

CODE OF ETHICS



AGUILERA INGENIEROS

Rev-01

INDEX

1. Object	3
2. Scope	3
3. Aguilera Ingenieros, S.A. ethical principles and values	3
4. Professional obligations and commitments	3
5. Conduct: policies and guidelines	4
5.1. Compliance with the existing legislation	4
5.2. Corruption and bribery	4
5.3. Compliance with international agreements on fundamental rights	4
5.4. Respect for human dignity, non-discrimination and equal opportunities	4
5.5. Right to privacy	5
5.6. Safety and health	5
5.7. Environmental protection	5
6. Specific rules of conduct	5
6.1. Conflicts of interest	5
6.2. Confidentiality and communication of information	6
6.3. Insider information and unfair use of information	6
6.4. Employees' outside activities	7
6.5. Relationships with clients	7
6.6. Relationships with manufacturers, suppliers, builders and subcontractors	7
6.7. Relationships with competitors	8
6.8. Gifts and other courtesies	8
6.9. Respect for intellectual property	8
7. Distribution of the Code of Ethics	8
8. Compliance	9
9. Validity	9
10. Acceptance	9

1. Object

AGUILERA INGENIEROS, S.A.'s Code of Ethics sets out the core values and operating principles in place since the company was founded and to which it owes its reputation.

It also establishes policies and guidelines for employee conduct both in their professional endeavor and their relationships and interactions with other company staff, project team members, clients, suppliers and other partners/collaborators, competitors, public and private institutions, and society at large.

2. Scope

This Code of Ethics is binding on all AGUILERA INGENIEROS, S.A. employees, regardless of position.

3. Aguilera Ingenieros, S.A. ethical principles and values

- Independence, fairness and honesty
- Integrity
- Maximum professionalism and responsibility in the fulfillment of duties
- Loyalty and commitment to our clients' interests
- Commitment to the environment and sustainability
- Commitment to society and the public interest

4. Professional obligations and commitments

- Performance services only in the area of competence
- Compliance with laws, rules and regulations governing the practice of the profession
- Compliance with confidentiality commitments
- Lifelong training and professional development
- Commitment to continuous improvement and to the pursuit of professional excellence
- Commitment to occupational safety and health
- Commitment to energy efficiency, sustainability and environmental conservation

5. Conduct: policies and guidelines

5.1. Compliance with the existing legislation

AGUILERA INGENIEROS, S.A. employees must comply strictly with the spirit and purpose of the legislation in effect at the place where they perform their duties. They must also honor all the commitments and obligations covenanted by the Company in its agreements with third parties.

5.2. Corruption and bribery

No manner of corruption or attempted corruption, including extortion, bribery or other unlawful practices, are tolerated in relationships with clients.

No bribes or other unjustified emoluments may be accepted, either directly or indirectly, in relationships with suppliers, manufacturers or subcontractors to obtain or maintain an order or undue advantage. Demanding or expecting bribes or other unjustified emoluments from suppliers is similarly prohibited.

5.3. Compliance with international agreements on fundamental rights

AGUILERA INGENIEROS, S.A. is committed to respecting and protecting the human rights and public freedoms laid down in the Universal Declaration of Human Rights and other international agreements, to ensuring that the principles addressed in those agreements are honored in all its policies and to furthering them among its suppliers and other partners/collaborators:

- respect for employees' rights
- freedom of association and collective bargaining
- prohibition of child labor
- prohibition of forced labor
- freedom of conscience.

5.4. Respect for human dignity, non-discrimination and equal opportunities

AGUILERA INGENIEROS, S.A. rejects physical, sexual, psychological, moral or other forms of harassment or abuse of authority and any other conduct that generates an intimidating or demeaning workplace environment.

All employees are obliged to treat their peers, superiors and subordinates fairly and respectfully.

AGUILERA INGENIEROS, S.A. regards overall personal development as essential and is committed to ensuring the necessary balance between work and family life.

AGUILERA INGENIEROS, S.A. accepts no manner of discrimination among its employees on the grounds of race, gender, ideology, nationality, religion, sexual orientation or any other personal, physical, or social condition and furthers equal opportunities in connection with access to employment, training, career advancement and working conditions.

Hiring and in-house employee assessment are based exclusively on merit.

5.5. Right to privacy

AGUILERA INGENIEROS, S.A. respects its employees' privacy in all domains and in particular with regard to personal data. Further to the Data Protection Act it refrains from disclosing its employees' personal data without their consent, except where mandated by law.

5.6. Safety and health

AGUILERA INGENIEROS, S.A., provides its employees with a safe and stable work environment and is committed to constantly updating risk prevention practices to ensure workplace safety and health.

The company likewise undertakes to abide by all local occupational safety and health provisions and regulations wherever it conducts business.

All employees must be aware of and follow the occupational safety and health rules and ensure their own safety and the safety of other employees, clients, suppliers, other partners/collaborators and, in general, anyone who may be affected by the performance of their duties.

5.7. Environmental protection

AGUILERA INGENIEROS, S.A. is committed to sustainability and respect for the environment, and has an ISO 14001-compliant environmental management system certified by BSI.

6. Specific rules of conduct

6.1. Conflicts of interest

AGUILERA INGENIEROS, S.A. employees who become aware of a situation that may affect the independent fulfillment of their duties must inform their supervisor accordingly and explain the potential conflict of interest to the stakeholders. Where deemed necessary, they may be replaced by another team member free of any such conflict.

Conflicts of interest are regarded to exist whenever an employee or close relation has a personal interest that directly or indirectly conflicts with the interests of AGUILERA INGENIEROS, S.A. or its clients.

6.2. Confidentiality and communication of information

AGUILERA INGENIEROS, S.A. employees undertake to communicate both internal and external information, in a truthful, organized, useful and consistent manner.

All proprietary information and information entrusted to AGUILERA INGENIEROS, S.A. is regarded as confidential. All employees are consequently bound to maintain the information they may access in the fulfillment of their duties in the strictest confidentiality.

All company employees are likewise bound by the confidentiality agreements concluded with the company's clients.

Disclosure of information not publicly available to third parties not involved in the project is subject to the client's prior consent, except where required by law.

Company policy is to refrain from providing the media with information about clients' projects. Where requests for information are received, they are forwarded to the client's communications and public relations department. Information of a general nature may be disclosed at the client's request.

Prior to disclosure, the information is checked to ensure that it does not include possibly confidential strategic data on infrastructure relating to building or infrastructure vulnerability. All public notices respect design authorship and intellectual property rights.

During tendering, contact and communication with participants is limited to the period established for technical inquiries, after which all clarifications are issued to all tender participants and a copy is sent to the client.

In the design phase, all communications with administrative authorities and utility companies are channeled through the project author and in the construction phase through the site project director or whoever takes his/her place. Copies are sent to the owner's representative.

On termination of employment, all confidential and proprietary information and information entrusted to AGUILERA INGENIEROS, S.A., including documents and information on digital media, must be immediately and proactively returned by the employee, who shall be bound to honor the aforementioned terms of confidentiality after termination.

No documents, in-house information, programs or media developed or owned by AGUILERA INGENIEROS, S.A. may be disclosed to third parties without the Managing Director's authorization.

6.3. Insider information and unfair use of information

AGUILERA INGENIEROS, S.A. staff members refrain from using the information on business matters or technical processes or any other specialized knowledge obtained in a project to their own benefit, either as entrepreneurs or to opt for a new job, without stakeholders' knowledge and approval.

AGUILERA INGENIEROS, S.A. staff refrain from participating in projects on which they have inside information on business affairs or technical processes or any specialized knowledge obtained in past dealings with former clients or employers that could be used unfairly against them, without stakeholders' prior knowledge and approval.

6.4. Employees' outside activities

AGUILERA INGENIEROS, S.A.'s employees are bound by exclusive arrangements and may not engage in any other employment, self or otherwise. Employees may take part in educational or academic activities subject to the approval of the Managing Director.

The company respects employee participation in social and public activities, provided they do not interfere with their on-the-job performance and such engagements are clearly unrelated to AGUILERA INGENIEROS, S.A.

6.5. Relationships with clients

In their relations with clients, all AGUILERA INGENIEROS, S.A. employees must behave professionally, honestly and with integrity.

