



INTEGRATED MANAGEMENT SYSTEM
QUALITY | ENVIRONMENT | SAFETY

CODE OF ETHICS AND CONDUCT

ELABORATION		HRH	APPROVAL	MBD
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1. OBJECTIVE AND FIELD OF APPLICATION

The Code of Ethics and Conduct (Code) is the instrument that sets out the values that guide Anywind's actions, as well as the ethical principles and rules of conduct to which the company and its employees, in particular, are subject and assume as intrinsically theirs.

WHO THE CODE OF ETHICS AND CONDUCT IS AIMED AT

This Code applies to all Anywind employees. In this sense, employees shall mean all members of management, consultants, directors and other employees, regardless of the type of their relationship, as well as all other elements that act in any way on behalf of Anywind.

FUNDAMENTAL OBJECTIVES

To make employees, customers, public organisations, suppliers and the whole community aware of the principles and values by which Anywind conducts its business, fostering growing relationships of trust between all of them, as well as reinforcing the elements of the company's culture.

Clarify for employees the rules of conduct that they must observe, through their decisions, behaviour and attitudes, continuously and scrupulously, both in their relationships with each other and in the relationships they establish with *stakeholders* on Anywind's behalf.

APPROVAL OF THE CODE

The Code is approved by Anywind's *Main Board of Directors*. Any amendment and/or integration of the Code must be approved by the same bodies and publicised to the recipients without delay.

VIOLATION OF THE CODE

Any violation of this code, duly supported, must be reported to the Human Resources Department, via e-mail to rh@anywind.com, which will ensure that it is dealt with swiftly and confidentially, in order to protect the dignity and privacy of each individual involved.

2. RESPONSIBILITIES

Responsibilities are listed throughout this document.

3. DEFINITIONS AND ABBREVIATIONS

Mobbing	Mobbing in the workplace is basically a type of constant bullying of an employee
Sharepoint	Web application platform used to create corporate portals and intranets, content management, document management and the creation of collaborative portals.
Stakeholders	Person or organisation that can affect, be affected by, or consider itself to be affected by a decision or activity.
MBD	Main Board of Directors
HHR	Head Of Human Resources Department
SHST	Health, Hygiene and Safety at Work

4.1 THE ORGANISATION'S OPERATING PRINCIPLES

4.1.1 LEGISLATION AND LEGAL COMPLIANCE

Ensure strict compliance with legal obligations, including current legislation, in the regions where it operates, including current legislation and quality, environmental and occupational health and safety requirements.

Provide the supervisory and inspection authorities with all the collaboration required or information requested, to the best of their ability.

4.1.2 COMPETITION

Respecting market rules, promoting fair competition and avoiding any practice that could prevent, distort or appreciably restrict competition.

Relate to competitors in a healthy and cordial manner and promote mutual respect.

4.1.3 INTEGRITY

Ensure that conduct is always integrated and that prevention and control systems are maintained in relation to fraud and irregularities, particularly in financial matters, property matters, conflicts of interest, misappropriation or misuse of information. These systems take into account the guidelines contained in the approved corruption prevention plans.

4.1.4 CUSTOMERS

Treat customers with professionalism, efficiency, respect, loyalty, good faith and dedication.

Ensuring equal treatment for all customers, not discriminating unjustifiably between them.

Providing products and services to satisfy customer needs, fulfilling agreed conditions and commitments in accordance with expectations.

4.1.5 SUPPLIERS

Choosing suppliers based on impartial, fair and transparent criteria, without granting privileges or favouritism.

The selection must be made in accordance not only with the commercial conditions and quality of the products or services offered, but also with their ethical behaviour as perceived by Anywind.

Honouring commitments.

4.1.6 SHAREHOLDERS AND THE MARKET

Acting loyally towards shareholders, looking after their interests with the fundamental aim of creating value for them and controlling risk.

Absolute compliance with legal principles and equal treatment of its shareholders, ensuring that all shareholders are provided with the necessary information in an appropriate, truthful, transparent and rigorous manner.

