



CODE OF CONDUCT





Our decisions and actions are what make up who we are on a daily basis, and the principles, values and behaviour are what inspire us. At AMPO, our vision is very clear. We have no doubts about where we are heading. We want to be a cooperative project and contribute solutions that are adapted to meet our clients' needs, and for this we are a global reference in the energy sector. However, we must offer this added value for our clients in an ethical and sustainable way to ensure progress in our society.

Consequently, the responsibility of each person that makes up the AMPO project is crucial to continue strengthening our commitment to society. This responsibility is based on appropriate ethical behaviour in keeping with the criteria established in this Code of Conduct set out below. This commitment affects all the people who form the AMPO team, a commitment that we must embrace and apply in all our daily decisions and actions, always leading by example.

The application of this Code of Conduct will also contribute to strengthening the trust-based relationships we have with all the agents who accompany us in the development of our activities around the world: our clients, suppliers, partners, public administrations, etc. This will undoubtedly bring us closer to the excellence we aspire to, which we hope will also contribute to making the world a better place for future generations.

I would encourage you all to read the AMPO Code of Conduct carefully and take it on board, applying it with the purpose of contributing to our shared project. This is the only way we can also be leaders in ethical behaviour in our sector. If we safeguard our values and stick to our commitment to act appropriately and with integrity, together we will continue to build a project for the future.

President of AMPO

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1. INTRODUCTION

1. AMPO aims to ensure that its conduct and that of the people who make up the company comply with all existing legislation as well as the Ethical Principles and Values established in this Code of Conduct.

2. This Code of Conduct comes under the AMPO Compliance Programme, the purpose of which is to:

- a) Establish the Ethical Principles and Values as well as the AMPO rules of conduct and guidelines that everyone in the company must follow as part of the professional activity and in their relationships with other members of AMPO, and with suppliers, interested parties, business partners, clients, public authorities and administrations, and society as a whole.
- b) Prevent any criminal behaviour or any other wrongful conduct from being committed by people while performing their professional duties, providing a model for common action to achieve appropriate ethical behaviour.

3. The Code of Conduct also aims to consolidate a corporate culture that already exists at AMPO.

4. AMPO strongly condemns any criminal offence or any other behaviour that goes against this Code of Conduct. AMPO will safeguard that the Ethical Principles and Values established in this Code of Conduct are, in fact, effectively applied, and that any failure to comply with the above shall be dealt with by the Compliance Committee through the Internal Reporting System.

2. SCOPE OF APPLICATION AND DUTY TO COMPLY

1. Every person who makes up AMPO has a duty to comply with the Ethical Principles and Values and the Rules of Conduct contained in this Code of Conduct and in the Compliance Programme as a whole.

2. The people who make up AMPO are under obligation to know and comply with the contents of this Code of Conduct.

3. The Code of Conduct is applicable to the controlled companies and, as far as possible, to all the other companies in which AMPO is a shareholder.

4. The Code of Conduct shall, as far as possible, apply to AMPO's suppliers, interested parties, business partners and clients.

5. The Code of Conduct will also apply, as far as possible, to AMPO's activities in any geographical area, both local and international.

6. Everyone who is part of AMPO is notified of the Code of Conduct through the Reception Plan. It is made clear in this Plan that it is mandatory to read and comply with the Code of Conduct.





3. GENERAL RULES OF CONDUCT

3.1. Performance of full professional conduct

1. The conduct of people who form AMPO must be based on professionalism and integrity.

- a) Professionalism entails diligent, responsible, sensible and efficient action.
- b) Integrity entails loyal, honest action in good faith, respecting oneself and others in the performance of one's professional duties, in keeping with the trust placed in that person.

2. The people in question must apply the Ethical Principles and Values established in this Code of Conduct to both themselves and to others, and they shall not carry out their professional activity for any other purpose than that for which they have been hired.

3.2. Regarding legality and the internal rules and contracts to which AMPO is bound

1. Everyone shall carry out their professional activities in keeping with current legislation and with all internal rules and contracts to which the Company is bound, in all territories in which AMPO is present.