All employees are committed to excellence in the provision of company services to earn client trust and foster long-term relations based on the following principles:

- satisfactory identification of client needs and objectives and commitment to meet them
- uncompromising professional expertise, in-depth study and analysis verified against experience
- skilled project management
- diligent, responsive and timely fulfillment of commitments
- accessible, flexible, helpful and respectful attitude.

Where design errors are detected, the Managing Director informs clients in a frank and timely manner of the problems identified and any regulatory non-conformities, as well as the action required to correct the situation, irrespective of the contractual consequences for AGUILERA INGENIEROS, S.A.

6.6. Relationships with manufacturers, suppliers, builders and subcontractors

AGUILERA INGENIEROS, S.A. is employee-owned and is not professionally or financially dependent upon any manufacturer, builder, subcontractor or business group.

AGUILERA INGENIEROS, S.A. recommends products, materials and equipment based on purely technical and objective criteria. The company does not accept commissions or any other form of consideration that might compromise its independence, such as cost-free design or calculations by parties seeking to secure a recommendation.

As site supervisors, AGUILERA INGENIEROS, S.A. defends the owner's interests but always in keeping with independent criteria, fair interpretation of the design and equitable treatment for all parties.

6.7. Relationships with competitors

Company relations with its competitors are consistently cordial, loyal, honest, and respectful of free competition.

AGUILERA INGENIEROS, S.A. does not provide engineering services in connection with competitors' projects unless the respective agreement is terminated. Failing that, the client is asked to notify the other party accordingly before work is undertaken.

All reports on competitors' designs or installations are drafted in all fairness and objectivity, based on hard facts and rigorous and methodical analysis of the problems detected.

6.8. Gifts and other courtesies

AGUILERA INGENIEROS, S.A. staff may not accept gifts, travel invitations, services or any other kind of favor or consideration from any person or entity that affect or may be construed to affect decision-making in a business, professional or administrative relationship.

Similarly, AGUILERA INGENIEROS, S.A. staff may not offer direct or indirect payments, gifts, services or any other kind of favor or consideration to customers, partners/collaborators or any other person or entity that maintains or may potentially maintain relations with the company, with a view to unfairly influencing such relations.

6.9. Respect for intellectual property

AGUILERA INGENIEROS, S.A. acknowledges and honors outside professionals' intellectual property rights in all design and commercial documents and public notices, and by the same token demands acknowledgement of its own work.

7. Distribution of the Code of Ethics

All employees, suppliers, other partners/collaborators, builders and clients receive copies of the Code of Ethics.

Doubts concerning its interpretation or application are raised to the Managing Director.

8. Compliance

This Code of Ethics is binding on all AGUILERA INGENIEROS, S.A. employees. The company adopts all necessary measures to ensure its effective implementation.

No one, irrespective of rank or position, may ask an employee to commit acts that are unlawful or in breach of the provisions of this Code of Ethics. Nor may employees justify improper or illegal conduct on the grounds of orders from a superior or unfamiliarity with this Code.

Inasmuch as breaches of the Code of Ethics jeopardize the company's reputation, any reasonable indication of irregular or unlawful behavior or acts that contravene this Code of Ethics must be reported in writing to the Managing Director.

The identity of persons reporting irregular actions is regarded as confidential and AGUILERA INGENIEROS, S.A. undertakes to refrain from any manner of direct or indirect retaliation against them.

When an AGUILERA INGENIEROS, S.A. employee is proven to have engaged in activities in breach of the law or this Code of Ethics, disciplinary measures deemed appropriate by the Managing Director are applied.

9. Validity

This Code of Ethics is applicable from the day of its circulation among all employees and will remain in effect until superseded.

The Code is reviewed and updated from time to time, based on suggestions and proposals submitted by employees and stakeholders.

Updates to the Code of Ethics are approved by the Managing Director.

10. Acceptance

AGUILERA INGENIEROS, S.A. employees explicitly accept and undertake to abide by the rules established in this Code of Ethics.

All new hires are furnished with a copy of this Code of Ethics when joining AGUILERA INGENIEROS, S.A. and must explicitly accept all the provisions hereunder.

Reviewed and approved by the Managing Director:

AGUILERA INGENIEROS