Code of Conduct

BRUC

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1. Good business with sound judgement

Bruc Energy, S.L. and its affiliated companies' ("BRUC" or the "Group") way of doing business is based on enabling the energy transition through delivering a sustainable energy supply by constantly looking for additional value generation with respect to the environment and the society while abiding to the highest standards of business ethics, sustainability, transparency and good conduct.

BRUC's business ethics and compliance model

The code of conduct (the "Code of Conduct" or the "Code") defines BRUC's business-ethics and compliance model and is implemented through policies, standards, processes and controls.

BRUC applies the principle of due diligence to prevent, detect and, when applicable, eliminate irregular conducts that violate the Group's policies and applicable legislation. The Board of Directors is BRUC's ultimate safeguard for its culture of ethics and for the effectiveness of its business-ethics and compliance model.

Why a Code of Conduct

BRUC has a long-term perspective on its business. The Group has a commitment towards its shareholders and the rest of its stakeholders: Board of directors, managers, employees, suppliers, customers, business partners, and the community as a whole. For BRUC, responsibility and profitability go hand in hand and the Group is therefore committed to sustainable growth.

The Code provides an overview of the behavior all directors, managers, employees and, in general, BRUC's business partners are expected to follow and demonstrates BRUC's values.

The provisions of the Code of Conduct are mandatory and failure to comply with them may give rise to disciplinary sanctions or other appropriate actions depending on the offender's relationship with BRUC.

BRUC's Code of Conduct applies to everyone

The Code is applicable to all the companies that make up the Group, as well as to the investee companies not integrated in the Group over which BRUC has effective control, within the legally established limits. In those investee companies in which this Policy is not applicable, BRUC will promote, through its representatives in its administrative bodies, the alignment of its own policies with this Policy. In addition, this Policy is applicable, as appropriate, to joint ventures, temporary joint ventures and other equivalent associations, when BRUC assumes their management. In shareholdings in which the Group does not have effective control, the application of other principles and guidelines that are in line with this Code is to be encouraged.

The Code applies to BRUC's directors, managers and all employees who have an employment relationship with the Group (all of them referred to as the "Professional" or the "Professionals"), as well as contractors, suppliers, consultants, advisors, clients, collaborators, business partners and any other person acting with or on behalf of the Group, regardless of their location.

Compliance with the Code must not affect strict compliance with legislation in force and with all regulations and internal rules of BRUC. If the aforementioned regulations and internal rules or legislation in force establish stricter obligations than those of this Code, they are to prevail over those defined herein.

2. BRUC's values

BRUC's corporate values are the essential principles that guide the performance of the Group and show the true expression of the culture, how Professionals face BRUC's objectives and the work model necessary to achieve them. They define a framework for the relationship between people, both internally and in their interaction with other stakeholders.

- INTEGRITY: This value is not only expressed through respect for the law, but also as a way of dealing with personal relationships in the professional sphere, both internally and externally. At BRUC, it is all about doing good business with common sense, based on honesty, respect, sustainability, innovation, fairness, transparency and integrity.

- EXCELLENCE: BRUC is committed to establishing lasting commercial relations based on excellence, honesty, professional responsibility and value contribution.

- SUSTAINABILITY: BRUC is committed to the environment and society and seeks a balance between the profitability of its business model and the protection of the environment and surroundings, contributing to the well-being of people and the efficiency of resources.

- TEAMWORK: BRUC is aware that each person has a unique talent and seeks to make the most of diversity to create synergies in daily work.

3. Business integrity

Fair and honest relations with business partners

The way the Group deals with its business partners shall be characterized by honesty, respect, sustainability, innovation, fairness and integrity.

The companies and Professionals that belong to the Group shall comply with the laws and regulations in all jurisdictions where they do business.

Professionals shall not offer or accept from customers and other business partners, official institutions or representatives of such entities any rewards or benefits that violate any applicable laws or this Code.

