

## Code of Conduct and Corporate Values

15/04/2025



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# Code of Conduct and Corporate Values

## 1 Introduction

### 1.1 Purpose of the document

The main purpose of this document is to define a set of rules and guidelines to be followed by all employees and collaborators of *Haya Energy Solutions*, to foster a company culture based on ethics, respect and responsibility. *Haya Energy Solutions'* conduct policies are intended to:

- Promote a safe and equitable work environment.
- Promote transparency in day-to-day operations.
- Ensure compliance with applicable national and international laws and regulations.
- Provide guidance on proper workplace behaviour, handling of conflicts of interest, handling of sensitive information, and relations with customers and suppliers.

### 1.2 Scope

This set of conduct policies applies to all employees, contractors and external partners working directly or indirectly with *Haya Energy Solutions*, regardless of their position or location.

This document covers all operations and activities of the organisation, including interactions with customers, suppliers and other stakeholders. As such, it is mandatory that all individuals who have any kind of relationship with the company, without exception, adhere to the standards set out in this document to ensure consistency in values and expectations within the organisation.

This document is also applicable in situations of business travel, telecommuting and any other scenario where representation of the company is required.

### 1.3 Values and ethical principles

The values and ethical principles that guide the company's conduct policies are as follows:

- **Integrity:** It is imperative that all employees act with absolute honesty and transparency in each of their professional interactions, preserving the trust and respect of colleagues, customers, and business partners.
- **Respect:** We foster an inclusive environment in which every individual is valued, without discrimination of race, gender, sexual orientation, religion, ethnicity, or any other personal characteristic. Mutual respect is fundamental to a harmonious and collaborative work environment.



- **Responsibility:** Each member of the company is responsible for his or her actions and decisions, fulfilling commitments and contributing to collective success.
- **Stewardship:** The company will seek to incorporate solutions to improve operational performance in a responsible manner, without compromising the quality of service or the well-being of employees.
- **Trust and confidentiality:** It is essential that all employees handle confidential information and personal data with strict discretion and responsibility, ensuring that the privacy of customers and the company is always protected. Failure to comply with this obligation may give rise to the corresponding sanctions and responsibilities, in accordance with the provisions of the Annex “Information Confidentiality Management Policies”.
- **Commitment to quality:** The pursuit of excellence in service and project quality is essential to preserve a solid reputation in the industry, ensuring client satisfaction and compliance with industry standards.

## 2 General Standards of Conduct

Establishing general standards of conduct at *Haya Energy Solutions* is essential to promoting a professional, inclusive, and ethical work environment. These standards range from mutual respect to compliance with laws, regulations, and internal policies, ensuring that all actions of our employees and partners are aligned with the company's core values. Below are the key principles that guide the conduct of all members of the organisation.

### 2.1 Respect and diversity in the workplace

At *Haya Energy Solutions*, we firmly believe that a diverse and inclusive environment is fundamental to the success of the company. We therefore promote a workplace where everyone, regardless of race, gender, sexual orientation, religion, ethnicity, age, or any other personal characteristic, is treated with equality, dignity, respect, and fairness.

Diversity is not only a value that we constantly promote, but also a key factor that drives innovation, enhances creativity and improves collaboration in our company.

All employees must be committed to promoting an inclusive culture that values individual differences and respects diverse perspectives. Relationships within the organisation should be based on mutual respect and cooperation, ensuring that each team member feels respected and valued, as well as recognised in contributing to the achievement of common goals.

### 2.2 Commitment to integrity and honesty

Integrity and honesty are fundamental principles that must guide all actions and decisions within *Haya Energy Solutions*. All employees have an obligation to act with the utmost transparency,

ensuring that their behaviour is ethical and fair in all their interactions, whether with colleagues, customers, suppliers or any other stakeholders.

It is essential that each member of the company adheres to these principles when making professional decisions, always keeping ethical standards in mind.

Commitment to integrity includes the responsibility to report accurately on work performance and results and to act fairly and objectively, avoiding any form of deception or manipulation.

