



ETHICAL CODE

CASTELOMEGA SL aspires that its conduct and that of the people linked to it respond and accommodate itself, in addition to current legislation and its corporate governance system, to the ethical principles and social responsibility of general acceptance.

This Ethical Code develops and specifies the Purpose and Values of the company and aims to serve as a guide for the actions of the administrators, professionals, and suppliers of the Company in the sense established by law, a global, complex, and changing environment.

Additionally, the Ethical Code has been prepared considering the recommendations of good governance of general recognition in international markets and the principles of social responsibility accepted by the Company, It also responds to the prevention obligations imposed in the field of criminal liability of legal persons.

The Ethical Code reflects the Company's commitment to the principles of business ethics and transparency in all areas of action, establishing a set of principles and guidelines of conduct aimed at guaranteeing the ethical and responsible behaviour of all administrators, professionals, and suppliers of the company.



1 Scope

This Ethical Code will apply to all managers and employees of the company, regardless of the position they occupy.

This Ethical Code applies to the company in the development of its activities:

- Repair of engines.
- Advanced engine consulting.
- Engine design.

2 Ethical Code

2.1 General Ethical Principles

1. The company contributes to the achievement of the Sustainable Development Goals (SDGs) approved by the United Nations through the development of all its business activities. Through this Ethical Code, the company formalizes its support for objective sixteen, which has among its goals the fight against corruption and bribery in all its forms.
2. The company expresses its firm commitment to the principles of the General Sustainable Development Policy as an integrating framework for its programs and actions with professionals, customers, suppliers, shareholders, and all stakeholders with whom it relates.
3. In this sense, the company, faithful to the business objective of generating wealth and well-being for society, adopts a responsible business ethic that allows harmonizing the creation of value for its shareholders, with a sustainable development that contemplates as its main objective the protection of the environment, social cohesion, the development of a favourable framework of labour relations and constant communication with the different groups related to the Company in order to meet your needs and expectations.
4. The company expresses its firm commitment to the principles of the Anti-Corruption and Fraud Policy and the Policy for the Prevention of Crimes and to the non-performance of practices that may be considered irregular in its relations with third parties (customers, suppliers, competitors, or authorities, among others), including those related to money laundering. To this end, professionals shall receive appropriate training on the applicable legislation.

The company will ensure compliance with the applicable tax regulations and will ensure adequate coordination of the tax policy followed by all of them, avoiding risks and tax inefficiencies in the execution of business decisions.

5. The company expresses its commitment and link with human and labour rights recognized in national and international legislation and with the principles on which the United Nations Global Compact and the United Nations Standards on the responsibilities of the company in the field of human rights are based.



6. In particular, in accordance with the provisions of the Human Rights Respect Policy, the company expresses its total rejection of child labour and forced or compulsory labour and undertakes to respect freedom of association and collective bargaining, the right to freedom of movement within each country, as well as non-discrimination and the rights of ethnic minorities.
7. Specifically, and to contribute to the objectives of fulfilment, Castelomega follows the roadmap of the Office of the United Nations High Commissioner for Human Rights, to promote peace, development, and security:
 - a. Provide expert legal advice on human rights issues.
 - b. Facilitate learning, employment regardless of sex, race, religion, disability, age, and sexual orientation.
 - c. Provide human rights education in its area of influence.
 - d. Create awareness about the actions that contribute to this regard in the field of Human Rights.
 - e. Communicate, control, and inform publicly, and even denounce situations that violate rights.
 - f. Participate in the promotion and protection of Human Rights.
8. The company develops its activity from the respect and protection of the environment, complying with or improving the standards established in the applicable environmental regulations, minimizing the impact that its activities may have on it and promoting actions that contribute to its protection, carrying out and sponsoring research and development projects that promote the decarbonization of the economy.
9. The company assumes behavioural guidelines to promote the decarbonization of the economy, minimize waste and pollution, conserve natural resources, as well as promote energy saving as a way to mitigate climate change and avoid the environmental, social, and economic costs that it entails.
10. The economic and financial information of the company, and especially the annual accounts, will faithfully reflect its economic, financial, and patrimonial reality, in accordance with the generally accepted accounting principles and the financial reporting standards that are applicable. For these purposes, no administrator, professional or supplier will hide or distort the information in the records and accounting reports of the company, which will be complete, accurate and truthful.
11. The lack of honesty in the communication of information, both within the company to professionals, controlled companies, departments, internal bodies, administrative bodies, etc. – and externally – to auditors, shareholders and investors, regulatory bodies, media, etc. – contravenes this Ethical Code. Dishonesty is also incurred by providing incorrect information, organizing it misleading or trying to confuse those who receive it.
12. The company, applying in any case rules of transparency, information, and protection, undertakes to offer a quality of services and products equal to or superior to that established by law, competing in the market, and carrying out marketing and sales activities based on the merits of its products and services.