The Group will make its best efforts to ensure that its business partners, as well as the companies in which BRUC directly invests, are aware of this Code and BRUC's values.

Zero tolerance towards corruption and bribery

Trust, respect, integrity and honesty are essential to BRUC. Any type of corruption is contradictory to the objective of doing good business. The Group has zero tolerance towards corruption, bribery or kickbacks in any form, both public and private, as it is established in the relevant policies and procedures related to this matter.

Furthermore, it is important for BRUC to be able to ensure that its business partners share the same zero-tolerance stance toward corruption and have implanted robust measures of due diligence. Third parties collaborating with the Group must strictly adhere to legal requirements and internal anti-corruption policies. Any suspicious activities involving a third party in collaboration with the Group must be promptly reported.

Corruption is defined as the act by which a person in the exercise of a public function or private office solicits or accepts an undue advantage with a view to participating or refraining from performing in any act that falls, directly or indirectly, within the scope of his or her authority.

Bribery consists of the act of offering, promising, authorizing or granting, directly or indirectly, an undue or unfair advantage to any person in a public or private position with the intent of obtaining a personal benefit from such offer, using undue or excessive power.

Fight against fraud and money laundering

BRUC expressly prohibits any fraudulent and/or illegal activity.

Fraud is defined as any intentional action committed to obtain an illegal or unfair advantage through deception.

Money laundering is defined as any operation or process aimed at legitimizing or giving the appearance of legality to goods, funds or assets derived from illegal activities. BRUC's Professionals are particularly vigilant of situations in which there may be indications that a transaction of this kind is taking place within the scope of BRUC's activities.

Payments in cash must not be accepted without adequate supporting documentation.

Professionals must report any indication or suspicion of unethical or irregular activities in relation to fraud or money laundering through the Ethics Channel.

Avoid conflicts of interest

Within BRUC, business decisions shall always be based on what is in the best interest of the Group.

Decisions shall never be based on personal considerations or relationships.

A conflict of interest arises when anything interferes with or influences the exercise of a Professional's independent judgement, and which may not be in the best interest of BRUC. Professionals must avoid situations in which personal interests may conflict with, or even appear to conflict with, the interests of the Group.

Situations professionals must be aware of

Assessing whether there is a conflict of interest is sometimes difficult. If in any doubt, Professionals always must be transparent and ask BRUC's ESG department. If a clear conflict of interest as described below should arise, it must be reported immediately to ESG department or through the Ethics Channel.

The following are some types of situations that Professionals have to be particularly aware of:

- **Business opportunities**: Professionals may not take business opportunities for themselves or their related persons, which may arise during the course of their duties for BRUC, if this could be contrary to the interests of the Group. Nor may any Professional use BRUC's property or information for any type of personal gain.

- **Other employment**: Any employment outside of BRUC, with or without compensation, must not influence a Professional's job performance. Professionals may not engage in outside business interests that divert time and attention away from their personal work responsibilities or require work during company time.

- **Board memberships and other outside affiliations**: Any service on a board of directors or similar body of any enterprise or institution is not permitted if it creates a conflict of interest. All outside professional service must be approved by BRUC.

- **Gifts, benefits, reimbursements**: No Professional may offer, accept or promise gifts, benefits, reimbursements or entertainment to or from a third party that would constitute a violation of this Code or the relevant applicable laws. Gifts in the form of cash

payments, including personal loans or guarantees of such obligations, whether of large or small amounts, could be regarded as bribes and may not be accepted under any circumstances. Offers of this nature must be politely but firmly declined, or immediately returned to the sender if delivered without prior notice and reported to BRUC. This also applies to any situation that could affect professional judgment in the performance of the respective work or duties for BRUC or a third party. However, the Group recognizes that the acceptance of small advertising or promotional items, with no commercial value as well as modest hospitality and events consistent with social uses may be a legitimate contribution to building good business relationships.

