INTERNAL CODE OF CONDUCT IN THE SECURITIES MARKETS OF TECNICAS REUNIDAS, S.A.

1. OBJECT

The Board of Directors of Tecnicas Reunidas, SA (the "**Company**"), at its meeting held on 17 December 2025, has approved a new version of the Internal Code of Conduct in the Securities Markets (the "**Code**" or "**ICC**") for the purpose of supplementing the applicable securities market regulations and, in particular, those established in Regulation (EU) 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (the "**MAR**") and its implementing regulations.

This Code establishes the criteria of behavior and action that its addressees must follow in relation to the operations described therein, as well as with the handling, management, control and disclosure of Inside Information, as this term will be defined later, in order to promote transparency in the development of the activities and the governance system of the companies integrated into the group whose dominant entity is the Company, the adequate information and protection of the interests of investors and to prevent situations of market abuse.

2. DEFINITIONS

For the purposes of this Code, the following definitions shall apply:

- **External Advisors:**

  Those natural or legal persons (including their directors or employees), who without having the status of Persons Discharging Managerial Responsibilities or employees of the Company or of any of the companies of the Tecnicas Reunidas Group, provide financial, legal, auditing, consulting or any type of services to the Company or to any company of the Tecnicas Reunidas Group, and who, as a result, have or may have access to Inside Information.

- **Confidential Documents:**

  Documents, regardless of their medium, containing inside information.

- **Tecnicas Reunidas Group:**

  The Company and all subsidiaries and affiliates that are in the situation provided for in Article 42 of the Commercial Code in relation to it.

- **Inside Information:**

  Inside Information shall be understood as any specific information that has not been made public, which refers, directly or indirectly, to the Company or any of the companies of the Tecnicas Reunidas Group or to the Securities and Financial Instruments, and which, if made public, could significantly influence the prices of the Securities and Financial Instruments.

Information will be considered to have a specific nature if it relates to a set of circumstances that exist or can reasonably be expected to exist, or to an event that has occurred or can reasonably be expected to occur, provided that such information is sufficiently precise to allow a conclusion to be drawn as to the possible effect that those circumstances or that event may have on the prices of Securities and Financial Instruments.

In this regard, in the case of a prolonged process intended to generate or resulting in certain circumstances or a specific event, both that future circumstance or event and the intermediate stages of that process that are linked to the creation or occurrence of that future circumstance or event may be considered as information of a specific nature.

An intermediate stage of a prolonged process will be considered Inside Information if, by itself, it meets the criteria relating to Inside Information mentioned herein.

Finally, information that, if made public, could significantly influence the prices of securities and financial instruments is considered to be that which a reasonable investor would likely use as one of the basic motivating elements of their investment decisions.

- **Insiders:**

  Insiders shall be considered: those Persons Subject to the Code and other executives or employees of the Company or Tecnicas Reunidas Group, as well as External Advisors hired by the Company who, in relation to a specific transaction or situation, have Inside Information.

  Insiders shall cease to be considered as such when the Inside Information that led to their inclusion on the Insider List is disclosed to the market through the communication required in accordance with applicable regulations or when they cease to be considered as such in any other way (for example, due to the suspension or abandonment of the operation or transaction that gave rise to the Inside Information) and when the Monitoring Body notifies them or, by delegation, the Person Discharging Managerial Responsibilities responsible for the operation.

- **Personal Transactions:**

  Any transaction carried out on their own account by Persons Discharging Managerial Responsibilities and persons closely associated with them, relating to Securities and Financial Instruments as defined under the applicable regulations.

- **Monitoring Body:**

  Body responsible for the application, interpretation and monitoring of compliance with the provisions of this Code, without prejudice to the functions of the Chairman of the Board of Directors set forth herein and the supervision of the Audit and Control Commission. This body has been established as a collegiate entity, composed of four (4) members with expertise in the financial, commercial, and operational environment, in addition to the Secretary of the Board of Directors, the latter being responsible for actions before supervisory or regulatory bodies.

