



GRUPOTREBOL
ENERGIA

CODE OF ETHICS FOR SUPPLIERS AND COLLABORATORS OF GRUPO TREBOL ENERGIA

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TABLE OF CONTENTS/CONTENTS

FIRST. -OBJECT.....	3
SECOND. - SUBJECTIVE SCOPE OF APPLICATION	3
THIRD. - COMMITMENT OF GRUPO TREBOL ENERGIA AND ITS SUPPLIERS AND COLLABORATORS.	4
ROOM. - GUIDELINES OF CONDUCT THAT GOVERN GRUPO TREBOL ENERGÍA'S RELATIONSHIP WITH ITS SUPPLIERS AND COLLABORATORS TO PREVENT THE COMMISSION OF CRIMES	4
1. Legality. Compliance with current legislation and ethical values.	4
2. Respect for the dignity of people in their workplace.	4
3. Occupational health and safety policies and respect for workers' rights.	5
4. Loyalty and conflicts of interest.	6
5. Protection of personal data.....	6
6. Transparency of information, Confidentiality, Protection of trade secrets.	6
7. Use and protection of the assets and resources of GRUPO TREBOL ENERGIA	7
8. Anti-corruption measures.	7
9. Respect for free competition and behavior in the market.	7
10. Environmental protection.	8
11. Licences, authorisations, concessions and permits necessary for the exercise of their activity.	8
12. Public Finance and Social Security.....	9
13. Accurate business and accounting records.	9
14. Prevention of Money Laundering.....	9
15. Donations and social content projects.	9
16. Quality and safety of products and services.	10
SIXTH. - COMPLIANCE, EVALUATION AND CONTROL OF THE CODE OF ETHICS OF SUPPLIERS AND COLLABORATORS.	10
SEVENTH. - VALIDITY OF THE CODE OF ETHICS.....	10
EIGHTH. - CERTIFICATE OF ADHESION	10

FIRST. -OBJECT

The Code of Ethics for suppliers and collaborators is understood as an extension of the Code of Ethics of GRUPO TREBOL ENERGIA (TREBOL SOLUCIONES ENERGETICAS SL), S.L. (hereinafter GRUPO TREBOL ENERGIA) and aims to establish on a binding basis the values, principles and general guidelines of conduct that must guide the behaviour, operation and performance of suppliers and collaborators in their commercial relations with GRUPO TREBOL ENERGIA, requiring a business ethical commitment and a policy to prevent criminal behaviour, in accordance with the provisions of Organic Law 1/2015, of 30 May amending Organic Law 10/1995 of 23 November 1995 on the Penal Code.

GRUPO TREBOL ENERGIA considers it of the utmost importance to work with suppliers and collaborators who carry out their activity under the same ethical principles and values.

By adhering to this Code of Ethics, Suppliers and collaborators who provide services or collaborate professionally with GRUPO TREBOL ENERGIA accept the commitment to respect the values and ethical principles in all their actions. Likewise, Suppliers and collaborators are obliged to inform their employees and subcontractors of the content of this Code of Ethics.

The ethical values that serve as a reference and must guide the conduct of suppliers and collaborators in their relations with GRUPO TREBOL ENERGIA are, in addition to respect for human rights and the legal provisions in force, the following:

- I. Honesty.
Maintain an upright, impeccable, upright, honest and honest behavior.
- II. Impartiality and good faith.
All Suppliers and collaborators must act in the exercise of their activities with impartiality and good faith.
- III. Transparency.
Suppliers and collaborators must provide adequate, truthful, faithful and verifiable information on the management carried out.
- IV. Responsibility.
Suppliers and collaborators will act responsibly at all times.
- V. Care and diligence.
Suppliers and collaborators must act with care and diligence in their actions, respecting contractual agreements and always taking into account the regulations and customs of each market.

Suppliers and collaborators undertake to assume the principle of due diligence for the prevention, detection and eradication of irregularities related to the violation of this Code of Ethics. Specifically, they undertake to comply with the rules relating to the criminal liability of the legal person.
- VI. Security.
Suppliers and collaborators will offer optimal working conditions to their employees in terms of health and safety, in the facilities, processes and services that are carried out.

