

The purpose **of this Code of Ethics and Social Responsibility** is to reflect the corporate values and basic principles that must guide the actions of the **ADC GROUP** and the people who are part of the companies that make it up.

The corporate management system is based on the Code of Ethics and Social Responsibility, compliance with which **is mandatory** for all employees, regardless of their position and/or level.

CORPORATE VALUES

The Management of Grupo ADC is committed to complying with and ensuring compliance by all employees with the following corporate values:

1 Customer Orientation

2 Commitment

3 Solidarity

4 Overcoming

5 Quality-Excellence

6 Responsibility

These values allow us to fulfill the following commitments:

Commitment to quality, excellence and safety

Guarantee the technical requirements and traceability of raw materials through the approval of suppliers, inspection and control of their products and certificates.

To meet the requirements of our customers, providing them with maximum value and satisfaction.

Transparency

To be clear and consistent in our business relationships and agreements with our customers, suppliers and colleagues.

Integrity

Be truthful in all professional actions with customers, suppliers and colleagues.

Confidentiality

Not to disseminate or authorize the dissemination of confidential information of the client, except in the case of prior written authorization from the client.

Code of Ethics and Social Responsibility

1. Corporate and company image.

Grupo ADC considers that among its most important assets are its corporate image and its corporate reputation.

All employees must ensure that their actions do not damage the image and reputation of ADC and that of its customers.

No employee may use the name and trademark of ADC INGENIERÍA for purposes other than those permitted by the company.

No employee should provide false or misleading information to stakeholders.

2. Respect for people.

Grupo ADC believes that respect for others should be a basic element of the conduct of its employees and of the company's social responsibility.

All employees have an obligation and responsibility to treat their colleagues, superiors and subordinates respectfully, and must contribute to maintaining a harassment-free work environment.

3. Health, safety and prevention of occupational risks.

Grupo ADC is committed to promoting and maintaining a safe and healthy work environment. It shall take appropriate measures to prevent accidents and injuries caused during or associated with work activity by limiting, as far as is reasonable, the causes of risk inherent in that work environment.

All ADC employees must be aware of and comply with the safety and health regulations established in the company.

All employees have the right and duty to communicate, through the established internal means, any situation in which the safety and health of both themselves and other colleagues is being endangered.

4. Equal opportunities and non-discrimination.

Grupo ADC is committed to promoting an appropriate work environment so that there is no discrimination of any kind based on the attributes of race, sex, ideology, religion, sexual orientation, age, nationality, disability or any other personal, physical or social condition, and in which diversity is respected and valued.

ADC will not allow behavior (including gestures, language, and physical contact) that is coercive, threatening, abusive, and/or exploitative.

All employees must promote, with their participation and action, work environments where equality between all workers is respected.

All employees who have professional responsibility for other people must be objective in their proposals for selection, promotion, remuneration conditions, training and evaluation, and all these actions must be carried out within a framework free of any type of discrimination based exclusively on individual performance, professional worth and employee performance.

5. Work-life balance.

Grupo ADC believes that professional development and work-life balance is the basis of social responsibility. ADC establishes different measures aimed at achieving a balance between the family, personal and professional responsibilities of its employees.

All employees must respect each other's private lives and facilitate social responsibility actions pre-established by the organization.

6. Relationship with suppliers and subcontractors.

Grupo ADC's professional relations with suppliers and subcontractors must be based on the quality of products and services and compliance with our Code of Ethics and Social Responsibility.

The selection and contracting of products or services must be carried out according to technical, experience, delivery and economic criteria, without compromising the requirements of our customers and the needs and interests of ADC.

Relationships may not be established with suppliers that violate the law or the basic principles contained in this code.

No ADC employee may receive or offer amounts in the form of commissions or gratuities, or gifts or favors of any other nature for actions that are being performed on behalf of ADC (except for courtesy gifts valued at less than €45).

Recruitment of personnel

1. Personnel recruitment management.

The personnel selection procedure begins once the need for recruitment is detected, which may be due to different causes:

- 1 Production Needs
- 2 Voluntary Terminations or Dismissals
- 3 Retirements and early retirements

2. Job profile.

The definition of the job begins with the analysis of the needs of the recruitment of personnel and whether or not the position is newly created. HR will consult the area manager on the necessary functions, skills and knowledge. If applicable, HR will update the job profile.

3. Job offer.

The job offer will be drafted in accordance with the needs already analysed of the job to be filled. The channels for carrying out the call will be appropriate for the job in question and it will be ensured that they are of equal access for all people.

(1) Announcements and/or press releases will be made in compliance with current legislation and will not include information that may affect the corporate image of Grupo ADC.

4. Reception of applications.

The CVs that arrive at ADC will be received by HR who will screen them. The CVs of candidates who are considered suitable will be sent to the head of the department that needs to fill the job. It will be he/she who makes a selection of those CVs that best suit the needs of the required job.

5. Interviews and Selection.

The personal interviews will be carried out by the area manager together with HR. The candidate who best suits the company's needs will be selected.

6. Personnel file.

HR will manage the personnel file which will contain, mainly, the following documents:

- 1 Personal documentation
- 2 Contractual Documentation
- 3 Legal and ORP documentation
- 4 GDPR Documentation

Note:

(1) HR will be responsible for updating the appropriate documentation.

(2) The processing of employee data will be carried out in compliance with the General Data Protection Regulation approved in May 2018.

(3) Access to employee data will only be available to internal/external personnel who require it for the performance of their functions upon written and formal request.

7. Reception plan.

The integration of new personnel into the work team is essential for the result of the activities we carry out. All the personnel who join will receive, depending on their responsibility, a general presentation that will be completed with the necessary training at all times.

The Reception Plan is the means to facilitate the integration of new staff into their new job and the organisation's protocols. The Reception Plan includes the following elements:

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- 1 Presentation of the organization
- 2 Presentation of the facilities
- 3 Presentation of the organizational chart
- 4 Job description
- 5 General training of their functions and general requirements (management system)
- 6 General rules
- 7 Media and addresses of interest
- 8 Information about ORP
- 9 Quality-Excellence
- 10 Responsibility

Note:

(1) Area managers shall ensure that the staff incorporated receive appropriate training.

(2) HR will guarantee that new staff have the resources and infrastructure necessary for the performance of their functions.

Environment

Grupo ADC wants to contribute to a more sustainable world by taking into account the environmental aspects of its activities and establishes measures to promote sustainability and prevent pollution.

For all these reasons, it establishes a Quality and Environment Policy that establishes principles on which the bases for action of the entire company are based, as well as a Code of Good Environmental Practices that guarantees legislative compliance and respect for the environment.

Clients

Grupo ADC is committed to contributing to the success of its clients. ADC always seeks mutual satisfaction and good faith in all agreements, high quality in the services offered, fair prices and excellent after-sales service.

Revision control.

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Revision	Date	Description of the modifications
00	05-11-2018	Initiation and approval of the process
01	27-08-2019	Revision
02	10-09-2019	Review and approval
03	05-02-2024	Adaptation of the text to the group of companies.