13. The company will guarantee the confidentiality of its client's data, undertaking not to disclose them to third parties, except with the client's consent or by legal obligation or in compliance with judicial or administrative resolutions.
14. The collection, use and processing of the personal data of customers must be carried out in a way that guarantees the right to privacy and compliance with the legislation on the protection of personal data, as well as the rights recognized to customers by the legislation on services of the information society and electronic commerce and other provisions that are applicable.
15. Contracts with the company's customers will be drafted simply and clearly. In pre-contractual or contractual relations with customers, transparency will be promoted, and information will be provided on the different existing alternatives, especially in terms of services, products, and tariffs.
16. In case of export or import, the company undertakes to generate export control documents through which the exporter describes the use, user, and final destination to which the objects regulated by the Export Control Agreement are subject.
17. In the case of Imports, the customs control process will be subject to the controls stipulated by customs control, which analyses, investigates, inspects, and supervises all the merchandise subject to import or export.
18. Professionals will avoid any kind of interference or influence from clients or third parties that may alter their professional impartiality and objectivity and may not receive any kind of remuneration from clients or, in general, from third parties, for services related to the activity of the professional within the company.
19. The company will adapt the supplier selection processes to criteria of objectivity and impartiality and will avoid any conflict of interest or favouritism in its selection.
20. The company's professionals are committed to complying with the internal procedures established for the award processes.
21. The prices and information presented by suppliers in a selection process will be treated confidentially and will not be disclosed to third parties except with the consent of the interested parties or by legal obligation, or in compliance with judicial or administrative resolutions. The professionals of the company who access the personal data of suppliers must maintain their confidentiality and comply with the provisions of the legislation on the protection of personal data, to the extent applicable.
22. The information provided by the company's professionals to its suppliers will be truthful and not designed to mislead.
23. Professionals will avoid any kind of interference or influence from suppliers or third parties that may alter their professional impartiality and objectivity and may not receive any kind of remuneration from suppliers of the company, from third parties, for services related to the activity of the professional within the company.
24. The company will ensure compliance with the provisions of this Ethical Code by its suppliers and will act accordingly in the event of any violation.



25. The company undertakes to compete in the markets fairly and not to engage in misleading or denigrating advertising of its competitors or third parties.
26. The obtaining of information from third parties, including that of the competition, will be carried out within the framework of the law.
27. The company undertakes to promote free competition for the benefit of consumers and users and to comply with competition regulations, avoiding any conduct that constitutes or may constitute collusion, abuse, or restriction of competition.
28. We maintain appropriate files to meet our financial, legal, regulatory, and operational goals and obligations.
29. Relations with the authorities, regulatory bodies, civil servants, and Public Administrations will be governed by the principles of legality, loyalty, trust, professionalism, collaboration, reciprocity, and good faith, without prejudice to the legitimate disputes that, respecting the above principles and in defence of the social interest, may arise with said authorities in relation to the interpretation of the applicable regulations.
30. The company will respect and comply with the judicial or administrative resolutions that are issued, but reserves the right to appeal them, before as many instances as appropriate, when it understands that they do not conform to Law and contravene its interests.
31. The company, by itself or through intermediaries, will refrain from making contributions whose purpose does not respond to the social responsibility strategy established by this Ethical Code.

2.2 Ethical principles and duties of managers

1. The ethical principles that must govern the actions of the directors of the company (and of the natural persons representing the directors) are:
 - a. Strict compliance with the law and the Corporate Governance System, including its duties regarding confidentiality, use of non-public information, non-competition, use of social assets, business opportunities, related-party transactions, and other conflicts of interest.
 - b. The commitment and link with human and labour rights.
 - c. The protection of the environment.
 - d. Non-discrimination on grounds of race, colour, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political opinions, religion or any other personal, physical, or social condition of professionals, as well as equal opportunities between them.
 - e. The reconciliation of family life with work.
 - f. Safety and health at work, which implies ensuring that material conditions do not endanger the physical integrity and health of people.
 - g. The selection and evaluation, rigorous and objective, and the training of the company's professionals.



