



CODE OF ETHICS DRIZA GREEN
PARTNERS, S.L.

MARCH 2022



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1. INTRODUCTION

Driza Green Partners, S.L. (hereinafter referred to as "DRIZA" or the "Company") has the most valuable asset possible: People. As these people are what determine the character of our Company, the aim of this **Code of Ethics** is to define our commitment, as a Company, to society and to the people who form part of DRIZA, with this commitment being reciprocal.

DRIZA has a series of ethical rules in carrying out its activity. These rules are now set out in this Code of Ethics, which is part of the Compliance Policy that DRIZA implements, as well as a key element of Corporate Social Responsibility. This Code of Ethics should therefore be viewed as a set of standards that the Company already has in place.

The Company's ethical culture is based on a firm commitment and is reflected in all areas of the Company: Human resources, customer relations, supplier relations, etc., and the achievement of the best possible results in a safe and comfortable working environment.

1.1. What is its scope?

This **Code of Ethics** aims to reach all of the Company's stakeholders, even at an international level, adapting to the cultural and socio-economic characteristics of the environment in the countries in which DRIZA may operate:

- More specifically, employees, managers and professionals working for the Company must be aware of its content and be obliged to comply with it when they join the Company and during their time with it. (hereinafter referred to as "Professionals").
- More globally, customers, suppliers and subcontractors of the group are stakeholders who will be covered by the principles of the **Code of Ethics** insofar as they apply to them and will be obliged to comply with them in their relations with DRIZA. (Hereinafter referred to as "Partners").



1.2. What is our objective?

- To develop the guidelines and standards of professional, ethical and responsible behaviour that must be followed by all the people who form part of DRIZA in their professional activity. The **Code of Ethics**, by its nature, cannot cover all possible situations, rather sets out the guidelines for conduct of the people who form part of DRIZA.
- To prevent unlawful conduct in the course of their professional activity.
- To establish protocols for implementation, monitoring and control to ensure compliance.

1.3. What are the pillars of our Code of Ethics?

- Values: From a global viewpoint that defines our corporate culture.
- Standards of conduct: Mandatory for all persons who form part of our Company.
- Implementation and dissemination mechanisms: From a commitment to real implementation and continuous improvement.
- Monitoring and control mechanisms: Ensuring compliance at all levels.

2. COMPANY VALUES

2.1. Respect for current legislation and professional ethics.

All DRIZA Professionals will scrupulously respect the current legal regulations applicable in the territory where such persons act in their professional field.



To this end, no order that contravenes current legislation must be obeyed, and this Code of Ethics establishes the channels of communication for resolving this contingency.

Ethical actions must permeate both the professional and personal activity of the people who make up DRIZA, with ethics being a fundamental pillar on which our way of operating and understanding the market is based.

2.2. Honesty and integrity

These principles commit us to carry out our work with honesty, dignity, good faith, consistency and respect; guaranteeing the physical and moral integrity of the Professionals that make up DRIZA, as well as its Partners, both in our external relations and in the Company's internal relations.

In the conviction that honesty guarantees a better way of working and therefore an improvement in the results of our work, our Company has no room for deceit or unfair advantage.

By responding positively to these premises, we will undoubtedly act with honesty and integrity: actions that are lawful, ethically acceptable, desirable for society and for DRIZA, and for which we are prepared to assume responsibility.

2.3. Diligence and responsibility

Only with personal responsibility can a job be done well, and only with diligence can we achieve the optimum result we are aiming for.

2.4. Respect for human and labour rights



DRIZA expresses its commitment and attachment to the human and labour rights recognised in national and international law and to the principles underlying the United Nations Global Compact, the United Nations Norms on the Responsibilities of Transnational Corporations and Other Business Enterprises with regard to Human Rights, the OECD Guidelines for Multinational Enterprises, the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy and the Social Policy of the International Labour Organisation, the European Social Responsibility Alliance, as well as any documents or texts that may replace or supplement any of them.

In particular, DRIZA is totally opposed to child labour and forced or compulsory labour and is committed to respecting freedom of association and collective bargaining, as well as the rights of ethnic minorities and indigenous peoples in the places where it operates. The Company takes these premises into consideration in its working practices.

