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BUSINESS ETHICS POLICY

Seppelec's Executive Management, with a view to implementing corporate ethics in its commercial activities, undertakes to work actively with customers, suppliers, subcontractors and business partners in this regard. To this end, the following quantitative and qualitative objectives are established, which are consistent with the Corporate Ethics Policy, which serves as the framework for their establishment and review:

Qualitative objectives

Measures against corruption and bribery

- To contract the procurement of goods or services from suppliers and subcontractors, or the provision of services to clients, in a fair manner and without any form of consideration being given to any of the parties. In this regard, it is expressly prohibited to offer, promise, give, accept or solicit any kind of unfair advantage, incentive or undue consideration.

Conflict of interest

- To contract the procurement of goods or services from suppliers and subcontractors, as well as the provision of services to clients, whilst avoiding situations in which there is a personal, family or financial link between the contracted companies and Seppelec staff involved in the contracting process.

Fraud

- We comply with applicable legislation on fraud prevention. We therefore avoid carrying out irregular or deceptive transactions, promoting transparency and diligence in our activities and commercial relationships.

Money laundering

- To comply with applicable legislation on the prevention of money laundering, avoiding transactions with third parties where there are indications that the funds involved originate from illegal activities, and ensuring that our business relationships are conducted in accordance with the law.

Information security

- To guarantee information security and manage the confidential information of employees, customers, suppliers and other stakeholders responsibly.

Quantitative targets

Conflicts of interest and measures against corruption and bribery

- During 2026, issue at least one annual communication to all staff, reminding them of the existence and availability of the whistleblowing channel, as well as the types of situations or conduct that can be reported through this channel.
- During 2026, maintain the number of reports concerning information security or practices related to corruption, such as bribery or conflicts of interest, submitted via the ethics channel at 0.

Fraud

- During 2026, carry out a 100 per cent review of all incidents or reports relating to possible cases of fraud received by Seppelec via the ethics channel.

Money laundering

- Record and analyse 100 per cent of transactions in which invoicing anomalies are detected, such as unjustified payments to third-party accounts or payments for items not included in the quotation.

Information security

- During 2026, ensure that there are zero reports regarding information security or practices related to corruption, such as bribes or conflicts of interest, submitted via the ethics channel.

Validity and review

This Policy applies to all Seppelec employees and associates, customers, suppliers and subcontractors, and is reviewed annually to ensure it remains up to date

The implementation and monitoring of the qualitative and quantitative objectives set out in this policy are the responsibility of the Executive Management, whilst the review of reports submitted via the whistleblowing channel and correspondence relating to its use falls to the HR Department.

Transparency

Progress and results arising from this policy will be documented and reported in Seppelec's Sustainability Report, as part of our commitment to transparency and continuous improvement in the area of business ethics.

In order to reinforce our commitment to ethics and compliance within 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/

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



Signed: Sven Funke

Operations Officer

Alcorcón, 16 January 2026