

CODE OF CONDUCT



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1. Introduction

Commitment to excellence

Since its origins in 1987, IDE has been known for its ethical and professional line of action, following basic criteria of action including: **engagement** in a sound project; **honesty** as a basis for professional relations; **self-improvement** to obtain the best results; **team work** to reach common goals; and quality in order to obtain excellence. Key attitudes, which sustained over time have allowed us to maintain the reputation in the market and in society as a whole.

- The customers know they a reliable supplier and recognise the quality of our products and services.
- The suppliers have a customer who makes continuous purchases and who meets their payment commitments.
- The electricity sector knows that the company acts in a socially and environmentally responsible manner.
- The administrations have a responsible company which offers value to its environment and location.

As a company, IDE contributes to sustainable development, creating social welfare and wealth, increasing the quality of life of people, permanently seeking to add value to their investments and to the social environment.

In addition, it is a corporate reference in terms of professional ethical conduct. Within the IDE organisation, people have an essential and differential value. The human team is our main value, this is why respect and honesty towards the workers is key to the development of our business activities.

We want the people who work at IDE to feel proud to belong to a solvent, continuously growing organisation of the future, which offers them occupational stability and safety and a family working environment. This desire to maintain a line of ethical, professional and continuously improving line of conduct lies behind the Code of Conduct, whose essential mission is to spread a corporate philosophy among its staff, customers and suppliers, supported by the following statement of goals, strategic principles and values.



2. Objective

The objective of this Code of Conduct is that everyone, who reads and endorses it, will maintain a high level of compliance and ethics in the performance of their professional work in and with IDE, pursuant to the applicable legislation and the policies applicable to each activity and at any moment.

Prior to taking a business decision, we must ask ourselves the following questions:

Does my decision comply with IDE Values and adhere to the Code of Conduct?

Is it legal? Remember that in case of doubt, you should ask for advice from the Compliance Committee at IDE.

Would I be proud to share my decision?

Ignorance of the law does not exempt you from complying with it. The same can be said of the rules applying to the performance of your work in and with IDE

- Read, understand and comply with this Code of Conduct and the IDE policies and rules, the law and other applicable regulations with regard to the performance of your work at IDE or as a supplier to IDE.
- You can always consult the online version of this Code of Conduct and the specific applicable rules and policies will always be available in the latest version.
- Ask for professional guidance if you have any queries about the best corporate practices, regulatory compliance or how to proceed in a specific situation. Send your queries via e-mail to the Compliance Committee at compliance@ide.es or via the IDE Ethics Channel, accessible from www.ide.es.
- Do not hesitate to report any possible breach of this Code of Conduct, the rules and policies, and the requirements established by the regulations. Any communications about breaches, concerns or questions you raise will be dealt with in full confidence, and with total impartiality and due diligence.
- Communication, awareness and understanding are essential for optimising compliance in the organisation. This is why we ask you to attend all the practical information and training sessions to which you are invited in order to learn, understand, comply and to certify your level of knowledge about compliance, and criminal risk minimisation and prevention at IDE.

Scope of Code of Conduct



This Code of Conduct is an extension of our values because it reflects our commitment with and responsibility towards ethics, legal compliance and good corporate practices.

- This Code of Conduct is applicable to all members of IDE Electric, SL.
- No-one, regardless of their level or position, is authorised to ask an employee of IDE to disobey that set out in this Code. Similarly, no employee may justify improper or illegal conduct by invoking the order of a superior.
- In addition, all members will promote the application of that set out herein, where applicable, among the business partners, suppliers, service providers, customers and other third parties with whom relations are held during the performance of their activities.
- The Code of Conduct helps us to take correct decisions, although it has not been designed to guarantee compliance with all the situations that may occur to anyone or any organisation that has relations with IDE.
- This Code of Conduct is a framework of reference that does not replace the specific rules, procedures and instructions of the company.
- Our commitment is to establish respectful, ethical relations that comply with legal requirements.

3. Mission and vision

We have defined our Mission, Vision and Values, which we seek to promote through the Compliance Management System of which this Code of Conduct forms part.

Mission

This is our raison d'être, our purpose, our direction.

Our mission is to manufacture and sell electrical enclosures for low-voltage electricity distribution and the telecommunications sector, providing global solutions to the international electricity sector and offering innovative products of the highest quality with excellent service.

Vision

This is what we seek to be, what inspires and motivates us to continue improving.

Our vision is to be a leading company in the manufacture and sale of electrical enclosures, reaching anywhere in the world where they are required, providing value, innovation and sustainability.



4. Values

What do we call values?