SECOND. - SUBJECTIVE SCOPE OF APPLICATION

For the purposes of this Code of Ethics for suppliers and collaborators, such is understood to be any supplier, contractor or external collaborator, natural or legal person, who intervenes in the business relations they

maintain with GRUPO TREBOL ENERGIA, including their representatives, employees and, where appropriate, subcontractors.

This Code of Ethics is mandatory for all Suppliers and collaborators of GRUPO TREBOL ENERGIA

It is the responsibility of each of the Suppliers and collaborators of GRUPO TREBOL ENERGIA to comply, enforce and promote this Code of Ethics among its administrators, managers and employees, and where appropriate subcontractors, as well as to report any breach of it, unethical conduct or conduct that goes against the principles of GRUPO TREBOL ENERGIA

Compliance with this Code of Ethics will be considered by GRUPO TREBOL ENERGIA both in the approval and selection processes, as well as in the subsequent assessment of professional performance by its suppliers and collaborators.

THIRD. - COMMITMENT OF GRUPO TREBOL ENERGIA AND ITS SUPPLIERS AND COLLABORATORS.

The Suppliers and collaborators join the ethical and good governance commitment of GRUPO TREBOL ENERGIA and categorically reject any criminal behaviour. Any indication of a crime of which they are aware will be investigated, and if its commission is confirmed, it will be disciplined.

GRUPO TREBOL ENERGIA and its suppliers and collaborators reject any attempt to obtain direct or indirect benefit through illicit means.

FOURTH. - GUIDELINES OF CONDUCT THAT GOVERN GRUPO TREBOL ENERGIA'S RELATIONSHIP WITH ITS SUPPLIERS AND COLLABORATORS TO PREVENT THE COMMISSION OF CRIMES

GRUPO TREBOL ENERGIA and its suppliers and collaborators formally undertake to respect the following guidelines of conduct, integrity and ethical behaviour:

1. Legality. Compliance with current legislation and ethical values.

The Suppliers and collaborators of GRUPO TREBOL ENERGIA undertake to carry out their business and professional activity in accordance with current legislation and observing ethical behaviour in all their actions.

All Suppliers and collaborators must be aware of and respect the legislation that affects their work, putting the necessary means so that their employees are aware of it at all times in relation to the functions they perform.

Likewise, Suppliers and collaborators must avoid any conduct that may damage the reputation of GRUPO TREBOL ENERGIA

2. Respect for the dignity of people in their workplace.

The suppliers and collaborators of GRUPO TREBOL ENERGIA reject any manifestation of physical, psychological, moral harassment or abuse of authority. Any conduct that may generate a threatening, intimidating, offensive or hostile environment with the rights of individuals is prohibited.

Suppliers and collaborators are committed to treating their employees fairly and respectfully, promoting a healthy and safe work environment.

Suppliers and collaborators must prevent conduct that violates the dignity, equality and sexual freedom of the company's workers or third parties, and avoid any discrimination based on gender, colour, age, religion, political, trade union or religious affiliation, sexual orientation, race, culture, education, marital status or nationality, adopting the necessary measures in their organisation to this end.

3. Occupational health and safety policies and respect for workers' rights.

The Suppliers and collaborators of GRUPO TREBOL ENERGIA will promote the adoption of occupational health and safety policies and will adopt the preventive measures established in the legislation to minimise risks at work, both for the company's own personnel and for those subcontracted.

The Suppliers and collaborators of GRUPO TREBOL ENERGIA are obliged to assess the risks to the health and safety of their workers, taking into account the nature of the activity they carry out, the characteristics of the existing jobs and those of the workers. The Suppliers and collaborators of GRUPO TREBOL ENERGIA are also obliged to review this risk assessment when working conditions change and to adopt the necessary measures to protect the health and safety of all employees and managers of their respective companies, as well as of subcontractors, suppliers and other agents who carry out work activities in their facilities.