2. Everyone must comply with this Code of Conduct as well as the Controls that make up the AMPO Compliance Programme.

3. Everyone must respect the obligations and commitments taken on by AMPO in its contractual relationships with third parties, as well as the uses and good practices of the countries in which they perform their professional duties.

4. Ignorance of the law, the Code of Conduct, the Controls or any contracts to which AMPO is bound, as well as the argument that an infringement is a generalised occurrence within AMPO, will not justify a failure to comply.

5. In the performance of their duties, nobody should carry out or follow indications or orders they are given that go against the law, the Code of Conduct, the Controls or any contracts to which AMPO is bound, even when they have been given the indication or order in question from a higher-ranking person in the Company.

6. Anyone who manages or leads teams of people must:

- a) Be the people who are most aware of the relevant legislation, the Code of Conduct, the Controls and contracts that may affect their respective areas of activity.
- b) Be a reference for conduct at AMPO.
- c) Safeguard and ensure that the people who depend on them receive adequate information and training that will enable them to know and comply with the relevant legislation, the Code of Conduct, the Controls and contracts to which AMPO is bound and which may affect them in their duties.

3.3. Fulfilment of the United Nations Global Compact

AMPO manifests its commitment to Human Rights as well as with employment and environment standards, the fight against corruption, and, in particular, with the principles on which the United Nations Global Compact is based, to promote Corporate Social Responsibility (CSR). To this effect, AMPO accepts the principles of the United Nations Global Compact.

3.4. Promotion of AMPO's image and reputation

1. AMPO has a solid reputation, thanks to its extensive experience and a loyal, competent technical team who is committed to AMPO's Ethical Principles and Values and its culture of expertise.

2. They take the utmost care to preserve AMPO's image and reputation in all their professional actions. They also ensure that suppliers, interested parties, business partners and clients all respect and use the company's corporate image and reputation appropriately.

4. PEOPLE

4.1. Equal opportunities and zero discrimination

1. AMPO wholeheartedly embraces the principle of equal treatment, rejecting any type of discrimination, and acknowledging the right to equal employment opportunities. Likewise, any harassment behaviour or physical, sexual, psychological or verbal abuse, or any kind of degrading treatment, will not be tolerated at AMPO.

2. AMPO also provides the same opportunities in access to work and professional promotion, making sure at all times that there are no situations of discrimination on the grounds of sex, race, sexual orientation, age, disability, illness or any other circumstance that may be susceptible to discrimination.

3. Consequently, everyone, at all professional levels, will promote relations based on mutual respect, integrity, cordiality, trust, collaboration and effort when working as part of a team, fostering a respectful work atmosphere to ensure a positive working environment.

4. The Company employees who intervene in the processes of recruitment, selection and/or professional promotion will be objective in their actions and decisions, with the purpose of identifying those people who best fit the profile and needs of the job in question, promoting equal opportunities.

4.2. Ban on forced or excessively arduous labour

AMPO categorically rejects, and does not directly or indirectly use or resort to, labour obtained by forcing the workers' will by means of threats, punishment, deprivation or by applying any type of slavery or semi-slavery.

4.3. Ban on the trafficking of human beings, and the protection of foreign citizens

1. AMPO undertakes to protect foreign citizens by complying with the corresponding regulations regarding foreigners.

2. The people who make up AMPO will not collaborate in allowing an individual who is not a citizen of a European Union member state to enter, remain or move about Spain in such a way that is in breach of applicable legislation regarding the entry or movement of foreigners.

4.4. Ban on child labour, and child protection

Child protection is one of AMPO's ethical principles that entails not resorting to child labour, understanding as such to mean work that deprives children of their childhood, their potential and their dignity, and which is harmful for their physical and psychological development.



5. HEALTH AND SAFETY AT WORK

1. Achieving a comfortable and safe work environment for people is a priority for AMPO to ensure working conditions are continually being improved. AMPO carries out all the relevant actions as regards occupational risks with a preventive approach aimed at continuous improvement. For this reason, AMPO has implemented an occupational risk prevention system equipped with sufficient and necessary resources.

2. AMPO provides its workers with safe, clean and healthy work places and processes.

3. The people who make up AMPO are provided with the necessary means so that they can perform their professional activity with all the appropriate safety, health and hygiene measures, so that their life, health or physical integrity is never in danger.