- h. The consideration of the legitimate interests, public or private, that converge in the development of the business activity of the company and, significantly, those of the different interest groups.
2. As an expression of the integrity required of the directors of the company, they must comply with the following ethical duties in the performance of their position (also applicable to natural person representatives of legal entity directors):
- a. Not to give or accept gifts or gifts in the exercise of their office. Exceptionally, they may accept or grant gifts of irrelevant or symbolic economic value, which respond to signs of courtesy or usual commercial hospitality and that are not prohibited by law, the Corporate Governance System or generally accepted commercial practices.
 - b. Not to offer or grant or request or accept, directly or through an intermediary, unjustified advantages or benefits that have as their immediate or immediate purpose to obtain a present or future benefit for the company, for themselves or a third party. They may not give or receive any form of bribe or commission, coming from, or carried out by, any other party involved, such as public officials, Spanish or foreign, personnel of other companies, political parties, authorities, customers, suppliers, and shareholders. Acts of bribery, expressly prohibited, include the offer, or promise, direct or indirect, of any type of improper advantage, any instrument for its concealment, as well as influence peddling.
 - c. Not to receive, in a personal capacity, money from customers or suppliers, not even in the form of a loan or advance. The foregoing does not apply to loans or credits granted by financial institutions that are customers or suppliers of the company.
 - d. Do not accept hospitalities that influence, may influence, or can be interpreted as influencing decision-making.
 - e. In case of maintaining any type of link, membership or collaboration with Public Administrations, public bodies and entities, state companies, political parties or other types of entities, institutions, or associations for public purposes, ensure that their strictly personal nature, unrelated to the company, is evident.
 - f. Make responsible use of the resources and means made available to them for the exercise of their position, which will be destined exclusively to professional activities in the interest of the company.
 - g. Recognize and respect the ownership of the property and the rights of use and exploitation of the company of the programs, presentations, projects, studies, reports and other works and rights created, developed, or used in the performance of their functions or based on the computer systems of the company.
 - h. Respect the principle of confidentiality concerning the characteristics of the rights, licenses, programs, systems, and technological knowledge, in general, whose ownership or rights of exploitation or use correspond to the company.
 - i. Use the equipment, systems and computer programs and passwords that the company makes available for the exercise of its position, including the ease of



- access and operation on the Internet and the website of the director (or similar instrument), in accordance with criteria of security and efficiency, excluding any use, action or computer function that is illicit or contrary to the rules or instructions of the company or that compromises the confidentiality of the Company Information.
- j. Not to exploit, reproduce, replicate, or transfer the computer systems and applications of the company for purposes that are unrelated to the exercise of the position. They will not install or use it in the computer equipment provided by the company programs or applications whose use is illegal or may damage the systems or harm the image or interests of the company, its customers or third parties.
 - k. Avoid any action or decision that may violate the law or the Corporate Governance System in their business, professional or private activities, in relation to related-party operations, significant transactions, business opportunities, use of social assets, other situations of conflict of interest, relations with shareholders, professionals, customers, suppliers and suppliers of the company, competing companies and the media.
 - l. Contribute to the Company's commitment to the continuous and sustained creation of value for its shareholders and to its long-term success, within the framework of corporate policies and the principle of equal treatment for shareholders who are in identical conditions.
 - m. Be governed, in its relations with authorities, regulatory and supervisory bodies and Public Administrations in general, by the principles of cooperation and transparency. Transparency in information, especially economic and financial information, is a fundamental principle that should govern the actions of directors.
 - n. Assume the principles of the General Policy of Sustainable Development and a responsible business ethic that allows harmonizing the creation of value for its shareholders with a sustainable development that contemplates as main objectives the protection of the environment, social cohesion, the development of a favourable framework of labour relations and constant communication with the different groups related to the Society in order to meet their needs and expectations.
 - o. Report the commission by an administrator of any irregularity or act contrary to the law, the corporate governance system or the rules of action provided for in this Ethical Code.
 - p. The company will guarantee not to exercise actions of any kind or retaliation in any case before possible denunciations. As the people working at Castelomega have the right and obligation to report alleged wrongdoing and to cooperate with investigations or audits, the Organization in turn must protect them from any form of retaliation in the workplace while an investigation or audit is ongoing or after it has been completed. Under this policy, contractors, suppliers, and associates who report in good faith alleged wrongdoing involving people working at Castelomega or cooperating in an investigation or audit will also be protected, to the extent possible, from retaliation. A person who in good faith reports or provides information



shall be protected from retaliation if he or she has reasonable grounds to believe that the information is true and that unethical or unethical acts have occurred or are likely to occur. A person who makes a complaint in good faith will be protected from retaliation even if the allegation is later unfounded or not supported by evidence. If it is established that a report is intentionally false or misleading or has been made intentionally or in bad faith, disciplinary action may be taken against the person who made the report. Moreover, a person providing information may be subject to disciplinary action if it is determined that he or she has engaged in improper activities or misconduct.