## 2.3 Transparency

Transparency is a core value at *Haya Energy Solutions* and all employees are expected to act with complete clarity in all actions and decisions. Transparency refers not only to honesty in internal communication, but also to the clarity with which decision-making processes, reports and results are handled.

Employees must be transparent with colleagues, superiors, and customers, ensuring that all relevant information is shared in a timely and accurate manner with stakeholders.

The company fosters an organisational culture that values openness and the exchange of ideas, facilitating the adoption of best practices and solutions to achieve corporate objectives. Transparency also implies an obligation to disclose any conflicts of interest and a willingness to appropriately address any issues that may arise in the work environment.

## 2.4 Compliance with laws and regulations

Regulatory compliance is essential for *Haya Energy Solutions*, which is why the company is committed to operating within the applicable legal framework in the areas corresponding to its activity. The main regulations applicable in the countries where the company mainly operates are highlighted below:

- **Environmental regulations:** The company adheres to national and European environmental regulations with the aim of reducing its ecological impact and promoting sustainability. This includes compliance with European Union legislation on energy and climate change, as well as compliance with international commitments on sustainability and emissions reduction.
- **Occupational health and safety:** The company ensures safe working conditions and compliance with occupational health and safety regulations, in line with EU guidelines on occupational health and safety. In addition, it ensures compliance with the Law on Health and Safety at Work and the Workers' Statute in Spain, as well as with the occupational safety regulations and employee rights set out in the French "Code du Travail".
- **Data protection and privacy:** Compliance with the regulations in force to guarantee the protection of personal data, including the General Data Protection Regulation of the European Union (Regulation (EU) 2016/679), ensuring that all personal information is treated securely and in accordance with the applicable data protection laws. All information



on data protection and privacy is contained in the internal document entitled “Data-Protection”, which details the principles and measures that guarantee the confidentiality and correct treatment of personal data in the company.

- **Tax and financial compliance:** Transparency in economic management and compliance with tax obligations is guaranteed, in accordance with national regulations in Spain and France on taxation and corporate accounting. It also adheres to international regulations on the prevention of money laundering and the fight against corruption.
- **Commercial and international regulations:** In its commercial relations and contracts, the company adheres to commercial and corporate legislation in Spain and France, as well as to European Union regulations on trade and public procurement,

All employees must be committed to respecting these laws and regulations, as well as the company's internal policies, which are designed to ensure compliance.

*Haya Energy Solutions* is committed to updating its procedures and practices in accordance with any regulatory changes that may affect its activity, ensuring compliance with the applicable provisions.

## 2.5 Compliance with sexual harassment prevention protocol

*Haya Energy Solutions* has a zero-tolerance policy towards sexual harassment. Sexual harassment is unacceptable in any form, whether verbal, physical or visual. All employees must always conduct themselves in a professional and respectful manner, avoiding any behaviour that could be perceived as intimidating or inappropriate.

The company has established a clear and accessible protocol for reporting sexual harassment, ensuring that all complaints are treated confidentially, respectfully, and with the utmost care. It is the responsibility of every member of the organisation to comply with this protocol, promoting a safe and harassment-free working environment. Any breach of the protocol will be treated with the utmost seriousness and may lead to disciplinary sanctions, as stipulated in the *Haya Energy Solutions* “Protocol for the Prevention and Response to Sexual Harassment and Harassment on Grounds of Sex”.

## 3 Confidentiality and Data Protection Policies

At *Haya Energy Solutions*, the confidentiality of information and the protection of personal data are fundamental aspects that underpin the trust that our customers, partners and employees place in us. Proper handling of confidential information and data security are not only essential to maintaining our reputation but are also legal and ethical obligations. This section describes the policies governing the handling of confidential information, the protection of personal data and the security of information in the work environment, with the aim of ensuring that everyone in the company understands and complies with these responsibilities.



The company's specific policies are set out in detail in the Annex "Information Confidentiality Management Policies".

### 3.1 Handling of confidential information

Confidential information includes any data, documents or content that must not be disclosed to outsiders without authorisation. This may include financial information, business strategies, projects under development, contracts, agreements with customers and suppliers, as well as any other sensitive information that is crucial to the proper functioning of the company.