In order to achieve the objectives of implementing occupational health and safety policies and respect for workers' rights, the Suppliers and collaborators of GRUPO TREBOL ENERGIA will promote the following conduct:

- They will expressly reject the use of child labour in their organisation, respecting the minimum recruitment ages in accordance with applicable legislation and will have adequate mechanisms for verifying the age of their employees.
- They will reject the clandestine immigration of workers in Spain, and will not hire foreign workers without work permits.
- They must promote their actions and adopt the necessary measures in their organization to eliminate all forms or modalities of forced labor.
- They will pay their workers in accordance with applicable wage laws, including minimum wages, overtime, and social benefits, and will respect the maximum duration of the ordinary working day.
- They shall respect the freedom of association and the right to collective bargaining of workers, subject to the rules applicable in each case.
- They will ensure the protection of their workers, protecting them from overexposure to chemical, biological, physical hazards and tasks that require physical overexertion in the workplace.
- They will identify and assess potential emergency situations in the workplace and minimize the potential impact by implementing emergency plans and emergency response procedures.
- They must provide their staff with the training and the necessary means to carry out their work in accordance with what has been contracted, and answer for any damage or harm for which they are responsible by action or omission, especially as a result of not having adopted the appropriate preventive measures to avoid them.

4. Loyalty and conflicts of interest.

Suppliers and collaborators must act with total loyalty in the commercial relations or provision of services that they establish with GRUPO TREBOL ENERGIA

5. Protection of personal data.

The Suppliers and collaborators undertake to comply at all times with the applicable national and international regulations on data protection, undertaking to make the appropriate adaptations and will be liable for any damages caused by non-compliance with the obligations established by law for each party.

6. Transparency of information, Confidentiality, Protection of trade secrets.

GRUPO TREBOL ENERGIA considers information as one of its main assets and must therefore be subject to special protection.

The Suppliers and collaborators declare the veracity of the information as an essential principle of all their actions. They undertake to transfer the information truthfully and under no circumstances to voluntarily provide incorrect or inaccurate information or information that may mislead GRUPO TREBOL ENERGIA

Suppliers and external collaborators who enter any type of information into the computer systems or files of GRUPO TREBOL ENERGIA must ensure that it is truthful, accurate and reliable.

Suppliers and external collaborators who, within the framework of their contractual relationship with GRUPO TREBOL ENERGIA, inform or advise customers or potential customers of GRUPO TREBOL ENERGIA will always do so in full, not admitting fraudulent or misleading conduct. Under no circumstances may customers be provided with information that is equivocal, ambiguous, lacking in rigour in such a way that it may lead to error or the adoption of wrong decisions.

The Suppliers and collaborators will guarantee the confidential use of all the information to which they have access as a result of the commercial and contractual relations maintained with GRUPO TREBOL ENERGIA and also undertake to adopt all the necessary security measures to prevent this information from falling unduly into the hands of third parties without authorisation.

For the purposes of this Code, confidential information is considered to be all information delivered, sent, received or exchanged, unless expressly authorized for disclosure in writing by GRUPO TREBOL ENERGIA

The Suppliers and collaborators undertake to use confidential information exclusively in the scope of the provision of the contracted services and with the sole purpose of complying with them as agreed.

In the event that Suppliers and collaborators have confidential information about GRUPO TREBOL ENERGIA on important aspects of its strategy, commercial policy, plans or assets, they must preserve it so that it cannot be used inappropriately and refrain from using it improperly or for their own benefit or that of third parties.

In the event of loss or disclosure of confidential information by the supplier's or collaborator's personnel, this incident will be notified immediately to GRUPO TREBOL ENERGIA, informing it of

all the details in its possession and will also make every possible effort to avoid the repetition of an event of this nature.

The obligation of confidentiality will remain once the commercial relationship with GRUPO TREBOL ENERGIA has been terminated

7. Use and protection of the assets and resources of GRUPO TREBOL ENERGIA

Suppliers and collaborators must protect and conserve the resources that GRUPO TREBOL ENERGIA makes available to them and must use them only for the purposes authorised by it in a responsible, efficient and appropriate manner for the professional activity carried out. These resources include tangible items, as well as intangible items, such as the Company's good name and reputation and confidential information.

GRUPO TREBOL ENERGIA does not allow the use of the equipment that they make available to Suppliers and external collaborators to use computer programs or applications whose use is illegal, which may compromise or damage their image or are used to download or distribute illegal or offensive content or for the commission of other illegal or criminal actions.

Suppliers and collaborators must respect and not violate the intellectual property rights of GRUPO TREBOL ENERGIA or third parties, including, but not limited to, proprietary information, copyrights, patents, trademarks, domain names, reproduction rights, design rights, database extraction rights, and trade secrets.

Without prejudice to the provisions of current legislation, or otherwise permitted by virtue of a prior written consent signed by an authorized person of the Company, the Suppliers and collaborators of GRUPO TREBOL ENERGIA may not use the name, logo or trademarks of the Company or make public disclosures or announcements related to the subject matter of their contract.

