

Ethics and Compliance Code

Técnicas Reunidas (hereinafter **TR**) is committed to the integrity and high commercial conduct in all its activities, including our relations with **Suppliers and Subcontractors** (regardless and hereinafter **Business Partner or "BP"**).

TR bases its relations with its **Business Partner** in legal, efficient and just practices, and the BP must comply with the applicable legal and regulatory requirements in their commercial relation associated with its activities for **TR**.

Business Partners are responsible for ensuring that they as employees, workers, representatives, suppliers and subcontractors meet the conduct standards to be fulfilled by all **TR Business Partners**.

As a TR Supplier or Subcontractor, I accept that my company must observe and fulfil the following guidelines:

General Guidelines:

Legal Compliance	BPs must comply with the applicable legislation in the countries they operate in, avoiding any conduct that, even if not violating the law, may hinder the reputation of TR and produce adverse consequences to it or its environment.
Responsibility	The BP shall employ its technical and professional capacity, as well as the prudence and care necessary to carry out its activities for TR.
Conduct Commitments	It is expected the BP observes, during the execution of its activities, a conduct that is in line with the 10 Principles of the United Nations Global Compact, which establish fundamental values in the human rights areas, labour standards, environment and anti-corruption.
Commitment to Técnicas Reunidas	The BP shall always reasonably act in the best interest of TR, making a suitable use of resources provided to it and avoiding any actions that may cause hindrances.
Environment, Health and Safety	The BP is expected to meet the applicable environmental, health and safety (EHS) laws and regulations as well as TR's EHS requirements, providing its employees a safe and healthy working environment, without negatively affecting the local community.
Fair employment practices	The BP must observe the applicable laws and regulations that regulate the salaries and hours, forbid discrimination, harassment and reprisals: shall not employ workers under sixteen years of age (16) or minors of the minimum applicable age (whichever is greater); shall not use forced labour or take part in human trafficking

Obligation to know and comply with the guidelines	The BP has the obligation to identify and meet these Guidelines, actively acting on the comprehension and practical application in its daily activities for TR. Likewise, it shall comply with the provisions set forth herein that are also applicable to its contractors (subcontracting), ensuring a consistent application of the values advocated by TR in the procurement chain.
Defence of Competition	The BP shall not share or exchange any information related to the prices, costs or other information that may be contrary to the free competition, with any third parties relative to any relation it maintains with TR.
Privacy	The BP must establish the appropriate measures to protect personal confidential information of clients, suppliers or subcontractors that it has access to in connection to its relation with TR.

Unacceptable behaviour

Corruption	The BP may not carry out, direct or indirectly, an offer, promise, delivery, request or acceptance of an undue advantage of any value (which may be financial or otherwise) and regardless of its location, in violation of the applicable law, as an incentive or reward so that a person acts or does not act with regards to the execution of its obligations.
Discovery and revealing of information	During the relation between TR and the BP, TR shall provide it with the documents, specifications, charts, price information, leaflets, catalogues, reports and any other type of information necessary so it can carry out its functions. The BP shall not under any circumstance publicise any of this information, without the express written consent of TR. This information shall be solely destined to be handled by the BP and, therefore, no other person may access it. In addition, the BP shall, at the end of the relation with TR, delete this information and return the documents required. It may also not reveal information relative to the negotiations carried out between it and TR, with regards to secrets or confidential testimonies that it may have gained access to. Likewise, the BP may not reveal information from the competition to TR, if not obtained ethically and without breaching the rules that may contravene the principle of free competition.
Actions on behalf of Técnicas Reunidas	The BP is an independent THIRD PARTY and therefore is not bound by an employment relation with TR. Therefore the BP is not entitled to assume any obligations of any kind or nature on behalf of TR. It may also not represent TR legally, or carry out any actions on its behalf, unless it has the express written authorisation of TR.
Fraud	The BP shall take special care in only offering the services that meet customer requirements, so that the practices carried out by it have always, as the main goal, elevate the level of market protection.
Conflict of interests	The BP must carry out its activities in an open, transparent manner and with the utmost integrity. There is a possibility of an emerging conflict of interests of an BP employee or a member of its family maintains a close

	relation with a TR employee that may take decisions affecting the activities of the BP. Therefore, the BP shall disclose this type of relations to TR, before starting negotiations and whenever these emerge.
Money laundering and financing of terrorism	The BP shall be aware and comply with the regulatory money laundering prevention and financing of terrorisms obligations. The BP shall adopt the internal control measures in accordance with money laundering and financing of terrorism regulations and carry out the appropriate actions so that those it is commercially related to are aware at all times of this regulation.

HOW TO REPORT ANY MATTER RELATED TO THE BREACH OF THESE GUIDELINES?

TR expects that any **Business Partner** reports any reasonable evidence of any act contrary to these guidelines and unacceptable conducts that affect TR as soon as possible.

For this, it provides the **Business Partner** a communication channel through which to contact the Regulatory Compliance Area.

Mailbox: buzondelcodigo@tecnicasreunidas.es

In any case TR guarantees the confidentiality, and commits to not take any retaliation, direct or indirect, for any **Business Partner** that make communications in good faith, on any actions the **Business Partner** was not involved in.

The **Business Partner** shall cooperate with TR in the event the communication entails the start of an investigation.

COMPLIANCE DECLARATION

I am aware that this document establishes matters of great importance for TECNICAS REUNIDAS, so that the substantial violation by the company that I represent of its content could lead to the resolution of the relationships that my company could maintain with TR

Name & Surname: _____

Position into the organization with representation powers: _____

Date: _____

Signature and Stamp: