



**QuintasGroup**  
MANAGING POWER

# **Code of Conduct**

For Business Partners

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## Version Control

Date	Version	Author/s	Notes
22.04.2022	1.0	Compliance	
08/09/2022	1.1	Compliance	Adaptation to the Equality Plan

## Intro

The Quintas Energy Group ("Quintas") as a provider of specialised asset management services in the renewable energy sector, is committed to ensuring that its business practices comply with all applicable laws, regulations and business ethics standards and principles, and to developing a culture of accountability, integrity and sustainability.

To this end, in accordance with the principles set out in its Code of Ethics, it aims to promote its values with respect to human rights, employment and environmental practices, both within its organisation and through its business relationships with Business Partners<sup>1</sup> with whom it has a contractual relationship.

Quintas expects its Business Partners to recognise the United Nations Guiding Principles on Business and Human Rights<sup>2</sup>, comply with the core conventions of the International Labour Organisation (ILO) and act with due diligence for responsible business conduct in accordance with the OECD Guidelines for Multinational Enterprises<sup>3</sup>. All Business Partners shall recognise the laws, regulations and policies fundamental to their respective activities carried out in conjunction with or on behalf of Quintas.

Quintas Business Partners must know and act in accordance with the ethical principles defined in this Code of Conduct for Business Partners, undertaking to establish internal mechanisms to ensure their correct disclosure and compliance.

This Code of Conduct for Business Partners is built on the basis of the following ethical principles that are mandatory in the business relationship:

### 1. Compliance with the Law

Compliance with the legal system is a primary mandate for Quintas Energy. All Business Partners must comply with the regulations of the legal system within which they operate. Non-compliance with the law must be avoided under all circumstances.

### 2. Human Rights

With regard to the protection of human and labour rights and the fight against modern slavery, Quintas Energy Business Partners shall conduct their business with ethics and

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<sup>1</sup>**Business Partners** are all natural or legal persons involved in the Quintas value chain, including contractors, consultants, suppliers, customers, and other stakeholders who supply products, goods and services to Quintas, represent and/or cooperate with Quintas in any activity.

<sup>2</sup> [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr\\_sp.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_sp.pdf)

<sup>3</sup> <http://mneguidelines.oecd.org/guidelines/>

integrity, ensuring in all cases full respect for the rights of their workers, in accordance with applicable national and international regulations.

Quintas Business Partners undertake to implement the necessary measures to ensure compliance with this principle and to act in line with the United Nations Guiding Principles on Business and Human Rights, with the aim of avoiding, in the exercise of their activity and throughout the value chain, any type of behaviour that could be classified as a form of modern slavery, child labour or human trafficking.

### **3. Employment and Labour Relations**

Quintas Energy promotes equal opportunities in all matters relating to access to employment, working conditions, training, development and promotion of professionals. Consequently, conduct or actions that could be discriminatory on the basis of personal characteristics, such as skin colour, sex, race, religion, origin, political opinion, sexual orientation, social origin, age or physical or intellectual disability, will not be accepted by its Business Partners, in accordance with the principles set out in the applicable legal system and the principles and rights recognised in the 1998 ILO Declaration on Fundamental Principles and Rights at Work, in particular those relating to equal pay and non-discrimination.

Within the framework of promoting equal opportunities, Quintas promotes gender equality, which is reflected in its Equality Plan. The measures in terms of work-life balance and gender equality implemented and complied with by its Business Partners will be highly valued.

Quintas Energy and, therefore, its Business Partners, assume responsibility for maintaining a work environment free of discrimination and any conduct involving harassment of a personal nature.

Under no circumstances will there be unfair treatment, retaliation or disparagement of any person who, in good faith, reports the existence of the behaviour described above or participates in the investigation of a complaint.

### **4. Environment and Health and Safety**

Quintas Energy Business Partners shall ensure respect for the environment and natural resources in all their business activities, in accordance with the laws and regulations for their protection.