4. Everyone, at all times, will respect the applicable prevention measures as regards occupational health and safety, using the resources established by AMPO and ensuring that the members of their teams carry out their duties in safe conditions.

6. INFORMATION MANAGEMENT

6.1. Protection of privacy. Use of personal data

1. AMPO respects everyone's right to privacy in every way, as well as regarding people's personal correspondence online and through other media. In particular, people's privacy and rights regarding personal data must be respected.

2. Consequently, AMPO undertakes to protect all information related to the people who make up the Company, and other affected third parties, and not to disseminate personal data, except where there are legitimate grounds to do so. Personal data may not, under any circumstances, be processed for anything other than the legally or contractually envisaged purposes.

6.2. Processing and Protection of Confidential Information

1. Any information that AMPO has and that is not of a public nature, whether in digital format or otherwise, will, in general, be considered as Confidential Information.

2. This Confidential Information must be used with the utmost discretion and care, and the people involved must employ sufficient means to protect it, without allowing the contents to be passed on to third parties, except where the competent AMPO body or person in each case has given their express authorisation, or where there is a legal requirement or court summons.



3. To that effect, the employees must know and comply with all the internal rules about the use of information and confidentiality at AMPO throughout the course of their work.

4. Any information from third parties must be obtained legally. Employees must reject any information obtained inappropriately or by breaching the confidentiality that the legitimate owners have over said information.

5. When the Confidential Information belongs to third parties outside of AMPO, the employees must comply with the confidentiality agreements that, where applicable, the Company has signed with said third parties.

6. Should the work relationship with AMPO end, the people's duty to maintain confidentiality shall remain, and they must return any documents, resources or storage devices, as well as any information related to Confidential Information that they may have stored on their computer.

6.3. Intellectual and industrial property rights

1. The people who make up the AMPO team must respect all the Company's business secrets, intellectual property and industrial property rights with regard to the projects, processes, technology, know-how and, in general, any content created or developed in the organisation.

2. The rights to use intellectual property, industrial property and business secrets generated by the people during the course of their professional activity at AMPO will be owned by the latter.

3. The intellectual property and industrial property rights will also be respected, along with any business secrets, held by third parties outside of AMPO. As a result, everyone must make an effort to protect information that is subject to intellectual property and industrial property rights, as well as business secrets, in each case ensuring they obtain the relevant licences or authorisations from the legal owners of those rights, and including those related to the use of trademarks, logos and other third-party distinguishing signs.

4. No logos or any other external trademarks may be used in promotions or presentations without having first obtained their owners' express consent. No AMPO trademarks or logos may be used for any personal use or purposes beyond the Company's interests, knowledge and wishes.

6.4. IT security protection and ban on downloading illegal contents

1. AMPO endeavours to ensure its IT security is protected, and the use of unauthorised software is strictly prohibited, as is the downloading, installation and use on AMPO computer equipment of malware or any other type of programme or software application that is not covered by the corresponding official user licence or which may entail a risk of introducing any element that may endanger the security of the Company's IT systems or those of third parties.

2. AMPO expressly prohibits the download of illegal contents.



7. RELATIONS WITH THIRD PARTIES

7.1. Truth and accuracy as regards AMPO's assets

1. AMPO's economic-financial information will faithfully reflect its real assets, in keeping with generally accepted accounting principles and with any international standards on financial information that may apply.
2. Nobody shall hide or misrepresent the information given in AMPO's accounting reports and records, which shall be complete, true and accurate.
3. AMPO accepts the commitment to convey reliable information to the markets and to society in general, which enables them to form a true image of AMPO.
4. Any act or omission that causes undue harm or privilege to creditors is strictly prohibited, as is any act of patrimonial disposition that generates obligations which delay, hinder or prevent the efficacy of any seizure of assets or judicial, extra-judicial or administrative proceedings.

7.2. Protection of free competition, of the market and the consumers

1. AMPO undertakes not to damage free competition. AMPO will comply with all regulations defending competition, avoiding any conduct that may constitute collusion, abuse or restrictions to competition or price changes.
2. There must be no disloyal actions or false advertising, or any that may show AMPO's activity or that of its competitors or third parties in a false light.

