

1 PURPOSE AND SCOPE

The Montrel Industrial Group, whose raison d'être is its vocation for excellence in its field of expertise and related fields, accepts the responsibility of being a leader in its sector with the principles of integrity, ethics, loyalty, and quality work.

Its foundational objectives and established basic ethos, firmly and determinedly progressing over time, provide the best professional services. This includes a wide and effective cooperation with our clients, integral behavior of our staff, respect for our competition, total transparency in our business, maximum environmental performance and strict fulfilment of the applicable national and international regulations.

This code of ethics applies to the managers and staff of the companies in the Montrel Industrial Group, its suppliers and subcontractors, consultants, and other collaborating companies whatever the nature of their activity or their geographical business area, who must act in accordance with these guidelines. Montrel encourages these business partners to commit to these terms or to establish and enforce their own rules that include principles consistent with those cited in this code.

The Montrel Industrial Group declares its firm commitment to the guidelines of this code of ethical behavior and conduct, and requires the same respect, application, and diligence with these principles from those entities and staff, both internal and external, who work on its behalf..

2 MISSION, VISION AND VALUES

Montrel is an industrial business group, established nationally and internationally, which develops its specific activities in the field of electrical engineering, information technology (ICT) and applied engineering, managed effectively..

Mission

Our mission is to engage responsibly with our clients by providing efficient, safe and technical assurance electrical engineering solutions and systems, driven by high technology and evolving towards excellence in the quality of its products and services.

Vision

Contribute as an innovator in the development of industry by providing a proven professionalism, technical expertise, extensive and varied experience, complemented by a highly efficient self-organization and dynamics in order to be a leader in the energy sector, providing our customers an excellent differential service with a guarantee of future and high profitability.

Values**a) Ethics**

All managers and employees of the Group share the same philosophy of competitive work, maintaining values based on a very respectful, honest, and friendly relationship with the client, as well as a firm attitude of support, sensitivity, a responsible and reliable response in managing their professional demands. This all contributes to the differential values, mutual trust, and absolute empathy, as it should be in a modern company born with a vocation for its profession and willingness to serve.

b) Efficiency

To carry out our mission in a differential way, with excellent value for money, in an innovative way, using reliable methods, more modern means and applying significant national and international standards of high technological value. With the additional commitment to carry out all the necessary efforts to offer the best professional services in our sector with an effective cooperation with our clients.

c) Excellence

Firmly progressing over time, with a creative work constantly evolving towards excellence, focused on innovation and continuous improvement, linked to advanced technology. Also providing a proven professionalism, extensive experience, and high technical know-how.

3 RULES OF CONDUCT

a) Employees

All employees and directors of the Group must comply with the values described above in the day-to-day running of the company, both in the office and when representing the company at events, meetings or on trips. Therefore, it is essential to be committed to the internal regime of the company, from strict compliance with in/out times to confidentiality agreements regarding internal information.

b) Suppliers, Subcontractors and consultants

The supplier, subcontractor, consultant, or any entity working on behalf of Montrel must establish legitimate and productive relationships with its own suppliers and companies with which it does business with, whether they are public entities or not.

These entities must establish mechanisms that allow them to fight all forms of corruption and bribery in all their activities. This means:

- Not making or offering, directly or indirectly, any remuneration to any person or entity in the service of any authority, public or private entity, political party, or candidate for public office, in order to obtain or maintain business or other advantages illicitly, or in order for the latter to abuse its influence to obtain any business or other advantage.
- Not making payments to facilitate or speed up procedures, whatever their amount, in exchange for ensuring or speeding up a procedure or action before any judicial body, public administration or official body
- Specifically, the supplier will not make, offer, or accept with cause in contracting with Montrel, any payment from/to any natural or legal person, in order to obtain or retain any business or advantage for itself or for a third party, which could result in a conflict between the interests of the supplier or the third party and those of Montrel.
- Not allowing extra-occupational activities if they constitute a conflict of interest, such as working for a competitor, a supplier, or a partner; or if they may affect the performance of their work, in which case they should be immediately reported to their superior.

c) Clients and competitors

Montrel's relations with the public and private sectors in its area of activity, both nationally and internationally, will be based on the principles of transparency and equal opportunities, ruling out any action aimed at gaining an advantage over competitors, in the market, or in public or private contracts, which is based on an unlawful act.

Exceptionally, the delivery and acceptance of gifts and presents will be allowed when the following circumstances occur simultaneously:

- a) Whether they are of irrelevant economic value or symbolic
- b) Respond to common courtesies or business courtesies.
- c) Are not prohibited by law or generally accepted business practices.

d) Public Administration

The contribution to the public administration through paying the corresponding taxes is a concept that lies intrinsically in the management of Montrel, and therefore this Group is fully confident that the improvement of public services must be maintained with this contribution and that of its suppliers and subcontractors.

The principles that prevail in relations with public entities and regulatory bodies are absolute obedience, coordination, and transparency.

Montrel, therefore, agrees not to make or offer any payment, favor, or benefit to facilitate or streamline business, actions or proceedings before any public body or authority which would constitute an unfair advantage or benefit in Montrel's industrial activity, and requires the same commitment from suppliers, subcontractors and external staff involved in its business activity.

e) CSR

The business practice of the Montrel Industrial Group, whose foundations are based on the ethical commitments it upholds and which it promotes among its stakeholders, has as its highest recognition and application of its specific policies a commitment to ensure and adopt effective measures to minimize the social, environmental, human rights and largely the work safety impact of its activity and direct involvement in the energy sector.

Corporate Social Responsibility in Montrel is based on the following principles:

- To contribute to social welfare understood as the contribution of jobs in growing numbers and work conditions, in areas from the lowest to the most qualified and in areas that even exceed the national territory.
- Total respect for the environment, which translates into efficient management of natural resources and raw materials, reusing materials as much as possible and also minimizing and properly managing its waste, so that its activity and facilities do not contribute to the pollution of soil, water and/or air.
- Firm defense, application and respect for internationally recognized human rights, which include the dignified and respectful treatment of all employees, the elimination of forced labor, work conditions consistent with international standards and the prohibition of child labor.
- Guarantee of health and safety at its works in ATEX environments, not only for staff during the execution but also for the end users during the whole life of the facility.
- Commitment to innovation, technology watch and the application in the energy sector of the best available technologies in its field of operations.
- Accessible, fast and transparent communication to third parties interested in the policies and activities of Montrel.

4 COMPLIANCE AND REQUIRMENTS

It is the responsibility of department heads with regular relations with third parties involved in the activity and all the company's own staff in general to share this ethical code of conduct to ensure that they are aware of it and comply with it with due diligence.

Montrel makes available to any interested party the contact means available from this organization to communicate and/or report facts that may be considered a total or partial breach and/or non-compliance with the principles of this code.

Appropriate actions may be taken in terms of the contractual relationship with the Montrel Industrial Group where management considers that our policies or legal obligations are being breached by both internal and external staff.