- These are a set of beliefs which guide our behaviour. Companies, just like people, have values.
- Rules of conduct help us to live in line with our values, which includes our commitment to impeccable ethical and legal conduct.
- Our values must be present in all our relations.
- IDE maintains a firm commitment of responsibility for people, society, safety and the environment; with the promotion of knowledge through training, expert advice and constant work through the company's Know-How; for a guarantee of quality, for professionals at the service of the customer and for the maintenance of certifications which guide the process of ongoing improvement; for exclusivity in customer guidance, through a vocation of service, specialisation and flexibility.

1. Involvement

We are constant in our project. We always aim to improve. We take consensus decisions and learn from our decisions.

2. Improvement

We constantly question ourselves about what we are doing and we aim to achieve results effectively, anticipating situations. We seek to apply creative ideas that allow us to innovate in a streamlined and practical manner.

3. Honesty

We work with respect, transparency and humility to create trust with the people with whom we have relations.

4. Team work

We collaborate to reach common goals, sharing information, knowledge and experiences. We listen and offer different points of view to improve and obtain better results.

5. Quality

We continuously strive towards excellence.

6. Sustainability

We approach our activities with a focus on protection of the environment and the well-being of present and future generations.

7. Safety

We prioritize relationships and care for our employees to ensure safe and healthy working conditions.

If we are defined by anything, this must be our common sense

We carry on walking, never forgetting where we came from

5. Commitments

Respect for the law

In addition to the applicable legislation, all members of IDE must comply with the rules and procedures established internally, available and valid at any moment. These internal regulations will never imply the breaching of the applicable legal provisions.

We recognise and respect the diversity of cultures and customs in all areas of our activity, and corporate practices in the international market.

We show a firm commitment to complying with the applicable laws and regulations in Spain and Europe, as well as the laws in those local markets where we have business.

The appropriateness of the decisions taken by the members of the company to the internal and external rules must be justifiable, provable and verifiable in the event of a review by competent third parties or by the company itself.

We undertake to provide the necessary resources for our workers to know and understand the internal and external regulations required for the exercise of their duties and to comply with their responsibilities.

Through this Code of Conduct, we seek to embody the principle of due diligence aimed at the prevention, detection and elimination of irregular conduct, of any nature, taking into account the principle of criminal responsibility of the legal entities described in the Spanish legal system.



Responsible leadership

We design, manufacture, sell and test our products in a responsible manner, with the aim of increasing and maintaining the quality and confidence of our customers.

Our commitment to integrity will always be linked to the personal development of our teams aligned with the quality of our products.

Protection of rights

We take care to comply with the regulations of the countries in which we operate, and to protect the rights of customers, users and suppliers in the market.

Our commitment to the compliance of human rights is based on respect for the UN Guiding Principles on business and human rights;

the UN Universal Declaration of Human Rights; UN International Covenant on Civil and Political Rights; the UN International Covenant on Economic, Social and Cultural Rights; the Internal Labour Organisation Declaration on fundamental principles and rights at work, and the Spanish legislation on

the environment, privacy and personal data protection, occupational health and safety, information security, labour rights, freedom of expression, among others.

Commitment to Quality

Our quality objectives are always directed at the design and manufacture of standard and tailor-made products, which are efficient and strongly linked to our customers and suppliers.

We are in constant contact with customers to determine their degree of satisfaction and to attend to their requirements without delay, improving the quality of our products.

The information collected helps us to understand where we need to improve in order to offer a suitable response to their expectations.

Conflicts of interest

We act in favour of the corporate interests with integrity, transparency and honesty, avoiding any type of conflict of interest.

All members of IDE must act in the interests of the company, without involving personal interest or placing other interests in conflict.

How can you recognise a conflict of interest?

A conflict of interest occurs when, for any reason, a reasonable person may ask themselves if their personal motivations are in line with the company interests.

The existence of a conflict of interest may imply that corporate interests are influenced or compromised, especially when the person in this type of situation has the authority to make decisions.

Some common situations of conflict of interest that may serve as an example

- The existence of family or sentimental relations with other members, or with our suppliers or customers.
- The giving or receiving of gifts or trips contrary to the IDE gifts and business courtesy protocol.
- Perform activities not related to the activity in the company.
- Agreements with suppliers or collaborators for having employed a family member.

How to act in the event of a potential conflict of interest?

- Report any existing or potential conflict of interest to the Regulatory Compliance Committee immediately, before taking any action in this respect.
- The IDE Regulatory Compliance Committee will determine, in light of the circumstances, the effective existence of a conflict of interest and, where applicable, the necessary safeguards to preserve the interests of the Company.



6. Business relations: Market and public administrations

Anti-corruption and anti-bribery

At IDE the corruption of anyone with a position in any Public Administration, and the payment or acceptance of bribes or illegal commissions of any nature to any individual are strictly forbidden.

We are firmly committed to respecting the anti-corruption and money-laundering laws applicable in all the countries in which we have business.

No employee or representative of IDE should suffer adverse consequences for refusing a gift, the payment of a bribe or an illegal commission, even if this implies the loss of business for the Company.

