



## Code of Conduct

## Code of Conduct.

### 2.1. Purpose.

**Ineco's** code of conduct is based on respect for the 10 Principles of the United Nations Global Compact and **Ineco's** defined Mission, Vision, Values and Corporate Responsibility Policy, which they complement and constitute guidelines to ensure appropriate conduct in the professional activities of its employees.

The purpose is to identify and share the group of principles and recommendations for conduct whose adoption and application will contribute to ethical and responsible management in the development of **Ineco's** services and products and in the relationships it establishes with different stakeholders:

- Loyalty to the organisation
- Relationships of professionals with other stakeholders
- Relationships between professionals
- Administrators and staff

#### 2.1.A. Loyalty to the organisation.

##### A.1. Reputation and loyalty to the company

Each employee is a representative of Ineco's interests and image during the exercise of his or her professional activities and therefore shall avoid any conduct which might harm the reputation or interests of **Ineco** and shall follow the principles established in this Code.

In the case of conflicts of interest during professional activities, Ineco employees shall subordinate their personal interests and those of third parties to the interests of the company. Likewise, they shall always express the company's point of view and not their personal one.

##### A.2. Confidentiality

In the exercise of their professional duties, employees shall respect the professional secrecy associated with their relationships with clients, committing themselves to not releasing or publishing information or documentation to which they have access as a result of their employment relationship with **Ineco** and which could harm its interests (see *Chapter II Section 7*)

##### A.3. Dedication

Employees shall work in an efficient manner during the work day, making the best use of their time and all resources the company places at their disposition, making an effort to contribute maximum value in all processes in which they participate and following the procedures established for each activity. During the established work day, employees shall be responsible for using their time for work purposes.

#### A.4. Non-competition

While employed by **Ineco**, the professional shall not provide work-related services that are or could represent competition with the activities pursued by the company, or any which could lead to direct or indirect competition with it, except when expressly authorised to do so.

#### A.6. Use of company resources

Employees shall make rational and appropriate use of the resources owned by the company which are placed at their disposition by same for performing their professional duties, avoiding their use for purposes unrelated to their contractual relationship with **Ineco** and taking responsibility for their protection.

#### A.7. Safety, Health and Environment

All employees are obliged to know and comply with the preventive measures for health and safety which affect their positions, using the equipment that **Ineco** places at their disposition.

Likewise, they shall know **Ineco's** environmental policy and incorporate it into all company processes (see *Chapter II Section 3 and Appendix II*).

### 2.1.B. Relationship of professionals with other stakeholders.

#### B. 1.Relationships with clients

Employees shall conduct themselves with integrity in their interactions with clients of the organisation, pursuing the objectives of achieving the highest quality levels, excellence in provision of the service and the development of long-term relationships based on confidentiality, objectivity and ongoing dialogue which ensure mutual trust.

#### B.2. Relationships with suppliers and collaborators

The treatment of suppliers and collaborating companies shall seek to establish relationships based on trust and mutual benefit.

Relationships with suppliers and collaborators shall be governed by the principles of integrity and honesty, and they shall be selected in accordance with the principles of merit and capability, with attention to the ratio of product or service quality to price. To this end, professionals involved in selection decisions shall guarantee transparency, impartiality and objectivity in each selection process for contractors, suppliers and external collaborators (see *PG-03 and PG-04 in the quality procedures, which are included in this document as Appendices VIII and IX respectively*).

#### B.3. International relationships

Employees shall scrupulously observe the laws in force, customs and culture of the countries where they work (see *Chapter II Section 4 and Appendix III*).

#### **B.4. Legality**

Compliance with the law is an unconditional requirement for **Ineco**, which is committed to acting in accordance with the laws in force in all their forms. All employees shall be familiar with the laws that affect their work and Management shall provide the necessary instructions and advice.

#### **B.5. Transparency and truthfulness of information**

All **Ineco** employees agree to communicate information, both internal and external, transparently, honestly and truthfully. In no case shall an employee intentionally submit or provide the company with information that is incorrect, incomplete, inexact or which could mislead the recipient (see *Chapter II Section 5 and Appendix IV*).

All information related to the company shall meet the following requirements: truthfulness, objectivity, timeliness, integrity, exactness, verifiability and clarity.

#### **B.6. Gifts, kickbacks and bribes**

Ineco prohibits all corrupt practices, bribes, the acceptance or remission of payments, or facilitation of same in any form, active or passive, through acts or omissions or through the creation or maintenance of situations of unfair advantage or which are irregular (see *Chapter II Section 4 and Appendix III*).

### **2.1.C. Relationship between professionals.**

#### **C.1. Respect for people**

All employees, regardless of the responsibilities they hold in the company, shall treat one another with respect, fomenting relationships and a cordial working environment and avoiding situations which might intimidate persons or infringe on their rights.

