



**QuintasGroup**  
MANAGING POWER

# **Code of Ethics**

Quintas Group Policy

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## Version Control

Date	Version	Author/s	Notes	Approval by CEO &CCO
October 2021	01.00	Quintas Energy		26/10/2021

# 1. INTRODUCTION

Quintas Energy, S.A. (hereinafter "Quintas Energy" or "Company"), offers specialized asset management services in the renewable energy sector, combining the use of Information and Communication Technologies (ICT) and the set of advisory skills, creating value to both the Company and the society.

This Code of Ethics (hereinafter "the Code") aims to establish the principles and values that shape the activity of Quintas Energy, and should be considered as a guide for its employees, managers and partners in all their professional relationships.

This Code does not cover all possible situations that may occur, however, it includes the principles that should inspire, at all times, the behaviour of all persons working in and with the Company.

To this end, it is essential that all personnel are familiar with this Code and that in the performance of their duties they comply with it and respect its principles. This is without prejudice to the provisions of other special internal rules and current legislation, which shall prevail in the event of conflict or contradiction with this Code.

# 2. SCOPE OF APPLICATION

This Code of Ethics applies to all employees, officers and directors of the Company.

Also subject to compliance with this Code are all those persons, natural or legal, who maintain any kind of relationship with Quintas Energy in the performance of their professional or business activities, such as external auditors, consultants, advisors, suppliers, among others.

# 3. ETHICAL PRINCIPLES AND ESSENTIAL VALUES

Quintas Energy's corporate culture is focused on achieving positive results in all areas of the Company, based on honesty and professionalism at work, compliance with current legislation and corporate responsibility.

This Code of Ethics is based on the following ETHICAL PRINCIPLES that are mandatory in the performance of work:

- **Principle of legality and regulation**

Compliance with the legal system is a primary mandate for Quintas Energy. All employees must comply with the regulations of the legal system within which they

operate, in addition to the applicable internal policies of Quintas Energy. Non-compliance with the law must be avoided under all circumstances.

Regardless of any penalties that may be imposed by law, any employee responsible for a breach of the law will be subject to disciplinary consequences in accordance with the Collective Bargaining Agreement in force.

It is therefore expected that, in dealing with third parties, whether customers, Public Administrations, suppliers and other partners, to act in the interest of Quintas Energy and in accordance with the laws and regulations that may be applicable.

- **Anti-Corruption Policy**

Quintas Energy rejects any form of corruption, bribery, fraud or any other criminal behaviour that favours or involves offering and/or accepting gifts, retribution, advantageous conditions or unjustified benefits from a customer or supplier for their own benefit or that of the Company against third parties.

The Company will carry out all awareness and prevention activities it deems necessary to avoid these criminal conducts or actions, promoting relationships with professional, fair and honest business partners.

- **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, organization or institution to act in a manner contrary to the Company's interest.

All Quintas Energy employees must maintain and ensure an impartial posture in the performance of their duties and responsibilities at Quintas Energy, avoiding any situation in which their interests may be perceived to be contrary to the interests of Quintas Energy. Should a potential conflict of interest arise, Quintas Energy Compliance must be notified as soon as it becomes known.

- **Principle of political neutrality and 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.

All relations with the Public Administration will be carried out with total transparency and in collaboration with the Public Bodies in charge of the public administration.

- **Principle of integrity and professionalism**

Quintas Energy promotes integrity and professionalism as a guiding element in the company's labour relations.

Integrity in the performance of work is understood as all actions that are loyal, in good faith, objective and aligned with the interests of Quintas Energy.

Professionalism in the performance of work is understood as diligent, responsible, efficient and focused on excellence, quality and innovation.

- **Principle of objectivity, impartiality and transparency in the contracting of suppliers and third parties**

Quintas Energy complies with the principle of objectivity, impartiality and transparency in supplier selection and contracting processes. This principle shall always be applied at all stages of the negotiation or execution of commercial contracts.

- **Principle of equality and non-discrimination**

Quintas Energy encourages the promotion of 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 due to 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, in accordance with the principles set out in our Constitution and in the rest of the legal system, as well as in the Company's Collective Bargaining Agreement, in particular those relating to equal pay and non-discrimination.