- **Bribes, kickbacks and similar**: Professionals may not, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback, unauthorized loan or any other unlawful or unethical benefit when conducting business for BRUC.

- **Business meals, events, and entertainment**: The giving and receiving of meals in the normal course of business is permitted. Lavish meals and inappropriate entertainment should be politely but firmly declined. Taking care of clients is the main theme here, and Professionals show their respect, humbleness and cost consciousness to the Group's business partners.

- **Personal relationships**: All Professionals working at BRUC must be observant of any conflict of interest if any family member, person with whom it exists a temporary or permanent affectivity relationship, relative or close friend is involved. This is applicable within the Group as well as to other business relations. Family interests include those of spouses, parents, children, siblings and other relatives up to the third degree of consanguinity, and those of other persons with whom residence is shared.

  BRUC respects the privacy of its Professionals and recognizes that consensual personal relationships may arise in the workplace. However, any such relationship must not impair professional judgement, compromise objectivity, or create actual or perceived conflicts of interest.
  Professionals must ensure that their behaviour remains appropriate, respectful and professional at all times in the workplace and in any work-related environment.
  Particular care must be taken in situations involving reporting lines, performance evaluations, remuneration decisions, promotions, hiring processes or any other circumstance where one Professional may influence the employment conditions or career development of another.
  Any actual, potential or perceived conflict of interest arising from a personal relationship must be disclosed promptly to the relevant manager, Human Resources or ESG, so that appropriate measures may be implemented to manage the situation fairly and transparently.

Political neutrality

BRUC observes neutrality with regard to governments, public authorities, institutions, political parties and candidates. Company names or assets related to companies within the Group shall not be used to promote or discredit the interests of political parties or candidates.

BRUC refrains from direct or indirect financing of political parties or their representatives or candidates.

Corporate fiscal responsibility

BRUC adheres to the commitments established in the codes of good practices defined by tax authorities. The Group reports with transparency its tax contributions and does not use structures

that are designed to conceal information from tax authorities. Professionals are required to avoid any form of tax evasion or the pursuit of obtaining undue profit for BRUC. Any forms of public aid, subventions or other funds from which the Group may benefit must be used solely for their intended purposes.

Social responsibility

BRUC contributes actively to the socioeconomic development of its areas of operation through the provision of services and the development of new corporate activities that contribute to the improvement of the quality of life and the creation of wealth. The Group's relations with local communities are based on respect of cultural diversity and customs, dialogue and mutual trust. Professionals must adhere to BRUC's established guidelines when dealing with sponsorships, patronage and donations. These offerings must be duly authorized, fully transparent and conducted according to objective and ethical standards.

4. Meaningful and inclusive workplace

BRUC believes in and strives to be a meaningful and purpose-driven workplace based on respect, togetherness, diversity and inclusion. Improving diversity and inclusion contributes to better decision-making, team dynamics and creativity, as well as enhancing the ability to attract and retain talent.

Equal opportunities

The Group contributes to making businesses stronger by supporting a fair and equal society.

BRUC respects all fundamental human rights, specifically those rights that apply to our activities by involving our professionals.

The Group hires, performs evaluations and promotions, and engages with its Professionals in a manner based on the merits and the objective criteria that are associated with the candidates' skills and abilities, and with respect to the requirements of the position. BRUC enables equal opportunities and does not discriminate with regards to gender, appearance, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social or ethnic origin or based on any other discriminatory reason as established in the law.

BRUC makes every effort to make all its Professionals aware of, and understand, unconscious biases that they may have.

Good working environments

BRUC always wants to provide a good working environment that promotes growth, learning, dialogue, transparency, togetherness and development as well as physical and emotional well-being.

The Group is committed to providing the conditions for safe, sound and healthy working environments in a proactive way.

