

# CODE OF CONDUCT

## ANDEL S.A.



## Introduction

Andel has been providing technical and constructive solutions to the electricity transmission and distribution sector for more than 40 years. Since 1980, when we started working in the construction of metallic supports for power lines, we have not stopped improving processes and expanding our manufacturing portfolio to meet the challenges demanded by the electricity market.

The accumulated experience, a deep knowledge of our activity and an absolute responsibility with the projects we undertake, have made the trust of our clients our best asset.

We understand that business excellence can only be achieved with the best raw materials, suppliers, technical and human resources, and above all with the conviction that it is possible to achieve any challenge we set ourselves.

This Code of Business Conduct specifies the Corporate Business Principles and helps to implement them on an ongoing basis through the establishment of certain minimum standards of behavior.

The purpose of this code is to provide a framework against which to measure any activity. Employees should seek advice if they are in any doubt about the plan of action in a given situation, as it is the absolute responsibility of each employee to do the right thing, and this responsibility cannot be delegated.

Employees should always be guided by the following basic principles:

1. Avoid any conduct that may damage or endanger Andel or its reputation.
2. Act legally and honestly.
3. Prioritize the interests of the company over personal or other interests.

## 1. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

### **We respect the law at all times**

Andel and its employees are governed by law and must comply with the laws and regulations of the applicable legal systems. In addition, employees must adhere to internal rules and regulations, which are specific to Andel.

## 2. CONFLICTS OF INTEREST

### **We will always act in the best interests of ANDEL.**

A conflict of interest occurs when an employee's personal interests or the interests of a third party compete with the interests of Andel. In this situation, it may be difficult for the employee to act fully in the best interests of Andel.

Whenever possible, employees should avoid Conflicts of Interest and if a Conflict of Interest has arisen or an employee is faced with a situation that may involve or give rise to a Conflict of Interest, the employee should disclose it to his/her line manager and/or the head of the HR Department in order to resolve the situation in a fair and transparent manner.

## 3. ANTITRUST AND COMMERCIAL LEGALITY

### **Importance of free competition**

Andel is prepared to compete successfully in today's commercial world and will always do so in full compliance with all applicable laws.

Commercial policy and prices will be set independently and will never be agreed with competitors. Customers and suppliers will be treated fairly.

All employees, but in particular those engaged in purchasing and sales activities, should ensure that they are familiar with applicable competition laws. In case of doubt, the head of the legal department should be contacted for advice on such laws.

## 4. CONFIDENTIAL INFORMATION

### **We value and protect our confidential information and respect the confidential information of customers and suppliers.**

Confidential information is information that is not public knowledge, including trade secrets, business plans, engineering and manufacturing ideas, designs, databases, records, salary information and any other unpublished financial or other information. Unless required by law or authorised by management, employees shall not disclose or permit the disclosure of confidential information. This obligation continues after termination of employment.

In the event that suppliers or customers share confidential information with Andel, such information will receive the same care that Andel's confidential information receives.

## 5. BRIBERY AND CORRUPTION

### **We repudiate all forms of bribery and corruption.**

Employees must never offer or promise an improper personal, financial or other favour in order to obtain or secure business or other advantage from a supplier or customer. Employees must refrain from any activity or conduct that could lead to the appearance or suspicion of such conduct or an attempt thereof, and will be subject to appropriate disciplinary action if they do so.

No employee shall offer to third parties, or accept from third parties, gifts such as money, loans, bribes and similar monetary advantages, regardless of their value.

## 6. DISCRIMINATION AND HARASSMENT

### **We promote non-discrimination and respect for employees.**

Andel promotes equal opportunities and equal treatment of employees irrespective of origin, nationality, religion, race, gender, age, sexual orientation or political affiliation and does not tolerate psychological abuse, sexual harassment or discrimination and does not allow verbal or physical harassment based on the above or on any other grounds.

Employees who feel that their work environment does not comply with the above principles can raise their concerns with the HR manager.

## 7. WORKING HOURS AND WAGES

### **We recognise workers' rights and comply with regulations on working hours and wages.**

Andel recognizes the rights of workers to join existing trade unions. Andel complies with all applicable laws on working hours and wages.

## 8. EMPLOYEE HEALTH AND SAFETY

### **We comply with all applicable Occupational Health and Safety Laws.**

Health, safety and hygiene at work is a fundamental aspect whose regulations are complied with by both Andel and its employees. The company undertakes to strictly comply with the regulations on safety, health and hygiene at work, as well as those relating to the prevention of occupational hazards, to provide employees with the technical equipment necessary for the performance of their duties and to provide the necessary training courses for the protection of its workers.

All Andel employees assume the responsibility of rigorously complying with Safety, Health and Hygiene regulations in the performance of their activities, ensuring their own safety and that of those around them, in the same way employees will disseminate their knowledge in this area among their colleagues and subordinates and will promote compliance with the best risk protection and prevention practices.

## **9. NO SMOKING ON THE ENTIRE PREMISES**

### **We comply with the anti-smoking law**

Smoking is strictly forbidden on all company premises. Andel is faced with an express legal obligation not to allow smoking in the workplace, which it must enforce by means of the instructions communicated to all employees, the disobedience of which may be subject to sanction.

## **10. ENVIRONMENT**

### **Environmental protection**

Andel has a special concern for the care and preservation of the environment, and respect for the environment is a fundamental principle for this company. We act in accordance with the applicable environmental laws and we have an environmental management system in place.

## **11. RELATIONS WITH THIRD PARTIES AND THE MARKET**

### **Relations with suppliers and customers shall be governed by this code.**

In our relations with suppliers and customers, we shall abide by the principles of transparency, professionalism, solidarity and fair competition, as well as comply with the principles of non-discrimination in the selection and treatment of suppliers.

Andel will endeavour to ensure that suppliers comply with these principles.

## **12. NON-COMPLIANCE**

### **We will consult the Code and comply with its provisions.**

It is the responsibility of each employee to ensure full compliance with all provisions of this Code and if necessary, to seek assistance from his or her line manager or Human



Resources manager. Doing the right thing is the personal responsibility of each employee and cannot be delegated.

Failure to comply with this Code may result in disciplinary action, including the possibility of dismissal and, where appropriate, legal action.

