. Environmental Rules****Article 23. Protection of the Environment**

The Tragsa Group will conduct all activities with utmost respect for the environment. It will promote preventive measures for all agents involved in its actions and minimise any negative effects that may arise from its activities.

Group companies will endeavour to minimise waste and the effects of pollution, conserve natural resources, promote energy conservation, and undertake and sponsor research and development projects that promote environmental protection. The Group aims to preserve, care for, and protect the environment, natural resources, and biodiversity. We will respond to the needs of society and the environment while seeking to develop the rural and marine environment. We will constantly improve our quality parameters and minimise environmental impacts. We will avoid dumping, emitting, or introducing materials or substances into the air, soil, or water that could endanger the life, integrity, health, or property of people.

The Tragsa Group will execute actions guaranteeing the preservation of natural resources, avoiding any unauthorised intervention in soils addressed for roads, green areas, public domain assets or places that have legally or administratively recognised its landscape, ecological, artistic, historical or culture, or that for the same reasons have been considered of special protection.

The Group will work with authorities to develop and promote laws and regulations that protect the environment. The Group will also promote the use of the most advanced and less polluting technology, protecting the natural environment, seeking collaboration with other companies that show special interest and initiatives in these matters.

The Group will disclose this policy to commissioning entities, suppliers and other external professionals with which it is related, demanding compliance always. In this regard, Tragsa Group is committed to the provisions of Order PCI/86/2019, of 31 January, which publishes the Agreement of the Council of Ministers of 7 December 2018, approving the Green Public Procurement Plan for the General State Administration, its autonomous bodies and Social Security management entities (2018-2025).

Chapter Five. Economic Rules**Article 24. Activity Development**

The Tragsa Group will promote the development of its activity in an efficient and competitive way, optimising the resources it has, being able to grow and be profitable under the principle of responsible management.

The Group's ethical commitment, which includes basic principles and standards for the proper development of

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relations between the company and its main stakeholders (employees, administrations, contracting authorities, suppliers, providers, subcontractors, collaborators and shareholders), among other goals, will consider the following:

- a) The company's socially responsible investments should align with the objectives outlined in this document while also maintaining economic profitability.
- b) Transparency in business activities.
- c) Reports on the social responsibility policy, with the inclusion of social and environmental information in the annual reports, and the publication of the Group's sustainability report.
- d) The incorporation of a solid model of regulatory compliance and prevention of criminal risks that can prevent the incursion of the company in criminal proceedings that may entail economic, financial or reputation damages.
- e) The establishment of an internal reporting system that guarantees the rights of the informant and the person mentioned in the report, as per the provisions of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption.

Drawing on its previous experience, the Tragsa Group is committed to enhancing the quality of its actions and ensuring safety in its execution. To achieve this, the company conducts both internal and external audits, enabling continuous improvement of its activities.

The Tragsa Group is committed to obtaining its income in compliance with applicable regulations, and rejects any deceitful or fraudulent practices that would allow it to obtain aid or subsidies, or to use public funds, whether national or foreign, to the detriment of third parties or for purposes other than those for which they were intended.

Article 25. Accuracy of Economic and Financial Reporting

The Tragsa Group ensures the accuracy of its financial statements and strongly opposes any form of manipulation. It believes that the statements should provide reliable and truthful information about the Group's economic situation. The Group uses all available means to prevent any misinterpretation of its statements that could lead to errors in analysis.

Similarly, the Tragsa Group has implemented internal control procedures to prevent any improper conduct by its employees that could negatively impact the Group's financial situation or the perception of it by third parties. This includes avoiding actions that could lead to economic crisis or insolvency, and protecting the interests of public entities, suppliers, creditors, and employees.

Likewise, and in compliance with the recent legislation applicable to this effect, the accuracy of the non-financial

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information provided must be guaranteed.

Article 26. Compliance with Accounting, Tax and Social Security Obligations.

In line with the Tragsa Group's concern to adjust all its activities to strict compliance with the provisions of current legislation, and to ensure the veracity of the economic and financial information and the contribution of the Group companies to the common interest in accordance with the provisions of tax and Social Security legislation, the Group complies with its accounting, tax and Social Security obligations in a timely and rigorous manner, having established the necessary internal procedures to ensure that deviations in internal operations that may affect compliance with the obligations imposed in relation to these matters are avoided.