7.3. Cooperation and transparency with Public Administrations

1. Relations with the authorities, regulatory bodies and Public Administrations shall be carried out under the principles of cooperation and transparency.
2. AMPO shall fulfil its duties before the different Public Administrations and, in particular, those related to the Public Treasury (Tax Authorities) and the Social Security department, ensuring that all the work relationships it establishes are legal, as well as those from which they receive subsidies or where AMPO is responsible for the tenders of public contracts.
3. Any conduct aiming to evade tax obligations or obtain benefits to the detriment of the Public Treasury, Social Security and other equivalent bodies is strictly prohibited.

7.4. Relations with third parties

1. AMPO shall always remain prudent and diligent in its contracting decisions and activities, safeguarding its financial sustainability, expressly prohibiting any practice that may entail a risk of insolvency for the Company or for third parties with which it maintains a business relationship.





2. AMPO uses criteria based on sustainability and social responsibility in its selection processes for suppliers, promoting the application of socially responsible practices through the organisation's supply chain. Everyone must apply criteria of quality, opportunity, cost and sustainability in the selection processes for suppliers, interested parties, business partners and clients, always acting to defend AMPO's interests.

3. Awareness of, and, as far as possible, compliance with this Code of Conduct shall be promoted among the suppliers, interested parties, business partners and clients, for the purposes of applying the ethical principles and values contained herein.

8. ANTI-CORRUPTION POLICY

8.1. Prevention of private and public corruption

1. AMPO hereby states that it is opposed to corruption in every shape and form, and to illegally influencing the will of people outside of AMPO to obtain benefits or advantages. All acts of corruption, bribery and extortion are expressly prohibited, including directly or indirectly offering or promising any type of unlawful advantage, or influence trading.

2. Consequently, in their relations with suppliers, interested parties, business partners and clients, as well as with the Public Administrations both in Spain and abroad, everyone must behave such that they do not lead an individual, authority or public official to breach their duties of impartiality or any other legal precept. The bans established in this section shall also apply to people who are closely linked through family ties or friendship to the corresponding individual, authority or public official.

3. AMPO, either itself or through another party, shall refrain from making any donation, contribution, even by way of a loan or advance, that may entail the illegal funding of political parties.

4. Gifts and courtesies are for promoting the image of the AMPO brand. Gifts, favours or compensations may not be directly or indirectly given or accepted, whether in cash or in kind, whatever their nature, to unlawfully influence AMPO's relations.

5. Gifts and courtesies may be given out and accepted when their economic value is limited or symbolic, and when they are used purely as a show of courtesy or the usual commercial attention.

6. When the gifts offered or received do not meet the requirements listed in this section, they must be rejected or returned.

7. In certain circumstances and cultures, rejecting a gift offered in good faith may be considered insensitive or even damage business relationships. In this case, the gift shall be accepted on behalf of AMPO, the recipient of said gift shall immediately inform their superior and the Compliance Committee, and hand over the present to the People Management Team, who will issue the corresponding receipt and include it in AMPO's gift inventory to be allocated for social interest purposes.

8.2. Prevention of money laundering and financing of terrorism

1. AMPO will comply with all applicable national and international laws on money laundering and financing of terrorism at all times, fully cooperating with the authorities in charge of the fight against money laundering and the financing of any unlawful activities.

2. Client identification measures, along with the internal information and controls established for that purpose, shall be applied, collaborating fully with the relevant authorities.

8.3. Import and export. Ban on smuggling

1. As part of the Company's import and export activities, everyone must fulfil the obligations set by any applicable legislation, as well as by AMPO's internal regulations and any external regulations that may be imposed by other operators.

2. Consequently, any actions that may be related to contraband are strictly prohibited. Should any doubts arise as to any possible incursion in a banned activity, you must check with the Compliance Committee.

8.4. Conflicts of interest

1. The people at AMPO must avoid any possible Conflict of Interest situation.

2. A Conflict of Interest will be considered to exist in those situations in which external business, financial, family, political or personal interests could interfere in the judgement of the people who make up AMPO as they carry out their duties in the organisation.

