



Code of Ethics and Conduct for Professionals *Summary*

Ethical and responsible conduct guides our way of being
and doing business.



Dear professional,

The Nexus Energía Group has a Code of Ethics and Conduct, a summary of which you are now holding in your hands. This document formalises our commitment to the values and principles that define and must define our behaviour as individuals and as a Company.

This Code testifies to the firm commitment of the Board of Directors to reinforce a corporate culture and working environment in which integrity, ethics and compliance with the law and internal regulations guide our daily work and the decisions we take. Ethical management is a pillar of the Group's sustainability and profitability and each one of us is a key player to achieve our Company Vision through behaviour that permanently reflects our values and principles.

All the people who work in the Nexus Energía Group and all the members of the Board of Directors must take individual responsibility for complying with our Code and commit ourselves to disseminate it, to serve as an example internally and externally, and to enforce its provisions throughout the organisation.

For this, it is important that we are aware of our Code. Please read the whole document carefully and use this summary booklet for quick reference. If you have any questions, please contact canal.eticoycumplimiento@nexusenergia.com

I count on you all to join me in renewing our commitment to protect and strengthen our most precious asset: the Group's image and reputation, its ability to transmit security and trust, and the reliability and professionalism of its staff.

Kind regards,

Oriol Xalabarder Angli,
CEO



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The Board of Directors approved the Code of Ethics and Conduct, a brief summary of which is shown in this document, on 19 June 2014 and its latest amended version on 24 March 2022.

The existence of this summary does not relieve us of our duty to know and apply the full content of the Code.



Our Code





Our Code



Values and principles

Guide actions and decisions

Ethics and integrity

Ethical and responsible conduct guides our way of being and doing business.

Our Code of Ethics and Conduct (hereinafter the Code) aims to **share the set of values and principles that should guide our actions and decisions.**

The reputation of the Nexus Energía Group (hereinafter, Nexus or the Group) is based on the way we behave and interact internally and externally.

Acting with standards of ethics, integrity and complying with the law and applicable regulations in our daily operations and in our relations both among ourselves and with third parties is the way to protect our reputation, earn the respect and trust of all our stakeholders and build Nexus Energía as a Group of companies of which we are proud.

Being aware of, applying and ensuring compliance with this Code must therefore be a priority for all Group employees.

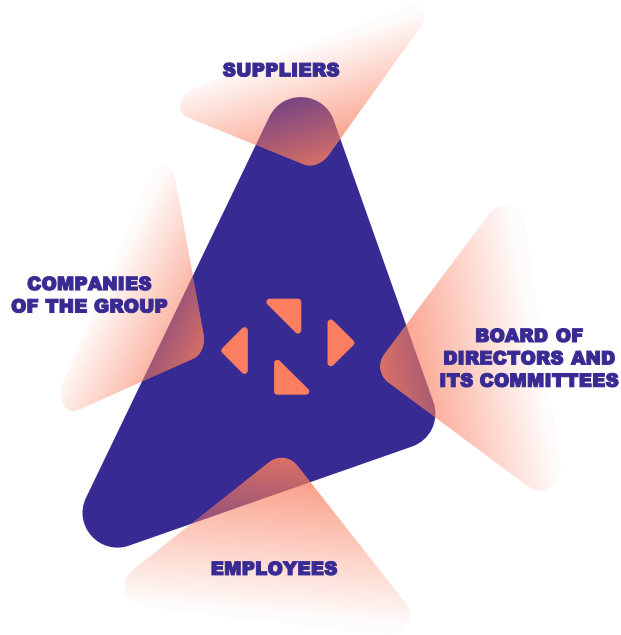


Scope of Application





Ámbito de aplicación



Compliance with our Code is mandatory for all employees and members of the governing bodies of any Group company or of those companies in which it exercises management (hereinafter, professionals).

Compliance also extends to individuals or companies that collaborate with the Group or carry out activities on its behalf, with a Code of Ethics and Conduct for Suppliers.



Principles that Guide our Business





→ Principles that Guide our Business



1. INTEGRITY

We are honest, ethical, objective, trustworthy and loyal to the interests of the Group and its shareholders.



2. PROFESSIONAL BEHAVIOUR

We behave ethically, diligently, competently, responsibly, with conviction, respect and a focus on excellence, innovation and efficiency.



