

AMPER GROUP CODE OF ETHICS

Corporate Policy

Approved by the Governing Board on 14 February 2020

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The first version of the Code of Ethics was amended and approved by the Board of Directors at its meeting on 22 February 2023. These changes were made in order to adapt the Code to the Group's reality and to current legislation.

1. INTRODUCTION

The purpose of the Code is to set out the basic ethical principles that must be complied with and the guidelines for conduct that should guide the actions of the companies of the Amper Group and its Members.

In this way, this Code is applicable to all directors, managers and employees of the Amper Group, regardless of the type of contract that determines their professional or employment relationship. In relation to agents, suppliers, business partners, representatives and consultants, the group expresses its commitment to make them aware of and request their adherence to this Code of Ethics. All of them are hereinafter collectively referred to as "Members".

It is the responsibility and obligation of all employees to know and comply with this Code. The Amper Group promotes the training of its employees in the importance of complying with the Code and the legislation applicable to their activity.

For the purposes of this Code, the "Amper Group" and companies of the "Amper Group" are understood to be all those companies, companies, branches, consortiums, etc., in which Amper, S.A. is in a position of dominance or control in relation to another company because it is in one of the following situations: (i) directly or indirectly holds the majority of the voting rights, (ii) has the power to appoint or dismiss the majority of the members of the administrative body, (iii) can dispose, by virtue of agreements entered into with third parties, of the majority of the voting rights, and (iv) has appointed with its votes the majority of the members of the administrative body.

The Code does not contain or summarise all the laws and internal rules applicable to the Amper Group and its employees. The most recent list of the Amper Group's internal rules is available on the website in the "Corporate Governance" section, being in any case an extension of the principles contained in this Code of Ethics.

This Code must be applied in conjunction with the Amper Group's internal rules and, in the event of a discrepancy, the more restrictive provision shall take precedence. On the other hand, given that local regulations and customs may, on occasion, imply an adaptation of certain principles included in this Code of Ethics, local regulations shall apply if they are more stringent, provided that they do not contravene the Group's general principles.

The Code and internal rules do not purport to regulate every issue or situation that may arise, so in all cases you should rely on common sense, good judgement and individual integrity to determine appropriate conduct.

Failure by Members to comply with the Code may result in disciplinary action, termination of their contract with Amper, civil claims or even reporting to appropriate law enforcement authorities, government agencies or bodies.

Members who are in doubt as to the application of the Code, whether a certain activity, act or omission constitutes or may constitute a non-compliance with the Code or wish to raise any suggestions should be addressed to the Group's Compliance Department.

2. OF THE RESPONSIBILITY OF THE GROUP AMPER TO ITS EMPLOYEES AND OF THESE TO THE GROUP

Health and safety at work

The Amper Group is committed to providing a safe and healthy working environment for employees and for those who visit or work in its facilities and work areas.

In all of the Company's projects, safety must be the first consideration in all decision-making.

The Amper Group is firmly committed to compliance with occupational risk prevention legislation. This commitment is substantiated by the adoption of international standards as management models for risk prevention in its activities and facilities. Any employee is required to report any occupational health and safety concerns to his or her line manager when the relevant procedures are not known or are not being applied. In addition, each Group company shall establish the necessary action plans to adequately manage and mitigate the risks associated with its activity. These plans shall be reviewed periodically and the necessary resources shall be provided for their maintenance and improvement.

Harassment-free workplace

The Amper Group upholds the right to work in an environment free from intimidation, harassment and abuse. Thus, it excludes any form of slavery, human trafficking, forced labour or work carried out under duress. It also excludes any form of child labour.

The Amper Group does not tolerate unwanted or annoying conduct by any employee that harasses another person, disrupts the work of another or creates an intimidating, offensive, abusive or hostile work environment. This includes bullying, abuse of authority, excessive use of profanity or any other form of aggression or hostility that may create a climate of intimidation.

With regard to harassment, the reform of the Criminal Code brought about by [*Organic Law 10/2022 of 6 September on the comprehensive guarantee of sexual freedom*](#), which modifies the system of criminal liability of legal persons, includes as a novelty the introduction of the conduct of sexual harassment within the catalogue of offences for which a legal person may be held liable. Specifically, conduct linked to the request for favours of a sexual nature, for oneself or for a third party, in the context of an employment, service provision or similar, continuous or habitual relationship, which causes an objective and seriously intimidating, hostile or humiliating situation for the victim, will generate criminal liability.