- **Persons Discharging Managerial Responsibilities:**

  Persons within the Company who hold the status of:

  (i) member of the Board of Directors, responsible for the management and supervision of the Company (the "**Directors**"), or

  (ii) the Secretary of the Board of Directors,

  (iii) senior management of the Company who is not a member of the Board of Directors and who has regular, direct or indirect access to Inside Information of the Company, as well as authority to make management decisions that affect the Company's future development and business prospects (the "**Senior Management**").

- **Persons Subject to the Code:**

  The following shall be considered Persons Subject to the Code:

  (i) Persons Discharging Managerial Responsibilities;

  (ii) the executives and employees designated by the Monitoring Body or the Chairman of the Board of Directors, whether of the Company or of the companies forming part of the Tecnicas Reunidas Group, who work in areas related to securities markets or who regularly have access to Inside Information related, directly or indirectly, to the Company and its subsidiaries, or who have authority to make management decisions that affect the future development and business prospects of the Company and its subsidiaries;

  (iii) any staff assigned to the stock market services of the companies within the Tecnicas Reunidas Group, if applicable; and

  (iv) any other person included within the scope of this Code by decision of the Chairman of the Board of Directors or the Monitoring Body, in view of the circumstances of each case.

- **Closely Associated Persons:**

  Regarding Persons Discharging Managerial Responsibilities, the following will be considered Closely Associated Persons:

  (i) the spouse or any person considered equivalent to a spouse under Spanish law.

  (ii) dependent children, in accordance with Spanish law.

  (iii) any other relative who has lived in the same household for at least one (1) year prior to the date of the relevant transaction; and

  (iv) any legal entity, trust or partnership in which a Person Discharging Managerial Responsibilities or a person referred to in paragraphs (i), (ii) and (iii) above holds a management position, or is directly or indirectly controlled by such persons, or whose economic interests are substantially equivalent to those of such persons.

- **Securities and Financial Instruments:**

  The term "Securities and Financial Instruments" shall be understood as follows:

  (i) Securities (including shares and instruments equivalent to shares, bonds or other forms of securitized debt, or securitized debt convertible or exchangeable for shares or other instruments equivalent to shares) issued by the Company or by entities within the Tecnicas Reunidas Group that are traded, or for which admission to trading has been requested, on a regulated market, multilateral trading facility, organized trading system, or other organized secondary markets.

  (ii) Financial instruments and contracts of any kind that grant the right to acquire the aforementioned securities.

  (iii) Financial instruments and contracts whose underlying assets are securities, instruments or contracts of the type mentioned above.

  (iv) For the sole purposes of Article 5 of this Code ("Prohibition of Insider Dealing and Handling of Inside Information"), those securities, instruments or financial contracts issued by companies other than the Company and the entities of the Tecnicas Reunidas Group in respect of which the Persons subject to the regulations or the Insiders have obtained Inside Information due to their connection with the Company or the Tecnicas Reunidas Group and, in any case, securities, instruments and contracts when so determined in accordance with this Code.

3. SUBJECTIVE SCOPE OF APPLICATION

Unless expressly stated otherwise, this Code shall apply on a permanent basis to the persons subject to it and to the Insiders for as long as they appear on the Insider List in accordance with Article 4 below.

The Monitoring Body shall always maintain an up-to-date record of Persons Discharging Managerial Responsibilities, as well as the identity of the Persons Closely Associated with them. For these purposes, Persons Discharging Managerial Responsibilities must inform the Monitoring Body of the identity of the Persons Closely Associated with them and any changes that occur.

4. INSIDER LIST

The Company, through the Monitoring Body, will prepare, maintain and update a list of all those persons who have access to Inside Information and work for it under an employment contract, or who perform functions through which they have access to Privileged Information, such as External Advisors (the "**Insider List**").

The Insider List will be divided into separate sections for each piece of Inside Information identified by the Company. Individuals to be included in the Insider List shall be registered in the section corresponding to the Inside Information that motivated their inclusion in the list.

In addition, the Company may enable a supplementary section of the Insider List in which individuals who regularly have access to Inside Information shall be registered.

The Insider List shall be prepared in electronic formats and according to the legally established template.

The Insider List shall be updated without delay, including the date and time of the update, in the following circumstances: (i) when the reason for including a person already on the Insider List changes; (ii) when a new person must be included in the Insider List, because they have access to Inside Information; (iii) when a person ceases to have access to Inside Information. Likewise, the data recorded in the Insider List must be kept for at least five (5) years from the date of its creation or last update.