Business Partners are committed to achieving the highest standards of occupational health and safety in the workplace. They shall implement programmes, training activities and internal controls necessary for the continuous promotion of safe working practices.

In any case, Business Partners shall comply with Quintas' health and safety requirements when acting on its premises or on its behalf.

## 5. Fighting corruption, bribe demands and other forms of extortion

### 5.1. Anti-corruption

Business Partners shall not continue, allow, consent or connive in any form of corruption, bribery, fraud or any other criminal behaviour that favours or involves offering and/or accepting gifts, remuneration, advantageous conditions or unjustified benefits from a customer or supplier for their own or the company's benefit vis-à-vis third parties.

They shall carry out all necessary awareness and prevention activities to avoid such criminal conduct or actions, fostering relationships with professional, fair and honest business partners.

### 5.2. Conflict of interest

A conflict of interest is any situation in which a particular interest interferes or may interfere with the ability of a person, organisation or institution to act in a manner contrary to the Company's interest.

Business Partners shall ensure that their employees, managers, suppliers, etc. maintain an impartial stance in the performance of their duties and responsibilities, avoiding any situation in which their interests may be perceived to be contrary to the interests of the supplier or Quintas. Should a potential conflict of interest arise, Quintas Energy Compliance ([compliance@quintasenergy.com](mailto:compliance@quintasenergy.com)) must be notified as soon as it becomes known.

### 5.3. Principle of political neutrality and the relationship with the public administration.

Quintas Energy declares its political neutrality and its commitment to the non-irregular financing of political parties or their representatives and demands this of its Business Partners, who must refrain from offering, promising, making, accepting or agreeing to accept inappropriate payments in money or objects of value to public officials, political parties, candidates for public office or other persons.

All dealings with Public Administrations shall be conducted in full transparency and in collaboration with public bodies in an open, honest, and disinterested manner.

## 6. Confidentiality, data protection and intellectual property

Quintas Business Partners shall be aware of the importance of preserving the confidentiality of information. For this reason, they shall undertake to keep the strict confidentiality of the information to which they have access in the development of their contractual relationship.

In this sense, the privacy of the personal data of Quintas' employees, of its Business Partners and, in short, of any party intervening in Quintas' value chain, shall be promoted and protected. Personal data will be used securely, adopting the necessary security measures for the correct processing of the same in accordance with the General Data Protection Regulation (GDPR).

A fundamental part of Quintas Energy's business activity revolves around the provision of specialised services for the management of clients' renewable assets, which are protected by intellectual and industrial property rights. Consequently, proper and correct management is essential for the creation of value at Quintas Energy. Therefore, it is strictly forbidden to reproduce, copy, plagiarise, distribute, modify, transfer or communicate, totally or partially, any product owned by Quintas Energy or its clients without the appropriate authorisations from the company.

## 7. Audits and Inspections

Business Partners are expected to facilitate internal and external audits, investigations and enquiries by Quintas and investigations or requests for information by government officials or regulatory bodies that may affect Quintas in any way.

If the supplier becomes aware of any potential investigation or enquiry that relates to its business relationship with Quintas, it must immediately notify Quintas Energy Compliance ([compliance@quintasenergy.com](mailto:compliance@quintasenergy.com)) before taking any action.

## Dealing with suspected violations of the code of conduct for business partners

In the event of violations of the Code of Conduct for Quintas Business Partners, Quintas reserves the right to respond proportionately to the seriousness of the violation. This includes, among other things, the requirement to remedy the infringement without delay, the claim for damages or the termination of the contract. In the event of a serious breach of the Code of Conduct for Business Partners, Quintas reserves the right to terminate the contract without notice.

Any doubts or suspicions regarding the compliance with the requirements of the Code of Conduct for Business Partners, information and management of possible breaches shall be dealt with, ensuring, at all times, the confidentiality of all parties involved throughout the process.

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