3. The following will be considered to have ties to the person in question: the spouse or partner of that person; their immediate family (first-degree relatives) and siblings of the person in question or their spouse/partner; the companies or ventures in which the person in question or the person who has ties to the former have control or hold a management position, or where they have a direct or indirect significant influence on the financial decisions and operations in those companies or ventures.

4. Any person who feels they are facing a Conflict of Interest must notify their superior as soon as possible to inform them of the situation. If in doubt as to whether there is a Conflict of Interest, the matter shall be brought before the Compliance Committee for their interpretation. Likewise, the person affected by the Conflict of Interest in question shall refrain from intervening or influencing the decision-making affected by said Conflict of Interest, from attending meetings in which those decisions are discussed, and from accessing information that affects the aforementioned Conflict of Interest.



9. ENVIRONMENT

1. AMPO presents a sustainable development model that balances its activity with protecting the environment, complying with established legislation and offering a preventive and continuous improvement approach, providing its entire team with the necessary means and training.

2. The people who work at AMPO are actively and responsibly committed to environmental conservation, and they are fully aware of all the activities, products and services in which AMPO can influence and have an impact on the environment.

3. To this effect, the people who work at AMPO shall respect all relevant legal requirements, and must comply with AMPO's instructions, specifications and procedures aimed at reducing the environmental impact of its activity. The people at AMPO follow the directives defined by internal and external regulations (ISO 14001), paying particular attention to the sensitive natural environment (Natura 2000) and strictly following the established protocols regarding the management of waste and potentially hazardous materials.

4. The actions carried out by AMPO related to urban development, construction and building shall be developed with the maximum respect for the applicable town planning and administrative legislation in each case.

5. The people at AMPO must strive to minimise the environmental impact derived from the use of the facilities, assets and resources provided by AMPO.

6. Special care must be taken when handling, possessing and transporting explosives, flammable or corrosive, toxic or asphyxiating substances, or any other material, equipment or devices that may endanger people's health or the environment.

10. PROTECTION AND USE OF RESOURCES

1. AMPO provides its people with the necessary assets and resources to be able to perform their professional activities, including media, telematic means, computer equipment and systems, technological resources, facilities and AMPO's financial resources.

2. Everyone must protect and preserve AMPO's assets and resources from any loss, damage, theft or improper use that may have a negative effect on AMPO's interests.

3. Everyone must use AMPO's assets and resources responsibly, and said use must be in accordance with the guidelines established by AMPO, so that they can perform their professional duties efficiently, making good use of time and the assets and resources that AMPO provides.





11. APPLICATION OF THE CODE. COMMUNICATION AND MONITORING

11.1. Entry into force

1. This Code of Conduct takes effect from the moment it is approved by the AMPO, S.Coop. Governing Council, i.e. from 13th May 2021, having been updated in accordance with the Governing Council, and it shall remain effective unless there is an express agreement to overturn, revise, update or bring into force a new version to replace it.

2. The Compliance Committee must be informed of any breach of the Code of Conduct, as this is the competent body to safeguard compliance with this Code of Conduct and its correct application.

11.2. Interpretation of the Code of Conduct

1. In the event of any discrepancy between this Code of Conduct and any Control forming part of the Compliance Programme, the Code of Conduct shall take precedence. Likewise, the Controls shall be interpreted in line with the spirit and purpose of this Code of Conduct.

2. It is the Compliance Committee's responsibility to interpret the contents of the Code of Conduct. Its interpretation criteria are mandatory for all its recipients.

3. Any queries that may arise as to the interpretation of the Code of Conduct shall be resolved by the Compliance Committee by communicating as such to the Compliance Coordinator.

11.3. Compliance Committee

1. The Compliance Committee is the body entrusted with the task of guaranteeing that the people who make up AMPO comply with the provisions laid down in the Code of Conduct.

2. The Compliance Committee has competence in all matters corresponding to the compliance function. The structure, operation, functions and other aspects related to the Compliance Committee shall be regulated in the Committee's own regulations.

3. The Compliance Committee draws up and proposes the series of Controls that make up AMPO's Compliance Programme, which must be followed by all members of AMPO.

11.4. Breach and communication to the Internal Reporting System

1. Any breach of this Code of Conduct may lead to employment or corporate sanctions, without prejudice to any administrative or criminal actions that may also apply as a result of said breach.

