

AQUATEC, PROYECTOS PARA EL SECTOR DEL AGUA, S.A.U. CODE OF ETHICS

Ethical values have always been a cornerstone of AQUATEC, PROYECTOS PARA EL SECTOR DEL AGUA, S.A.U.'s strategy and development.

Today, more than ever, AQUATEC, PROYECTOS PARA EL SECTOR DEL AGUA, S.A.U. needs to act responsibly and ethically in its activities with regard to all stakeholders.

The AQUATEC, PROYECTOS PARA EL SECTOR DEL AGUA, S.A.U. (hereinafter, the 'Company') Code of Ethics defines the values of our organisation. It should provide a benchmark for the entirety of our conduct and actions, both individually and as a group.

It is only with the commitment of each and every one of us that we can make a meaningful contribution to our common goal of sustainably managing resources that are essential to our future.

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OUR VALUES

Rigour

To guarantee the Company's long-term results for all stakeholders, through the tireless search for efficiency and innovation to the benefit of customers, playing an active role in the commitment to a circular economy.

Commitment

Reconciling development with respect for the planet, assisting customers in the sustainable management of their resources, to optimise their administration and use of those currently in existence, whilst guaranteeing those that will be required in the future.

Audaciousness

To optimistically live the present and creatively build the future, decisively supporting sustainable management of resources.

Partnership

Mobilising all our strengths, together, hand in hand with all stakeholders, to develop solutions for the smart and sustainable management of resources that are essential to our future.

OUR ETHICAL PRINCIPLES

The Company's corporate values are expressed through the way in which its professionals¹ act. Their ethics are recognised in the core principles underlying their behaviour: compliance with the law and regulations, integrity, justice, trustworthiness and respect for others.

The Company expects its staff to comply with these ethical principles whatever the circumstances and whatever their position, level of responsibility or interlocutors. All its professionals are strictly forbidden from acting in any way that may raise the slightest doubt concerning the Company's ethics.

Since its very beginnings, the Company has always made ethics a core part of improving its results and competitiveness, and has spent many years committed to human rights and dignity, the fight against corruption and environmental preservation.

The Company has infused this Code of Ethics with the values and principles that should guide the behaviour of its professionals, in accordance with the targets and the action framework set by its shareholders and establishing comparable goals.

Our ethical commitment and respect for our principles by all professionals are, today, more necessary than ever, to carry out our shared mission of the smart, sustainable management of resources that are essential to our future.

¹ Defined as all Company employees, senior managers and directors, as well as collaborators, suppliers and third parties acting on the Company's behalf.

FOUR CORE PRINCIPLES GUIDE OUR BEHAVIOUR

- To act in accordance with the law and regulations.
- To guarantee a deep-rooted culture of integrity.
- To be demonstrably fair and trustworthy.
- To respect others.

These four core principles are applied to all three of the fields in which the Company carries on its activities:

- **the organisation,** comprising its staff and shareholders,
- **the market,** where it forges relations with its customers, suppliers and other collaborators², partners and competitors and, lastly,
- **the surrounding environment,** made up of everywhere it has a presence, and embracing the local community and the environment.

Stringent ethical standards should be guaranteed for all stakeholders, to the benefit of all three fields (organisation, market and surrounding environment).

² Other collaborators include consultants, agents or contracted third parties.

OUR PRINCIPLES AS APPLIED TO THE ORGANISATION

Our team of professionals

Strict standards are set for all levels to ensure smooth relations between every member of staff. In this regard, it is the responsibility of each and every professional to carry on his or her work under good physical and intellectual conditions. This means that everyone, in the carrying out of their responsibilities and hierarchical relations, must always be shown respect.

The Company fosters relationships between staff based on courtesy, consideration, recognition and discretion. The Company completely condemns any type of harassment and disapproves of all forms or pressure tactics.

Respectful of diversity and privacy, the Company takes into consideration, above all, the competence of its professionals and refuses to countenance any form of discrimination. The Company's requirement of a high degree of professionalism helps with individuals' development, from both a professional and a personal standpoint.

Teamwork—to which particular importance is attached—is based on open, constructive dialogue that bolsters cohesiveness. The Company makes every effort to inform its professionals of its goals and challenges, to foster their engagement in corporate life.

Lastly, the Company strives to ensure that, in all areas of its activities, its salaries permit the enjoyment of a decent quality of life in accordance

with local standards. Furthermore, it takes care to implement proper measures to guarantee the health and safety of its professionals in the workplace.