The Monitoring Body shall inform the persons included in the Insider List of their inclusion therein and of their obligation to comply with the current regulations on market abuse, as well as the sanctions applicable to insider trading and the unlawful disclosure of inside information, requiring them to confirm in writing that they are aware of all these obligations.

Upon request, the Insider List shall be provided to the competent authority as soon as possible.

5. PROHIBITION OF INSIDER DEALING AND HANDLING OF INSIDE INFORMATION

Persons subject to the Code and Insiders who possess any type of Inside Information shall refrain from carrying out, on their own behalf or on behalf of others, directly or indirectly, any of the following actions:

(a) Carry out or attempt to carry out transactions involving Inside Information on Securities and Financial Instruments; that is, while in possession of Inside Information, acquire, transfer, or dispose of Securities and Financial Instruments, on one's own behalf or on behalf of third parties, directly or indirectly, as well as using such information to cancel or modify an order relating to Securities and Financial Instruments when the order was placed before becoming aware of the Inside Information.

The preparation and execution of transactions whose existence in itself constitutes Inside Information are exempt from this obligation, as well as transactions carried out in fulfillment of an obligation, already due, to acquire, transfer, or dispose of Securities and Financial Instruments, when such obligation is provided for in an agreement entered into before the Person subject to the Code or Insider came into possession of the Inside Information. Transactions carried out in accordance with applicable regulations are also excepted.

(b) Recommend or induce other persons to carry out transactions involving Inside Information, meaning those referred to in section (a), on Securities and Financial Instruments, or cause another person to execute such transactions based on Inside Information (whether the person recommending or inducing the transactions knows, or should know, that the recommendation or inducement was based on Inside Information).

(c) Unlawfully disclose Inside Information, meaning any disclosure of Inside Information to another person, except where the disclosure is made in the normal exercise of an employment, a profession or duties.

Persons subject to the Code who possess inside information must inform the Monitoring Body as soon as possible. The communication must include the characteristics of the information, the reason for knowing the information, the date and time when it was accessed, the financial instruments affected, and the identity of the persons who are aware of it.

6. STANDARDS OF CONDUCT IN RELATION TO SECURITIES AND FINANCIAL INSTRUMENTS

6.1. Restricted trading periods

Persons discharging managerial responsibilities shall refrain from conducting Personal Transactions during restricted trading periods, that is, in a closed period of thirty (30) calendar days before the announcement by the Company of an interim financial report or a year-end report.

Additionally, the Chairman of the Board of Directors or the Monitoring Body may decide to prohibit or require prior authorization for transactions involving Securities and Financial Instruments by all or some Persons subject to the Code for a limited period of time, and may grant case-by-case exemptions from the prohibition on carrying out Personal Transactions during closed periods, provided that such exemptions are legally permissible.

In such cases, the authority to authorize Personal Transactions involving Securities and Financial Instruments shall rest with the Chairman of the Board of Directors, upon a written and duly justified request submitted by the Person discharging managerial responsibilities.

6.2. Reporting of Personal Transactions in Securities and Financial Instruments

Persons discharging managerial responsibilities, as well as the Persons closely associated with them, must notify the Monitoring Body in writing or by any means that ensures receipt, within three (3) business days, of the execution of any Personal Transaction involving Securities and Financial Instruments, in accordance with the format, content, and means legally established at any given time. They must also send the corresponding communication to the National Securities Market Commission (the "**CNMV**").

The provisions of the preceding paragraph shall apply to any subsequent Personal Transaction once a total amount of twenty thousand euros (€20,000) has been reached within one (1) calendar year or the lower or higher amount determined by the CNMV at any given time. The above threshold shall be calculated by adding together all transactions involving Securities and Financial Instruments (including acquisitions made free of charge, in which case the affected Securities and Financial Instruments shall be valued at their market value on the acquisition date), without offsetting transactions of opposite signs, such as purchases and sales.

Persons Discharging Managerial Responsibilities shall notify the Persons Closely Associated with them of the latter's obligations under this article. Likewise, when transactions involving Securities and Financial Instruments are carried out by Closely Associated Persons, communication may be made by the corresponding Person Discharging Managerial Responsibilities or directly by the Closely Associated Person.

