

CODE OF ETHICS

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1.- A daily guide

The Code of Ethics sets the principles that employees of CIMET S.A. (hereinafter “CIMET”) must respect as part of their professional activities. It complements the rules and procedures that remain applicable.

It can be updated at any time by the Board’s initiative. It is applicable to all the employees, as well as to the members of the Board.

The Code of Ethics is meant to help us solve issues and doubts we may encounter at work. How to handle customers’ or suppliers’ demands? How to interact with our colleagues? The Code of Ethics provides practical support for these and many other issues. The table of contents allows you to quickly find the topics covered.

However, it is not possible to thoroughly address all the situations that may arise. If you face an issue of ethics or professional conduct, ask yourself the following questions:

Is it legal? Does it comply with the Company Code of Ethics? Am I sure of the appropriate action to take? Am I making the right decision?

In case of doubt, each individual should express their concerns and ask for advice. For that purpose, your area manager or the Legal Management are at your disposal.

If you are a supervisor, area manager, chief or director, you have more responsibilities because:

- You set an example and promote a conduct
- You are a decision-maker and therefore you face issues that may be complex.
- Your team will ask you for help and advice and you must be able to respond accordingly.

2.- Our business partners

CIMET wants to build solid and long lasting relations based on honesty, interest and mutual trust with its clients and suppliers. The agreements with third parties can only be made by duly authorized employees.

We respect the rights over tangible or intangible assets of our collaborators, regarding any matter entrusted to us.

We preserve the confidentiality of the information entrusted to us.

We handle our business partners' personal data with responsibility, in accordance with the laws applicable to data protection.

2.1 Relationships with our clients

CIMET treats its clients with integrity and fairness.

We are committed to promoting our products in a responsible and honest manner. We assure that any statement, communication or presentation we make, will be accurate and trustworthy.

2.2 Relationships with our suppliers and subcontractors

We are judged by the quality of the relationships we keep with our suppliers. Particularly, our clients evaluate us based on both our selection criteria and the commitment of our suppliers to manage their business with responsibility.

We select suppliers through an open and competitive tender. We must ensure that all bids are treated with the same consideration.

We encourage our suppliers to share our commitments, particularly regarding working conditions, respect for human rights and the environment.

2.3 Gifts and invitations

When we offer gifts or invitations, we must remain within the reasonable limits set by usual commercial practices and legal regulations.

We do not accept any gifts that might influence our judgment (or be considered of influential intent), or interfere with our loyalty towards CIMET.

Any gifts offered or received must comply with the above mentioned principles. In case of doubt, talk about it with your superior.

2.4 Competition

CIMET behaves according to the principles of free competition, in compliance with applicable laws. This legal competition is open and of direct interest for CIMET. The Antitrust legislation forbids competitors to reach any form of agreement, concerted action, or expressed or unspoken understanding that may restrict free competition.

Relationships with competitors that imply legal agreement or understanding must be avoided. Particularly, CIMET must not take part in:

- Pricing agreements
- Clients or markets allocation
- Production and sales quota agreements
- Arrangements among bidders in a tender, susceptible to distorting competition behavior
- Arrangements or agreements to exclude a competitor from the market or restrict access to the market to new competitors, by illegal methods

In case of doubt, it is advisable to ask the Legal Management as soon as possible.

2.5 Money laundering prevention

CIMET is committed to complying with all legal regulations against money laundering and terrorism.

Each of us must be alert about unusual requests or payments and fund transfers from or to countries not involved in the transaction.

3.- Accurate and comprehensive information of financial data

It is essential that all financial, legal, economic, industrial, commercial and environmental information provided be accurate and with no mistakes, to ensure compliance with respect to our legal obligations, particularly with our shareholders, business partners and authorities, to justify the decisions we make and preserve CIMET's credibility and reputation.

All obligations, procedures and guidelines regarding the recording, archiving and conservation of information must be complied with.

We must ensure that all transactions and operations are recorded accurately and in full detail, and cooperate with internal and external auditors responsible for its verification.

In case of doubt, talk about the issues, look for advice and if necessary, immediately report any irregularities or violations of the rules to a superior or CIMET's Legal Management.

4.- Protection of the environment

CIMET is committed to minimizing the impact of its activities and products on the environment.

CIMET is deeply involved in the safety of the installers, operators and users of infrastructures, buildings, means of transport, equipment and machines equipped with its cables.

5.- Product responsibility

Our clients' trust is mainly based on the quality and safety of our products. All of us must contribute to this end. Each of us, depending on our responsibilities, must:

- Ensure that our products comply with the regulatory and internal guidelines, supporting safety requirements.
- Ensure strict application of quality controls during production; swiftly react and report any quality problems with the aim of correcting them.
- Ensure that the technical documentation and handling and transport instructions that accompany our products are perfectly clear so as to prevent any risks of accident.
- Take into account all safety or quality problems verified by installers and clients.

We work closely with our clients to develop energy saving wiring solutions that facilitate production and transportation of renewable energies.

We strive to satisfy our clients as much as possible by providing them with accurate information about the composition of our products.