Shareholders

Our shareholders play a key role in the Company's development. The trust they place in us gives rise to a dual obligation: on the one hand, to guarantee financial results and an optimal return on their investment and, on the other, to ensure good governance.

To achieve this goal, we apply very exacting standards with regard to corporate governance. The Company also works to ensure equitable treatment for its shareholders and undertakes to provide accurate, transparent, truthful and verifiable financial information by the required deadlines.

The Company's requirement of a high degree of professionalism helps with individuals' development, from both a professional and a personal standpoint.

IN SHORT...

OUR PRINCIPLES AS APPLIED TO THE ORGANISATION

Working in a healthy environment is key to the Company's successful operations. The Company has taken the necessary steps to guarantee its professionals decent living conditions and a safe working environment.

Additionally, the Company requires that, in relations between its professionals, respect and trust must always prevail.

What's more, this relationship and ethics-related requirement is also binding upon the Company itself and its relations with shareholders, in whose interests it implements the highest standards of corporate governance.

OUR PRINCIPLES AS APPLIED TO THE MARKET

Customers

Customer satisfaction—and therefore the Company's very viability—depend on a number of clearly-defined factors: accessibility, imagination, innovation, constant quality improvements and traceability, particularly in the field of health and safety, and a concern for the sustainable management of resources, not to mention regard for the social impact of its activities.

These requirements call for dialogue based on the use of accurate and truthful information, transparency with regard to procedures implemented and respect for commitments and the rules of fair competition.

Suppliers and partners

The quality of the products and services provided by the Company to its customers also depends upon its ability to obtain top-drawer performance from its suppliers and partners.

Therefore, its choice of said suppliers and partners must be impartial and stringent. So it is that they are selected on the basis of their professionalism and competitiveness, with a view to establishing with them a relationship based on trust.

All negotiations should respect the quality principles defined by the Company. In this regard, the decision-making process should involve all relevant interlocutors.

Additionally, the professionals involved must demonstrate impeccable ethics, avoid any conflict of interests and comply with regulations, particularly those associated with fair competition.

Our quality principles also find expression in the incorporation of a concern for the environment and society in the criteria for selecting suppliers and partners. The Company recommends that its business partners, subcontractors and suppliers implement—if they have not already done so—ethical, environmental and social standards that promote practices compatible with the values established in this Code of Ethics.

Competitors

The Company respects the rules of the market. As a result, it complies with competition and regulated market regulations, behaves fairly and undertakes to neither defame nor denigrate its competitors.

It also protects its confidential information and its trade secrets. And, lastly, it employs only legal and honest methods to gather information to help it win markets and tenders.

IN SHORT...

OUR PRINCIPLES AS APPLIED TO THE MARKET

Customer satisfaction and the sustainable management of resources are a priority for the Company, and are based on clearly-defined factors: quality in products and services, open dialogue and a spirit of collaboration, transparency in its procedures, and respecting its undertakings and the rules of fair competition.

These principles, which all of the Company's professionals must respect, are also applicable to its partners, suppliers and competitors. In this regard, the Company's professionals are asked to behave fairly and act justly and impartially in negotiations. It must be ensured that partners, suppliers and subcontractors apply ethical principles compatible with those established here.

OUR PRINCIPLES APPLIED TO THE SURROUNDING ENVIRONMENT

THE COMMUNITY

The activities carried on by the Company place it at the heart of the groups with which it is involved, and so it attaches particular importance to supporting those communities that welcome it.

This means that it implements an active policy of support for those experiencing difficulties, in partnership with the public authorities. It also carries out patronage and sponsorship activities that reflect its strategy of support for community initiatives. Activities must be open, transparent and legitimate.

It is Company policy not to fund any form of political activity. In exceptional circumstances it may, under certain conditions, contemplate the possibility of making limited contributions, but always in accordance with applicable law.

Lastly, in partnership with local actors, the Company strives to understand and respect all cultures.

In this regard, to ensure its on-the-ground actions are consistent with its principles, it enters in dialogue and associations with non-governmental organisations (NGOs) with regard to the environment and humanitarian work. It also promotes the civic and associative engagement of its professionals on a personal level.

The Company regards integrity as one of the core underlying principles of its ethics. It rejects corruption of any type and works to ensure that professionals involved in enforcing this principle do not suffer any detriment.

The planet

The environment, its conservation and sustainable development are all central to the Company's activities. The Company's commitment to sustainable development places respect for people and environment at the core of its identity and values.