Anti-corruption policy

The negotiations and operations are carried out with ethics, transparency, respect and social corporate responsibility.

We are opposed to influencing the will of a person in order to obtain

a benefit through the use of non-ethical practices. In addition, we do not permit other people, companies or entities to use such practices with our associates, workers or collaborators.

The associates, workers or collaborators of IDE may not directly, or through an intermediary, offer or grant, or request or accept, unjustified advantages or benefits that have the immediate or indirect goal of obtaining a benefit, in the present or the future, for the Company, themselves or a third party.

In particular, it is strictly forbidden to receive, offer, promise or conceal any form of bribe, influence peddling, commission or advantage, from, or made by any other party involved, such as civil servants (Spanish or

foreign), employees of other companies, political parties, authorities, customers and suppliers.

The acceptance or giving of gifts must at all times be in line with that laid out in the IDE gifts and business courtesy protocol.

In the event of queries about what is or is not acceptable, the Regulatory Compliance Committee should be consulted and they will determine the procedure to follow.



These are the most important points of our anticorruption policy:

- We do not offer or pay bribes.
- Transactions must be transparent and documented in accordance with the internal regulations on payments and collections.
- Travel, food and accommodation expenses must be appropriate and approved in advance; in line with the internal regulations on the justification of expenses.
- All expenses must be accurately entered in the records and accounts. Expenses that are not duly justified will not be paid.
- The gifts and business courtesy samples must be in line with that laid out in the IDE gifts and business courtesy protocol.
- Any practice tending to perpetrate or encourage money-laundering by a third party, or any link tending to the funding of terrorism or the illegal financing of political parties is strictly forbidden.
- Report any sign of infringement or suspicion to the Regulatory Compliance Committee and, if in doubt, ask for advice. You can contact them via the ethics channel available on the IDE website: www.ide.es, or via e-mail: compliance@ide.es.

Anti-monopoly and unfair competition

IDE conducts its business in accordance with the laws against monopolies and unfair competition, aimed at promoting healthy competition and forbidding activities which hamper trade and restrict competition.

The infringement of the anti-monopoly legislation and that relating to competition may be the object of economic sanctions, both for the company and for the individuals involved.

All associates, personnel and collaborators of IDE shall pay special attention to the compliance of the principles governing free competition.

In this respect, they shall abstain from any practice contrary to this principle such as:

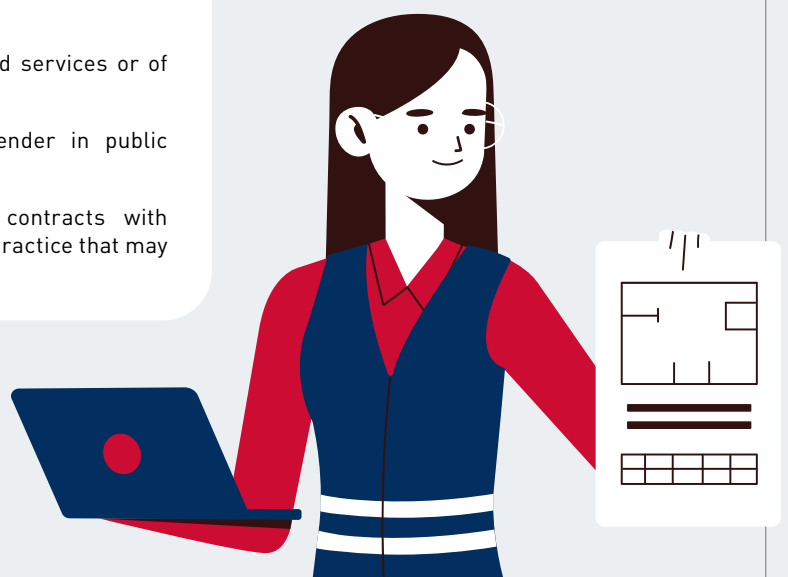
Agreeing prices with other competitor companies.

Disclosing design, manufacture, sales or marketing strategies and plans.

Providing information about the cost of goods and services or of products, profits or margins.

Providing information about the intention to tender in public competitions.

Providing information about agreements and contracts with suppliers or customers and, in general, any other practice that may suppose an infringement of free competition.



Relation with suppliers and collaborators

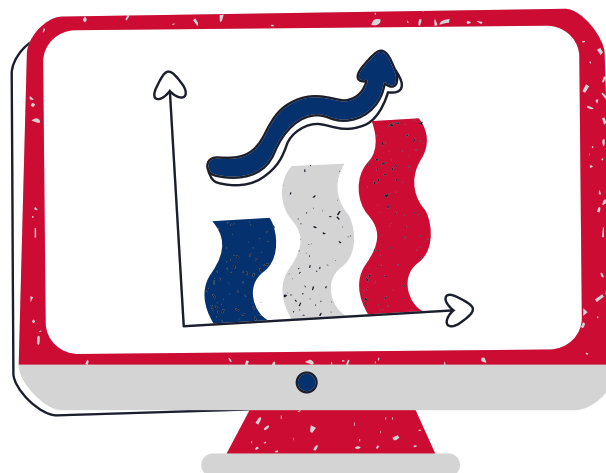
During the purchasing, negotiation, signing and contracting decision-making processes, the applicable laws and regulations governing these relations will be observed and we expect our suppliers and collaborators to behave in the same way.

