

CODES

**Code of Ethics and Conduct of Best Technologies for Buildings,
S.L.**

MESSAGE FROM THE MANAGING DIRECTOR

Dear collaborators,

In order to achieve the objectives we set ourselves, it is very important that all of us, from the members of the Board of Directors to the newest employees or partners recruited by **SENSEDI** - the brand name of our company, **Best Technologies for Buildings, S.L.** - share the same **common values**, and that these are transmitted both in our way of working and in our relationships, both between ourselves and with those around us (Customers, Agents, Brokers, Suppliers, etc.). These **values** are **Positive Attitude, Commitment, Ethics, Respect** and **Transparency**.

This Code of Ethics and Conduct is another tool to ensure that the people who make up **SENSEDI** act in accordance with the values mentioned above on a daily basis, and that each one of us can feel proud to be part of this organisation and our contribution to society.

The image of **SENSEDI** depends on our work, and the Group's values must be perceived in every action we take in connection with our Employees, Customers and Suppliers.



Warm regards,
Pedro Maqueda
Managing Director of Best Technologies for Buildings, S.L.

Contents

Contents

<i>MESSAGE FROM THE MANAGING DIRECTOR</i>	<u>2</u>
<i>1. INTRODUCTION</i>	<u>4</u>
<i>2. SCOPE</i>	<u>4</u>
<i>3. PERFORMANCE PRINCIPLE</i>	<u>4</u>
3.1. Ethics	4
3.2. Respect	<u>5</u>
3.3. Commitment	6
3.4. Transparency	<u>7</u>
3.5. Positive Attitude	<u>7</u>
3.6. Confidentiality	<u>7</u>
<i>4. GENERAL LIMITATIONS AND INCOMPATIBILITIES</i>	<u>8</u>
<i>5. RELEVANT FACTS AND INFORMATION</i>	<u>9</u>
<i>6. COMPLIANCE WITH THE CODE OF ETHICS</i>	<u>9</u>
6.1. Skills	<u>9</u>
6.2. Composition	<u>9</u>
6.3. Operation	<u>10</u>
<i>7. FINAL PROVISIONS</i>	<u>10</u>
7.1. Adoption and Distribution	<u>10</u>
<i>8. ENTRY INTO FORCE</i>	<u>10</u>

1. INTRODUCTION

The purpose of this Code is to establish rules of conduct that will be applicable in all areas in which **Best Technologies for Buildings, S.L.** (hereinafter referred to as **SENSEDI**) operates. The purpose of its creation is to incorporate principles that can aid the improvement and transparency of its services.

This Code is also the backbone of all the Policies of the **Mutual Owners' Association**, which must be in line with the values and spirit of the Code.

2. SCOPE

This *Code of Ethics and Conduct* will apply to directors, administrators and managers, as well as to all those persons linked by an employment or service provision contract, or who form part of the teams through which **SENSEDI**'s suppliers directly provide services.

3. PERFORMANCE PRINCIPLE

SENSEDI employees and collaborators must act at all times in accordance with our values of *Ethics, Respect, Commitment, Transparency and Positive Attitude*.

3.1. Ethics

We will act with independence and moral integrity, considering the following requirements:

- Loyalty and good faith: We shall tailor our actions at all times to the principles of loyalty and good faith towards the Company, hierarchical superiors, peers and collaborators, as well as towards third parties with whom we have professional relations.
- Conflict of interest: When acting, we shall prioritise the interests of **SENSEDI** over personal interests or those of third parties who may influence any decisions, actions, services or advice made on behalf of **SENSEDI** . Likewise, no identical, analogous or complementary type of service may be performed unilaterally for a **SENSEDI** client, or any other service deriving from a previous action carried out by **SENSEDI**.
- Integrity of information: Information handled under our responsibility must be processed and reflected in a complete, accurate and truthful manner.

- Insider information: We must never misuse or disclose insider information obtained in the course of our duties.
- Legal Compliance: We must be aware of and obey the regulations governing **SENSEDI**'s activities relating to its area of responsibility, as defined by the Group and in accordance with the instructions received and the established internal criteria and rules.

