

BUSINESS ETHICS POLICY

In order to implement business ethics in its commercial activities, Seppelec's management is committed to working actively with customers, suppliers, subcontractors and business partners in this regard. To this end, the organisation undertakes to comply with the following strategic guidelines:

- To contract the acquisition of goods or services with suppliers and subcontractors or the provision of services to customers in a fair manner and without any form of consideration to any of the parties. In this regard, it is expressly prohibited to offer, promise, give, accept or request any type of unfair advantage, incentive or undue consideration.
- Ensuring information security and responsibly managing the confidential information of employees, customers, suppliers and other stakeholders.
- Comply with all applicable laws on fraud prevention and money laundering. To this end, we avoid transactions with third parties whose activities cannot be verified or who show signs of irregular operations, maintaining an attitude of diligence and control in our commercial relationships.

In order to achieve continuous improvement, the following quantitative objectives are established at all levels of the organisation. These are consistent with the Policy, which serves as a framework for their establishment and review:

- Issue at least one annual communication to all staff, reminding them of the existence and availability of the reporting channel, as well as the types of situations or conduct that can be reported through this channel.
- During 2025, maintain at zero the number of communications on information security or practices related to corruption, such as bribery or conflicts of interest, reported through the ethics channel.
- Distribute an annual economic and financial report detailing the results of the previous financial year to all staff members in order to strengthen trust and internal vigilance against possible irregularities.

This Policy applies to all Seppelec employees and collaborators, customers, suppliers and subcontractors, and is reviewed annually to ensure its validity.

The implementation and monitoring of the qualitative and quantitative objectives proposed in this policy is the responsibility of the Executive Management, while the review of reports from the reporting channel and correspondence related to its use is the responsibility of the Human Resources Department. The progress and results derived from this policy will be documented and communicated in Seppelec's Sustainability Report, as part of our commitment to transparency and continuous improvement in business ethics.

In order to reinforce our commitment to ethics and compliance in the supply chain, Seppelec provides employees, suppliers and other stakeholders with a confidential communication channel to report any breaches of this policy via the "Ethics Channel" tab on the website <https://seppelec.com/es/>

In addition, this business ethics policy is available to all stakeholders on Seppelec's official website, ensuring its transparency and easy access.



Signed: Sven Funke
Operations Officer

In Alcorcón, 31 March 2025