Article 27. Money Laundering and Irregular Financial Transactions

Tragsa Group personnel should be particularly vigilant in cases where there are indications of a lack of integrity on the part of individuals or entities with whom the company has dealings.

Special attention should be paid to cash payments that are unusual given the nature of the transaction, payments made by means of bearer cheques, or payments made in currencies other than the one previously agreed upon. Any irregular payments should be reported through the channels and procedures established in this Code of Ethics.

They should also be alert to payments made to or by third parties not mentioned in the relevant contracts, as well as to payments made to accounts that are not the usual ones in dealings with a terminated entity, company or person.

They should also scrutinise payments made to individuals, companies, or entities with accounts in tax havens, as well as payments made to entities where the partner, owner, or ultimate beneficiary cannot be identified.

Article 28 Protection of Intellectual and Industrial Property

Tragsa Group personnel is committed to protecting intellectual and industrial property, group companies and third parties, scrupulously complying with the rules that govern this issue to prevent breaching rights or causing damage to the Group or to third parties.

Chapter Six. Strategic Communication Standards**Article 29. Communication and Dissemination of the Code of Ethics**

The Code of Ethics will be shared with Group employees and personnel via publication on the intranet.

The Directorate for Coordination and Institutional Actions is responsible for externally disseminating the Code of

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Ethics, which is published on the Group's website. However, all Directorates will contribute to increasing its dissemination within the scope of their powers.

The Compliance Officer will prepare reports annually on the level of compliance with this Code, as well as the number of reports received and the resulting internal investigations. These reports will be incorporated into the Tragsa Group's annual sustainability report.

Article 30. Responsibility for Compliance with this Code

The Group will encourage a strong commitment from employees and personnel to comply with this Code of Ethics.

The Tragsa Group will provide employees and personnel with the necessary means to disseminate and enforce the principles of action included in this Code of Ethics.

Any breaches of the Code of Ethics will be addressed by the Compliance Officer and the Compliance Body established for this purpose, in accordance with the relevant regulations. Group employees and third parties shall confidentially report any actions contrary to the Code of Ethics that they may observe. To achieve this, they will use the internal information channels established by the company, which allow its personnel, employees and third parties, in a confidential manner, to consult doubts and report irregular conduct in matters, of a criminal nature or any other, relating to the Code of Ethics.

The Tragsa Group formally establishes that it will not tolerate reprisals against those persons who make use of the procedures established for reporting irregular conduct in matters, criminal or otherwise, relating to the Code of Ethics, in accordance with the provisions of the "PRP.06: Procedure for action and decision in the event of possible unlawful acts and breaches of regulations in the TRAGSA Group". All employees and bodies of the company shall comply with the requirements of personal data protection legislation regarding the communications sent to them by professionals in accordance with the provisions of the Code of Ethics. This commitment is a requirement for all management positions and unrestricted appointments within the Tragsa Group.

If an employee has any questions regarding the interpretation or application of this Code, they should refer to the Compliance Officer.

If breaches of European Union Law are reported, or if they constitute actions or omissions that could be considered serious or very serious criminal or administrative offences, the information management procedure regulated in the internal regulations of the Tragsa Group shall be followed in accordance with the provisions of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption.

PRP.01 TRAGSA GROUP CODE OF ETHICS**Article 31. Information policies**

Tragsa Group will ensure that good governance practices are communicated, both internally and externally, within the framework of the Corporate Social Responsibility Policy.

To carry out communication management, particularly that related to the Tragsa Group's own personnel, specific planning will be drawn up and, in addition, responsible advertising will be published, also seeking to maintain the current quality and environmental certificates.

Article 32. Approval and amendment of the Code of Ethics

The Board of Directors of the Company is responsible for approving and amending this Code after it has been approved by the Management Committee.

Chapter VII. Governance, Corporate Responsibility and Criminal Risk Prevention Committee Compliance Body and Compliance Officer.**Article 33. Governance, Corporate Responsibility and Criminal Risk Prevention Committee.**

The Governance, Corporate Responsibility and Criminal Risk Prevention Committee, which is attached to TRAGSA's Board of Directors, has the following functions:


- To be informed on updates on Tragsa Group's efforts to ensure adherence to the Code of Ethics.
- To oversee the Compliance System.
- To receive notification of any compliance-related activity to be presented to the Board of Directors.
- Evaluate the Company's compliance with its corporate social responsibility policy to determine its impact on the Company's management.