The obligation to make these notifications is understood without prejudice to the fulfillment by Persons Discharging Managerial Responsibilities of any other notification obligation to the CNMV or any other regulatory bodies established under the applicable regulations at any given time.

6.3. Resale Prohibition

Under no circumstances may Securities and Financial Instruments acquired by Persons discharging managerial responsibilities be sold on the same day the purchase transaction was executed.

7. PORTFOLIO MANAGEMENT

With the exception of the provisions of Article 6.2, the restrictions on transactions involving Securities and Financial Instruments set out in the preceding Article 6 shall not apply to transactions carried out on behalf of Persons Discharging Managerial Responsibilities or Persons Closely Associated with them, when such transactions are executed by a third party under a contract or as part of a discretionary portfolio management investment service. Therefore, the following rules will apply to these contracts:

(i) No prior communication about the transaction between the portfolio manager and the Person Discharging Managerial Responsibilities or Persons Closely Associated with them. The Monitoring Body or the Chairman of the Board of Directors may require a statement to this effect.

(ii) Contract content: Discretionary portfolio management contracts must contain clauses that establish one of the following conditions:

- the express prohibition for the manager to carry out investment transactions on the Securities and Financial Instruments; or
- the express instruction not to carry out transactions on Securities and Financial Instruments prohibited by this Code, as well as the obligation to immediately report the execution of a transaction on Securities and Financial Instruments so that the aforementioned persons can comply with their obligation to report in accordance with the provisions of Article 6 of this Regulation.

(iii) Communication: Persons Discharging Managerial Responsibilities and the corresponding Persons Closely Associated with them who formalize a discretionary portfolio management contract must send a copy of it to the Chairman of the Board of Directors or the Monitoring Body, within three (3) business days following its signing. If the Chairman of the Board of Directors or the Monitoring Body reasonably determines that the contract does not comply with the provisions of this section, they will inform the person in question so that the agreement can be modified in the appropriate aspects. Until such adaptation is made, the Person Discharging Managerial Responsibilities or the relevant Persons Closely Associated with them will order the manager not to carry out any transaction on the Securities and Financial Instruments.

(iv) Information for the manager: The Person Discharging Managerial Responsibilities or the Closely Associated Person must inform the manager of their adherence to this Code and its content.

(v) Previous contracts: contracts entered into by Persons Discharging Managerial Responsibilities or Persons Closely Associated with them prior to entering into force of this Code shall be adapted to the provisions herein, with the provisions of paragraph (ii) above regarding the prohibition of carrying out transactions on Securities and Financial Instruments applying in the meantime.

8. RULES OF CONDUCT REGARDING INSIDE INFORMATION

8.1. Public Disclosure of Inside Information

The Company must notify the CNMV and disclose, as soon as possible, any Inside Information that directly concerns it, ensuring that the method of disclosure allows for rapid access and a complete, accurate, and timely assessment of such information, in accordance with the legally established disclosure regime. The content of the communication must be truthful, clear and complete, so as not to induce confusion or deception.

In its dissemination, which must be carried out using electronic means that guarantee integrity and confidentiality, such information must be identified as 'Inside Information'. Communications relating to Inside Information must be sent to the CNMV through the specific channel provided for this purpose and will be accessible through the Company's corporate website as soon as they have been notified to the CNMV and must be kept for a period of at least five (5) years.

When a subsequent event or decision occurs that is significant and originates from, results from, or continues, entails a change or rectification, or in any way completes, alters, or terminates the Inside Information initially communicated, a new communication must be immediately disseminated to the market in the same manner, clearly identifying the original communication that is, where applicable, altered, completed, or corrected and specifying in what aspects, without this implying in any case the replacement of the original communication by the new one.

8.2. Delay in the public disclosure of inside information

Without prejudice to the provisions of the preceding paragraph, the Company may, under its own responsibility, delay the public disclosure of inside information provided that: (i) immediate disclosure may harm the legitimate interests of the Company or the entities of the Tecnicas Reunidas Group, (ii) the aforementioned delay may not mislead or deceive the public, and (iii) the Company or the entities of the Tecnicas Reunidas Group are able to guarantee the confidentiality of the information.