6.- Employees

CIMET wishes to develop teams that reflect the diversity of the market segments and communities where it operates. Any individual who works for

CIMET contributes to its success. Everyone should be treated with fairness and respect. By working together, taking advantage of the diversity of our talents and developing our capabilities, we are open to new opportunities.

CIMET deploys the necessary resources to ensure the health and safety of its employees in their workplace.

6.1 Diversity and fairness

Diversity is an asset that must be valued and developed. CIMET respects equal opportunities and strives to provide its employees with a working environment without discrimination and harassment of any kind.

We ensure that the decisions concerning recruitment, compensation, promotion and retention, are based on skills, abilities and results. Skin color, religion, sex, age, origin, sexual orientation, marital status, union support, and political or philosophical opinions should not give rise to discrimination.

We preserve the confidentiality of our employees' personal information.

We should treat our colleagues and others we work with as we would like to be treated: with respect, trust and courtesy.

6.2 Training and development

In order to develop each employee's potential and share the best results, CIMET wants to give its employees, throughout their professional career, access to the appropriate training to perform their job correctly and facilitate their employability.

6.3 Labor relations

CIMET wants to develop constructive relations with its employees and their union representatives.

We respect the right of our employees to join a union.

We recognize the role and responsibilities of legally constituted and recognized unions, and we are committed to openly communicating and negotiating with them to address issues of collective interest.

6.4 Health and safety

Safety at work is based not only on the technical reliability of the installations and equipment, but also on the training of the employee and the strength of the health and safety culture at CIMET.

CIMET wants to provide a safe working environment that does not expose its employees to unnecessary risks.

We should all respect the rules of hygiene, health and safety and help our colleagues and suppliers to do the same.

We must be alert to safety issues and ensure that our actions do not cause any risks to others or to ourselves.

For CIMET, safety is an **absolute priority**. Whatever the degree of urgency, safety must prevail.

7.- Governments and communities

CIMET wants to give a positive contribution to the communities where they are present by creating jobs and developing skills. We are against corruption and we are committed to showing transparency in our transactions.

7.1 Fighting corruption

Corruption is incompatible with CIMET's ethics. None of us should directly or indirectly make a payment or give a gift, or officially or secretly grant any other economic advantage with the purpose of influencing an agent of the Public Administration or other governmental authorities.

7.2 Political activities

CIMET's general policy is not to make contributions to political parties, their alliances, organizations or committees.

CIMET respects the right of its employees to take part in political activities on a personal basis provided they do not claim to represent the company or act on its behalf. Employees must not engage in political activities during working hours or in the working environment, or use company resources to that end.

7.3 Inspections or investigations by governmental or regulatory authorities

The representatives of governmental or regulatory authorities who perform an inspection or investigation must be treated with courtesy and respect.

If their request is unusual, the Legal Management and the person directly responsible should be informed and asked for advice before responding it.

If you have any doubts about this point and/or about how to manage a request, activity or initiative from a government, association, NGO or any mass media, contact your superior, the Legal Management or the Team Responsible for Communication and External Relations.

8.- Professional conduct

CIMET respects its employees' private life and does not interfere with their behavior outside the workplace.

8.1 Conflict of interests

A conflict of interests may arise when the social, economic or political activities of the employees or people around them, influence or may influence their objectivity and loyalty to CIMET.

When an employee fills a position or holds an economic interest with a competitor, client, supplier or business partner of CIMET's, when their functions within CIMET let them influence such relationship, they face a conflict of interests.

All employees must report and obtain their superior's approval of any situation that might involve a conflict of interests or give the impression of influencing their good sense and actions.

8.2 Protection of the Company resources

We must behave with integrity, vigilance and common sense to ensure that CIMET's resources and business opportunities are not embezzled or wasted. Such resources include working time, intangible assets and confidential information.

All equipment, information, ideas and data used or accessed at work, belong to CIMET or its business partners. CIMET's resources must be used only for professional purposes. The same is applicable to opportunities identified as part of their functions.

8.3 Compliance with confidentiality rules

Intellectual property, industrial knowledge, strategic plans and analyses, technical and business information and all confidential information are valuable assets, and their unauthorized disclosure might seriously damage CIMET.

All confidential information, especially clients' and suppliers' data, must be kept in a safe place and returned in case of leaving CIMET.

We must avoid talking about or working with confidential information in public places where conversations may be overheard and data safety may be compromised.

8.4 Intellectual property

CIMET respects intellectual property and third parties' protected information.

Confidential information pertaining to third parties can only be used with prior approval of the Legal Management.

9.- Implementation of the principles of professional conduct

Consent and application of the Code's principles concern all CIMET employees, according to their functions and responsibilities. Each employee must read them thoroughly and comply with them.

In case of uncertainty or doubt regarding a clause of this code, you can consult your superior, the Human Talent Management or the Legal Management. They will advise you on the best way to proceed.

An Ethics Line is available, with the purpose of providing a formal, confidential and anonymous communication channel, to present concerns or claims, with no retaliation, based on our open and transparent communication.

ETHICS LINE: linea_etica@cimet.com



CIMET OPTEL
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