The penalties that may be imposed on legal persons for certain offences are also amended. In particular, offences relating to prostitution,

sexual exploitation and corruption of minors should imperatively entail the penalty of dissolution for the legal person.

Equal opportunities

The Amper Group has employees from all professional backgrounds, skills and cultures. The combination of such a wealth of talents and resources creates diverse and dynamic teams that constantly drive for success.

All Group personnel have the right to be respected, as well as the duty to be evaluated on the basis of their achievements, qualifications and performance.

The Amper Group excludes any discrimination of its employees or applicants for employment or occupation on the basis of race, colour, sex, ancestry, nationality, religion, age, political opinion, physical or mental disability, medical condition, sexual orientation, extraction or social origin, language, marital status or any other condition, as provided for by local law.

Personal information

The Amper Group places special emphasis on the regulations related to the protection of personal data. The protection of this information is not only a legal requirement to comply with, but for the Amper Group, privacy is a matter of trust.

Thus, particular attention should be paid to (i) the loss of control over personal information, e.g. when sending an e-mail containing personal data of an employee and (ii) the communication of personal information relating to an employee without prior consent.

Amper Group's responsibilities towards its employees

The Amper Group bases its relationship with its employees on the principles of diversity, equal opportunity and equal treatment in employment.

The Amper Group respects, in accordance with applicable law, the right of its employees to form and be members of trade unions and organisations representing their interests. It also recognises the right of its employees to collective bargaining.

In compliance with [*Law 3/2007, of 22 March, for the effective equality of women and men*](#), equal treatment and opportunities in the workplace are respected and, to this end, measures have been adopted to avoid any type of discrimination between women and men in the workplace, as set out in the Equality Plans of the Group companies that are obliged to have them. Along these lines, these companies have specific channels for reporting situations of harassment and sexual harassment.

Employee responsibilities to the Group

All employees must act with responsibility, honesty and integrity in every professional decision they make on a day-to-day basis.

They must be aware of and comply with what is described in this Code and in the rest of this Code.

regulations applicable in each case.

If they become aware of any non-compliance, they should report it through the whistleblowing channel, acting as responsibly as possible.

Likewise, they must cooperate with any type of internal investigation that may be carried out, as well as with any type of request for assistance and information that may be required by external collaborators (auditors, consultants, etc.). In this regard, employees involved in an audit, consultancy or other investigation process shall not destroy, modify or conceal information, nor shall they provide incomplete information or information of doubtful credibility.

In the direct relationship with customers and suppliers, this Code of Ethics must be put into practice.

Conflict of interest

A conflict of interest can arise when you have competing personal interests, which interfere or could be perceived as interfering with your ability to make an objective business decision. The application of good judgement is expected of each Employee. Even situations that may appear to be a conflict or that may affect the trust others place in the Group and damage the reputation of the Amper Group must be avoided.

Any relationship, business, financial, financial, romantic or family activity that may involve a potential conflict of interest or the appearance of a potential conflict must be disclosed. This information must be disclosed in writing to the line manager and/or the Compliance Department.

3. THE AMPER GROUP'S RESPONSIBILITIES TO ITS CUSTOMERS AND SUPPLIERS

Fair business, supplier and partner relations

The Amper Group bases its relationship with customers, suppliers, business partners and other stakeholders on fairness and honesty. Therefore, we work to understand and meet their needs, while remaining true to high internal standards.

Amper Group is honest about its services and capabilities and never makes promises it cannot keep. Obtaining undue advantage through manipulation, concealment or misuse of privileged or confidential information, inaccuracy, fraudulent conduct or any other unfair practice is not permitted.

Thus, in its relations with business partners, the Amper Group is governed by the same ethical principles of respect and teamwork that it employs internally with employees.

Gifts, presents and hospitality

The giver or provider of the gift or attention should consider whether it may compromise the recipient's independence, integrity and/or honesty in making a business decision and, in all cases, whether the gift or attention may compromise the recipient's independence, integrity and/or honesty in making a business decision:

- a) are of irrelevant or symbolic economic value; in no case may they exceed the sum of one hundred (100) euros.
- b) are in response to signs of politeness or customary business courtesies; and
- c) are not prohibited by law, the Governance and Sustainability System or generally accepted business practices.

In case of doubt, consult your line manager, the Compliance Department or the Amper Group Ethics Committee.

In the event that an employee receives a gift, it must be returned to the person who gave it. In the event that, for reasons of courtesy, this is not possible, it will be made available to the Amper Group so that it can be raffled among employees or given to a non-profit organisation.