In this regard, if the confidentiality of the Inside Information is delayed and is no longer guaranteed, the Company shall make such information public as soon as possible. This includes cases where a rumor explicitly refers to Inside Information whose disclosure has been delayed, when the degree of accuracy of the rumor is sufficient to indicate that the confidentiality of such

information is no longer guaranteed.

For the purposes of determining the legitimate interests of the Company and the situations in which the delay of the Inside Information may generate confusion in the market, the legally established criteria in force at any given time must be observed.

If the Company delays the disclosure of Inside Information, it must notify the CNMV immediately after making the information public. However, the Company will only provide the CNMV with an explanation of how the conditions established by the legal provisions in force at any given time for the delay of the dissemination of the Inside Information were met when the CNMV expressly requests it.

8.3. Study or negotiation phases

During the advanced stages of closing the awards or any legal or financial transaction that could significantly influence the price of any class of Securities and Financial Instruments issued by the Company:

a) Access to Inside Information will be strictly limited to those persons, internal or external to the organization, for whom it is essential;

b) The persons referred to in the previous point will be included in the relevant section of the Insider List, together with the legally required information;

c) The persons included in the Insider List will be expressly warned of the nature of the inside information, their duty of confidentiality, and the prohibition of its use, as well as the infringements and penalties arising from its improper use. Likewise, those concerned must be informed about their inclusion in the Insider List and the other matters provided for in Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights;

d) Security measures will be established for the custody, archiving, access, reproduction and distribution of inside information;

e) The evolution of the market for Securities and Financial Instruments issued by the Company will be monitored, as well as any news issued by professional economic information providers and the media that could affect them; and

f) In the event of an abnormal evolution of traded volumes or negotiated prices and there are reasonable indications that such evolution is occurring as a result of premature, partial, or distorted disclosure of the transaction, the Company shall immediately disseminate a communication clearly and precisely informing of the current status of the ongoing transaction or providing a preview of the information to be disclosed.

Additionally, Persons subject to regulations and Insiders who possess any Inside Information will be obliged to:

- safeguard it, without prejudice to their duty to communicate and collaborate with the judicial and administrative authorities under the terms provided for in Law 6/2023, of March 17, on Securities Markets and Investment Services and other applicable legislation;

- adopt appropriate measures to prevent such information from being subject to abusive or unfair use; and

- immediately report to the Chairman of the Board of Directors or the Monitoring Body any abusive or unfair use of inside information of which they become aware.

Inside Information shall be communicated to the CNMV by the Chairman of the Board of Directors, immediately and in accordance with the provisions of this Code and the applicable regulations in force at any given time.

The Company will confirm or deny, as the case may be, public information on circumstances that are considered Inside Information.

Persons subject to the Code and Insiders shall refrain from providing analysts, shareholders, investors or the press with information whose content is considered Inside Information, which has not been previously or simultaneously made available to the market as a whole.

Persons subject to the Code and Insiders will endeavor with the utmost diligence to properly preserve Confidential Documents and maintain their confidential nature.

In the case of the Company's External Advisors, their access to the Confidential Documents will require that they first sign a confidentiality agreement in accordance with market standards.

9. COMMUNICATION OF OTHER RELEVANT INFORMATION

The Company will notify the CNMV as 'Other Relevant Information' and will likewise publish on its website any financial or corporate information that does not qualify as Inside Information, relating to the Company itself or its Securities and Financial Instruments, which any legal or regulatory provision requires to be made public in Spain or which it considers necessary to disseminate among investors due to its particular interest.

This communication will be made simultaneously with its dissemination by any other means. Communications relating to "Other Relevant Information" should be sent to the CNMV through the specific channel provided for this purpose.

10. PROHIBITION OF MARKET MANIPULATION

Persons subject to the Code and Insiders shall refrain from preparing or engaging in practices that may constitute market manipulation or an attempt at market manipulation as defined under the applicable legislation at any given time.