IDE's suppliers and contractors must read and observe the rules contained in this Code of Contact and train their personnel accordingly; or in accordance with their own Code of Conduct provided it contains similar guidelines for action to those contained herein.

IDE may verify compliance with this Code of Conduct at any moment.

We structure our purchasing and investment processes on this basis and subject to the principles of **transparency, competition and nondiscrimination**, which is demonstrated by the following commitments for action:

- To promote, wherever possible, the concurrence of several suppliers of goods and services for whom the characteristics and conditions offered are in line, at any moment, with our needs and requirements.
- To ensure that the purchase of goods and services takes place by reconciling the search for the most advantageous conditions for the Company with the maintenance of the value attributed to sustained relations over time with certain strategic suppliers.
- To guarantee the objectivity and transparency of the decision-making processes, avoiding situations which may affect the objectivity of the people participating in the same. All the activities and decisions adopted in regard to the purchase and contracting of goods and services must be documented in such a way as to be provable and verifiable.
- Suppliers who have IDE information to which their personnel may have access will be responsible for introducing the technical and organisational measures necessary to guarantee the security of the information and the protection of the personal data for which IDE is responsible. They must therefore sign the corresponding confidentiality and personal data processing contracts.



7. Information Security

The protection of any information that is not of public domain or published is a priority for IDE, considering it as confidential and business secret.

This also applies to information relating to IDE, its associates, personnel, collaborators and interested third parties, including information which contains personal data. Given that personal information is handled in some of IDE's activities, the unauthorised and illegal disclosure of this information may result in significant damage for the company and for third parties.

Communicating or distributing this information may infringe the confidentiality commitments assumed by IDE towards third parties or may give rise to the disclosure of secret company information or to the breach of the legislation on personal data protection.

This is the reason why, at IDE we adopt the technical and organisational measures suited to the level of risk and criticality of the information to protect it and keep it safely, maximising the protection of the most critical information and that which contains personal data, in order to avoid any situation in which the unauthorised communication or distribution outside the company takes place, even during negotiations with a third party.



Image, corporate reputation and advertising

We care for our corporate image and reputation like an asset of huge value to secure the trust of our customers; our personnel; suppliers; authorities and society in general.

All the associates and personnel at IDE, together with the personnel of supplier and collaborator companies must take the utmost care to preserve, respect and use our corporate image and reputation correctly and suitably in all their professional activities.

IDE personnel undertake to be especially careful in any public intervention, whether this is personal via their social media, when they identify with the Company, and must have the authorisation of the marketing department to appear before the communication media; taking part in professional conferences; congresses or seminars; and in any other public act in which they appear as IDE personnel, with the exception of those competencies which are included in their duties in their job description.

We are aware of the needs of our customers, our personnel and collaborators and we undertake to offer them a serious and honest response.

The information relating to advertising, sales and the promotion of our products and services will always be transparent, true and will not contain misleading content.

Our objective in the media is to continuously improve the channels of communication and interaction, basing our activities on the principles of equality and non-discrimination on the grounds of ideology or for any other reason, and on raising awareness about matters of social and corporate importance.



Confidential Information

We respect the ethical and legal responsibilities for the protection of our own and third-party personal and confidential information, which is only processed to comply with contractual obligations derived from legitimate interest; in compliance of legal obligations or with the express and previously informed consent of the owner of the personal data.

We adopt the technical, organisational and legal measures necessary to guarantee the correct processing of the personal data, pursuant to the applicable legislation on data protection, with the aim of guaranteeing the privacy of anyone who has a relation with IDE and the protection of the rights of the interested party.

No-one who works or collaborates with IDE, or any supplier or entity with whom IDE has a commercial or contractual relation of any nature, may use this information for their own benefit or use it for purposes other than those related to the processing of data registered with IDE.

All the associates, directors, personnel, collaborators and suppliers of IDE sign a confidentiality and the use of information assets agreement.



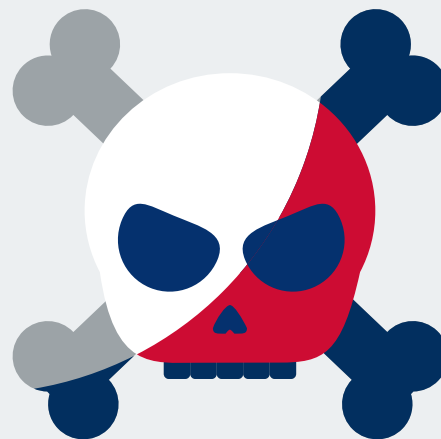
At IDE the confidentiality agreements are valid indefinitely.