3. COMPLIANCE

We undertake to respect this Code and any regulations that implement the Governance and Compliance System, and to act at all times in accordance with the law and with internal and external regulations.



4. RESPECT FOR THE DIGNITY, PRIVACY AND HUMAN RIGHTS OF INDIVIDUALS

In our workplace and in our dealings with third parties, we act with respect for people, human rights, the right to personal privacy, showing absolute rejection of any situation that may violate human dignity.



5. IMPARTIALITY

We guarantee respectful and impartial treatment, avoiding any kind of discrimination.



6. EQUAL OPPORTUNITIES AND RESPECT FOR DIVERSITY

We promote equal treatment and opportunities for all stakeholders and in particular for employees.



Principles that Guide our Business

7. COMMUNICATION

We encourage communication and dialogue with our stakeholders, and in particular, in relation to our professionals, we are committed to maintaining regular communication, reporting periodically on the progress of the Group and any other relevant information.

8. ENVIRONMENTAL PROTECTION

We promote respect for the environment and sustainability, with information and training on the rational use of our resources, energy efficiency and waste management.

9. COLLABORATION AND TEAMWORK

We encourage teamwork, collaboration, participation and knowledge sharing to facilitate professional performance (both individually and collectively), greater efficiency and effectiveness in our actions, and the fulfilment of our own collective and Group goals.

10. HEALTH AND SAFETY

We are committed to adopting preventive measures in the area of occupational health and safety, developing risk awareness and promoting responsible behaviour in order to prevent and minimise occupational risks.

11. PERSONNEL RECRUITMENT

The selection and recruitment of personnel is carried out taking into account the requirements of the job and according to objective methods, free of influences and conflicts of interest, respecting the principle of equal opportunities for all interested parties.

12. ASSESSMENT AND PROFESSIONAL DEVELOPMENT

The promotion of our professionals is based on merit, capacity and skills required for the job, all measured through the assessment of their skills and performance, and respecting the "Equal Opportunities" Principle.

Development and growth is the responsibility of every professional who manages others, reporting on the requirements of the role, identifying training needs and assessing performance in an objective and constructive manner.



Principles that Guide our Business



13. USE AND PROTECTION OF RESOURCES

We shall use resources appropriately, responsibly, lawfully, efficiently and respectfully, always for professional purposes in the interests of the Group.

We shall comply with established security policies and avoid actions that may impair the functionality and security of applications and information systems.



14. PERSONAL DATA PROTECTION

We shall respect the confidentiality and privacy of data and apply the necessary rules and procedures for the protection of personal data and legal compliance.



15. INFORMATION

We shall ensure transparency and the accuracy, timeliness, truthfulness and completeness of the information communicated internally or externally.



16. CONFIDENTIALITY

We shall keep confidential the information to which we have access in the course of our work, and shall refrain from using it, directly or indirectly, for personal or third-party purposes or interests, protecting it and complying with the security policies in place.



17. CONFLICTS OF INTEREST

Conflict of interest refers to any situation in which there is a direct or indirect conflict between the interest of the Group and the personal interest of a professional or a related third party.

We shall avoid and report any situation in which there may be a conflict of interest that could call into question the professional objectivity and/or integrity of the Group in the activities and decisions made, and we shall refrain from participating in them. We shall also disclose any related persons or entities doing business with the Group.

We may not, directly or indirectly, engage in activities or participate in companies with a type of activity which is the same as, similar or complementary to the corporate purpose of any Group company, nor may we hold positions or perform duties in such companies, unless this circumstance is reported and approved.



Principles that Guide our Business

18. DEDICATION

We shall make the most of our time and devote all of our skills and abilities in the interests of professional performance and value for the Group.

We shall not provide professional services related to the sector or the business carried out or which may be linked to Nexus, to third parties outside the Group, directly or indirectly, nor shall we perform duties or positions in agent, supplier or partner companies, unless these are approved prior to their being performance.

19. BUSINESS OPPORTUNITIES

Business opportunity means any option to carry out an investment or commercial or business activity.

We shall refrain from, directly or indirectly, taking advantage, for our own benefit, for the benefit of a third party or for the benefit of related persons or entities, of a business opportunity of which we have become aware due to their relationship with the Group. Similarly, we shall not use the name of any Group company or our relationship with any Group company to carry out transactions for our own account, for the account of third parties or for the account of related persons or entities.

