



## CODE OF ETHICS

The Board of Directors of FHECOR Ingenieros Consultores, S.A., hereinafter FHECOR, has a series of management commitments, both from an ethical point of view and from a responsibility to society, in which its stakeholders are made participants through this Code of Ethics.

This document develops and puts into practice a set of principles and standards of behaviour that the organization considers essential for the correct development of its activities and that must govern the actions of all the people who comprise it. Therefore, the entire staff of FHECOR, are obliged to comply with it.

This Code of Ethics forms part of the identity of the organization, reflects our values, is the guide for our business practice and will be reflected in different actions, both internal and external.

FHECOR acknowledges that this Code of Ethics is not exhaustive and that its content may vary over time.

### Commitment to our staff:

Through respect for the dignity and equal opportunities of people, we seek their comprehensive development, both personally and professionally, generating the necessary climate of trust to achieve their commitment and participation in a common project.

Through the effective application of the organization's declaration of principles for the prevention of harassment, to promote and preserve a work environment in which harassment in all its forms and modalities, violence, harassment or any other activity that violates the dignity of our employees is prevented.

To provide fair and respectful treatment and to avoid the discrimination of people by making any distinction, exclusion, restriction or preference that is not objective, rational, and has the purpose or result of hindering, restricting, preventing, or annulling the recognition or exercise of rights. human rights and freedoms for any reason, including race, marital status, age, gender, creed, political party or union association or affiliation, sexual orientation, or national origin.

Using our organizational culture as a tool, promote values such as honesty, loyalty, good faith and transparency.

To assume occupational health and safety as a value, which is why the physical integrity and health of the workers are rights whose protection must be a constant in the daily work for all those who work at FHECOR and especially for those that exercise command functions, which will assume and promote the integration of security in all the organization's processes.

To establish criteria that lead to a model of preventive policy integrated into the organizational structure of the company, which are capable of fostering consultation and promoting the participation of the workforce in issues related to their health and safety with the ultimate goal of increasing and improving safety levels and achieving the proposed objectives.

The management will have the responsibility to demonstrate compliance with this code through its actions. They must lead by example and make themselves available to workers who have ethical doubts or who want to report possible breaches of what is stated in this document.

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### **Commitment to our clients:**

To act at all times with integrity, loyalty, honesty, professionalism, good faith and honesty, assuming full responsibility for actions and decisions with the objective of achieving the highest levels of quality, excellence in service provision and long-term development of relationships based on trust and mutual respect.

To establish a collaborative relationship with clients based on truthfulness, transparency and confidentiality in the use and transmission of information, both professional and personal.

To understand the needs and expectations of our customers and to assume the commitment to innovate our processes, products and services to satisfy them.

To treat all information collected from our clients confidentially.

To disseminate, through our official communication channels, our Code of Ethics throughout our entire value chain.

### **Commitment to our suppliers:**

Supplier selection processes will be carried out with impartiality and objectivity, guaranteeing their equitable participation based on the criteria of quality, profitability and service, and considering the ethical, environmental and occupational health and safety standards established by FHECOR.

To promote the integration of suppliers in our activities, granting equal opportunities to all of them and promoting their development.

### **Commitment to society:**

To develop the culture of ethical and socially responsible management of the business, based on the contribution to the social, economic and environmental improvement of our surroundings.

To establish strategic alliances with civil society organizations and other entities, whose objective is to enhance the social impact of our community actions. These include collaboration with non-governmental organisations with the aim of promoting the construction of a fairer and more caring society.

To recognize the protection and conservation of the environment as part of our social and sustainability commitment.

To protect the environment and to prevent and reduce the pollution generated in carrying out our activities, promoting the reduction of waste generation and the conservation of resources through recycling and reuse, ensuring that the processes used contemplate the reduction in the consumption of raw materials, energy and water.

To comply with current legislation and regulations that regulate our activities, as well as with any legal requirements that may be applicable, both locally, nationally and internationally, and with any other regulations or requirements to which the organization voluntarily subscribes.

