

CODE OF ETHICS



** Code approved by Mr. Sabino García Vallina, TSK's Chairman, on August 6, 2019.*

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1. Definition

Since it was constituted, TSK has endeavored to become the leader in its sector, promoting, to achieve its goals, a law-abiding corporate culture, as well as measures aimed at preventing crime within the organization. In this Code are established the values and principles of action by which TSK's business is to be governed.

2. Recipients

Observance of this Code is demanded from the governing organs, the management organs and, in general, from all TSK employees; as well as from all the external collaborators, such as consultants, agents, suppliers and others. In this respect, every employee is bound to analyze his/her behavior in the light of the guidelines stated in this document and to make sure that they are complied with.

Every person that joins, collaborates with or becomes part of TSK must accept the values, principles and performance standards contained in this Code, and s/he must report, through appropriate channels, any infringement of the rules of conduct established in the internal procedures.

3. TSK's mission, vision and values

• 3.1. Mission

TSK's mission is to be highly competitive in the execution of engineering and equipping projects within the infrastructure, energy, industry and environment sectors; always aiming to please our clients and the people who make up TSK, committed to their personal and professional development.

• 3.2. Vision

TSK's vision is to be a leading company as regards human resources, technology and profitability, with the purpose of offering efficient solutions in the engineering and equipping field that contribute to sustainable development, at a national and at an international level, ensuring our clients' satisfaction and trust.

• 3.3. Values

TSK has defined the following values as part of its commitment to society and its vision:

Competitiveness:

As a value that is inherent to the company for the successful achievement of our vision.

Innovation:

In TSK, we have committed ourselves to innovation in our processes and in the way we work, offering our clients the most innovative services available in the market. We have a vigilant and proactive attitude towards new opportunities, in a process of continual development.

Excellence:

Quality is an intrinsic value to the company, whose purpose is to offer products and services that seek excellence. Our companies are to be perceived by our clients as companies that offer solutions and installations of the highest quality.

Flexibility:

Our companies provide services to the industrial sector, so that flexibility is a key factor to be able to compete with larger companies. We wish to transmit this flexibility in all of our companies, always willing to adapt to any changes that may take place.

Collaboration:

This value is always present in TSK's organization and culture, and it is extended to our daily relations with clients, suppliers, employees and society at large. Our collaborative spirit shows in our daily actions.

Commitment and Respect:

They are deep-rooted values in our organization. Our hallmark in every one of our actions must be commitment and respect towards all the groups with which we interact.

Enthusiasm and Passion:

Only through the enthusiasm and passion we put into our projects, behavior and actions can we achieve our common goal: turning TSK into a leading company in its sector.

4. Behavior criteria in relation to stakeholders

This Code of Conduct includes a number of provisions to be applied by every TSK collaborator in their professional and personal life, in those matters that may affect TSK's image. These principles of action are shown below without limitation, as they do not describe every possible situation. They are to be applied in all TSK companies and work centers.

• 4.1. Shareholders

Every TSK collaborator must endeavor to maximize return and minimize risk. The shareholders' rights are guaranteed by its administrators' strict compliance with all the regulations in force, particularly company-related regulations.

• 4.2. Employees and collaborators

Observance of current legislation

Every TSK employee and collaborator shall ensure that the current legislation is observed, both in his/her country of residence and in the countries where they are working or providing services.

The human rights and the applicable labor laws will be observed, at least. The wages and working hours must comply with the applicable laws, rules and standards in each country, including minimum wage, overtime and maximum working hours.

Observance of the Code of Conduct

Every person that joins or becomes part of TSK shall be informed and accept the policies,

values and standards of performance established by the company. They shall adapt and revise their behavior based on the guidelines stated therein and they will make sure that they are observed.

Respectful, harassment-free workplaces

All TSK workers and collaborators must show respect for each other and treat each other with dignity. This responsibility particularly includes avoiding any behavior constituting sexual harassment or mobbing, or implying discrimination based on race, sex, religion, nationality or disability, in order to contribute to maintain a pleasant, safe working environment.

Equal opportunities

All the TSK collaborators in charge of hiring or having an influence on hiring, promoting and other decisions related to professional careers in TSK must offer equal opportunities to every person. Equality is also understood in the sense of “positive discrimination”, when applicable.

Professionalism at work

TSK representatives, employees and collaborators shall, in the performance of their duties, endeavor to be as efficient as possible. They are also expected to be honest and respectful with their coworkers, superiors and subordinates. All the reports and answers inside and outside the organization must be truthful and without distortions, but they must never jeopardize the confidentiality of the information.

Duty to collaborate with auditors and inspectors

Every TSK member shall always act in a collaborative manner in any inspecting actions required by any bodies or public authorities.

Use and care of corporate assets

TSK employees and collaborators are TSK’s main asset. Therefore, TSK undertakes to contribute to their personal and professional development, by preparing and improving their working conditions and, consequently, their quality of life. Each person is considered in relation to his/her dignity and merit.