Confidentiality must be maintained even when the individual is no longer an associate, employee, collaborator, customer or supplier of IDE.



How to protect confidential information?

1. Comply with the confidentiality agreements to which IDE is party, observing the data protection and information security policies.
2. Do not discuss confidential information in public spaces.
3. If you talk about confidential information with other work colleagues, make sure that they are authorised, thanks to their duties, to know this information.
4. Do not work with documents that contain confidential information in public places where you may be observed by third parties.
5. Do not share confidential information with anyone, even if they are former work colleagues, members of your family or friends.
6. Wherever possible, encrypt files containing confidential information which are to be sent attached to e-mails.



Business secrets

In the performance of an activity or through agreements or conversations with our associates, customers or suppliers, access may be obtained to private confidential information or corporate secrets of IDE or third parties.

Some information may be considered of vital and critical importance if, as a result of knowing it, third parties may be given the opportunity to take decisions based on this information.

Every precaution must be taken when processing IDE or third-party confidential information or information considered to be a corporate secret, in all cases avoiding sharing this information with people external to the Company.

Given the complex nature of the analysis and the sanctions implied for negotiating with secret and/or confidential information, in the event of any doubt that this may be occurring, you should contact the Compliance Committee.

Information on social media

We are aware of the benefits in information, socialisation and marketing offered today by our appearance on social media. Nevertheless, we believe it is important to remember that the protection of sensitive, confidential information or that which identifies other individuals without their express consent must be maximised.

We recommend the responsible and sound use of social media, including personal accounts in which you appear as a member of the IDE staff



We are all responsible for IDE Security

Intellectual and industrial property

We have regulations in place that govern the rights and protection of the industrial and intellectual property of IDE and of third parties, including copyright, trade names and corporate secrets. All the contracts agreed must strictly observe the rules and procedures in this respect to avoid infringing the rights of third parties.

IDE is the owner of the property and the use and operating rights of the computer systems and programmes, equipment, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected or used by their personnel.

Any act that may infringe the industrial and intellectual property rights of third parties is forbidden.

No member of IDE is permitted to download software without the authorisation of the Department of Computer Systems.



We use software and other content in accordance with the terms and conditions of the licences associated with the same.

The unauthorised installation or use of copies of material or material protected by copyright is forbidden, including software, documentation, graphs, photographs, predesigned images, animations, films or fragments of video, sound and music, unless permitted under the applicable legislation and the corresponding licences.

Use of equipment

IDE will provide the necessary computer resources so that all their personnel may carry out their activities effectively and in safety.

Their use may be controlled by the Company.

The associates and personnel of IDE must protect and make good use of the resources provided and use them in a responsible, efficient and correct manner, protecting them from any damage, theft or inappropriate use.



8. Fiscal and financial integrity

Integridad fiscal

AWe act with transparency and honesty in the application, management and justification of the subsidies and grants that can be received from the national or European Public Administrations.

Therefore, it is forbidden to request any type of public grant or subsidy on behalf of IDE, falsifying the data, information or conditions necessary for their award, and to falsify or alter the information required for their justification or to allocate it to a purpose other than that for which it was awarded.

We undertake to strictly and faithfully comply with the applicable tax and social security obligations.

Therefore, any practice to avoid payment or obtain undue benefits to the prejudice of the Public Treasury and the Social Security Department is strictly forbidden. This includes the presentation of false, inexact or incomplete statements and information, or the performance of fiscal operations of an opaque nature, among others.

In addition, we are committed to comply with all the legal obligations derived from the performance of national and international sales transactions, and imports and exports; in particular those transactions listed in the regulations to counter smuggling and the trafficking of substances of any type.

Financial integrity

We conduct an efficient administration of the company's economic resources and use them with responsibility.

We keep accurate accounts of all the commercial information, complying with the local, national and international legislation applicable in each case.

The financial operations are carried out in accordance with legal processes, and are always recorded correctly in the financial sustainability. In addition, these accounts are audited by an auditor external to the organisation, as set out by Law.