2. Anyone who becomes aware of a breach must report it directly through the Internal Reporting System.

3. All communications shall be managed and processed by the individual who is appointed as operational officer in charge of managing and processing communications (RSII [according to its initials in Spanish]: Internal Reporting System Manager), who is, in turn, a member of the AMPO GROUP Compliance Committee. The Compliance Committee is the body responsible for the Internal Reporting System (ORSII [according to its initials in Spanish]: Body Responsible for the Internal Reporting System), which delegates the management and processing of investigation files from the Internal Reporting System to the RSII.

4. Failure to report a known breach will be considered an infringement of this Code of Conduct. Hiding a fact or incident about a violation of the Code of Conduct shall not be taken as an action in AMPO's interest.

5. Breaches can be reported to the Internal Reporting System in any of the following ways:

- The electronic channel located at: <https://www.ampo.com/internal-information-system/>
- The Reporting Person may request an appointment, if they so wish, to have a meeting in person with the RSII, during which they may present the facts themselves and, where applicable, submit any documents or other evidence.

6. The Reporting Person shall be notified of the progress made with regard to their communication to the Internal Reporting System in the terms envisaged in the Communications Management Procedure.

11.5. Confidentiality of communications and ban on reprisals

1. AMPO guarantees that confidentiality will be respected as regards the existence and contents of Communications submitted to the Internal Reporting System. Likewise, the Internal Reporting System guarantees that the Communication can be made anonymously.

2. All Communications to the Internal Reporting System shall be managed in accordance with the requirements of Law 2/2023, of 20th February, on the protection of informants, as well as personal data protection regulations.

3. It is strictly prohibited to take any measures by way of reprisal or any type of negative consequence because of having sent a Communication. Any reprisal against a person who has sent a Communication will be considered to be an infringement of this Code of Conduct.

4. The ban on reprisals envisaged in the previous paragraph shall not prevent disciplinary measures from being taken, where necessary or appropriate, should the internal investigation find that the communication is false and has been sent in bad faith.

11.6. Processing communications

1. A record will be kept of all communications received through the Internal Reporting System.

2. When a Communication is received, the corresponding Internal Reporting System procedure will be initiated, in accordance with the milestones and requirements envisaged in AMPO's Communications Management Procedure, which include the guarantee of confidentiality, the rights of the Reporting Person and the Affected Person, an acknowledgement of receipt being sent to the Reporting Person, the admission or non-admission of the Communication, and the issuance of the Final Report by the Compliance Committee.

3. In the internal investigation carried out, all the information and documentation that is deemed relevant may be compiled confidentially from any of AMPO's businesses or divisions.

4. In the event that the communication affects the RSII or any member of the Compliance Committee, said person shall not be allowed to take part in processing the complaint, and the rules established for this circumstance in the Communications Management Procedure shall apply.

5. The aforementioned procedure shall conclude with a Final Report by the Compliance Committee, which shall be passed on to the Governing Council or the corresponding body. The Final Report shall, where appropriate, suggest the corresponding disciplinary measures pursuant to applicable employment legislation and, in particular, to the Statute of Workers' Rights and any collective agreements that may apply, and/or the Internal Regulations System and any other social-employment rules that are relevant to the people who make up AMPO, that arise after the Final Report that concludes the Communications Management Procedure, and all this without prejudice to any administrative or criminal sanctions that may also apply.





11.7. Receipt of Communications through unofficial channels or by an unauthorised person.

The recipient of a Communication that has been sent through reporting channels other than those established by AMPO or to members of staff that are not responsible for processing said Communication, must guarantee its confidentiality and immediately pass it on to the AMPO RSII.

The recipient must preserve the identity and guarantee the confidentiality of the data related to the people affected and any other third party mentioned in the Communication, particularly regarding the Reporting Person.

Any breach of the duty of confidentiality shall be considered as a very serious administrative infringement, pursuant to the provisions established in the Law 2/2023, of 20th February, which regulates the protection of people who report regulatory and anti-corruption infringements, and as such may be considered as a criminal offence.

11.8. Presumption of innocence and right to honour

The Affected Persons' presumption of innocence and right to honour must be respected.



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