3.2. Respect

We will respect the following considerations:

- Diversity and integration: Commitment to providing a stimulating work environment, free from any kind of discrimination or harassment. Diversity and integration among employees is promoted, and this interaction between people with different cultures, abilities, outlooks and experiences is intended to generate and attract talent to create value within **SENSEDI** (Business and Innovation).
- Working environment: Those people with managerial functions within **SENSEDI** must create and promote a cordial and supportive environment, in which the values of **SENSEDI** are always present. Employees must treat each other with respect and avoid any conduct that could harm the dignity of any other individual, striving to oppose all forms of bullying, harassment or hounding.
- Respect for People: Decisions regarding employees - such as hiring, training, evaluation, promotion and functional or organisational mobility - must be based solely on the employee's individual merit and professional performance, and must not be influenced by (for example) the employee's race, ethnicity, religion or beliefs, sexual orientation, marital status or political views.
- Working Conditions: We must recognise the right to freedom of association and the collective agreements in force for employees.
- Relationships with suppliers: The establishment of relations with suppliers must be based on the fact that they are **SENSEDI**'s collaborators, and therefore our treatment of them must be like-for-like and always within the legal framework. It is prohibited to offer, give, request or receive any kind of payment out-of-contract. One's status as an employee must never be used for personal gain. Choices of suppliers should be based exclusively on the principles of fair competition and the quality of the products and services offered.

- Use of resources: During the working day, the resources of **SENSEDI** will be used primarily for professional purposes.
- Gifts, Invitations, Payments, etc.: We undertake to never accept or offer improper payments, gifts, entertainment invitations or other benefits.
It is strictly prohibited to promise, give or receive cash gifts or equivalent methods of payment, or any kind of negotiable securities.
Gifts and invitations to entertainment events or other benefits may be offered or accepted in accordance with the business activity and if they are considered common and appropriate practice under the circumstances (i.e. when reasonable), but must not exceed €50.
Any gift, invitation or other benefit whose estimated value is higher than this amount must first be announced to the Board of Directors of **SENSEDI** , and the Board shall validate the acceptance.

3.3. Commitment

We commit to the following aspects:

- Training: All shall attend to their own training and that of their collaborators, in order to achieve the best performance in the performance of their duties.
- Efficiency: We shall aim to achieve results in the most optimal and productive way possible during the performance of our duties.
- Prevention of Occupational Hazards We shall comply with preventive measures regarding safety, using the individual and collective means of protection that both **SENSEDI** and the **Mutual Owners' Association** make available.
- Commitment to the Environment: A commitment must be made to the environmental programmes implemented in the **Mutual Owners' Association**, and we must comply with the rules established by the Company to ensure compliance with current environmental legislation.
- Commitment to society: **SENSEDI**, as an entity that carries out its activities in various geographical environments, is committed to responsible action and the development of responsible practices that contribute to the sustainability of the organisation itself, but that also favour the development of the communities in which we operate.

The guidelines that mark our actions are integrity, respect for legality and observance of the legal systems of all the countries in which we operate, as well as collaboration with government authorities, international organisations and other institutions in the fight against any type of criminal activity.

3.4. Transparency

We must be transparent, respecting the following considerations:

- Co-operation: We shall cooperate personally and actively with other areas, units and departments, as well as with their collaborators or other employees.
- Confidential information: All staff must provide their line managers, collaborators and/or colleagues with truthful, necessary, complete and punctual information about the progress of the activities in their area of competence, as may be necessary for the proper performance of their duties.
- Client information: We undertake to ensure transparency at all times, via **SENSEDI**'s professional and business performance towards its clients.

3.5. Positive Attitude

We undertake to act considering the following aspects:

- Innovation: We undertake to promote continuous improvement and innovation to achieve maximum quality from profitability criteria.
- Customer Focus: This must be based on efficiency, professionalism, service mentality and collaboration, seeking the maximum satisfaction of our customers and providing them with competitive, high-quality solutions. We undertake to treat people kindly, courteously and with a service-focused attitude should be a priority. The information provided to clients must be clear and correct, with all requests and complaints sent via formal channels.

3.6. Confidentiality

It is understood that the employee and/or collaborator of **SENSEDI** operates within the framework of his/her professional performance, both internally and in his/her relations with third parties, under the strict duty of permanent confidentiality with respect to any information whose disclosure or publicity may affect **SENSEDI**'s interests.

This principle is embodied in:

- Confidentiality: We undertake to maintain the confidentiality of any data, reports, accounts, balance sheets, strategic plans and other activities by **SENSEDI** and its staff which are not of a public nature and whose disclosure may affect the interests of **SENSEDI**. No information about them may be provided, except when one has been expressly authorised to do so, when necessary within the framework of projects, contracts or agreements with suppliers or third parties subject to confidentiality clauses or when acting in compliance with a judicial decision, which is expressly provided for by law or at the request of the judicial or administrative authorities in accordance with the provisions of current legislation.
- Intellectual Property: You may not use any software, computer systems, manuals, videos, courses, studies, reports, etc. created, developed or improved by **SENSEDI** for your own purposes (or those of third parties) or for profit, and must ensure that their intellectual property is preserved at all times.
- Knowledge and ways of doing things: We undertake to maintain the strictest confidentiality as regards the use of insider knowledge outside the remit of **SENSEDI**.