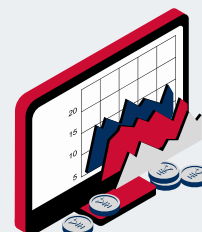
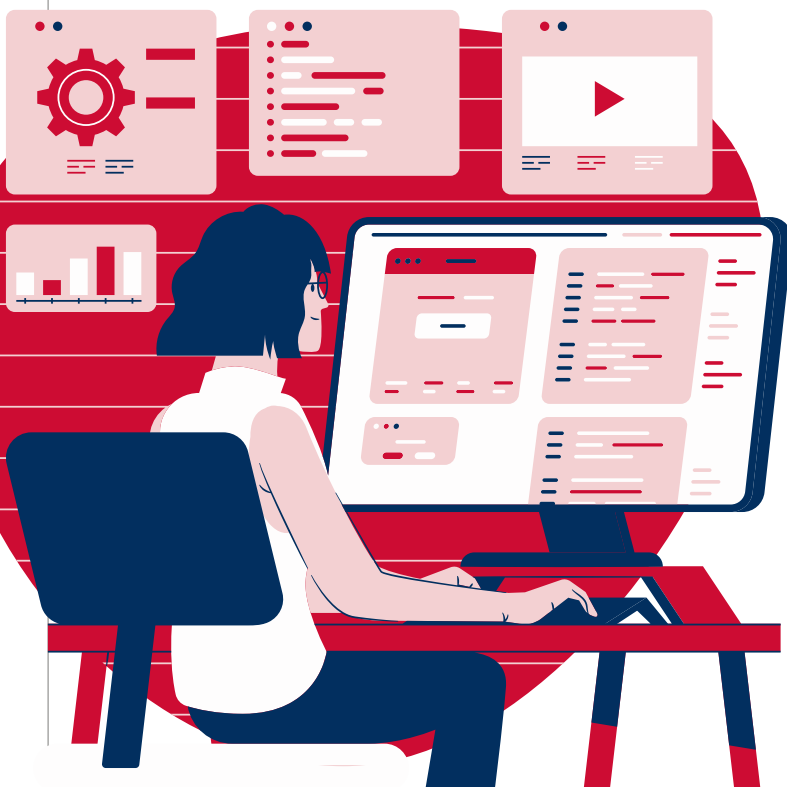
All personal with financial duties or authorised to make payments must comply with these regulations and ensure their compliance.

In any contract to which IDE is party, the agreement must be reflected in full, including the terms and conditions of the negotiation, the results and all the attachments and complementary agreements.

In no event is it permitted to change the invoicing terms if they are not coherent with the contractual agreements or purchasing and order emission protocols.

Whenever a standardised agreement exists through a process previously approved by the Management this should be used, avoiding the use of non-standardised agreements that have not been approved.

IDE strictly forbids the manipulation of cost estimates, invoices and agreements for personal benefit or the wrongful benefit of a third party.



9. Sustainability

Commitment to the environment, the creation and retention of talent and the protection of our personnel are of top priority in the development of our activities.



- We undertake to develop activities with the maximum respect of the environment, minimising the negative effects which these could cause.
- IDE associates and personnel are aware of the environmental impact of their activities and actively and responsibly undertake to contribute to minimising these impacts.
- For this reason, the legal provisions and internal legislation with respect to the environment must be observed at all times, acting with the utmost diligence.



10. Creation, promotion and retention of talent



Our human team: Our main value

In a competitive environment such as the one in which we live, if we are successful, it is thanks to the dedication and work of our team.

This is why we seek to have the best specialist professionals, ensure their ongoing training and invest in their potential.

For the same reason, we attract and promote diversity in the work environment, in order to promote the collaboration and personal and professional growth of our team.

Equal opportunities and fair treatment

We are firmly committed to respecting the dignity of the workers and the labour rights recognised in the applicable legislation.

This is why all our members must act with total respect for the applicable labour laws and the legally recognised rights in their relations with other workers.

The selection, recruitment and internal promotion processes are governed by objective criteria (professional qualifications, skills, experience, ethical behaviour...), at all times observing the legislation applicable to recruitment.

In this respect, any discrimination for gender, beliefs, religion, nationality or any other circumstance is strictly forbidden.

In addition, all members of IDE are obliged to observe and support the Company commitment to equal opportunities and fair, dignified and respectful treatment, providing a pleasant, positive and diversity-proactive work environment.