#### Specific policies on handling confidential information:

- **Restricted access:** Access to confidential information should be limited to only those employees who need this information to perform their job functions. Employees must ensure that this information is protected and not accessible by unauthorised persons, including within the organisation.
- **Proper use of information:** Employees should not use confidential information for personal purposes, nor share it with third parties, even after their relationship with the company.
- **Communication protection:** When sharing confidential information, whether in physical or digital format, procedures should be followed to ensure its security. This includes the use of secure communication channels, such as encrypted emails, and proper storage of sensitive documents.
- **Confidentiality agreements:** All employees, contractors, and business partners are required to sign confidentiality agreements upon joining the company or entering a business relationship. These agreements specify the obligations of each party regarding the handling and protection of confidential information.

### 3.2 Protection of personal data

Personal data includes any information that can identify an individual, such as name, address, email address, and telephone number, among others.

#### Specific policies on personal data protection:

- **Data collection and storage:** Personal data should only be collected when necessary to fulfil the company's business or legal obligations. This data should be stored securely and only for as long as necessary to fulfil its purpose.
- **Appropriate use of data:** *Haya Energy Solutions* employees must not use personal data for purposes other than those set out in the context of their work. The company undertakes not to share or disclose personal data of customers or employees to third parties without the explicit consent of the individual concerned, except where required by law.





- **Consent:** Customers, employees or any individual whose data is stored must be fully informed about the purpose of the collection of their data.
- **Rights of individuals:** Employees and customers have the right to access, correct or delete their personal data, as stipulated by data protection laws. *Haya Energy Solutions* is committed to facilitating these rights in a timely and efficient manner.

### 3.3 Information security and use of technology

*Haya Energy Solutions* implements a series of physical and digital security measures to prevent unauthorised access, misuse or loss of information. In this context, the use of technology must be aligned with best practices for information protection.

#### Specific policies on information security and use of technology:

- **Controlled access to systems:** Access to company information systems should be restricted according to the job functions of each employee. Authentication mechanisms, such as strong passwords, two-factor authentication (2FA) or other security controls, should be implemented to ensure that only authorised individuals have access to sensitive data.
- **Network and device protection:** All electronic devices used to handle sensitive data (such as computers, mobile phones, and servers) should have the necessary security measures in place, such as anti-virus, firewalls, and disk encryption. In addition, employees should be aware of the importance of keeping their devices protected by preventing unauthorised access through public or insecure Wi-Fi networks.
- **Monitoring:** *Haya Energy Solutions* implements continuous monitoring procedures to detect unauthorised access or suspicious activity on its IT systems.
- **Education and awareness:** The company will provide its employees with ongoing training on best practices for information security, such as secure password management, proper use of technology, and identification of risks, such as phishing or cyber-attacks

## 4 Professional Relationships and Conflicts of Interest

The professional relationships established by *Haya Energy Solutions* with its customers, suppliers and other stakeholders must be based on principles of transparency, ethics and professionalism. A proactive approach is also established to identify, declare and manage potential conflicts of interest, ensuring impartiality in all decisions and actions.

### 4.1 Relationships with clients and suppliers

Relationships with customers and suppliers are essential to the success of the organisation. They must therefore be based on mutual respect, transparency and compliance with legal and ethical standards.





- **Clients:** The company is committed to providing services of the highest quality, meeting clients' needs and acting honestly at all stages of the business relationship. It is essential to maintain the confidentiality of information provided by clients and to fulfil commitments in a timely and professional manner.
- **Suppliers:** Interactions with suppliers must be conducted in a fair and equitable manner. The selection of suppliers will be based on objective criteria such as quality, cost and compliance with regulations. A professional and ethical relationship is promoted, avoiding any practice that could be construed as favouritism or preferential treatment.