2.5. A focus on excellence

DRIZA's raison d'être is to be found in the quality of our services and customer satisfaction. Improvement in the provision of services must lead the way, as the search for excellence in what we do is the goal we pursue and the fundamental pillar on which the rest of our values are based.

2.6. Commitment to society and the environment.

DRIZA is committed to the goal of creating wealth for society and adopts a responsible business ethic.

It is in the very nature of DRIZA to respect the environment, and it is fully aware that value for its shareholders can only be created through sustainable development where the main objectives are the protection of the environment, social cohesion, the development of a favourable framework for labour relations and



constant communication with the Company's various stakeholders, as well as the development of specific measures to achieve social and labour insertion.

Likewise, the Company carries out its activities with respect for the environment by meeting and exceeding the standards established in environmental regulations. This commitment to the environment is also present in the energy projects developed by DRIZA.

3. STANDARDS OF CONDUCT

3.1. Corruption and bribery

At DRIZA it is forbidden to obtain an undue commercial benefit or advantage. It is strictly forbidden for a DRIZA Professional or Partner to participate, directly or indirectly, in bribing authorities and/or public officials, managers, employees or contributors from entities outside our Company. Likewise, DRIZA Professionals and Partners may not accept, request or receive payments, gifts or any other tokens of appreciation from persons or entities external to the Company that are outside the lawful practices of the market.

Bribery seeks to obtain an economic benefit or advantage, but the attainment of this benefit or advantage is separate from the fact that the act is considered as such. **Bribery** would be consummated by the mere promise. **Bribery** is also when the recipient is a legal person and when the one who benefits is not the same person as the one who carries out unlawful conduct, but a third party who benefits from the unlawful conduct.

As a general rule, DRIZA Professionals and Partners are forbidden to accept any gifts. However, **Bribery** should not be confused with **Business Courtesy**, which is widespread in many countries where DRIZA may do business. In order to differentiate between the two concepts, the following criteria must be applied: **Occasional practice** (not something that occurs continuously and on a daily basis) involving low value of what is received or given, and **prudence** (if there is any doubt as to whether the action is unlawful, I will reject it or consult my superior).



In any situation of invitation, token of appreciation, etc., the DRIZA Professional should ask himself/herself, "Is my courtesy or the courtesy of others intended to influence the other person's will or pending decision, or mine if I am the one receiving the business courtesy?". If the answer is "yes", or even if there is any doubt, the planned action should be rejected.

Given that the line between **Business Courtesy** and **Bribery** may, in certain cases, be unclear, the person involved shall, if in doubt, bring the situation to the attention of his or her superior, who may refer the matter to the **Compliance Body** in order to obtain an official opinion from the Company.

Similarly, **donations** and **sponsorships** must follow the criteria of occasional practice, low value and prudence, always seeking to consolidate a strong brand and image.

3.2. Health and safety at work

DRIZA, aware of the need in certain projects it carries out, implements a strict Health and Safety at Work programme, and will strive to ensure compliance with these standards by the Partners with whom it interacts.

DRIZA Professionals must observe the standards relating to health and safety at work, with the aim of preventing and minimising occupational hazards. To this end, DRIZA implements a number of specific measures within the framework of this health and safety policy.

3.3. Protection and processing of information

Information is one of the most valued assets at DRIZA. It is the responsibility of all members of the Company to protect it and give it the importance it deserves by making responsible use of it and using the protection measures that DRIZA makes available.

Transparency of information

Transparency in any information to be disclosed is a basic principle that must govern the actions of DRIZA Professionals.



DRIZA's economic and financial information, in particular its annual accounts, shall be drawn up in accordance with generally accepted accounting principles and shall give a true and fair view of its economic, financial and equity position. For this purpose, no Professional shall conceal or misrepresent information in the Company's accounting records and reports.

Lack of truthfulness in disclosing information, both internally and externally (auditors, investors, etc.), contravenes this [Code of Ethics](#).

Right to privacy

DRIZA scrupulously respects the right to privacy of its Professionals, in all its forms, and especially with regard to personal, medical and financial data. This type of non-public information is considered secret and confidential, and therefore the necessary mechanisms are applied for its appropriate processing and to preserve its integrity and confidentiality.