4. GENERAL LIMITATIONS AND INCOMPATIBILITIES

SENSEDI 's directors, administrators and managers will have the following limitations:

- They will not be able to fulfil, directly or through natural or legal persons, any positions, functions or representation in competing companies, companies providing goods and services of **SENSEDI** that may have any direct interest in or relationship with the Mutual Owners' Association, or in companies that hold a form of dominion or control in competing companies.
- The Board of Directors of **SENSEDI** must be consulted beforehand about the acceptance of any position, appointment or designation outside the entity that may affect their independence and professional dedication to **SENSEDI**. The following staff will be responsible for accepting this, according to their profiles:
 - Directors, for the Chief Executive Officer
 - The Chief Executive Officer, for the Chairman of the Board of Directors

The limitations and incompatibilities detailed herein shall not imply any modification of the existing working conditions that will prevail over such limitations and incompatibilities.

5. RELEVANT FACTS AND INFORMATION

A "significant event" is any circumstance that may have an appreciable effect on the assets of **SENSEDI** or its subsidiaries.

"Relevant information" shall be understood to mean any information knowledge of which is not in the public domain and which may significantly affect a third party related in any way to the **Mutual Owners' Association**.

Both the relevant facts and the relevant information must be brought to the attention of the Managing Director and/or the Board of Directors as soon as possible. The content of the communication must be truthful, clear, complete and, where the nature of the information so requires, quantified as far as possible in such a way as to avoid confusion or misleading.

6. COMPLIANCE WITH THE CODE OF ETHICS

In order to guarantee the application of the *Code of Ethics and Conduct*, as well as monitoring and supervision of compliance with the same, an "*Ethics Committee*" will be set up under the umbrella of the **Mutual Owners' Association**, which will have the following powers, composition and operating regime:

6.1. Skills

- Consultative: We undertake to resolve queries regarding the interpretation of the principles and guidelines contained in this Code and to advise on how to act in certain situations.
- Resolutive: We undertake to analyse and resolve complaints concerning non-compliance with the Code.
- Sanctioning/Disciplinary: We undertake to determine the type of sanctions to be imposed in the event of non-compliance with the Code of Ethics and Conduct, and impose the corresponding sanctions, with the exception of those for employees who will be dealt with by the Director of Persons and Talent of the **Mutual Owners' Association**.
- Surveillance: The Commission will ensure compliance with the Code and propose changes or updates.
- Promoters: We undertake to disseminate information and train employees regarding legal compliance and the rules of conduct included in the code.

6.2. Composition

It shall be composed of at least five, but no more than six members. It shall be chaired by the persons appointed by the Board of Directors of the **Mutual Owners' Association** from among its members. The composition of the group will be formalised via the following persons:

- Two or three members of the Board of Directors of the **Mutual Owners' Association**
- The General Manager of the **Mutual Owners' Association**

- The Legal Compliance Manager of the **Mutual Owners' Association**
- The Director of People and Talent of the **Mutual Owners' Association**

6.3. Functioning

Any **SENSEDI** employee who detects practices or conducts that he or she considers potentially constitute a crime and a breach of the Code of Ethics and Conduct may submit a Query or report it anonymously. A specific mailbox has been set up for this purpose codigo.etico@sensedi.com . Complaints regarding violations of the Code of Ethics and Conduct are regulated by the "**Consultation and Complaint Procedure**" Policy. This is published on the corporate website.

It will be ensured that the process complies with all ethical guarantees of operation, involving both parties (complainant and defendant) in the process.

7. FINAL PROVISIONS.

7.1. Adoption and Distribution

- The CEO of **SENSEDI** is responsible for the adoption of the Rules contained in this document.
- The Group's Internal Regulatory Compliance service is responsible for proposing Code revisions to the Code to the Chief Executive Officer/Board of Directors in order to keep it up to date.
- Any modification of this Code of Ethics and Conduct must be approved by the Board of Directors of **SENSEDI**.

8. EFFECTIVE DATE

This **Code of Ethics and Conduct** is already in force.

All employees and collaborators have access to this document on the **SENSEDI** website <http://www.sensedi.com>