## 4.2 Declaration and management of conflicts of interest

A conflict of interest arises when an employee's personal, family or financial interests may interfere with his or her ability to act in the best interests of the company. To protect the fairness and integrity of decisions, the following guidelines are established:

- **Identification and disclosure:** Every employee has an obligation to identify and disclose potential conflicts of interest as soon as they are identified. This includes, but is not limited to, personal relationships with customers, suppliers or competitors that may influence employment decisions. Conflicts should be reported directly to the CEO of the company.
- **Appropriate management:** Once declared, the conflict will be analysed by the CEO, who will assess the situation and decide on the necessary measures to avoid any negative impact on the company. These measures may include reassigning responsibilities or excluding the employee in question from specific decisions.
- **Conflict of interest of the CEO:** In case the conflict of interest involves the CEO, he/she should declare it to the president of the company, who will take responsibility for analysing the situation and making the corresponding decisions, thus ensuring the fairness of the process.
- **Transparency:** The company fosters a culture of transparency in which employees feel safe to report potential conflicts without fear of retaliation.

## 4.3 Anti-corruption

*Haya Energy Solutions* adopts a zero-tolerance policy towards all forms of corruption, including bribery, extortion and dishonest practices. The company seeks to ensure that all business activities are conducted ethically and in compliance with applicable laws.

### Prohibition of bribery and corrupt practices

- **Bribes:** Under no circumstances may we offer, solicit or accept bribes, gifts, inducements or any other benefit that could influence business or employment decisions.

- **Extortion and dishonest practices:** Any form of extortion, manipulation or improper advantage will be considered serious misconduct and will be sanctioned in accordance with internal policies and applicable laws.

#### Measures against theft and fraud

- **Theft of resources:** Misappropriation of property, money, equipment or any company resources will be considered a serious misconduct and legal action will be taken where necessary.
- **Fraud:** Falsification of documents, financial reports or any type of information for the purpose of improper personal or business gain is strictly prohibited.
- **Prompt action:** The company is committed to investigating any signs of theft or fraud and taking appropriate action with rigour and fairness.

#### Misuse of confidential information

- **Protection of sensitive data:** Confidential information of the company, customers and suppliers must be handled with the utmost discretion.
- **Employee responsibility:** All employees are obliged to protect confidential information and to use it only for the purposes authorised by the company.

#### Prevention of abuse of power

- **Ethical behaviour of superiors:** The use of hierarchical positions to intimidate, humiliate or make decisions that favour personal interests is strictly prohibited. *Haya Energy Solutions* promotes leadership based on respect and fairness.
- **Discriminatory or arbitrary actions:** Any conduct involving abuse of authority, discriminatory treatment or unjustified disciplinary measures towards employees or collaborators is prohibited.

#### Legal compliance and anti-corruption regulations

- **Mandatory compliance:** All employees must comply with national and international laws related to anti-corruption, such as the United Nations Convention against Corruption.

#### Whistleblowing

- **Procedure for action:** *Haya Energy Solutions* has a clear and structured procedure for employees to report any misconduct, such as abuse of power, bribery, theft, fraud or misuse of information. This procedure is detailed in section 6.3 of this document: “Managing conflict and inappropriate behaviour”.



- **Confidentiality:** All reports will be treated with absolute confidentiality. Investigations will be carried out with impartiality and diligence, ensuring that the complainant is protected against retaliation.

## 5 Environmental Responsibility and Sustainability

At *Haya Energy Solutions*, environmental responsibility and sustainability are fundamental pillars of our corporate mission and vision. As a company in the energy sector, we are committed to minimising our environmental footprint through responsible and sustainable practices.

This section sets out key guidelines to ensure that our operations, projects and corporate decisions are aligned with the following principles:

- **Minimising environmental impact:** We implement technologies and processes that optimise the use of resources, reduce emissions and promote energy efficiency.
- **Promotion of renewable energies:** We prioritise projects that integrate clean and renewable energy sources, contributing to the global energy transition.
- **Responsible resource management:** We adopt measures to reduce the consumption of materials and energy in our operations, ensuring their efficient and sustainable use.
- **Regulatory compliance:** We ensure that our business performance complies with applicable environmental laws and regulations.
- **Awareness and education:** We foster a culture of sustainability among our employees, customers, and partners, promoting respectful practices that respect the environment and contribute to the common good.

By integrating these principles into all areas of our business, we reaffirm our commitment to sustainable development and to preserving the environment for present and future generations.