4.1.7 EMPLOYEES

Treating each employee fairly and promoting equal opportunities for personal and professional development, namely through rigorous and constructive performance appraisals, participation in professional training programmes and encouraging participation in extra-professional activities.

Any form of individual discrimination that is incompatible with the dignity of the human person, in particular on the grounds of origin, ethnicity, gender, political conviction, religious confession, sexual orientation or physical disability, is not admissible, nor is any conduct that amounts to sexual harassment, *mobbing* or abuse of power.

Respect and promote the balance between employees' professional and personal lives.

4.2 ENVIRONMENT AND HEALTH AND SAFETY AT WORK

4.2.1 Environmental protection

The health and safety of our employees is of the utmost importance. Our Occupational Health and Safety (OHS) policy is to provide a safe and healthy workplace and to comply with current health and safety laws and regulations, as well as internal requirements.

We actively work to eliminate hazards and reduce OHS risks in order to provide safe and healthy working conditions, to prevent work-related injuries and to provide healthy conditions.

We promote training and awareness-raising among all employees, encouraging their involvement, consultation and participation.

4.2.2 Safety in the workplace

We are committed to maintaining a workplace free of violence, harassment, intimidation and other unsafe or disruptive conditions.

4.3 SOCIAL RESPONSIBILITY

To assume social responsibility towards the communities where it carries out its business activities in order to contribute to their progress and well-being.

4.4 HUMAN RIGHTS

4.4.1 Respect for Human Rights

We conduct our activities with honesty, integrity and openness, and with respect for the human rights and interests of our employees.

We encourage respect and co-operation among all employees, in a respectful and dignified working environment, and we are committed to providing transparency in all our activities.

4.4.2 Equality and non-discrimination

We work to keep workplaces free from discrimination or harassment based on age, gender, sexual orientation, marital status, family situation, economic situation, education, social origin or status, reduced labour capacity, disability, nationality, ethnic origin or race, political opinion or any other status protected by applicable law.

4.4.3 Diversity and inclusion

We are committed to ensuring that all employees work in an environment that promotes diversity and where there is mutual trust, respect for human rights and equal opportunities, and in which everyone is intolerant of discrimination and harassment.

4.4.4 Preventing harassment

We are committed to providing a harassment-free environment. We do not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind.

Harassment is not tolerated in the workplace or in any related circumstances outside the workplace.

4.4.5 Forced labour and human trafficking

We prohibit the use of all forms of forced labour.

4.4.6 Child labour

We prohibit the hiring of children under 18.

4.4.7 Working hours, salary and benefits

We guarantee fair remuneration for all employees in accordance with our benefits policy.

We guarantee full compliance with current laws on wages, working hours, overtime and benefits.

4.5 ANTI-CORRUPTION AND BRIBERY

We maintain a zero-tolerance approach to bribery and corruption and prohibit all bribery, as set out in our Anti-Corruption Policy.

4.6 RULES OF CONDUCT FOR EMPLOYEES

4.6.1 RESPONSIBILITIES

Employees must conduct themselves with scrupulous compliance with the laws and regulations applicable to their activity, in accordance with the responsibilities assigned to them, always with impartiality, competence, rigour, zeal and transparency.

Use the power that has been delegated to them in a non-abusive way, orientated towards the pursuit of the objectives of the respective company and never to obtain personal advantages.

Respect Anywind's values and the principles set out in this Code, both in internal and external relations.

Report any irregularities that may jeopardise the development of the business or the good name of Anywind.

4.6.2 CONFLICT OF INTEREST

Avoid situations that could give rise to conflicts of interest by intervening in decision-making processes that directly or even indirectly involve entities with which they collaborate or have collaborated, or natural persons to whom they are or were linked by ties of kinship or affinity of any kind. If they are unable to do so, they must inform their manager of the existence of these relationships.

4.6.3 INTEGRITY

Employees must act in accordance with the rules set out in the organisation's Anti-Corruption Policy.

4.6.4 HARASSMENT

Anywind encourages respect and co-operation between everyone, in a respectful and dignified working environment, and repudiates any practices of harassment. Any form of harassment is prohibited, whether practised when accessing employment or during employment or vocational training.