TSK provides its employees and collaborators with the resources required for the performance of their professional activities, and each one of them is responsible for

preserving and protecting them, ensuring that they are not used inappropriately or put at the disposal of people outside TSK without authorization.

Every member of TSK must comply with the established telematic protocol, as well as with its internal implementing regulations, in order to mitigate any risks that may arise as a result of the alteration of the computer systems.

Occupational Safety and Health

TSK is committed to providing safe working conditions for all its members. Each collaborator must promote this idea by achieving, in the performance of his/her duties, the goals established at each particular time regarding safety. In any case, TSK provides its employees with training regarding labor risks and safety, disseminating among them its Prevention Plan.

Gifts

In their relations with individuals and companies, the members of TSK are strictly forbidden to promise, offer or grant to suppliers, clients or third parties, directly or indirectly, any unjustified gifts in exchange for unlawful favors in their contractual relationships or which may, in any other way, compromise the receivers' obligation to make objective decisions for the benefit of their companies.

The members of TSK are also strictly forbidden to request, accept or receive any gifts that may influence the decision-making between the parties that are directly or indirectly involved. As an exception, the members of TSK may accept courtesy attention and promotional articles provided always that their value is symbolic.

The gifts received, if any, must be delivered to their workplaces and not their home addresses. If any gifts are received at their home addresses, they must inform the Ethics Committee, who will decide if they are to be accepted. In any case, if a doubt exists regarding the acceptability of any gifts received on the basis of the principles established in TSK's Crime Prevention Plan, they must communicate it to the Ethics Committee, who will advise them on the criteria to be followed.

Rewards

It is strictly forbidden to offer bribes or give rewards with the purpose of obtaining

preferential treatment for TSK from clients, suppliers, national or foreign government employees or third parties in general. This rule also applies to the use of third parties for the performance of those acts. Any employees or collaborators who find themselves in the position of being asked for rewards that may be illegal or not meet the ethical criteria must communicate it through the channel established for that purpose.

Conflicts of interests, privileged information and other activities

Every member of TSK is bound to inform the Ethics Committee of the existence of any possible conflicts of interests that may exist between them (or people linked to them) and TSK. They must also refrain from representing TSK or influencing decision-making in any situations in which they, directly or indirectly, have a personal interest.

No members of TSK may take advantage, for their own benefit or for the benefit of any people linked to them, of any information to which they have had access on account of the position they hold.

No members of TSK may engage in other activities, remunerated or not, when they are incompatible with the obligations arising from their working relationship with TSK.

Confidentiality of the information

Every member of TSK is bound to treat the information they have access to on account of the position they hold confidentially, and it will only be used within the scope of their working relationship with TSK. By default, all TSK's information is confidential.

TSK does not demand or induce its collaborators to disclose any information to which they have had access as a result of their relations with third parties.

TSK shall guarantee its faithful compliance with the current regulations on data protection in relation to its employees, suppliers, third parties and collaborators in general, by taking the necessary measures to ensure full effectiveness.

Observance of copyright

TSK shall protect, under the terms of current law, the rights of industrial and commercial use and exploitation of all the patents, invention models, copyright, industrial drawings and

models, etc. produced by its collaborators in the performance of their duties.

TSK guarantees that all its employees shall respect the intellectual and industrial property rights of third parties, and that they shall not make use of them without prior authorization.

• **4.3. Clients**

Every client relationship will be duly documented as legally required, expressed in clear terms that enable the identification of the rights and obligations arising from it.

TSK is committed to providing top quality works and services to its clients. Quality is one of the pillars of our organization. We undertake to ensure suitable quality standards in all our products and services in accordance with predefined levels and to periodically analyze the results in terms of perceived quality.

TSK, in its commitment to fighting against fraud and financial crimes, does not allow any conduct aimed at committing crimes regarding fraud or deception in the organization.

• **4.4. Suppliers and subcontractors**

TSK guarantees that the suppliers and subcontractors with which it establishes trade relations shall be identified and selected with complete impartiality, autonomy and independence. For their selection, due diligence must be performed in order to evaluate their competence, reputation, organizational skills and timely fulfillment of their contractual obligations.

Any supplier and, in general, any third party that enters into trade relations with TSK shall undertake to abide by the laws and regulations of every country where it operates, as well as with TSK's internal policies, codes and rules; and it shall not initiate or maintain any relations with those who do not intend to commit to this principle. Any commissions to such individuals to operate on behalf of TSK and/or in its interest must be given in writing, establishing a specific contractual clause that imposes the observance of TSK's ethical and crime prevention principles. Failure to honor such obligation will result in the rescission, due to non-compliance, of the contractual relationship, without prejudice to any other actions that may be taken.