### 5.1 Sustainable practices in projects and operations

*Haya Energy Solutions* encourages the design of projects that incorporate renewable energy and focus on long-term sustainable solutions. In addition, the company works closely with customers and suppliers to ensure that supply chains are responsible and meet high environmental standards.

### 5.2 Responsible management of energy resources

Efficient and responsible management of energy resources is central to our mission to lead the transition to a sustainable energy future.

We seek to optimise energy use in all our operations, maximising efficiency and minimising waste. This includes implementing advanced technologies and adopting best practices to reduce unnecessary resource consumption.

In addition, we promote awareness and education of our employees, partners and customers about the importance of managing energy resources responsibly.

### 5.3 Sustainable Development Goals

Our efforts are aligned with international sustainability standards, such as the United Nations Sustainable Development Goals (SDGs), contributing to the transition towards a more sustainable energy model. We promote the use of clean energy, encourage responsible consumption and resource efficiency, and seek to reduce our environmental footprint and combat climate change.

Through these actions, we reaffirm our commitment to sustainable development and the preservation of the environment.

## 6 Conduct in the Workplace

At *Haya Energy Solutions*, professional and ethical conduct in the workplace is paramount to ensuring a safe, productive environment that is aligned with the company's values. This section sets out expectations for day-to-day employee behaviour, highlighting the importance of respecting internal rules, using facilities and resources appropriately, and always acting with integrity and professionalism.

Compliance with these guidelines reinforces our organisational culture, contributes to the well-being of all employees and ensures the efficient use of corporate assets.

### 6.1 Proper use of facilities and resources

Company facilities and resources should be used exclusively for work purposes and in alignment with organisational objectives. In this regard, *Haya Energy Solutions* establishes the following guidelines to ensure that these resources are used responsibly and efficiently:

- **Physical facilities:** Offices and facilities should be kept clean, tidy, and in good repair. All employees are expected to contribute to a safe working environment and to respect established rules for the use of shared spaces.
- **Corporate equipment and tools:** Work equipment, such as computers, technical tools and other devices, should be used exclusively for work purposes. Personal use of these resources is limited and should only be done in a responsible and occasional manner, if it does not interfere with work activities or internal company policies.
- **Technology and communication systems:** Access to company email, internet, communication systems and databases must be exclusively for work-related activities. Any inappropriate use, such as downloading illegal content, disclosure of confidential



information or use for improper personal purposes, will be considered a serious breach of corporate rules.

- **Care and maintenance:** Employees are responsible for taking care of the resources they use and for reporting any damage, malfunctions or maintenance needs to the appropriate managers. This includes company infrastructure, technical tools, and furniture.
- **Sustainable use:** Employees are encouraged to make conscious and sustainable use of resources such as electricity, water, and office supplies. The company promotes environmentally friendly practices in the workplace, such as reducing unnecessary paper consumption and encouraging recycling.

## 6.2 Expected behaviour: politeness and mutual respect

Politeness and mutual respect are fundamental pillars in fostering a positive, inclusive and collaborative work environment. Each employee has a responsibility to contribute to the maintenance of cordial working relationships, based on dignified treatment and courtesy towards colleagues, customers and anyone with whom he/she interacts in the work context.

### Expected behaviours (indicative guide):

- **Respect for diversity:** Foster an inclusive environment, free of discrimination based on gender, race, religion, sexual orientation or any other personal characteristic.
- **Responsible use of resources:** Make efficient and ethical use of company facilities, equipment and resources, avoiding waste and reporting any damage or malfunction.
- **Respectful communication:** Use a friendly and professional tone in all interactions, whether verbal, written or virtual. As well as, avoiding the use of offensive expressions, sarcastic or disparaging remarks.
- **Conflict resolution:** Address differences in a constructive and professional manner, seek solutions through direct and respectful dialogue, resorting to higher instances if necessary.
- **Punctuality:** Comply with work schedules, meetings and work commitments. In the event of lateness or absence, you must inform us in advance.
- **Courtesy and good manners:** Greet and say goodbye politely.
- **Collaboration and support:** Show a proactive attitude to help co-workers when needed.
- **Active listening:** Attention should be paid to the opinions of others during meetings and discussions.