Market manipulation shall comprise the following activities:

a) executing a transaction, placing an order to trade or any other behavior which:

   (i) transmits or may transmit false or misleading signals regarding the supply, demand or price of Securities and Financial Instruments; or

   (ii) secures or may secure the price of one (1) or several Securities and Financial Instruments at an abnormal or artificial level;

   unless the person who carried out the transaction or placed an order to trade or engaged in any other behavior demonstrates that such transaction, order or behavior was carried out for legitimate reasons and in accordance with a legally accepted market practice.

b) executing a transaction, placing an order to trade or any other activity or behavior that affects or is likely to affect, through fictitious mechanisms or any other form of deception or contrivance, the price of one (1) or several Securities or Financial Instruments.

c) disseminating information through the media, including the internet, or by any other means, which transmits, or is likely to transmit false or misleading signals regarding the supply, demand or price of any of the Securities and Financial Instruments, or is likely to secure the price of one or several Securities and Financial Instruments at an abnormal or artificial level, including the dissemination of rumors, when the person who made the dissemination knows or should know that the information was false or misleading.

d) transmitting false or misleading information or providing false data in relation to a benchmark, when the person who made the transmission or provided the data knew or should have known that they were false or misleading, or any other behavior that involves manipulation of the calculation of a benchmark.

The following operations or orders will not be considered included in this article:

- those that originate from the execution by the Company of share buyback programs or securities stabilization programs, provided that the legally established conditions for this are met; or

- in general, those carried out in accordance with applicable regulations.

11. RULES REGARDING TREASURY STOCK TRANSACTIONS

Treasury stock transactions shall be understood as those carried out by the Company, either directly or through any of the companies within the Tecnicas Reunidas Group, which involve shares of the Company, as well as financial instruments or contracts of any kind, whether traded on the Stock Exchange or other organized secondary markets or not, that grant the right to acquire, or whose underlying asset consists of, shares of the Company.

Within the scope of the authorization granted by the General Shareholders' Meeting, it is the responsibility of the Board of Directors of each of the companies of the Tecnicas Reunidas Group to determine specific plans for the acquisition or disposal of its own shares or those of the parent company, such as buy-back programs, stabilization measures or subscription of liquidity contracts, in accordance with the applicable regulations and with the provisions of this Code.

In treasury stock transactions, the obligations and requirements provided for in the applicable regulations at any given time and the guidelines of the supervisory authorities in the matter will be observed.

Transactions involving the Company's own shares will always be carried out within the scope of the authorization granted by the General Shareholders' Meeting, fulfilling legitimate commitments undertaken or for any other purposes admissible under applicable regulations. In general, such transactions will aim to facilitate and promote the liquidity of the shares in the market or to reduce price fluctuations; therefore, they shall not be intended to interfere with the free price formation process in the market by generating misleading signals that create the appearance that the demand or supply for the Company's shares is greater than what would result from the free interaction of supply and demand, nor to mislead investors regarding their degree of liquidity, nor to favor specific shareholders of companies within the Tecnicas Reunidas Group.

The Company's treasury stock transactions shall under no circumstances be carried out based on Inside Information.

The Monitoring Body is responsible for carrying out treasury stock transactions in accordance with the instructions received from the Board of Directors and for executing the specific plans referred to in the preceding paragraphs. Among the functions of the Monitoring Body are also the following:

a) Manage the treasury stock in accordance with the plan approved by the Board of Directors and in line with the principles established in this Code.

b) Monitor the evolution of the Company's securities in the markets, informing the Chairman of the Board of Directors of any significant changes in their price.

c) Maintain an organized record of all treasury stock transactions carried out and make official notifications of transactions involving own shares as required by current regulations.

d) Prepare a report whenever requested by the Board of Directors regarding its activities.

The criteria set forth in this section regarding the Company's management of treasury stock shall apply only insofar as they are compatible with the market abuse regulations in force at any given time and must be adjusted or adapted as required by such regulations.

12. FILING AND RECORDING OF COMMUNICATIONS AND PERSONS

The Monitoring Body shall be required to keep properly filed all communications, notifications, and any other actions related to the obligations contained in this Code.

For this purpose, the Company will provide the 'Market Regulations Monitoring Mailbox' (normativamercados@tecnicasreunidas.es) as a channel through which communications from the Body Monitoring the Code may be addressed to the Persons Subject to it. Likewise, the Persons Subject to the Code may contact the Monitoring Body through this mailbox with any questions or issues related to its application.