- q. Manage and procure the management of the company, in all its areas of activity, under the provisions of the Purpose and Values of the company and this Ethical Code.

2.3 Rules of conduct for the company's professionals

1. All managers and employees of the company are considered professionals of the company.
2. Those professionals of the company who, in the performance of their functions, manage or direct teams of people must also ensure that the professionals directly in their charge know and comply with this Ethical Code and lead by example, being referents of conduct in the company.

The professionals of the company will strictly comply with the legislation in force in the jurisdiction in which they carry out their activity, considering the spirit and purpose of the rules, and will observe the provisions of this Ethical Code, the other rules and basic procedures that regulate the activity of the company and the society in which they provide their services. Likewise, they will fully respect the obligations and commitments assumed by the company in its contractual relations with third parties, as well as the uses and good practices of the countries in which they carry out their activity.

3. The members of the management of the company must have particular knowledge of the laws and regulations, including internal ones, that affect their respective areas of activity and must ensure that the professionals who depend on them receive adequate information and training to enable them to understand and comply with the legal and regulatory obligations applicable to their job function, including internal ones.
4. The guiding criteria to which the conduct of the company's professionals will be adjusted will be professionalism, integrity and self-control in their actions and decisions:
 - a. Professionalism is diligent, responsible, efficient, and focused on excellence, quality, and innovation.
 - b. Integrity is acting loyally, honestly, in good faith, objectively and aligned with the interests of the company and with its principles and values expressed in this Ethical Code.



- c. Self-control in actions and decision-making means that any action they perform is based on four basic premises: (i) that it is ethically acceptable; (ii) that it is within the law; (iii) that is carried out within the framework of the Company's social interest; and (iv) that you are willing to take responsibility for it.
5. All the professionals of the company must inform the Compliance Unit about the initiation, evolution and result of any judicial, criminal or administrative procedure, of a sanctioning nature, in which the professional is an accused, investigated, accused or accused party and may affect him in the exercise of his functions as a professional of the company or damage the image, the reputation or interests of the company. In such circumstances, the Compliance Unit will act following the protocol approved for this purpose.
 6. The company respects the right to privacy of its professionals, in all its manifestations, especially regarding their personal, medical, and economic data.
 7. The company respects the personal communications of its professionals through the Internet and other means of communication.
 8. The company's professionals undertake to make responsible use of the media, computer systems and, in general, any other means that the Company makes available to them in accordance with the policies and criteria established for this purpose. Such means are not provided for personal; non-professional use and are therefore not suitable for private communication. Therefore, they are not likely to generate expectations of privacy and may be supervised by the company in the proportionate exercise of their duties of control.
 9. The company undertakes not to disclose the personal data of its professionals, except with the consent of the interested parties and in cases of legal obligation or in compliance with judicial or administrative resolutions. In no case may the personal data of professionals be processed for purposes other than those legally or contractually foreseen.
 10. The professionals of the company who, due to their activity, access the personal data of other professionals of the company, will undertake in writing to maintain the confidentiality of these data.
 11. Company and employees will maintain appropriate files to meet financial, legal, regulatory, and operational goals and obligations. Most Castelomega employees and contractors are involved with documents and reports of some kind, such as preparing time record sheets, expense statements or hours of service reports, approving invoices, communicating customer information, signing receipt of purchased materials or preparing inventory reports. Although not everyone needs to be familiar with accounting procedures, they do need to ensure that all business records are correct and complete.
 12. Forgery or unauthorized destruction of any document or record of the Company, whether printed, recorded on tape, disc, video, electronic or in any other format, will not be tolerated. Castelomega maintains a system of internal controls that, among other things, ensures the integrity and accuracy of Castelomega's business and financial files. You must comply with the internal control procedures applicable to the job and ensure that all business records for which you are responsible are true and accurately reflect the transactions they document. No undocumented or "off-the-books" funds or assets should



be held for any reason. Where applicable to the job, written asset files should be regularly compared with actual assets.