BRUC ensures to take preventive measures to provide a safe workplace environment and to comply with legislation in force in each country where BRUC has presence. All Professionals must be aware of, and comply with, standards of occupational health and safety and, to the extent that their functions allow, must be vigilant of their own safety and that of other Professionals, customers, suppliers, collaborators and, in general, all those who may be affected by their activities.

BRUC has a strong culture of fostering a healthy work-life balance for Professionals. This includes, among other things, that Professionals should be able to combine their personal lives with a professional career. Therefore, BRUC respects the Professional's free time, their privacy and that of their families.

Career and teamwork

BRUC makes available to its Professionals the training resources they need for their development as professionals. Professionals must participate actively in training programs by taking an active part in them and by keeping their knowledge and skills up to date in order to make the advancement of their careers possible and to contribute to the Group's meeting of its goals.

Zero tolerance towards harassment

BRUC believes in respectful, fair and professional treatment among all colleagues, managers and employees, and seeks a workplace environment in which all may feel free to express their opinions in an atmosphere of openness and trust.

By treating each other with mutual respect, dignity and inclusion, BRUC intends to bring out the best in each other.

BRUC assumes the responsibility of maintaining a workplace environment free of discriminatory attitudes toward gender, nationality, race, disability, sexual orientation, age, religious belief, political opinion or any other quality that may be met with discrimination.

No form of harassment or abuse of authority is tolerated within BRUC or when conducting business for any company within the Group, as well as any conduct that may give rise to an environment of intimidation or hostility in the workplace.

This includes, but is not limited to, physical, verbal or written harassment, abuse, or psychological mistreatment, towards Professionals or any third party in the line of work (whether at the office, outside the office or online), related to intimation or discrimination –sexual, ethnic or otherwise– as well as acts or threats of violence.

Harassment includes offensive, embarrassing or disparaging jokes, remarks, images and name-calling, as well as unwanted attention or physical contact or other intrusion of personal space or privacy.

Protection of human rights

As part of its commitment to the protection of human and labor rights, BRUC promotes compliance with the principles established by the International Bill of Human Rights of the United Nations, the OECD Guidelines for Multinational Enterprises, the Declaration of the 14 International Labor Organization (OIT) and its core conventions and the European Convention on Human Rights.

BRUC does not tolerate child labor, compulsory or forced labor, and it safeguards respect for free association, collective bargaining and preference within institutional in the workplace, within the Group and among those that are affected by its activity.

Right of association

BRUC respects every Professional's right to freedom of association and preference within institutional and recognized employees' associations. The Group respects the rights of Professionals to join, form or not to join an employee association of her or his choice, without fear of reprisal, interference intimidation or harassment.

Alcohol and drug abuse is never acceptable

BRUC has a responsibility to provide a safe working environment. The Group does not tolerate or allow illegal drugs or alcohol abuse in any form during work. None of the Group's Professionals may work under the influence of alcohol or any substance that prevents Professionals from performing their work duties safely and effectively.

Further, BRUC does not tolerate or allow any kind of possession or distribution of illegal drugs on any Group premises.

Mental Health

BRUC encourages Professionals to be open, talk about it and ask for support in the case that they or others are in need of help.

Confidentiality of Professionals information

BRUC takes all measures necessary to maintain the confidential nature of the Professional's personal data at its disposal. In this way, it ensures that confidentiality in the disclosure of data is in keeping with current legislation when necessary for corporate purposes, and it complies with data-protection regulations. Professionals whose duties give them access to the personal data of others must observe and safeguard the confidentiality of the data and use the information in a responsible and professional manner.

5. Environmental sustainability

Caring for people and the environment in which BRUC works is part of the Group's culture. This should be reflected in how Professionals run the business and operations, as well as in the choices they all make as Professionals.

The promotion of renewable energies which are clean from greenhouse gas emissions and less harmful to the environment is the most significant example of BRUC's commitment to respect and preserve the environment.

Climate change is an urgent challenge for humanity. By contributing to decarbonization through the generation of non-polluting energy, the Group aims to contribute to mitigating the climate crisis, while also future proofing its investments.