20. ACCEPTANCE AND OFFER OF GIFTS AND OTHER COMPENSATION

We shall not accept or offer, directly or through a third party, gifts, financial compensation or advantages of any kind for our own benefit, for the benefit of a third party or the Group, which may influence any of the activities carried out or which seek to obtain improper benefits or influence the persons, entities or bodies with which we interact.

Only gifts or courtesy that are occasional and whose value is insignificant* and proportionate to the usual practices may be accepted or offered in order to prevent a third party from calling into question, due to their nature and value, the purpose, as well as the objectivity and independence of the professional's actions and/or in order to prevent them from being understood as an effort or bribe to exert undue influence or obtain a commercial advantage from or over a third party.

PROTECTION OF CORPORATE IMAGE AND REPUTATION

Our image and reputation is built from our daily actions and decisions, taken on a daily basis, taken individually or as a company within the Group. We are all committed to acting in accordance with this Code, preserving and ensuring the Group's good image and reputation.

*"Insignificant value" shall mean the amount set out in the Code of Ethics and Conduct from time to time.



Guidelines of Conduct





Guidelines of Conduct

GUIDELINES FOR CONDUCT IN RELATIONS WITH CUSTOMERS, SUPPLIERS, AGENTS OR OTHER PARTNERS



We are committed to:

- **Excellence and quality**, acting with integrity in our business relationships.
- **Establishing lasting relationships based on mutual value**, trust and mutual respect.
- **Conducting recruitment processes with impartiality**, objectivity and free of conflicts of interest.
- **Observing and fulfilling the commitments** arising from contracts.
- **Processing and protecting the information obtained in accordance with data protection regulations**, and maintaining due confidentiality, not disclosing information to third parties, unless with the consent of the data subject or unless we are required to do so by law.
- **Conducting business with third parties whose activities are legal and establishing the necessary mechanisms to avoid relationships and economic transactions** involving illicit, corrupt or criminal funds or funds related to money laundering.
- **Not offering or receiving gifts or any other compensation**, as described in the "Acceptance of Gifts and Other Compensation" Principle.
- **Promoting ethical conduct among our suppliers, agents or other partners** in accordance with this Code, and providing channels to report wrongdoings.
- **Providing our customers with adequate, comprehensible, complete, correct, accurate**, truthful and timely information. Contracts shall meet the criteria of transparency, fairness, correctness and compliance with current legislation.
- **Establishing adequate communication systems, assessing and analysing customer satisfaction, and continuously improving customer service processes.**



Guidelines of Conduct

GUIDELINES FOR CONDUCT IN EXTERNAL COMMUNICATIONS



We are committed to:

- **Not disclosing false or biased information** that could damage the image and reputation of the Group or violate current legislation.
- **Refraining from sending information or expressing opinions without prior approval.**

GUIDELINES FOR CONDUCT WITH CONTROL AND SUPERVISORY FUNCTIONS



We are committed to:

- **Collaborating with the governing bodies and functions**, both internal and external, that exercise control and supervision of the Group's activities.
- **Providing information and explanations that are free of errors and that cannot lead to misleading or different interpretations.**
- **Identifying risks in processes and activities, and establishing adequate internal control.**



Guidelines of Conduct

GUIDELINES FOR CONDUCT IN RELATIONS WITH PUBLIC ADMINISTRATIONS AND PUBLIC BODIES



We are committed to:

- Acting with integrity, respecting the law and the corresponding regulations.
- Communicating truthful information that accurately reflects the Group's actions.
- **Not receiving or offering gifts or any other compensation**, as described in the "Acceptance and Offering of Gifts and Other Compensation" Principle.

GUIDELINES FOR CONDUCT IN RELATIONS WITH COMPETITORS



- We are committed **to fair competition and to promoting the free market**, rejecting any action that could be contrary to the regulations in this field.



Guidelines of Conduct

GUIDELINES FOR CONDUCT IN RELATIONS WITH SHAREHOLDERS



We are committed to:

- Pursuing the **creation of continuous value**.
- **Establishing channels of communication, under the principle of equal treatment, to provide shareholders with adequate, useful and complete information on the Group's performance.**

GUIDELINES FOR CONDUCT IN RELATIONS WITH SOCIETY



- We are committed **to acting responsibly in social, labour, environmental and general spheres towards all our stakeholders.**



Our Responsibilities





Our Responsibilities

COMPLYING WITH THE CODE

We undertake to accept and comply with our Code, our internal policies and regulations and applicable laws.