8. Anti-corruption measures.

GRUPO TREBOL ENERGIA will not, under any circumstances, allow corrupt or bribery practices, and, in this sense, GRUPO TREBOL ENERGIA declares itself against influencing the will of people outside the organization to obtain any benefit through the use of unethical practices.

The suppliers and collaborators of GRUPO TREBOL ENERGIA may not be involved in any type of corruption, extortion, bribery or embezzlement in the performance of their business activity, neither in the public nor in the private sector (corruption of individuals).

No supplier or collaborator of GRUPO TREBOL ENERGIA shall offer or grant to public officials, third parties or any employee, in the context of the business activity carried out for or on behalf of it, directly or indirectly, gifts, gifts or other unauthorised advantages, whether in cash or in the form of other benefits, with the aim of obtaining favourable treatment in the granting or maintenance of contracts or personal benefits or for the supplier company. Acts of bribery, expressly prohibited, include the offer or promise, directly or indirectly, of any type of improper advantage, any instrument for its concealment, as well as influence peddling.

9. Respect for free competition and behavior in the market.

The Suppliers and collaborators of GRUPO TREBOL ENERGIA undertake to act in the market respecting free competition and complying with the laws established in this regard as well as those

regulated by the competent authority and the National Commission on Markets and Competition (CNMC).

The administrators, managers and employees of the Suppliers and collaborators of GRUPO TREBOL ENERGIA shall not engage in unfair actions or unlawful advertising of their activity or that of their competitors and shall avoid any conduct that may constitute an abuse or unlawful restriction of competition. Likewise, and in the event of participation by the Suppliers and collaborators of GRUPO TREBOL ENERGIA in tenders, tenders and public auctions, the necessary principles of action will be observed to guarantee respect for the free formation of prices resulting from the practice of such acts and, in general, compliance with current legislation.

The suppliers and collaborators of GRUPO TREBOL ENERGIA are prohibited from conducting conduct such as collusion, they will never enter into agreements or alliances, in written or verbal form, with other competitors to fix prices, sales areas, customer assignment or product lines, conditions of sale, coordinate tenders or be part of any other activity that violates the applicable antitrust or free competition laws.

10. Environmental protection.

Respect for the environment is a basic principle in the actions of GRUPO TREBOL ENERGIA. Therefore, the Suppliers and collaborators undertake to have an effective environmental policy that complies with all the obligations that correspond to it under the applicable legislation. To this end, they must obtain and keep up to date all those permits, licenses, registrations, and certifications in the field of environmental prevention and safety that are necessary for the development of their activity, undertaking to exhibit them at the request of GRUPO TREBOL ENERGIA.

Likewise, suppliers and collaborators are obliged to maintain a preventive approach that favors the environment, promoting initiatives that promote greater environmental responsibility, thus favoring the development and dissemination of environmentally friendly technologies.

Suppliers and collaborators will identify and manage substances and other materials that represent a hazard when released into the environment, in order to guarantee their handling, transfer, storage, recycling or reuse and disposal in safe conditions and in compliance with applicable regulations. Any waste, residue or emission that has the potential to adversely affect the environment must be managed, controlled and treated appropriately.

11. Licences, authorisations, concessions and permits necessary for the exercise of their activity.

The Entities and Companies that supply and collaborate with GRUPO TREBOL ENERGIA will have all the licences, authorisations, concessions, permits and civil liability insurance necessary for the exercise of their activity.

The directors, employees and administrators of the supplier and collaborating companies will ensure that the information submitted to the Administration is correct, without falsification or concealment of data and in accordance with the instructions given by the administrative authorities, where appropriate.

12. Public Finance and Social Security.

The Suppliers and collaborators of GRUPO TREBOL ENERGIA undertake to comply with their tax and Social Security obligations.

The administrators, managers and employees of the supplier and collaborating companies:

- They will maintain due diligence in the economic and financial management and in the preparation of the accounts, which will reflect the true image of the Company's assets and situation.
- They will act honestly in the management of their obligations to third parties.
- They will remain alert to the possible malicious conduct of third parties who intend to use the Company to delay, impede or hinder the expectation of collection from a third party or the effectiveness of an attachment.
- It will avoid the use of third parties, companies or structures in order to evade the payment of taxes.
- In no case shall they falsify, conceal or simulate operations, accounts or invoices to the detriment of the Public Treasury or Social Security.
- They will not carry out or protect smuggling actions: entry or exit from Spain of prohibited goods, without the proper authorisations or evading the payment of tariffs.