Advisors and consultants

It is often necessary to hire external consultants and advisors, and it is, in general, useful for TSK's objectives. Nevertheless, every member of TSK must control that those people comply with the terms of the contracts or agreements signed in each case and that they abide by TSK's policies.

• 4.5. Technological partners

We shall establish relationships and alliances with our technological partners that enable us to share potentialities, key skills and knowledge, encouraging cooperation and involvement in permanent creation of value through new projects.

The relationship with our technological partners will be clear and mutually respectful. We want to be considered an attractive, reliable technological partner that honors its obligations. Our relationship will always be based on mutual trust, ensuring security, confidentiality and respect for the ownership of the information and knowledge generated and shared in the relationships with our technological partners.

5. Behavior criteria in relation to material matters

• 5.1. Human Rights

We hereby explicitly undertake to observe, defend and promote the International Agreements, the current legislation and the principles relating to Human Rights, especially regarding the labor sphere.

We guarantee that no forced or obliged labor force shall be used, that no child labor shall be used and that our employees shall be free to leave their jobs as long as they provide sufficient notice.

• 5.2. Sustainable Development Goals (SDGs)

TSK undertakes to incorporate into its management, strategy and operations the Sustainable

Development Goals, which constitute the basis for the development of the 2030 Agenda established by the UN.

For that purpose, we shall carry out a materiality analysis taking into account both the organization's interests and the concerns of the stakeholders and communities where we operate, establishing indicators and objectives in line with the SDGs.

• **5.3. Environment**

TSK undertakes to endeavor to respect, defend and promote the international agreements, the current legislation and all the principles and requirements relating to the environment, contributing to environmental sustainability. We shall identify our main environmental aspects and impacts and we shall take action to eliminate and/or reduce them, particularly greenhouse gas emissions, as part of our commitment to the fight against climate change.

We shall promote the application of international standards, the application of existing and/or emerging technologies, and the participation in national and international environmental projects.

• **5.4. Diversity**

We are aware that our society is diverse and of the impact our decisions and actions have on people. Therefore, we shall endeavor to identify and see to the different diversity profiles, both in our company and in the communities where we work.

• **5.5. Commitment to the communities**

TSK takes part in programs focused on social welfare, endeavoring to improve the communities where it is present. This participation is carried out by means of our own programs, getting involved beyond our technological role, collaborating with various entities and associations through sponsorship or by entering into specific agreements in relation to social, cultural, sports, science and technological matters, both at a national level and in the countries where we carry out projects; in response, in this last case, to specific territorial needs.

• 5.6. Political contributions

Political contributions are completely excluded and forbidden. TSK does not support any parties or party representatives or candidates in Spain or abroad.

• 5.7. Transparency and Communication

We will be open about our actions and decisions, acting in compliance with the applicable current laws and regulations, and providing any stakeholders affected by our decisions and their implementation with clear, understandable information.

We shall be particularly strict in the awarding, hiring and procurement processes, in the performance of the contracts, and in the collaborations, arrangements and agreements.

• 5.8. Evaluation and Reporting

We shall evaluate all our policies and strategies, as well as the decisions arising from their implementation, by means of processes that enable us to know the effectiveness and efficiency of the action taken.

We shall promote a reporting culture in all our lines of business, with the purpose of informing about the achievement of the goals and the fulfillment of the undertakings given.

TSK has periodic internal and external auditing processes, which ensure the systematic, permanent assessment of all our Management Systems.

6. Code application control

• 6.1. Ethics Committee

TSK has an Ethics Committee, which is a collegial organ in charge of monitoring the performance and execution of the Criminal and Anti-bribery Compliance management system, as well as the observance and updating of TSK's Code of Ethics and Crime Prevention Plan.

It is made up of managers from the following areas:

- Legal Counsel
- Human Resources and Management Systems
- Financial-Corporate
- Economic-Financial
- Information Technologies

The Ethics Committee is an organ with executive competence to decide on the action to be taken at any indications of alleged criminal acts that may have criminal or other types of consequences for TSK arising from the alleged perpetration of a crime.

7. Reporting of noncompliance and irregularities

TSK has created an open report and consultation channel so that both TSK members and third parties can report, in good faith and based on reasonable evidence, any circumstances that may mean the materialization of a criminal risk for TSK, and ask any questions they need an answer to in relation to the Criminal Compliance management system.

This channel, available on the website through two different forms, can be used both to ask questions about the Criminal and Anti-bribery Compliance management system, and to report noncompliance. The said channel, can be managed internally or externally, always provided that the legally established guarantees are maintained.

Confidentiality, that is, the accuser's anonymity as against third parties, is guaranteed, unless the disclosure is required by a competent judicial or administrative authority. We also guarantee that no reprisals will be taken against people who report crimes in good faith.

Notwithstanding the above, TSK members and third parties shall be informed of the fact that making allegations knowing that they are false or recklessly disregarding the truth may result in criminal responsibility or civil liability under the terms of current law.



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