Keenly aware of its responsibilities to present and future generations, the Company defines its strategy and sets its goals as an actor committed to sustainable development and the circular economy, and renders account of its results. It respects local legal and regulatory obligations. It also lends an ear to the expectations of customers, local and neighbourhood communities and, more generally, all of its stakeholders.

Watchful of emissions and the impact of its activities, it is also concerned with sharing its environmental goals with its partners, suppliers and other collaborators and, where applicable, with the owners of the facilities it manages. The Company employs the methods and techniques best suited to the promotion of sustainable development, by means of the optimal and innovative management of resources. It promotes research and innovation to leverage the experience it has gained in the fields of quality and safety, the recovery and recycling of materials and the economical use of natural resources, as well as damage limitation and the conservation of biodiversity.

IN SHORT...

OUR PRINCIPLES AS APPLIED TO THE SURROUNDING ENVIRONMENT

Socially responsible, the Company is committed to the communities in which it carries on its activities. Respectful of the environment and of all cultures, it has given itself the mission of safeguarding resources that are essential to the carrying on of human activities and to our future. It makes no secret of its achievements and challenges in this field and supports environmental and humanitarian NGOs.

The Company rejects all forms of corruption and works to ensure that its professionals involved in enforcing this principle do not suffer a detriment as a result.

THE GOVERNANCE OF ETHICS

OUR CODE OF ETHICS: SCOPE OF APPLICATION

The Code of Ethics and its application

In order to foster ethical behaviour by its professionals and act in accordance with applicable laws and regulation, the Company has implemented a three-level ethical structure:

- The law, the Code and its values provide the bases for the first level, the foundations upon which the Company is set, so as to achieve one clearly-identified goal: to act, always and everywhere, in compliance with applicable regulations, according to the rules and principles of its Code of Ethics.
- The second level concerns the organisation. It involves implementing appropriate structures and procedures for control, management and communication.
- Professional practices make up the third (and last) level. These are all the operational tools made available to professionals to allow them to act in accordance with the Company's standards.

This ethical focus is backed up by a range of practical documents. Their function is to provide each and every professional with specific help with regard to their behaviour and decisions. They place special emphasis on laws, rules and standards in the field of ethics and conduct, sourced not only from international, national and local regulatory bodies, but also professional organisations.

The principles of the Code of Ethics should be promoted by all those forming part of the governing and supervisory bodies of those undertakings in which our Company does not hold a majority stake. All the Company's professionals must make sure they inform interlocutors, suppliers and subcontractors of the existence of the Code of Ethics by providing them with this document.

The Company's ethical focus is based on three levels: reference sources, organisational structures and professional practices.

IN SHORT...

OUR CODE OF ETHICS: SCOPE OF APPLICATION

This Code of Ethics is applicable to all levels of the Company itself, and should also be promoted by its professionals beyond its confines and notified to all relevant parties.

THE MANAGEMENT SYSTEM

All the Company's professionals should integrate this Code's ethical principles within the performance of their daily work. To this end, the governance system clearly delineates responsibilities at all levels.

The Company's senior management is the prime guarantor of the application of the Code of Ethics. To this end, it must equip itself with the tools necessary to monitor the Code's implementation and detect any infringement of its standards. It must also establish a control system for the application of the ethics structure and compliance.

The close involvement of senior management

The duties of all senior managers include that of ensuring, individually and as a group, the proper implementation of the Code of Ethics. The rules established by this document must compulsorily be known by all professionals likely to exercise some power of control over the Company's affairs or influence any part of its policies. The conduct of these people, whose decisions have a significant impact in terms of ethics, must—obviously—be exemplary.

So, when senior management appoints someone to a position of authority, care must be taken to ensure that the person so appointed has the responsibilities, authority and means necessary to enforce this Code of Ethics.

The right management structure

Fostering the Company's commitment to ethics takes place at the very highest levels: its governing and management bodies have furnished it with the right structures for ethical management.

The ethical structure is overseen by the Company's directors. This ethical structure features a supervisory body with autonomous powers of initiative and control: the Compliance Officer, who is particularly responsible for ensuring the adoption of necessary procedures and of ethical benchmarks within the Company. He or she must also enjoy the proper human and budgetary resources, as well as recognition of the authority required to be able to carry out his or her duties.

The Compliance Officer has the mission of integrating ethics into the Company's vision, strategy, management and practices. This means that he or she proposes the founding texts and promotes their adoption by operational areas and functional managers, in all activities. The Compliance Officer regularly reports to the Company's directors on his or her activities.