Harassment is any unwanted behaviour that has the purpose or effect of:

- a) Disturbing or embarrassing any individual;
- b) Violating the dignity of any individual, affecting their health and/or creating an intimidating, hostile, degrading, humiliating or destabilising environment;
- c) The unreasonable disruption of an employee's work performance;
- d) The conditioning of the decision to hire an individual, or their acceptance of it.

Sexual harassment is any unwanted behaviour of a sexual nature, whether verbal or non-verbal, physical or otherwise, with the aims or effects described in the previous paragraph.

In the event of an allegation of harassment, which must be put in writing, a disciplinary procedure is opened which will follow the procedure described in the Labour Code, culminating in the application of the disciplinary sanction appropriate to the case.

The complainant of harassment and the witnesses they indicate cannot be disciplined, unless they act intentionally, on the basis of statements or facts contained in the case file of judicial or administrative proceedings triggered by harassment until a final judgement has been handed down, without prejudice to the exercise of the right to an adversarial hearing.

4.6.5 CONFIDENTIALITY AND PROFESSIONAL SECRECY

Anywind employees, even after leaving their respective companies, are subject to professional secrecy, particularly in matters which, due to their objective importance, by virtue of an internal decision or by virtue of the legislation in force, should not be generally known.

To be reserved and discreet within and outside the organisation with regard to the facts and information they become aware of in the course of their duties and to respect the established rules on the confidentiality of information.

All personal data collected must be processed impartially, lawfully, carefully, in order to protect the privacy of each employee, and in strict compliance with the applicable legal regulations.

4.6.6 LOYALTY

Assume a loyal behaviour towards the company, striving to safeguard its credibility and good image in all situations, as well as promoting and guaranteeing its prestige.

4.6.7 PROTECTION AND UTILISATION OF ASSETS AND RESOURCES

Ensure the integrity, protection and conservation of the physical, financial and intellectual assets of the respective companies, and that the available resources are used efficiently, with a view to pursuing the objectives defined in the same companies, not using them, directly or indirectly, for their own personal benefit or that of third parties.

4.6.8 GOOD GOVERNANCE

To manage the company with care and transparency, creating conditions for dialogue within the management bodies on objectives, strategy, risk analysis and performance evaluation, and in compliance with the highest standards of corporate governance.

4.6.9 INFORMATION

Refrain from disclosing information considered sensitive, such as periodic financial information, acquisitions or disposals of shareholder interests or other assets, signing, amending or revoking strategic co-operation agreements, changes in investment policy, among others, during the period prior to their public disclosure.

4.6.10 PRIVATE TRANSACTIONS

Refraining from entering into or maintaining any contracts or transactions under conditions other than normal market conditions with entities with which Anywind maintains commercial relations or which are controlled by its directors, namely when negotiating loans, obtaining discounts, negotiating payment terms or selling goods or services that may interfere with institutional or commercial relations between the entities and Anywind or between Anywind employees benefiting from the transactions and these entities.

4.6.11 ANTI-CORRUPTION AND BRIBERY

All employees must scrupulously comply with the Anti-Corruption Policy established by the organisation.

4.6.12 RELATIONS WITH THE MEDIA AND SOCIAL NETWORKS

Not to grant interviews or provide information on their own initiative or at the request of the media without prior notification to the *Main Board of Directors* and authorisation by whoever is competent to do so, in accordance with internal regulations, whenever the employee is not a representative with the power to express opinions of the organisation to the outside world.

When using social media, the rules of conduct set out in this Code of Ethics and Conduct and other confidentiality agreements must be respected. Do not publish information about the organisation that is confidential or internal in nature, limiting yourself to information that is public and always considering the implications that may arise from publishing content about the organisation. Protect the organisation's image by not publishing content that could be considered illegal, offensive, defamatory or threatening, or which could damage the organisation's image and reputation.

4. ASSOCIATED DOCUMENTS

Whistleblowing Channel Manual
Sharepoint
Anti-Corruption Policy
Policy for the Prevention and Management of Conflicts of Interest