13. Accurate business and accounting records.

Industrial and commercial records, including contracts and all documents in paper or electronic format that are generated in the course of the activity, must be as accurate as possible and directly and completely reflect the existing commercial relationship between suppliers, collaborators and GRUPO TREBOL ENERGIA, and in this sense any falsification is strictly prohibited. omission, alteration or concealment of information.

In the same way, the accounting records of the suppliers and collaborators of GRUPO TREBOL ENERGIA must reflect all the components of the transactions and financial events with the utmost precision, especially with regard to expenses, collections and payments. All operations with economic significance carried out by the person, entity or company providing and collaborating must appear with the utmost accuracy and clarity in the accounting records, representing the true image of the transactions carried out.

14. Prevention of Money Laundering.

The suppliers and collaborators of GRUPO TREBOL ENERGIA must ensure that irregular payments or money laundering originating from illicit or criminal activities may be carried out in the course of their activities, and they will comply with the legal requirements in this area.

15. Donations and social content projects.

The donations made by the suppliers and collaborators of GRUPO TREBOL ENERGIA to projects with a social content must have the relevant internal authorisations, must be made to Entities of recognised prestige that have the appropriate organisational structure to guarantee the good administration of the resources, and must be faithfully reflected in the records and accounting books. they cannot be used to cover up an improper payment or bribe.

Donations or contributions may not be made to a political party, federation, coalition or group of voters by itself or by an interposed person to political parties or in favour of their representatives.

16. Quality and safety of products and services.

All products and services delivered by suppliers, contractors and external collaborators must comply with the quality and safety standards and parameters required by the applicable Laws, must comply with prices and delivery times and must also comply in all aspects with the requirements stipulated in the contracts entered into with GRUPO TREBOL ENERGIA.

Suppliers, contractors and external collaborators must have and/or use facilities and machinery in correct condition to carry out the activities and products subject to the contract. In this sense, the machinery and equipment used must comply with the applicable legislation and current standards.

This Code of Ethics for suppliers and collaborators is without prejudice to the additional conditions and requirements that derive from the applicable legislation and in the contracts signed with each supplier or collaborator, which will be applicable in all cases.

SIXTH. - COMPLIANCE, EVALUATION AND CONTROL OF THE CODE OF ETHICS OF SUPPLIERS AND COLLABORATORS.

This Code of Ethics is mandatory for suppliers and collaborators of GRUPO TREBOL ENERGIA and is included as an annex to their corresponding contracts. Suppliers and collaborators are obliged to:

- To publicise and disseminate the Code of Ethics for Suppliers and collaborators to all its workers, persons who directly or indirectly depend on it in the execution of the works or services provided to GRUPO TREBOL ENERGIA and, where appropriate, subcontractors.
- Ensure correct compliance with the Code of Ethics for Suppliers and Collaborators.
- Consult with GRUPO TREBOL ENERGIA through the usual communication channels any doubt, inconvenience or incident that may arise in relation to compliance with the aforementioned Code of Ethics for Suppliers and Collaborators.

GRUPO TREBOL ENERGIA reserves the right to terminate the contractual relationship with those suppliers, contractors and collaborators who fail to comply with the guidelines of conduct and principles contained in this Code of Ethics for suppliers and collaborators, without prejudice to the administrative, civil or criminal responsibilities that may legally arise from non-compliance.

SEVENTH. - VALIDITY OF THE CODE OF ETHICS

This Code of Ethics will be in force until its cancellation is agreed.

Likewise, it may be reviewed and updated in the future, and this circumstance will be communicated to suppliers and collaborators.

EIGHTH. - CERTIFICATE OF ADHESION

The company hereby will:

_____;

and in your name, Don / Doña

As a

You declare that you have received the CODE OF ETHICS FOR SUPPLIERS AND COLLABORATORS OF GRUPO TREBOL ENERGIA, undertaking to comply with the obligations and responsibilities expressed therein, using all the means necessary to do so, as well as to consider the good practices described.

In, _____, _____, 20__

Signed: _____

Charge: _____

Company Seal