Group Professionals may not, directly or through an intermediary, offer or grant or solicit or accept any unjustified advantages or benefits for the immediate or immediate purpose of obtaining a benefit, present or future, for the Group, for themselves or for a third party. In particular, they may not give or receive any form of bribe or kickback from or by any other party involved, such as Spanish or foreign public officials, personnel of other companies, political parties, authorities, customers, suppliers and shareholders. Acts of bribery, which are expressly prohibited, include the direct or indirect offer or promise of any kind of improper advantage, any instrument of concealment, as well as influence peddling.

Nor may they receive, on a personal basis, money from customers or suppliers, even in the form of loans or advances, regardless of loans or credits granted to the Group's professionals by financial institutions that are customers or suppliers of the Group and that are not involved in the aforementioned activities.

Group Professionals may not give or accept hospitality that influences, could influence or could be construed as influencing decision-making. Where there is any doubt as to what is acceptable, the offer must be declined or, where appropriate, the Compliance Department must be consulted beforehand.

4. OF THE AMPER GROUP'S RESPONSIBILITIES WITH REGARD TO DATA PROTECTION

Asset and property protection

Amper Group employees are responsible for the proper use of the Group's assets and for protecting them against misuse, abuse, sabotage or loss. The Company's assets include, in particular, the corporate image and reputation of the Group, as well as information, vehicles, tools, materials, supplies, intellectual property, computer systems, software, hardware and facilities.

Sensitive information and intellectual property

Employees who in the course of their work have access to confidential or non-public information about the Company, customers, business partners or third parties must protect such sensitive information, as well as information entrusted to them by others, except where disclosure is authorised or required by law.

In addition, if you have access to information about the Company's intellectual property, such information must not be disclosed to anyone, including friends and family, except where such disclosure is authorised by the Amper Group or is required by law. Intellectual property created at work or using Company resources belongs to the Group and may not be used for personal purposes.

The Amper Group's Information and Confidentiality Responsibilities

Amper S.A., as a company whose shares are listed on the Continuous Market, is committed to maintaining a fair market in the purchase and sale of its shares or any other listed securities. The Amper Group and the relevant legislation prohibit insider trading in its shares or any other listed securities. It is also illegal and/or contrary to this Code to provide such information about the Amper Group to others for their benefit. Trading in the shares or other listed securities of customers and suppliers on the basis of inside information is also prohibited.

The Amper Group undertakes to protect and use economic, financial, technological and other confidential information only for agreed purposes and to respect the terms and conditions of confidentiality, including limited disclosure only to Members of the Amper Group who have a need to know the confidential information.

The Amper Group is fully committed to complying with the personal data protection legislation of all its employees.

The Amper Group undertakes to keep its accounting books and records, correspondence, documentation and supporting documents relating to its business for the period of time provided for in the relevant legislation and in the Amper Group's policies on the preservation of archives.

5. OF THE AMPER GROUP'S RESPONSIBILITIES TO THE ENVIRONMENT

Human Rights

The Group is committed to and bound by the human rights recognised in national and international law in accordance with the Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the principles underlying the United Nations Global Compact, the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, the conventions of the International Labour Organisation (including Convention 169), the Sustainable Development Goals (SDGs) adopted by the Organisation for Economic Cooperation and Development (OECD) and the United Nations Global Compact, the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy, the conventions of the International Labour Organisation (including Convention 169), the Sustainable Development Goals (SDGs) adopted by the United Nations, the Code of Ethics of the Company, as well as documents and texts that may replace or complement the aforementioned.

In particular, the Group expresses its total rejection of child labour and forced or compulsory labour and undertakes to respect freedom of association and collective bargaining, the right to move freely within each country, non-discrimination based on any condition or circumstance, the rights of ethnic minorities and indigenous peoples in the places where it operates, as well as to promote an open dialogue that integrates different cultural frameworks.

Environment

The Group carries out its activities with respect for and protection of the environment, complying with or improving the standards established in the applicable environmental regulations, minimising the impact that its activities may have on the environment and promoting actions that contribute to its protection, carrying out and sponsoring research and development projects that promote the decarbonisation of the economy.

Combating bribery, corruption and money laundering

Inappropriate payments are prohibited in all activities carried out by the Group, both to governmental entities and in the private sector.

No bribes or kickbacks are paid under any circumstances.