Conservation of the environment is among BRUC's fundamental priorities. To this end, its policies and system of environmental management are based on the best practices. It takes measures to promote efficient use of resources, protection of biodiversity, transition toward a circular economy, efficient use of energy and reduction of harmful emissions, among other initiatives. All Professionals, within the scope of their functions, must be aware of and implement these policies and conduct themselves in ways that contribute to the meeting of the established targets while minimizing the environmental impact of their activities.

Investor and owner

Environmental sustainability is an integral part of the Group's investment approach and ownership model. The Group's investments represent almost its entire sustainability and climate footprint and hold a large opportunity for positive impact.

The Group should consider sustainability in its business decisions and use its influence to drive meaningful change and contribute to sustainable businesses. BRUC wants to empower people,

organizations and business to do good for people and the environment, while growing its assets responsibility with a long-term perspective.

Live and lead by example

BRUC aspires to ensure that its own operation and offices have a positive sustainability and carbon footprint, by for example:

- Avoiding unnecessary consumption and single-use products;
- Ensuring transparent reporting on the Group's project portfolio environmental impact, including greenhouse gas emissions;
- Ensuring adequate environmental management during the project life cycle, including consideration of ecosystem, biodiversity and land use impacts;
- Considering sustainability when contracting services.

All Professionals have a responsibility to contribute to sustainability and ethics in their daily work, and to live and lead by example.

6. Protection of assets and confidential information

Responsible use and protection of BRUC's assets

As a renewable energy Group, solar photovoltaic and wind power infrastructures are, among other renewable assets, some of the most valuable assets of the Group.

BRUC has a wide variety of other assets, such as financial investments, confidential information, computer systems, software and tools.

Professionals are responsible for the protection and responsible use of BRUC's assets entrusted to them, and must limit their use to professional activities in accordance with established rules. All assets provided to Professionals are to be considered property of BRUC at all times. When fulfilling their duties, Professionals must respect intellectual and industrial property rights by making sure they have the licenses or rights corresponding to the materials used.

The use of BRUC's computers, systems and computer programs, including Internet access, must adhere to security and efficiency standards, and must not include any illegal activity that may harm the Group's reputation or compromise its IT systems.

Compliance with security rules and policies is compulsory, and the Group may exercise any necessary controls. Professionals must be vigilant of cyberattacks or manipulation of IT security. Any suspicious activity that may compromise the security of BRUC's assets or systems must be reported immediately.

Prohibited conducts in the use of BRUC's IT resources, are, among others, the following:

- Sending bulk emails or spam.
- Attempting to read, delete, copy or modify emails or files of other users.
- Intentionally exposing computers or IT systems to anything that may cause alteration.
- Uploading, downloading, executing, using or distributing illegal or unauthorized computer programs.
- Destroying, modifying, disabling or damaging data, programs or electronic documents of BRUC or of third parties with bad faith.
- Attempting to decipher security features of computers.
- Intentionally blocking other users' access to the network.

Protect intellectual property

Intellectual property, including trademarks and know-how, owned by any company within the Group, are assets of utmost value and must be treated with appropriate care.

Professionals must follow instructions from the relevant legal department within the Group on how to protect BRUC's intellectual property.

Intellectual property created by a Professional is transferred and assigned to the relevant company within the Group by law and/or its employment contract.

All Professionals can assist by reporting suspected trademark infringements, and other intellectual property infringements, at any time by reporting these incidents to BRUC.

Protect confidential information

Business and operational information and knowledge are valuable assets in the Group's highly competitive business environment. It is therefore in BRUC's interest to protect this information.

In general terms, the information held by the Group is considered to be of a restricted and confidential nature. Any BRUC Professional who has access to confidential information owned by BRUC, as well as information owned by third parties, shall safeguard this information at all times. Any unauthorized disclosure may harm the Group or third parties. Such information may include, but it is not limited to, financial information, business and strategy plans, technical know-how, information about Professionals, customers, suppliers or business partners, and other types of sensitive knowledge.