DRIZA undertakes not to disclose the personal data of its Professionals and Partners, except with the consent of the data subjects and in cases of legal obligation or in compliance with court or government decisions. Under no circumstances may the personal data of the Professionals be processed for purposes other than those legally or contractually provided for.

Industrial and intellectual property

The Company's Professionals undertake to make responsible use of the means of communication, computer systems and, in general, any other means that DRIZA places at their disposal, in accordance with the policies and criteria established for this purpose. Such means are provided for professional use and are, therefore, not suitable for private communication. We therefore inform you that there is no expectation of privacy in the event that they should be monitored by DRIZA in the due performance of its monitoring duties.

The use of files or programmes from external sources may pose a serious risk to DRIZA's security or constitute an infringement of [Intellectual Property](#) rights if the corresponding licence or authorisation is not obtained. For these reasons, the use of unauthorised software



and the downloading of software or any other element that could introduce viruses into the DRIZA network or compromise computer security is forbidden.

In relation to the above, it is strictly forbidden to reproduce, copy, distribute, modify, transfer or communicate, totally or partially, trademarks, patents, industrial designs, etc., owned by DRIZA, that is, any item likely to be protected industrially or intellectually, without the prior written authorisation of the Company. Likewise, it is strictly forbidden to reproduce, copy, distribute, modify, transfer or communicate, totally or partially, such items owned by third parties (natural or legal persons) without their prior written authorisation.

Secret and confidential information

Non-public information that is the property of DRIZA will, in general, be confidential and, therefore, will be subject to **professional secrecy**, and its content may not be provided to third parties, except in the normal course of their work and provided that those to whom the information is disclosed are subject, legally or contractually, to an obligation of confidentiality and have confirmed to the Company that they have the necessary means to safeguard it.

Where this confidential information contains highly sensitive or especially valuable information or data, and its disclosure could cause serious financial, reputational and/or legal harm, it shall be classified as **Secret Information**. The secret nature of the information must be expressly pointed out to the DRIZA Professional.

It is the responsibility of DRIZA itself, as well as its Professionals and Partners to make every effort to safeguard this confidential and secret information.

It is strictly forbidden to disclose confidential or secret information or to use it for private purposes. Professionals are therefore obliged not to disclose the content of their work in their dealings with third parties.

Any reasonable suspicion of **disclosure** of confidential or secret information shall be reported by those who become aware of it to their immediate superior and to the **Compliance Body**.



In the event of termination of the employment or professional relationship of a DRIZA worker, any confidential and secret information shall be returned by the Professional to the Company, including the documents and storage media or devices, whether personal or belonging to DRIZA itself. The obligation of confidentiality shall survive the termination of the employment relationship.

3.4. Equal opportunities and rejection of harassment.

DRIZA guarantees equal opportunities. The only valid criteria for the assessment of its Professionals and Partners are those that take into account their effort, talent and results, regardless of any personal condition or circumstance. Therefore, the Company does not allow any kind of discrimination on the grounds of race, colour, nationality, social origin, sex, sexual orientation, ideology, political opinions, religion or any other personal, physical or social condition of its Professionals.

In particular, DRIZA shall promote equal treatment of men and women with regard to access to employment, professional promotion and working conditions. In this respect, a number of specific equality and non-discrimination measures will be implemented to give substance to the Company's values.

The Company rejects any behaviour or attitude that could constitute moral or sexual harassment, abuse of authority, or in any way violates the dignity of the individual.

3.5. Professional and personal growth

DRIZA is committed to the professional and personal growth of people within the company. We believe that people should grow in all aspects and for this reason:

DRIZA promotes the training of its professionals, focusing on career development and the acquisition of new skills and competences. Professionals must be committed to the goal of constant growth through training and quality self-study, participating in and taking advantage of the programmes offered by the Company.



DRIZA is committed to the personal and family life of its Professionals and therefore promotes work-life balance programmes that facilitate a better relationship between their personal and family life and their work responsibilities.