The data in this archive shall be strictly confidential. The Monitoring Body shall inform the Board of Directors and its Chairman of the contents of such archives periodically and whenever requested by that body.

Personal data that is provided in connection with communications made in compliance with the Code will be processed by the Company for the purpose of complying with and executing the provisions of the MAR.

The legitimate basis for the processing is the controller's interest in complying with a legal obligation arising from the Market Abuse regulations. The requested data is mandatory and strictly necessary to fulfill the purposes established in the forms prepared for this purpose. The data will be kept for as long as necessary to fulfill the purpose for which it was collected and, in any case, for the duration of the applicable statutory limitation periods.

13. SUPERVISION OF COMPLIANCE WITH THE INTERNAL CODE OF CONDUCT

The Monitoring Body shall have all the necessary powers to carry out the execution or development of the functions entrusted to it under this Code.

In accordance with the provisions of the Board of Directors' Regulations and the Regulations of the Audit and Control Commission of the Company, the Audit and Control Commission is responsible for overseeing the effective compliance with the obligations set out in this Code, for which purpose it is granted the following powers:

(i) to comply with and enforce the rules of conduct for securities markets and the provisions of this Code, its procedures and other supplementary regulations, present or future;

(ii) to promote awareness of the Code and the rest of the rules of conduct for securities markets by Persons Subject to the Code and Insiders;

(iii) to develop, where appropriate, procedures and implementing rules deemed necessary for the application of the Code;

(iv) to interpret the rules contained in the Code and resolve any doubts or issues raised by the Persons Subject to it and the Insiders;

(v) to conduct disciplinary proceedings against the Persons Subject to this Code and the Insiders for non-compliance with the rules of this Code; and

(vi) to propose to the Company's Board of Directors any reforms or improvements to this Code that it deems appropriate.

The Audit and Control Commission shall have all the necessary powers to fulfill its functions, and shall be especially authorized to, among other things:

(i) require any data or information it deems necessary from the Subject Persons and the Insiders; and

(ii) establish the information requirements, control standards and other measures it deems appropriate.

The Audit and Control Commission shall report annually, as well as whenever it deems necessary or is required to do so, to the Board of Directors on the measures adopted to ensure compliance with the provisions of the Code, the degree of compliance, and any incidents that have occurred and proceedings initiated, where applicable, during that period.

14. UPDATE

This Code shall be updated whenever necessary to adapt its content to the applicable provisions in force, in accordance with the regulations in effect at any given time.

The foregoing shall be understood without prejudice to the fact that, in the event of an update or modification of the content of the specific form established for this purpose by the competent authority to collect the data of the obligated parties, it will not be necessary to approve a new Code, but rather to sign and complete the new template that is determined.

15. STATEMENT OF AWARENESS AND ACCEPTANCE OF THE ICC

By signing the form, the Subject Person or the Insider expressly states their agreement with the rules contained in the Code and expressly declares that they have been informed of the following points:

- The duty to comply with and be subject to this Code, as well as the duties of information and communication contained therein.
- The improper use of Inside Information to which they may have access, as well as the failure to comply with the other obligations set forth in the Code, could constitute infringement or criminal offense of insider trading in the securities market in accordance with the applicable regulations.
- The completion of mandatory training for awareness on the subject.

16. NON-COMPLIANCE

Failure to comply with the provisions of this Code shall be considered a labor offense, the severity of which will be determined in the procedure carried out in accordance with the applicable regulations.

The foregoing shall be understood without prejudice to any administrative, civil, or criminal liability that may be enforceable against the non-compliant party in each case.

17. ENTRY INTO FORCE AND NOTIFICATION OF THE CODE

This Code shall remain in force indefinitely, taking effect on the day following its approval by the Board of Directors. The Chairman of the Board of Directors or any of the Vice-Chairmen to whom the Chairman has expressly delegated, or may delegate, this authority of the Company shall inform the Subject Persons and the Insiders of the Code and shall also communicate it to the other companies of the Tecnicas Reunidas Group for approval by their respective Boards of Directors and for dissemination to the Subject Persons and Insiders within those companies.