In relation to the Group's business partners, Professionals may also come across confidential information and knowledge about their businesses.

Professionals working within BRUC who have access to such assets or confidential information must act in accordance with their employment contract and contract with the applicable business partner and relevant laws as well as the policies and rules within the Group.

Professionals undertake not to disclose confidential information even after the termination of the professional relationship with BRUC.

Furthermore, Professionals are required to operate their devices in a responsible manner that does not lead to cyber-attacks or information breaches that could lead to the disclosure of confidential information.

Protection of BRUC's reputation

Reputation is a key aspect in maintaining the confidence and trust of stakeholders. All Professionals must take great care to preserve the image and reputation of BRUC both in the fulfilment of their duties and in other activities where their actions may be associated with those of the Group.

Regarding public appearances, when Professionals are representing BRUC or their appearance is related to their work performed in BRUC, prior authorization must be obtained. Similarly, Professionals must be particularly careful when using social networks, proceeding with caution and common sense, and avoiding conduct that may put BRUC's reputation at risk.

Any press release, posts in social networks or any other public communication that mentions BRUC or affects or could affect BRUC must have the prior authorization of BRUC's Head of Communications (or person exercising such role).

7. Commitments to third parties and the market

Fair competition

BRUC competes fairly in its markets, promoting free competition while fully complying with the law. The Group avoids any conduct that may be abusive or restrictive of competition, including price-fixing or other sales conditions, division or assignment of sales regions and similar practices. Any agreements that may compromise free competition must be reviewed, verified and authorized by BRUC.

Quality, innovation and technical know-how

BRUC is committed to the quality of its products and services. In this sense, it strives to achieve the highest level of customer satisfaction by anticipating their needs and establishing long-lasting commercial relations on the basis of excellence, honesty, professional responsibility and contribution of value. Innovation and technological progress are among BRUC's core values. To this end, all Professionals are expected to maintain a proactive approach, promoting innovation and actively contributing to new ideas, processes and products within the Group.

Confidentiality of third-party information

In compliance with current legislation, BRUC safeguards the confidentiality of the data of its customers, suppliers, contractors and collaborators and is committed to the nondisclosure of the data to third parties unless it is authorized by the owner of the data or required by law or administrative rulings. In this regard, BRUC guarantees data subjects access to their rights under legislation of protection of personal data. Professionals must maintain the absolute confidentiality of personal data and other confidential information of third parties they deal with in the fulfilment of their duties, and they must not engage in any type of improper use of the data.

Shareholder and investor relations

BRUC is committed to continually creating value for its investors, protecting its assets, rights and legitimate interests and honoring the commitments it has assumed. The information provided to investors must be truthful and must accurately represent the circumstances, corporate activity and business strategies of the Group. Information is to be provided in accordance with the law and within the periods established under current legislation. All corporate actions are to focus on the creation of value for shareholders.

Supplier, contractor and collaborator relations

BRUC considers its suppliers, contractors and collaborators as indispensable partners for the fulfillment of its objectives. The Group builds relationships based on trust, honesty and permanent dialogue. The Professionals who participate in the selection of suppliers, contractors and external collaborators must act with impartiality and objectivity, applying quality criteria and avoiding any conflict of interest. Suppliers and other entities must be selected on merit. BRUC has in place the Supplier's Code, which must be included in all contracts with suppliers or contractors, and issues of ethics, integrity, compliance and sustainability must be taken into account in the evaluation of the suitability of relationships with third parties. Once the relationship has been established, BRUC reserves the right to evaluate the performance of its counterparties to verify that it complies with the terms of the agreements and BRUC's Supplier Code.

8. Compliance with the Code and the law

BRUC Professionals may be subject to laws and regulations in different countries and jurisdictions. This Code refers to this set of relevant requirements as “the law”. Professionals are expected to comply with both the law and the Code.