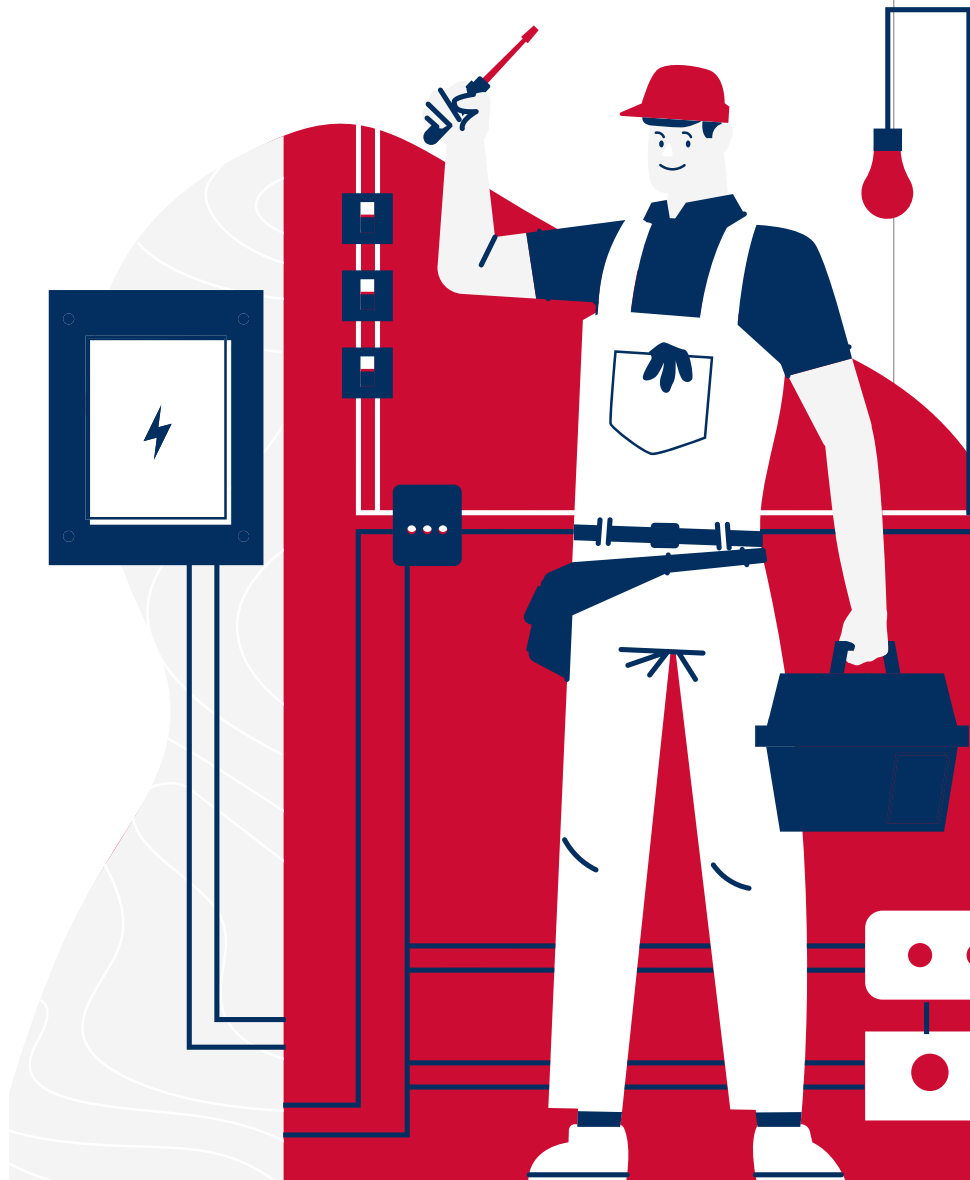
All offensive, discriminatory behaviour, sexual, psychological or moral harassment, abuse of authority, offence or any other form of aggression or hostility which fosters a climate of intimidation or grievance is strictly forbidden.

Occupational health and safety

We express our firm commitment to providing a safe and healthy work environment for our own and external personnel, establishing the necessary preventive measures and those required to coordinate business activities, in order to ensure a work environment which is free of risks, including controls, work procedures and security teams, in accordance with the types of risk befitting the activity and, in general, through the rigorous observance of that established in the regulations.

Consequently, all associates, personnel, suppliers and collaborators of IDE are obliged to adopt a proactive and responsible attitude in relation to the maintenance of safe and healthy working conditions and, in particular are obliged to:

- Look after their own safety, with the strict compliance of the occupational health and safety regulations implemented in IDE.
- Ensure the safety of their colleagues, promoting the application of these rules among the other workers and maintaining an attitude of joint responsibility.
- Make responsible use of the protection equipment allocated to them.
- Inform their direct supervisors of any situation which may be a risk for the health and safety of the workers, and the inefficiency or inadequacy of the preventive measures applied.



11. Criminal risk management system

IDE has established a Criminal Risk Management System (SGRP) using procedures to control the knowledge of and compliance with this Code of Conduct, the reporting of possible infringements, and the identification, evaluation and treatment of the different criminal risks which may result from the very nature of the activities carried out by the Company at any time.

The Criminal Risk Management System, and all the policies, procedures, instructions, records and protocols have been approved and are wholly supported by the Management, the Board of Governors, the Compliance Committee and have the approval of the Heads of the areas or departments concerned.

The Board of Governors, the Management and the Compliance Committee are responsible for supervising the compliance with and application of the internal regulations on which the system is based, and on keeping them updated.