Of particular importance is the monitoring of third parties acting on behalf of the Group. Third parties must understand that they are obliged to act in strict compliance with the Group's rules.

Money laundering is a global problem with serious consequences. It is defined as a set of mechanisms or procedures designed to give the appearance of legitimacy or legality to property or assets of criminal origin, and is not limited to cash transactions. Engaging in such activities undermines integrity, damages reputation and can expose the Group and its employees to serious sanctions.

The Amper Group is committed to compliance with the current regulations on money laundering.

International trade traffic

The Amper Group respects trade, import and export control laws.

export from all the countries in which it operates.

Business requirements change frequently and the laws of various jurisdictions may conflict. To avoid problems, the Legal Department should be consulted on the applicable law.

Antitrust

The Amper Group believes in free and open competition and does not engage in improper practices that may limit free competition. Nor does it gain competitive advantages through unethical or illegal business practices.

Antitrust laws are complex and the requirements to be met may vary depending on the circumstances, but in general, the following activities are examples of red lines and should be avoided if detected and reported to the Legal Department:

- a) Sharing sensitive competitive information of the Group with a competitor.
- b) Sharing non-public information of business partners or third parties with competitors.
- c) Attempt to obtain non-public information about competitors from new recruits or job applicants.

Communications with the public and with the media

Relations with the media will be channelled through the Marketing and Corporate Communications Department and will be governed by the principles of information transparency and collaboration.

6. COMMON PROVISIONS

Whistleblowing channel

The Amper Group has approved the creation of a multidisciplinary body responsible for compliance which, among its functions, has the task of supervising all communications received through the Whistleblowing Channel. All those bound by the Code may report directly to the members of the Body any actions that they consider to be contrary to the laws, internal company rules and principles of the Code, through the following means:

- [Complaint form](#), accessible via the website.
- In person and/or via email, to a member of the Ethics Committee, via email (comiteetica@grupoamper.com) and/or to the line manager.

Reporting principles for complaints through the Whistleblowing Channel

The communications made through the Whistleblowing Channel must always comply with criteria of truthfulness and proportionality, and may not be used for purposes other than those in pursuit of the fulfilment of this

Code of ethics or current legislation.

Reports through the Whistleblowing Channel can be made anonymously.

The identity of the person who reports wrongdoing through the Channel (if identified) will be treated as confidential information and therefore will not be disclosed to the reported person or any other third party without their consent, thus ensuring the confidentiality of the identity of the whistleblower.

The Group undertakes not to adopt and to ensure that no professional adopts any form of retaliation, directly or indirectly, against any person who has reported through the Channel any conduct which, in accordance with the provisions of this Code of Ethics and other internal regulations and applicable legislation, should be reported, unless he/she has acted in bad faith.

Without prejudice to the foregoing, the data of the persons making the communication, if known, may be provided both to the administrative or judicial authorities, to the extent that they are required by such authorities as a result of any proceedings arising from the subject of the complaint, and to the persons involved in any subsequent investigation or judicial proceedings initiated as a result of the investigation. Such transfer of data to administrative or judicial authorities shall always be carried out in full compliance with the legislation on personal data protection.

Handling of complaints made through the Complaints Channel

Complaints made through the Channel set up for this purpose shall be handled by the Regulatory Compliance Division. In the event that the complaint affects a member of said Directorate, the latter may not participate in its processing.

If the complaint affects any member of the Board of Directors of the Company, the Regulatory Compliance Department shall inform the secretary of the Board of Directors so that he/she may assist in the processing of the case and, specifically, in the selection of the instructor, who, as a guarantee of independence, shall be a person external to the Group.

In the event that the matter affects a *subholding* or parent company of the Group's businesses, even if it has its own compliance department, the Amper Group's Compliance Department shall investigate the complaint.

In any investigation, the rights to privacy, to defence and to the presumption of innocence of the persons under investigation shall be guaranteed.

Interpretation and integration of the Code of Ethics

This Code of Ethics shall be interpreted in accordance with the Governance and Sustainability System.

The Compliance Department is the body in charge of the overall interpretation and integration of the Code of Ethics.

This Code, by its nature, does not cover all possible situations, but rather establishes the criteria to guide the conduct of the persons subject to it in their relations with the Group and with third parties due to their relationship with the Group, as well as, where appropriate, to resolve any doubts that may arise in the course of their professional activity.

Any doubts that may arise for the Group's professionals regarding the interpretation of this Code should be consulted with the Regulatory Compliance Department.