Transparency through disseminating objective, clear and verifiable information, both internally and externally.

### **Commitment to Regulatory Compliance:**

#### **Culture of legality**

At FHECOR, legality is part of our culture and we work so that our collaborators practice it. We comply with the laws, regulations and ordinances applicable to our operation, as well as with the internal guidelines established by the FHECOR Board of Directors.

#### **Anti-corruption and Anti-bribery**

We carry out business practices in accordance with the law, in an honest and ethical manner, with zero tolerance for bribery, blackmail and other practices contrary to the law, rejecting, denouncing and combating any act of corruption and extortion.

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Fraudulent practices are not allowed under any circumstances, understood as any intentional action carried out by a person to obtain a benefit using in an inappropriate manner, any information, asset or resource of FHECOR.

FHECOR makes a commitment against influencing the will of people outside the company to obtain any benefit through the use of unethical practices.

In this sense, no worker is allowed to make and/or receive illegal payments or bribes, gifts, hospitality or advantages with entities, people, government authorities to secure any concession, contract, approval or advantage for their own benefit or that of the organization.

Neither may employees offer, deliver or receive, directly or indirectly, any payment in cash, in kind or any other benefit, to any person at the service of any public or private entity, political party or candidate for public office, with the intent to unlawfully obtain or retain business or other advantages.

In our activities within FHECOR or on its behalf, either directly or through a third party, we do not participate in acts of corruption, therefore:

- we do not order or authorize corrupt practices,
- we do not induce corrupt practices
- we do not conspire to carry corrupt practices out,
- we comply with any anti-corruption laws applicable to our operation

#### **Prevention of money laundering**

We comply with the applicable laws for the prevention of money laundering, and we promote its knowledge and compliance among our collaborators.

We develop processes and mechanisms for compliance with applicable laws in the prevention of money laundering, which contribute to the generation of security and trust in the economic sectors of the countries in which we operate.

#### **Conflicts of interest**

At FHECOR, we carry out all our activities with integrity and professional ethics, always putting the interests of the company above any personal interest, while avoiding obtaining undue personal benefits.

No employee may represent the company in business relationships in which they may have any personal interest, direct or indirect, at the expense of the company.

In order to avoid conflicts between private interests and the interests of the company and to promote a solution if required, all employees have the responsibility to declare any financial or non-financial interest that may conflict with their role within the company.

#### **Gifts and hospitality**

We do not directly or indirectly receive, give, pay, offer, promise, or authorize, on behalf of FHECOR or personally, money, gifts, advantageous conditions, wages, travel, commissions, or anything else of value to obtain any advantage or undue benefit of any kind.

We do not give or offer gifts to government officials.

We only accept, give or offer hospitality and gifts of a promotional, occasional and symbolic nature that respect the ethical principles of FHECOR in accordance with the provisions of our policies and applicable legal provisions.

Merely promotional gifts, of mere courtesy, whose maximum value is established in the corresponding internal policy, may be accepted, especially if they incorporate the issuer's corporate logo. Any doubt that may be generated by the nature of a gift, hospitality or attention must be communicated to the corresponding person in charge and, where appropriate, to the Ethics Management Committee.

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### Intellectual property

Our policy is to respect copyright and strictly comply with all applicable laws and regulations concerning the use and copying of computer programs.

We will not use third party documents without authorization for use by the owner of the intellectual property or through purchase.

### Communication of breaches

FHECOR has a communication and/or complaint channel so that any worker can raise concerns about a possible breach of the provisions of this Code of Ethics.

FHECOR has decided to create an Ethics Management Committee chaired by the CEO. Said committee will ultimately be responsible for the application of this Code of Ethics, since the values and principles of professional ethics contained in this document are the basis on which the commitments acquired by the organization in this matter are based.



**José Romo Martín**

CEO

Civil Engineer, Graduate of History, Euroengineer, Fellow of the UK Institute of Structural Engineers (IstructE)

Date: February 14, 2022

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