13. The company will promote a program of safety and health at work and will adopt the preventive measures established in this regard in the current legislation and any others that may be established in the future.
14. The professionals of the company will observe with special attention the norms related to safety and health at work, to prevent and minimize occupational risks.
15. The company will maintain the most rigorous and objective selection program, attending exclusively to the academic, personal, and professional merits of the candidates and the needs of the company.
16. The company will evaluate its professionals rigorously and objectively, considering their individual and collective professional performance.
17. The company shall not establish wage differentials based on personal, physical, or social conditions such as sex, race, marital status or ideology, political opinions, nationality, religion or any other personal, physical, or social condition.
18. The company respects the personal and family life of its professionals and will promote work-life balance programs that facilitate the best balance between this and their work responsibilities.
19. The use of discriminatory language in any type of corporate, internal, or external communication is prohibited.
20. The company will promote the training of its professionals. Training programmes shall promote equal opportunities and career development and contribute to the achievement of the company's objectives.
21. The company's professionals are committed to permanently updating their technical and managerial knowledge and to taking advantage of the company's training programs.
22. The company will inform its professionals about the main lines of its strategic objectives and the progress of the company.
23. The professionals of the company may not give or accept gifts or gifts in the development of their professional activity. Exceptionally, the delivery and acceptance of gifts and gifts will be allowed when the following circumstances occur simultaneously:
 - a. are of irrelevant or symbolic economic value;
 - b. respond to signs of courtesy or usual commercial attention; and
 - c. are not prohibited by law or generally accepted business practices.
24. The professionals of the company may not, directly or through an intermediary, offer or grant or request or accept unjustified advantages or benefits that have as their immediate or immediate purpose to obtain a benefit, present or future, for the company, for themselves or a third party. They may not give or receive any form of bribe or commission, coming from, or carried out by, any other party involved, such as public officials, Spanish or foreign, personnel of other companies, political parties, authorities, customers, suppliers, and shareholders. Acts of bribery, expressly prohibited, include the offer, or promise, direct



or indirect, of any type of improper advantage, any instrument for its concealment, as well as influence peddling.

25. Nor may they receive, on a personal basis, money from customers or suppliers, not even in the form of a loan or advance, all this regardless of the loans or credits granted to the company's professionals by financial institutions that are clients or suppliers of the company and that are not involved in the activities previously expressed.
26. The professionals of the company may not give or accept hospitalities that influence can influence, or can be interpreted as influencing decision-making.
27. It will be considered that there is a conflict of interest in those situations in which the personal interest of the professional and the interest of any of the company collide, directly or indirectly. There will be personal interest of the professional when the matter affects him, or a person related to him. The following (the "Related Persons") will be considered persons related to the professional:
 - a. The spouse of the professional or the person with a similar relationship of affectivity.
 - b. The ascendants, descendants, and siblings of the professional or his spouse (or person with a similar relationship of affectivity).
 - c. The spouses of the ascendants, descendants, and siblings of the professional.
 - d. Companies or entities in which the professional, or persons related to him, by himself or by an intermediary, are in any of the control situations established by law.
 - e. Companies or entities in which the professional, or any of the persons connected to him, by himself or through an intermediary, exercise an administrative or managerial position or from which they receive emoluments for any reason, provided that, in addition, they exercise, directly or indirectly, a significant influence on the financial and operational decisions of said companies or entities.
28. Professional decisions must be based on the best defence of the interests of the undertaking so that they are not influenced by personal or family relationships or by any other particular interests.
29. The company undertakes to make available to its professionals the resources and means necessary and appropriate for the development of their professional activity.
30. Without prejudice to the mandatory compliance with the specific rules and procedures on resources and means of the company, the professionals of the company undertake to make responsible use of the resources and means made available to them, allocating them exclusively to professional activities in the interest of the company and not to private purposes. The professionals of the company will avoid any practices, especially superfluous activities, and expenses, that reduce the creation of value.
31. The company is the owner of the property and the rights of use and exploitation of the programs and computer systems, equipment, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected, or used by its professionals, within the framework of their work activity or based on the computer facilities of the company.



32. Professionals shall respect the principle of confidentiality concerning the characteristics of rights, licenses, programs, systems, and technological knowledge, in general, whose ownership or rights of exploitation or use correspond to the company.
33. The non-public information that is owned by the company will have, in general, the consideration of information for internal use, unless it has been classified as confidential or reserved, and in any case will be subject to professional secrecy, without its content being provided by the professional to third parties unless it is in the regular exercise of his work, profession or functions and provided that those to whom the information is communicated are subject, legally or contractually, to an obligation of confidentiality and have confirmed that they have the necessary means to safeguard it.
34. It is the responsibility of the company and all its professionals to put sufficient security means and apply the established procedures to protect information for internal, confidential, and reserved use registered on physical or electronic support, against any internal or external risk of non-consensual access, manipulation, or destruction, both intentional and accidental. For these purposes, the professionals of the company will keep confidential the content of their work in their relations with third parties.
35. The Company will establish an ethical mailbox to promote compliance with the law and the rules of conduct established in this Ethical Code by its professionals and the reporting of possible irregular actions (the "Ethical Mailbox of professionals"). Communications with this mailbox will be anonymous.