Quintas Energy assumes responsibility for maintaining a working environment free from discrimination and any conduct involving harassment of a personal nature.

There will be no unfair treatment, retaliation or disparagement of anyone who, in good faith, reports the above behaviour or participates in the investigation of a complaint.

- **Intellectual and industrial property**

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 clients without the appropriate authorisations from the Company.

- **Protecting human and labour rights and combating modern slavery**

Quintas Energy's intention is to carry out its activity with ethics and integrity, ensuring full respect for the rights of its workers, in accordance with the applicable national and international regulations.

Furthermore, Quintas Energy undertakes to apply the necessary measures to guarantee compliance with this principle, in this sense, with the aim of avoiding, in the exercise of its activity and throughout the value chain, any type of behaviour that could be classified as a form of modern slavery or human trafficking.

- **Principle of health, safety at work and environmental protection**

Quintas Energy is committed to achieving the highest standards of occupational health and safety in the workplace. Quintas Energy implements programmes, training activities and internal controls necessary for the continuous promotion of safe working practices.

Quintas Energy guarantees respect for the environment and natural resources in all the company's activities, in accordance with the laws and provisions for its protection.

- **Resources and material means for the development of professional activities**

Quintas Energy provides its professionals with the resources and material means necessary and appropriate for the development of their professional activity. Quintas Energy employees and managers must make responsible use of the resources and means placed at their disposal, in such a way that these resources and means are not used or applied for private purposes unless expressly authorised.

- **Audits and Inspections**

All employees must cooperate fully with internal and external audits, investigations and enquiries conducted by the Company. In addition, in the course of our business, we may be subject to investigations or requests for information by public officials or regulatory bodies. If we become aware of any potential investigation or enquiry, we must immediately notify our manager and Quintas Energy Compliance before taking any action. With respect to audits, investigations and enquiries, you must NOT:

- Destroy, alter or conceal documents in anticipation of, or in response to, a request for them.
- Provide incomplete, false or misleading statements to a Company investigator or public official, or attempt to influence others to provide such statements, unless the information or documentation requested is completely unavailable, false or misleading.
- Conduct an investigation on an individual basis, as necessary and appropriate resources must be allocated to investigations.

- **Confidentiality and Data Protection**

Quintas Energy is aware of the importance of preserving the confidentiality of information. For this reason, it is committed to maintaining the strict confidentiality of the information to which it has access, not only in the performance of the work or function assigned, but also by the mere fact of belonging to a business organisation.

In this sense, Quintas Energy promotes and protects the privacy of the personal data of the Company's employees and its business partners. Quintas Energy uses personal data securely, adopting the necessary security measures for the correct processing thereof in accordance with the General Data Protection Regulation (GDPR).

## **4. MANAGEMENT OF VIOLATIONS OF THE CODE OF ETHICS**

This Code of Ethics shall govern any type of relationship, contractual or otherwise, between Quintas Energy and its employees, customers, suppliers, advisors, consultants, senior management and partners.

This document and its knowledge by Quintas Energy employees urges all employees, managers, senior management and partners to respect the principles and values expressed in it in the exercise of their functions.

Ignorance of the rules and principles contained therein does not exempt them from observance and compliance.

Non-compliance with the Code will not be tolerated. Actions or omissions that constitute serious or very serious breaches of the provisions of the Code may be considered as misconduct and be punished as such in accordance with the classification and grading thereof, as regulated in the Collective Bargaining Agreement in force.

The system of communication, reception and management of possible breaches of the Code of Ethics will be managed, depending on the case and the circumstances, by Quintas Energy Compliance, ensuring the confidentiality of all parties involved throughout the process at all times.

## **5. COMMUNICATION AND DISSEMINATION OF THE CODE OF ETHICS**

The Company's Management shall communicate and disseminate this Code of Ethics among Quintas Energy's employees, managers and partners.

The Code shall also be available to Stakeholders on the Quintas Energy website.

## **6. APPROVAL, UPDATING AND ENTRY INTO FORCE**

The Code of Ethics was approved by the CEO and COO of Quintas Energy in 2021, coming into force on 26 October 2021.





**QuintasGroup**  
MANAGING POWER

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