3.6. Loyalty and conflicts of interest.

In their professional performance, our Professionals and Partners must seek **impartiality and objectivity**, looking after the interests of DRIZA at all times. If, in certain situations, a conflict of interest situation arises between the Company and the Professional, the latter shall refrain from carrying out any activity and shall communicate the situation to his or her superior or to the **Supervisory Body**, which shall provide the Professional with a solution, with his or her cooperation at all times.

3.7. Relations with third parties:

Third parties outside the Company

Any Professionals providing any services, including teaching, whether on their own behalf or on behalf of others, to companies or entities other than DRIZA, when related to DRIZA's activities or the duties that such Professionals perform at DRIZA, they must be authorised in advance and in writing by the Company's human resources management.

DRIZA respects the performance of social and public activities by its Professionals, as long as they do not interfere with their work. The association or membership of Professionals in political parties or other types of public entities shall be carried out in such a way as to make clear that they are of a personal nature, and no relationship whatsoever with DRIZA shall be established.

The creation of social media accounts or participation on social media, and the opinions or statements made on them, shall be personal in nature. In all cases, on **social media of a professional nature**, any statements that may be made in relation to DRIZA shall be made with absolute respect for its brand, its principles and this **Code of Ethics**, and the owner of the post shall be solely responsible for its content.



Customers

DRIZA is committed to offering a quality of services and products equal to or superior to the requirements and quality standards established by law, competing in the market under the values set out in this Code of Ethics.

DRIZA guarantees the confidentiality of its customers' data and undertakes not to disclose it to third parties unless the customer has given consent to do so or there is a legal obligation to do so in compliance with court or government decisions. The collection, use and processing of customers' personal data must be carried out in a way that guarantees the right to privacy and compliance with personal data protection laws.

In pre-contractual and contractual relations with customers, transparency shall be ensured and information shall be provided on the various alternatives available, in particular with regard to services, products and fee rates.

Suppliers

DRIZA will align its supplier selection processes to criteria of objectivity and impartiality and will avoid any conflict of interest or favouritism in the selection. The Company's Professionals are obliged to comply with the internal procedures established for supplier selection processes, including, in particular, those relating to checking compliance with the law.

Prices and information submitted by suppliers shall be confidential information and shall not be disclosed to third parties unless the parties concerned have given consent to do so or there is a legal obligation to do so in compliance with court or government decisions. Professionals who have access to suppliers' personal data must keep it confidential and comply with the provisions of applicable personal data protection laws. The information provided by the Professionals to suppliers shall be truthful and honest.



Professionals shall avoid any kind of interference or influence from suppliers or third parties that may alter their impartiality and professional objectivity and may not receive any kind of remuneration from DRIZA suppliers, or from third parties in general, for services related to the Professional's own activity within the Company.

Public administration

Relations with the authorities and public administrations shall be based on the principles of cooperation and transparency.

Competitors

DRIZA undertakes to compete fairly and will not engage in misleading or disparaging advertising of its competitors or third parties. Obtaining information from third parties, including competitor information, must be done in a lawful manner.

DRIZA will comply with antitrust regulations, avoiding any conduct that constitutes or may constitute collusion, abuse or restriction of competition.

3.8. Money laundering and terrorist financing

DRIZA declares its commitment not to engage in irregular practices in the course of its relations with customers, providers, suppliers, competitors or authorities, including those related to the laundering of money from illicit or criminal activities.

DRIZA undertakes to comply with all applicable legal provisions in the area of combating money laundering and the financing of terrorism, and its employees must apply due diligence to detect situations that contravene the law.

4. IMPLEMENTATION AND DISSEMINATION

DRIZA Professionals expressly accept and assume the mandatory nature of the rules of conduct established in the [Code of Ethics](#) and the documents that implement it. Mechanisms for its dissemination and understanding will be set up by the different departments, as well as by the [Compliance Body](#).



Any Professionals who in the future join or, in any way, become part of DRIZA, will expressly accept the principles and rules of conduct established in the [Code of Ethics](#). The Professionals who currently form part of the Company will also be obliged to comply with this [Code of Ethics](#), which will be published on the Company's intranet. The [Code of Ethics](#) shall be attached to the employment contracts of all Professionals.