Article 34. Compliance Body

The Compliance Body comprises three members: the Audit Director, the Deputy Director of Labour Relations, and the Deputy Director of Jurisdictional Affairs.

The functions of the Compliance Body are the following:

- a) The Compliance Officer may refer to the Code of Ethics for guidance when making decisions. If there is any doubt, they may seek clarification. They may bring particularly complex or significant decisions to the attention of the Governance, Corporate Responsibility and Criminal Risk Prevention Committee.

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<div data-bbox="150 309 1484 696"> <ul style="list-style-type: none"> b) Analyse the reports prepared by the Compliance Officer regarding compliance with the Code of Ethics. Validate the recommendations and proposals for improvement to facilitate its application. These will be passed on to the Governance, Corporate Responsibility and Criminal Risk Prevention Committee. c) Instruct the Compliance Officer to investigate all communications within their area of responsibility. d) Inform the Governance, Corporate Responsibility and Criminal Risk Prevention Committee regarding the status of the risk prevention model and the analysis of criminal risks as outlined in the Criminal Risk Prevention Model, and those identified in "PRP.06". Procedure for action and decision in the event of possible unlawful acts and breaches of regulations in the TRAGSA Group". </div> <div data-bbox="150 770 1484 848"> <p>If the Compliance Body deems it necessary for optimal performance of its functions, it may seek advice from external professionals.</p> </div> <div data-bbox="150 907 746 943"> <p><u>Article 35. Compliance Officer in Tragsa Group</u></p> </div> <div data-bbox="150 999 1484 1077"> <p>The Compliance Officer will functionally report to the Internal Audit Department. This party will be autonomous and independent for executing the relevant functions that will be conducted under their own governing regulations.</p> </div> <div data-bbox="150 1135 1342 1171"> <p><u>Article 36. Obligations of Tragsa Group Employees Regarding Breaches of the Code of Ethics</u></p> </div> <div data-bbox="150 1229 1484 1400"> <p>All Tragsa Group employees and personnel have the duty to notify the Head of Compliance, through the internal information system channels, of any breaches of this Code of Ethics detected, as well as the breaches contained within the provisions of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption.</p> </div> <div data-bbox="150 1458 314 1491"> <p>In this regard:</p> </div> <div data-bbox="150 1565 1484 1998"> <ul style="list-style-type: none"> a) Employees must report to the Compliance Officer any news regarding the commission or reasonable possibility of commission of irregularities, as well as any breach or violation of the conduct outlined in the Group's Code of Ethics. b) Persons who make a report in good faith shall be protected against any form of corporate retaliation, under "PRP.06: Procedure for action and decision in the event of possible unlawful acts and breaches of regulations in the TRAGSA Group": c) In any case, we will ensure maximum confidentiality and anonymity for the person making the report. This will not affect our legal obligations or our duty to protect the rights of companies and individuals who may be accused unfairly or in bad faith. </div>		

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- d) If an employee fails to notify the Compliance Officer of non-compliance, the Compliance Officer will assess the severity of the risk arising from the non-compliance. This assessment will determine whether to report the non-compliance to the competent authority to determine the consequences.

Article 37. Management of Internal Information System Channels.

The Compliance Officer shall be the body in charge of managing the internal information channels, processing the information received, in accordance with the provisions of "PRP.06: Procedure for action and decision in the event of possible unlawful acts and breaches of regulations in the TRAGSA Group", in which case the provisions of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption, must be observed in all cases.

In any case, the validity of the evidence obtained through internal information channels or the possible actions of the Compliance Officer or, if applicable, the Compliance Body, shall follow the constitutional principles and rights set out in Spanish legislation. These include the right to effective judicial protection, the legal principle of innocent until proven guilty, the right to a fair trial, and the right to the protection of personal data.

The Boards of Directors of Tragsa and Tragsatec approved this amendment to the Tragsa Group Code of Ethics in Madrid on the date of approval by the Board of Directors.