In the unlikely event that the Code is in conflict with the law, then the law always prevails over the Code. If the Code stipulates higher demands than the law, then the Code prevails. Professionals must understand the Code and take responsibility for complying with the Code and the law.

There may be local rules and internal policies that complement the Code, which will also apply.

Use common sense

Professionals must always use their sound judgement and their common sense. In the course of their daily work, they may face difficult situations.

If there are any doubts about any action or activity, it could be useful to ask the following questions:

- Is it consistent with the Group’s Code?
- Is it ethical?
- Is it legal?
- Will it reflect well on BRUC?

Is it publicly defensible? If the answer to any of these questions is “no”, the action or activity must cease. Whenever there is a doubt, it is necessary to be transparent and ask BRUC’s ESG Departmentfor guidance.

BRUC strives to have an open culture of inclusiveness. Professionals are encouraged and should feel empowered to come forward to discuss ideas, improvements, different views and, in good faith, also raise any concerns they might have.

Raise concerns early: the Ethics Channel.

In the event that there are reasonable indications of a violation of the provisions of the Code or that any act contrary to the law or business ethics that may affect BRUC has occurred, such suspicion must be reported to BRUC through the established channels.

To this end, the Group has established the Ethics Channel, an internal information system through which BRUC Professionals, directors, suppliers or any third party must report possible criminal or administrative infractions or any illicit or unethical conduct or conduct contrary to ethics, this Code or applicable legislation committed in the context of the Group's activity.

The Ethics Channel can be accessed through the following route: https://brucenergy.integrityline.com/frontpage.

Communications made through the Ethics Channel will be processed in accordance with the provisions of BRUC's Ethics Channel Policy and with the guarantees recognized therein. BRUC admits anonymous communications.

Communications will be treated with strict confidentiality, and there will be no retaliation of any kind against the informant for making a report, unless the report was made in bad faith. In such cases, BRUC may take appropriate measures.

We lead by example

It is the responsibility of all Professionals within BRUC to communicate and demonstrate the content as well as the spirit of this document in their professional relations.

All Professionals have the responsibility of being aware of, understanding and applying the principles and values of BRUC and have an active duty to ensure their behavior supports compliance with, and the spirit of, the Code.

Specifically, all Professionals must:

- Act in an ethical, professional and diligent manner.
- Understand and comply with the provisions of the Code.
- Contribute to third parties' awareness of and compliance with the Code.
- Inquire about and report any actions that appear to be illegal or unethical, using the channels that have been set up for this purpose.
- Provide collaboration for the proper functioning of probes or audits.
- Those who hold roles of responsibility in BRUC or those who manage work groups must:
  - Collaborate and ensure that those under his or her responsibility are aware of, understand and apply the ethics and provisions of the Code.
  - Promote a culture of integrity and ethics and uphold exemplary behavior.
  - Support those who are under his or her responsibility and have concerns or report unethical or irregular conduct.

Accepting and complying with the code

All Professionals must accept and understand the provisions of the Code. Professionals hired by BRUC in the future must also confirm their understanding of the provisions of the Code. In this sense, BRUC provides the information and training needed by the Professionals, or any other stakeholders, in order to understand this Code and its standards.

Regardless of the position or place in the Group, Professionals must not request or order actions or conduct that violate the provisions of this Code. Violation of, or failure to comply with, the Code is punishable as defined by legislation in force, the Workers' Statute and the applicable labor agreement, without prejudice to other civil or penal liabilities that may have been incurred.

Approval and entry into force

This Code of Conduct was adopted by the Board of Directors of BRUC in 22th December, 2023 and has been amended by the Board on 28th November, 2024.

The Code will remain in force until the approval of its update, revision or revocation by the Board.

The Code is available to all Professionals, as well as to all the Group's stakeholders through its corporate website (https://brucenergy.com/).