### 6.3 Managing conflict and inappropriate behaviour

Conflict resolution is encouraged through open dialogue, mutual respect and the search for constructive agreements between the parties involved. Solutions must always be fair and satisfactory, based on cooperation and respect, with the aim of preserving working harmony and upholding the core values of *Haya Energy Solutions*.

Following the general principle set out in this document, conflicts should be reported to the CEO, who is ultimately responsible for their assessment and resolution in accordance with company policies. However, to ensure a more agile, efficient and dialogue-oriented management, a staggered procedure has been defined to address conflicts at an earlier stage. This approach facilitates a quicker and more peaceful resolution, without prejudice to the CEO always being kept informed of the situation, especially when it is not resolved at earlier stages or has a significant impact:

- **First instance: Direct manager:** The employee must report any problem or conflict to their immediate manager. The manager will assess the situation and seek an appropriate solution, in line with established company policies.
- **Conflict with the direct manager:** If the conflict or problem involves the direct manager, the employee should go directly to the CEO or to another manager who can act impartially in the situation.
- **Conflict with the CEO:** If the conflict arises with the CEO, the employee should communicate the situation to a manager, who will seek a solution together with the other managers in the organisation.
- **Final step: President of the company:** If the situation is not resolved in the previous steps, the case may be reported to the president of *Haya Energy Solutions*, who will be responsible for making a final decision.

In addition, this procedure will also be used when employees are required to report misconduct, such as those detailed in section 4.3 of the document, including abuse of power or misuse of information, among others.

## 7 Compliance with Policies

Compliance with internal policies and standards is essential to maintaining an organised work environment aligned with the company's objectives. All employees are responsible for knowing, understanding and adhering to the policies set out in this document. This section details employee responsibilities for compliance, as well as procedures for policy review and communication.

## 7.1 Periodic review of policies

*Haya Energy Solutions'* conduct policies will be subject to periodic review to ensure that they remain up to date and aligned with the changing needs of the business, as well as with legislative and regulatory changes that may arise.

The review will be carried out on a regular basis, adjusting its frequency as circumstances require, to ensure that the policies remain effective and relevant. During this process, the performance of existing conduct policies will be evaluated, and possible adjustments or additions will be considered, based on suggestions of employee interest, technological developments and changes in the legal or industry environment.

The objective is to maintain a flexible regulatory framework, which allows for adaptation to new realities without losing focus on the company's core values.

## 7.2 Communicating updates

When relevant changes to policies are made or new guidelines are introduced, these will be communicated clearly and efficiently to stakeholders, including employees, employees and partners.

Updates will be communicated through official company channels, such as email, meetings or specific trainings, as necessary. It is the responsibility of each employee to review updates and ensure that they understand any new regulations or changes implemented.

In addition, the latest version of this document will be available on the company's website, so that any interested party can access the updated version.

## 8 Approval and Validity of the Document

This section formalises this document, establishing its effective date and applicability within *Haya Energy Solutions*. Through this process, it ensures that the policies and guidelines described are implemented effectively, with appropriate support and oversight. It also determines who will be responsible for ensuring that the policies are regularly updated and adhered to in all areas of the company.

In addition, it specifies that all employees will have access to the most recent versions of this document, ensuring that everyone is aligned with current regulations and procedures.

### 8.1 Responsible for monitoring and updating

The company's "Compliance Officer" will be responsible for ensuring that this document is updated and supervised, ensuring its adaptation to regulatory and operational changes in the company's activity. To this end, he/she will carry out regular reviews and, if necessary, promote the relevant modifications to guarantee its validity and effectiveness.



Likewise, each employee shall be responsible for knowing and complying with the established policies, contributing to their correct application within their area of work.

## 8.2 Version control

Date	Reason for Issue	Prepared by	Verified by	Approved by
27/12/2024	Initial version	PMH	ISH	MDL
13/02/2025	Changes	PMH	ISH & MDL	MDL
14/04/2025	Final version	ISH & PMH	MDL & DiM	MDL

## 8.3 Approval date

This document has been approved by the management of *Haya Energy Solutions* on 15 April 2025.

The signature of this document by the management guarantees their agreement to the terms and their implementation within the company.