Compliance Committee

Its duties are:

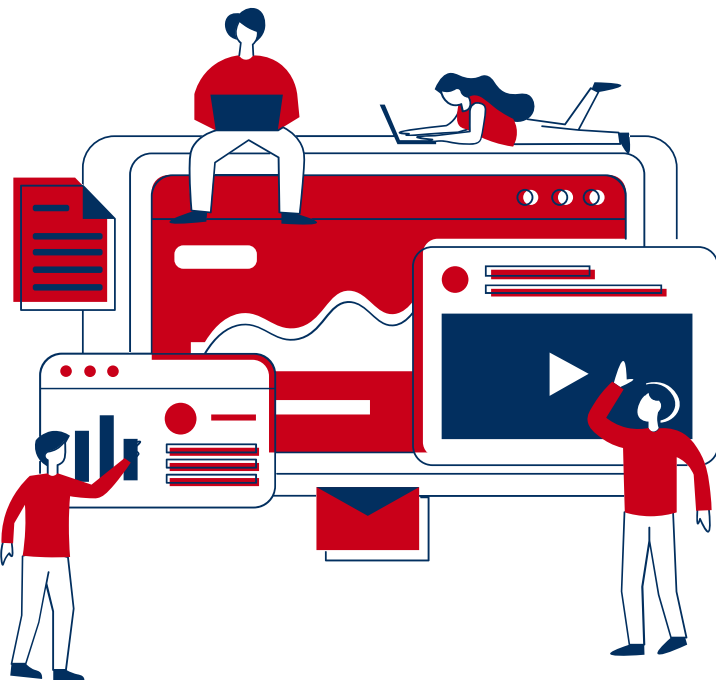
- To guarantee compliance with this Code of Conduct.
- To apply and interpret the rules.
- To administer the receipt and investigation of incidents.
- To communicate and raise awareness.
- To collaborate in the design, implementation and application of controls and preventive measures for compliance.

Any questions regarding the interpretation, scope and application of this Code of Conduct should be sent to the Compliance Committee at compliance@ide.es.



Compliance with the Code of Conduct

- All associates, workers and collaborators of IDE must read, understand and comply with this Code of Conduct, and remember the internal regulations and policies which guarantee their efficient application.
- In addition, they should observe and comply with the procedures and instructions established in the Criminal Risk Management System (Compliance) which may affect their job, and ensure the completion of the forms available for demonstrating an effective control.
- Employees of IDE must share the values of the company. This is why they are asked to express their acceptance of their responsibility by signing the Letter of Commitment which they receive with the Code of Conduct.
- Any exceptions to the instructions established in this Code of Conduct and the rules derived from the same, provided they do not enter into conflict with the applicable legal system, must have the prior written consent of the Compliance Committee.
- In order that all the interested parties are aware of this Code of Conduct, the procedures of the Criminal Risk Management System and the mechanisms for communicating its content are established.
- This Code is available to anyone who is interested on the IDE website: [www. ide.es](http://www.ide.es), and is also referenced throughout the recruitment with any interested party.



Ethics channel



Any employee, collaborator, client or supplier of IDE who considers that, for any reason, any conduct may be being carried out that could involve an action or omission that constitutes an infringement of European Union Law, or that could constitute a serious or very serious criminal or administrative offence; as well as conduct contrary to the Criminal Risk Prevention Policy, this Code of Conduct or other regulations within IDE, must immediately and directly notify the Compliance Committee through the Ethics Channel available on IDE's website www.ide.es.

IDE guarantees the anonymity and confidential treatment of any communication received through the Ethics Channel.

Similarly, any type of retaliation towards anyone who, in good faith, reports behaviour that may violate this Code is strictly forbidden, regardless of the results of the investigation into the events reported.

All associates, workers and collaborators of IDE must cooperate with the internal investigations regarding compliance and ethics.

Establishing channels of communication without fear of negative consequences is vital for the correct implementation of the Criminal Risk Management System (Compliance) of our Company.

Find out more about the operation of the Ethics Channel on the webpage: www.ide.es.

12. Disciplinary system

The individuals who form part of IDE must comply with the principles of this Code of Conduct and the other internal rules of the Integrated Management System (Quality, Occupational Risk Prevention, Information Security, Personal Data Protection) and the Criminal Risk Management System (Compliance).

Failure to comply with what is stipulated in the same will be considered an offence and the person involved may be sanctioned in accordance with the applicable Labour agreement.

In the case of collaborators and suppliers (whether individuals or legal entities) and other interested parties, this Code will be applied as is reasonable, and non-compliance of the same may result in the termination of the contract or of any relation with IDE.



13. Approval, validity and review



his Code of Conduct has been approved by the Board of Governors of IDE and is valid indefinitely.

It will be revised and updated regularly by the Compliance Committee, considering the contributions received from the personnel or interested parties, and the potential new risks derived from the life and activity of the company.

The Compliance Committee will prepare an annual report on the monitoring of compliance with that established in this Code of Conduct. This report will be revised by the General Management who will recommend, if they consider it necessary, any modifications or measures that are relevant for its approval by the Board of Governors of IDE and its updated publication on the corporate website.



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