



# PRÜDESA

GROUP

## CODE OF ETHICS

We have taken on a major  
challenge and a significant  
commitment:  
**Ensuring excellence**

This Code of Ethics summarizes the ethical principles that guide the PRODESA Group's activities. It describes the conduct that should be encouraged and the behavior that should be avoided.

The Code of Ethics constitutes the highest-level regulatory instrument within the PRODESA Group's regulatory framework. Its principles are elaborated upon in policies, rules, and procedures. It represents the company's commitment to compliance with the law and the ethical values upheld therein.

At all levels, care will be taken to ensure the actual and effective application of these principles, so that this self-regulatory system achieves the elimination of any act that could jeopardize the values and legal rights to be protected.

This Code of Ethics must be accepted by anyone who becomes part of the company's organizational structure.

The scope of application of the Code of Ethics extends to employees, suppliers, customers, distributors, external professionals, and company representatives, who will be required to accept this Code or to adhere to their own code of ethics, which upholds ethical principles and a prevention policy analogous to that of the PRODESA Group.



A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.

José Ignacio Pedrajas  
PRESIDENT

**PRODESA**  
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# 1. Legality

Strict compliance with current laws and regulations is an essential and non-negotiable requirement of our business. As evidence of this, we take special care to ensure that all our employees are fully aware of the regulations applicable to their respective areas. We ensure that the company's internal operations are in line with best practices, are internalized by our team, and are applied in their labor and business relationships.



## 2. Transparency

We consider transparency to be a cornerstone of our day-to-day operations, as it is the foundation of our credibility. Ensuring that the information we communicate is accurate, clear, and complete is our top priority.

### 3. Independence and customer focus

Our goal: to select and manage the best solution for the client. We operate freely and independently, making impartial decisions.

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### 3. Independence and customer focus

#### PROHIBITED BEHAVIOR:

- Acting on behalf of the PRODESA Group in situations where the employee, a family member, friend, or acquaintance has a personal interest.
- Misusing the company's name.
- Accepting any kind of favor from any entity, company, or third party with which the PRODESA Group has a business relationship.
- Personally benefiting from a business opportunity in which PRODESA Group is involved.
- Offering, giving, or receiving gifts that violate the provisions of the current Compliance Policy.

In short, employees must avoid any situation in which personal interests could potentially conflict with the values and best practices of PRODESA Group.

## 4. Integrity and honesty

Our reputation, built on extensive business experience, is PRODESA Group's most valuable asset and is shaped by the way we conduct ourselves. For this reason, every member of our team must carry out their work with a commitment to the values that define our corporate culture. We act ethically and beyond reproach, humbly acknowledging our mistakes and turning missteps into opportunities for improvement. Our market conduct must always be fair and honest, without engaging in misleading advertising about our competitors or third parties, and respecting free competition.

PRODESA Group understands that good practices build solid foundations rooted in trust and the value of keeping one's word.



## 5. Confidentiality and IT Security

Being discreet and safeguarding the company's sensitive information is a fundamental right and an inescapable duty.



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## 5. Confidentiality and IT Security

### PROHIBITED BEHAVIOR:

- Unauthorized access to, use of, or disclosure of confidential personal or business information.
- Disclosure of trade secrets.
- Fraud, deception, or misrepresentation of any kind.
- Falsifying the company's economic and financial information, particularly the annual financial statements.
- Spreading false rumors and criticism via the internet, social media, the media, or directly to customers.
- Exploiting confidential information accessed by virtue of one's position or work performed at the company.
- Dissemination of viruses or programs that may cause damage to tangible or intangible assets.
- Any other type of computer damage, including sabotage or the simple alteration of data or information contained therein.
- Conducting misleading campaigns or promotions.
- Infringement of intellectual or industrial property rights regarding technological assets.
- Pornography.

## 6. Continuing education

Continuing professional development is essential for ensuring that our team is properly trained and keeps their knowledge up to date, thereby guaranteeing our competitiveness.

With the aim of promoting equal opportunities and professional development, we are committed to providing adequate training to all our employees.



## 7. Our team

PRODESA Group's greatest asset is its team. We are committed to recruiting the best professionals.

We manage talent and work with motivated individuals to provide the best support and service, both internally and to our clients.

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## 8. Respect, dignity, and non-discrimination

Disrespectful behavior and/or hostile attitudes toward others will not be tolerated. Respect for human dignity, tolerance for people's unique and distinctive characteristics, and non-discrimination are fundamental values and must always be upheld. Employees and collaborators of the PRODESA Group have the right to fair, respectful, and courteous treatment from their superiors, subordinates, and peers, and discrimination and harassment based on age, origin, ethnicity, race, religion, gender, sexual orientation or identity, illness, or disability are expressly prohibited.



## 9. Health and safety

The image features a collage of safety equipment. On the left, a high-visibility vest in shades of blue and yellow is partially visible. In the center, a pair of grey and black work gloves is laid out. On the right, two black leather safety boots with orange stitching are shown. The background is a rustic wooden surface.

The PRODESA Group is committed to ensuring the protection, safety, and health of its employees. We are constantly striving to comply with regulations regarding occupational risk prevention, health protection, and workplace safety. All employees are responsible for complying with these regulations and for performing their duties in strict accordance with the relevant instructions and policies.

## 10. Commitment to the environment

We are an environmentally responsible company. For this reason, we encourage the adoption of best practices designed to reduce the consumption of natural resources, use them responsibly, and promote energy conservation.



## Ethics and Risk Reporting Channel

At all levels of the PRODESA Group, there is an obligation to report any risk situations that may arise within or outside the company and that could cause harm or damage to any individual or legal entity.

Violations of the law, the Code of Ethics, or the regulations implementing it must also be reported.

We have an Ethics Channel to which reports alerting to the existence of a risk or non-compliance situation, as well as any proposals for improving the prevention and control model, may be directed.

Reports to the Ethics Channel may be submitted via email to: [compliance@prodesa.net](mailto:compliance@prodesa.net)

The Compliance Committee will be responsible for managing the Ethics Channel and addressing the reports submitted to it. In any case, the Compliance Committee may outsource the management of the Ethics Channel to a specialized company or firm.

Reports submitted through the Ethics Channel will be treated with the utmost confidentiality.

Any violation of the law, this Code of Ethics, or the regulations implementing it shall constitute a violation, the severity and penalty for which shall be determined in accordance with the provisions of the applicable collective bargaining agreements and the Workers' Statute.



*This Code of Ethics will be updated periodically to incorporate any improvements deemed appropriate for defining the ideal standard of conduct to be followed.*

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