5. MONITORING AND CONTROL: THE COMPLIANCE BODY

The [Compliance Body](#) is a collective body of an internal and permanent nature, linked to the Board of Directors of the Company, which decides on its structure. The [Compliance Body](#) will be responsible for:

- Promoting the Code of Ethics among DRIZA Professionals and Partners.
- Receiving and analysing communications in relation to non-compliance with the Code of Ethics.
- Reviewing the effectiveness of DRIZA's internal controls to ensure compliance with the [Code of Ethics](#).
- Dealing with queries and doubts raised regarding this [Code of Ethics](#).
- Studying the Company's policies and ensuring their consistency with the Code of Ethics.
- Analysing the contents of queries received, incidents received regarding non-compliance and the manner of resolving them, the degree of compliance with the Code of Ethics, and transferring them to the Board of Directors.
- Making decisions regarding the consequences of a specific breach or violation of the [Code of Ethics](#).

It is the obligation of all DRIZA Professionals to inform the [Compliance Body](#) of the commencement and outcome of any judicial, criminal or administrative proceedings, of a punitive nature, in which a professional is a party involved, charged or accused and which may affect them in the



exercise of their duties as a professional of the Company, or harm the image or interests of DRIZA.

Any doubts that may arise regarding the interpretation of the **Code of Ethics** should be referred to the immediate superior. If circumstances so require, the Compliance Body may also be called upon.

DRIZA has a communication mailbox (buzonetico@drizapartners.es), the safekeeping and management of which is the responsibility of the **Compliance Body**, with the aim of promoting compliance with the law and the rules of conduct established in the **Code of Ethics** (the "Ethics Mailbox"). This **Ethics Mailbox** is made available to the Company's Professionals, but does not have to be the only means of communication for these purposes.

This is a **confidential channel** for communicating any doubts about interpretation in relation to this **Code of Ethics**, as well as for reporting any irregularities found.

The identity of the reporter will not be communicated to the reported person, thus guaranteeing the confidentiality of the identity of the reporter. Notwithstanding the foregoing, the details of the persons making the report may be provided both to government or court authorities, to the extent that they are requested by such authorities as a result of any proceedings arising from the subject matter of the report, and to the persons involved in any subsequent investigation or court proceedings initiated as a result of the investigation. Such disclosure of data to government or court authorities shall always be carried out in full compliance with personal data protection laws.

Reports made through the **Ethics Mailbox** are dealt with by the **Compliance Body**. In the event that the report concerns a member of that body, he/she shall abstain from participating in the processing of the report.

The data provided through the **Ethics Mailbox** will be included in a personal data file owned by the Company for communication purposes, as well as for carrying out any investigation that may be necessary to determine the commission of the infringement. DRIZA undertakes to



process at all times the personal data received in an absolutely confidential manner and in accordance with the purposes set out in this section, all in compliance with the provisions of the law on the protection of personal data.

As a general rule, when a report is made to the **Ethics Mailbox** and after an initial study by the **Compliance Body** of the specific event, the reported person will be informed of the existence of the report. However, in cases where there is a significant risk that such notification would jeopardise the ability to effectively investigate the report or gather the necessary evidence, notification to the reported person may be delayed for as long as such risk exists.

When, after the relevant study and enquiries, the **Compliance Body** determines that a DRIZA professional has carried out activities that contravene the provisions of the law or the **Code of Ethics**, it will take **disciplinary measures** against any Professionals involved, that is, against those linked to the Company by an employment relationship. For other Partners, DRIZA may terminate the existing relationships with them due to the infringement. Whichever the case, any action taken shall be in accordance with the law in force at any given time.

Once an infringement has been found, the **Compliance Body** shall entrust the **Human Resources Department** to implement the proposed disciplinary measures in accordance with the system of offences and penalties set out in the collective bargaining agreement of the Company to which the Professional belongs or in the applicable labour laws.

6. ENTRY INTO FORCE

This Code of Ethics was approved by the DRIZA Board of Directors on 30 March 2022. However, it may be subject to continuous updating and revision at the proposal of the **Supervisory Body**, with approval by the governing bodies.