Spreading the word

The Company's hierarchical managers are the guarantors of the dissemination of this document to its professionals, so that they may understand and implement the Company's ethics in their daily work.

To this end, they arrange training and/or awareness-raising activities, and offer help and advice to those professionals raising questions or doubts with them on ethical issues.

Lastly, the upper levels of management must verify their teams' understanding of their ethical and regulatory obligations. Also, they must make sure that their practices are in line with their obligations. Lastly, when there is duly demonstrated non-compliance, the applicable penalties shall be applied, with proper regard for applicable labour and commercial legislation.

The Compliance Officer enjoys the support of functional areas—particularly Human Resources and Communication—to implement and enforce ethical standards.

IN SHORT...

THE MANAGEMENT SYSTEM

Although all the Company's professionals are expected to adopt its ethical principles, its senior management have some specific obligations: to inform, raise awareness, train and perform proper monitoring. The Company has established a structure dedicated to strengthening ethical practices and verifying that these practices are compatible with its commitments.

THE SUPERVISORY BODY: THE COMPLIANCE OFFICER

The Compliance Officer is the supervisory body with autonomous powers of initiative and control, charged with the mission of ensuring the development and safeguarding of the Code of Ethics and overseeing the ethical structure.

Both facilitator and promoter, he or she contributes to ethical risk prevention by fostering professional practices in line with the Company's commitments.

The Compliance Officer is appointed by the Company's directors, to which he or she regularly reports.

The Officer's chief mission in this field is:

- To communicate and explain, when necessary, the codes, standards and/or guides that define the ethical commitments to all those making up the Company, in close collaboration with its senior management.
- To design and/or oversee the preparation of complementary documents for the ethics function, specific to the Company's locations or activities.
- To ensure that ethical principles are respected in the Company's development strategy and activities.
- To organise awareness-raising, training and communication activities.
- To respond to professionals' questions and resolve any doubts raised with regard to ethics and compliance.
- To deal, in partnership with the affected departments and with sufficient autonomy, with any ethics-related alerts and/or notifications received.
- To identify risks associated with the Company's prevention programme.

The Compliance Officer must strictly respect the confidentiality of any information of which he or she becomes aware in the carrying out of his or her mission. This means that he or she may not, without the interested party's prior consent, divulge the name of anyone who has made or received an accusation.

This duty of confidentiality is exercised in accordance with applicable legislation and internal rules and regulations. Additionally, the necessary measures must be taken so that anyone making a query or notification does not suffer from reprisals.

Chosen on the basis of his or her personal and professional qualities of experience, training, strictness, integrity and discretion, as well as his or her mediation skills and analytical abilities, the Compliance Officer belongs to the Company's senior management team and/or has direct access thereto.

An ethical objective monitoring system

The Compliance Officer provides the Company with an overview of its ethical practices. To this end, he or she provides the Company's directors with regular reports and issues an annual report on ethics- and compliance-related activities.

IN SHORT...

THE COMPLIANCE OFFICER

The Compliance Officer participates in the definition of professional ethics-related standards and obligations and works to ensure that they are respected within the Company. He or she provides help and advice for all professionals raising ethics- and compliance-related issues.

He or she contributes to Company ethical risk prevention by issuing an annual activity report and ensures that ethical alerts are dealt with diligently and efficiently.

REPORTS, CONTROLS AND AUDITS

Within the framework of the ethics structure it has implemented, the Company establishes procedures to guarantee implementation of its policy in this area.

The Compliance Officer issues an annual report on ethics-related developments. This report is accompanied by a declaration of compliance, which certifies the commitment with regard to implementation of the ethics structure and compliance within the Company.

All documents associated with the ethics structure are available to all the Company's professionals. There is an email address, in addition to the Company's registered postal address, available to anyone who may require advice or seeks to raise queries or report impropriety with regard to ethical issues.

To complement the Compliance Officer, the Company's internal control and audit services are watchful for any information that may point to possible infringement of rules and standards.

They should also look out for the existence of potential weaknesses in the organisation. If required, these services shall perform a specific review of certain aspects of the ethics function.

*There is an email address, in addition to the Company's registered postal address, available to anyone who may require advice or seeks to raise queries with regard to ethical issues.
codigoetico@aquatec.es*

IN SHORT...

The Company has established communication, information and internal audit procedures that are completely integrated in the internal function to guarantee compliance with its ethical principles.

NOTE: This Code of Ethics was approved by the AQUATEC, PROYECTOS PARA EL SECTOR DEL AGUA, S.A.U. management body by means of a resolution dated 21 December 2016.



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