Employees shall not, under any circumstances, engage in sexual harassment, abuse of authority, insulting behaviour or other forms of aggressiveness or hostility that could give rise to a climate of intimidation (see *Chapter II.6 and Appendix V*).

#### **C.2. Non-discrimination**

All professionals in the organisation, without exception, are obliged to scrupulously respect the human rights and civil liberties covered in the Universal Declaration of Human Rights and the legal systems of the countries where they work in each and every area of the company.

Discrimination based on gender, age, race, social origin, disability, nationality, membership in labour organisations, political affiliation, sexual orientation or any other personal or social aspect shall not be tolerated in hiring, remuneration, access to training, promotion, dismissal or retirement.

**Ineco** shall implement the personnel hiring process included in this document as Appendix VI.

### C.3. Cooperation and collaboration

Employees shall strive to be efficient in the exercise of their duties, actively cooperating with other units in the organisation.

All **Ineco** employees shall act in the spirit of cooperation and collaboration, participating in teamwork and making any knowledge and resources that might facilitate the achievement of company objectives and further company interests available to all other units of the organisation.

#### 2.1.D. Administrators and staff.

In particular, administrators, managers and staff of **Ineco**, in the exercise of their administrative and management duties, must act in accordance with:

##### D.1. Knowledge and communication:

- Observe ethical and responsible professional practice.
- Comply and oblige compliance with the **Ineco** Code of Conduct and, to this end, make this known and establish adequate mechanisms to guarantee its application.
- Immediately report any issue or situation that might represent or give rise to a conflict between the interests of the company and the private interests of the administrator or manager to the administrative body and abstain from participating in its resolution.
- Inform Human Resources management of any improper behaviour detected in the conduct of subordinates.

##### D.2. Basic rights:

- Recognise the rights of association, union membership and collective bargaining.
- Guarantee safety and health at work, adopting any reasonable measures to maximise the prevention of occupational risks.
- Not permit any form of violence, harassment or abuse at work.
- Respect, support and promote equal opportunities by not discriminating against employees on the basis of race, religion, age, nationality, gender or any other personal or social circumstance unrelated to their merit and capability.

##### D.3. Confidentiality:

- Maintain the confidentiality of background information, data and documents to which they have access in the exercise of their duties, including after ceasing to hold them.
- Respect the privacy and confidentiality of employee information by requesting and using only the information necessary for effective management of their responsibilities or when required by applicable regulations, making responsible use of same.

#### D.4. Professionalism:

- Subordinate personal interests to those of the company when acting in the name and in representation of same, and refrain from using corporate assets for personal benefit, except in a transparent manner and with prior authorisation of the pertinent corporate body, providing consideration consistent with their market value.
- Dedicate the necessary time and effort on an ongoing basis to regularly attend to the issues raised by company management, collecting as much information as needed for this purpose and providing any collaboration or assistance that it considers necessary.
- Not provide professional services or act on the behalf of entities outside **Ineco** without the required authorisation.

#### D.5. Economic-Financial:

- Guarantee the truthfulness of the economic information recorded in the general financial tracking model and in all work under his or her responsibility or oversight. (See Appendix IV. *Basic project management procedure*)
- Truthfully, exactly and honestly reflect the economic and financial situation of **Ineco**, in instruments used for both management and reporting.
- Schedule and remit payments according to established guidelines, with maximum diligence and without any form of discrimination.
- Refrain from participating, for personal benefit, in any investment or operation involving knowledge acquired in the exercise of professional duties if said investment or operation has been offered to **Ineco** or if the company has an interest in it, unless it has been ruled out.

#### D.6. Hiring, training and promotion:

- Select collaborators and subordinates according to the principles of merit and capability as stated in the Career Plan, acting exclusively in the best interest of the company.
- Guarantee that all professionals, employees and collaborators of **Ineco** who are non-Spanish citizens hold the corresponding official authorisation to perform paid work, determining the identity of each of them and verifying the truthfulness of this information before hiring them.
- Promote the development, training and professional promotion of employees based on objective circumstances and assessments.
- Link remuneration and promotion of employees to their merit and capability.

**D.7. Diversity and work-life balance:**

- Treat employees with dignity, respect and fairness, taking into consideration their different cultural sensibilities.
- Strive to integrate persons with disabilities or handicaps by eliminating all barriers in the workplace to promote their integration.
- Facilitate the participation of employees in the company's social action programmes.
- Strive to facilitate work-life balance for employees in the company.

**2.2. Scope.**

Observance of this Code of Conduct is incumbent upon all **Ineco** employees in the exercise of their duties and responsibilities in all professional areas in which they represent the company. The guarantee of personal conduct procedure detailed in Chapter II, Section 5 and in Appendix VI is established for this purpose.