Failure to comply with this Code, without prejudice to any other liability to which it may give rise, may lead to disciplinary and punitive measures depending on the nature and seriousness of such non-compliance in accordance with the provisions of the agreements and the corresponding labour or other applicable legislation.

LEADING BY EXAMPLE

We all have to act in accordance with the Code. Those in management or leadership positions have a key role to play, because they are the ones who must lead by example and encourage ethical and responsible behaviour.

We cannot ask another professional to breach or act contrary to the Code or justify improper or illegal conduct just because a superior has asked us to do so.

REPORTING CONCERNS AND ETHICALLY QUESTIONABLE BEHAVIOUR

We are committed to raising concerns and disclosing, in good faith, any instances of non-compliance or questionable conduct observed, even if they do not relate to our area of responsibility or action.



Management of the Code





→ Management of the Code

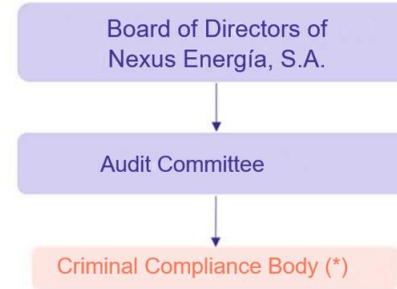
RESPONSABILITIES



OCP
Criminal
Compliance Body

The activities related to the Code shall be assessed and supervised by the Board of Directors of Nexus Energía, S.A., through its Audit Committee.

The Criminal Compliance Body, which is appointed by the Board of Directors as a collective, independent and autonomous body, in charge of supervising the operation and compliance of the Compliance management system, as well as ensuring and promoting compliance with the Code of Ethics and Conduct, is also responsible for implementing and managing the Code.



(*) Made up of the Corporate Internal Audit Director, who holds the position of *Compliance Officer*, the Legal Services Director and the Corporate Systems Director, whose duties are set out in its own Regulations, which are available for consultation by all professionals in the Internal Regulations System.



About the Ethical Channel





About the Ethical Channel



Differences between queries and communications

- **Query:** Questions about the interpretation or application of the Code.
- **Communication:** Disclosure, in good faith, of a breach of the Code or ethically questionable conduct even if it does not relate to our area of action or responsibility.

Queries and communications about the Code shall be received and managed by the Compliance Officer via e-mail at: canal.eticocumplimiento@nexusenergia.com

All queries and communications shall be handled in accordance with the Ethical Channel Regulations, available for consultation by all professionals in the Internal Regulatory Framework, which regulate the guidelines and guarantees for users of the channel.

Other ways to contact the Compliance Officer directly are by post, telephone or even a face-to-face meeting.



Compliance officer - Nexus Energía, S.A.
Consejo de Ciento, 42
08014 Barcelona (Spain)



900 938 063
Compliance officer

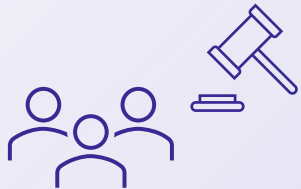


Protection from Retaliation and Confidentiality





Protection from Retaliation and Confidentiality



- The confidentiality of the communication and the information processed, as well as the anonymity of the person making the communication, shall be maintained whenever legally possible.
- Any act of retaliation against the person who has made the communication or participated in its resolution is prohibited, unless the communication is manifestly unfounded.
- Any information and documentation generated shall be adequately safeguarded and, in particular, documents containing personal information, which must be treated in accordance with current data protection legislation or any other applicable legislation.



Personal Data Protection





Personal Data Protection



By sending a query or communication, the sender expressly consents to the use, processing and communication of the data provided for the aforementioned purposes.

The information provided shall be processed in order to handle and resolve the queries and communications received, as well as the investigations deemed necessary to determine the existence of possible breaches.

Data subjects may exercise their rights of access, rectification or erasure of data, restriction or objection to the processing of data, as well as the right of portability of their personal data by emailing the Nexus Data Protection Officer at privacidad@nexusenergia.com, attaching a photocopy of the national identity card or equivalent and stating the specific right they wish to exercise.



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