VALORIZA

# VALORIZA GROUP
# CODE OF ETHICS

VALORIZA

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**SUMMARY SHEET AND CHANGE CONTROL**

| | | |
|---|---|---|
| **TITLE** | **CODE OF ETHICS** | |
| **DESCRIPTION** | The Valoriza Group's Code of Ethics sets out the ethical and social responsibility values and principles that will apply to the activities of the VALORIZA Group. | |
| **SCOPE** | All entities belonging to Valoriza, taking into account their own characteristics, including subsidiaries or majority-owned companies in which Valoriza exercises effective control.<br>The members of the administrative and executive bodies and employees of all the Valoriza entities detailed above.<br>Third parties, natural and/or legal persons, related to Valoriza, in those aspects of this Policy that are applicable to them.<br>In general, any person who wishes to inform the organization of the existence of possible breaches and/or infringements. | |
| **DEPARTMENTS AFFECTED** | All | |
| **AUTHOR** | Regulatory Compliance Unit | |
| **RESPONSIBLE** | **RESPONSIBLE** | **FUNCTIONS** |
| | Regulatory Compliance Unit | Distribution, monitoring, and follow-up of policy. |
| | Other departments | Ensuring compliance with the principles, guidelines and commitments established in this Code. |
| **APPROVED BY** | Board of Directors | |
| **REVIEW PERIOD** | The frequency of review of this Code shall be subject to the needs determined by the company's strategy, as well as to changes in applicable regulations. | |

**Version log:**

| DATE | EDITION | REVISION | RESPONSIBLE | DESCRIPTION OF CHANGES |
|---|---|---|---|---|
| 29/11/2023 | V1 | Changes. | Regulatory Compliance Unit | Initial draft. |
| 06/02/2024 | V2 | Changes. | Regulatory Compliance Unit | Draft V2. |
| 06/03/2024 | V3 | Approval. | Regulatory Compliance Unit | Version approved by the Board of Directors. |
| 20/03/2024 | V4 | Approved by the Board of Directors | Board of Directors. | Version approved by the Board of Directors. |
| 31/03/2026 | V5 | Approved by the Board of Directors | Board of Directors. | Update of the Chairwoman's Letter, and mission, vision and values. |

**Letter from the Chairwoman**

Dear Sir/Madam

At Valoriza, we understand Regulatory Compliance as something that goes far beyond the mere implementation of control mechanisms designed to prevent risks or mitigate possible liabilities arising from irregular actions. Our true aspiration has been to consolidate a way of acting based on integrity, which permeates not only those who work in the Company, but also our collaborators, suppliers and all those with whom we interact.

To this end, and in line with the legal framework in force since 2010, Valoriza has developed an organizational and management structure specifically aimed at preventing crime and promoting responsible practices in all its activities.

This approach is embodied in a set of internal rules, procedures and guidelines that make up our Corporate Governance System and, in particular, the Regulatory Compliance, Criminal Prevention, Anti-Bribery and Competition Defense Model. All of this reinforces the ethical principles and commitment to compliance that define Valoriza.

In this context, I am pleased to present the Valoriza Group's Code of Ethics, a document that reflects our corporate identity and establishes the guidelines for conduct that should guide, from an ethical perspective, both the people who make up the organization in the performance of their duties and the entities and third parties associated with it. It sets out the basic criteria that guarantee responsible behavior consistent with our values.

Compliance with this Code is essential. I personally assume this responsibility as Chairwoman, as do the Board of Directors, the management team and all the people who form part of Valoriza.

Maintaining ethical business conduct is an essential condition for ensuring compliance with the applicable legal regulations at all times and with the internal policies that the Company voluntarily adopts, which are fundamental pillars for achieving the Group's objectives.

**María Dionis Trenor**
Chairwoman of the Board of Directors

# VALORIZA GROUP CODE OF ETHICS.

## 1 Objective

This Code of Ethics of the Valoriza Group (hereinafter the "Code") sets out the values and principles that will be applicable to the activities of the VALORIZA Group (hereinafter, the VALORIZA Group, the Group or VALORIZA, interchangeably).

The VALORIZA Group aspires to ensure that its conduct, and that of the persons and third parties associated with it, complies not only with the requirements of current legislation and the provisions of its Corporate Governance System, but also with generally accepted ethical and social responsibility principles.

This Code reflects VALORIZA's commitment to the principles of business ethics and establishes the guidelines for professional and personal behavior and conduct that the Board of Directors of VALORIZA SERVICIOS MEDIOAMBIENTALES, S.A. considers necessary to ensure the ethical, honest and responsible behavior of all the companies through which it operates and their administrators, all its staff (including management personnel) and related third parties, as well as to obtain added value for all these groups, its shareholders and other stakeholders.

To this end, VALORIZA has voluntarily adopted a set of rules, a Purpose, a Mission, Vision and Values, and a set of general principles that inspire and serve as an interpretation of a series of guidelines for behavior and action aimed at generating sustainable value for all stakeholders and which should regulate and guide our internal relations, our relations with the market, with society and with nature.

This Code also sets out the procedure for communicating any queries or complaints about it, as well as the consequences of non-compliance.

## 2 Presentation of the organization and scope of application

VALORIZA SERVICIOS MEDIOAMBIENTALES, S.A. and its subsidiaries are entities specializing in environmental management. They provide highly specialized services in different areas of the waste recycling chain, such as waste collection, treatment and management. It also works in cities, managing street cleaning, mobility, urban infrastructure and the care of green areas.

VALORIZA not only seeks to maintain the trust of its clients, but also strives to uphold the highest standards of quality and excellent service with partner companies, public representatives, suppliers, third parties, and any other business partners.

Along with the high level of professionalism of all its staff, confidentiality and discretion are taken care of to the utmost.

The VALORIZA Group's Code of Ethics applies directly to:

- All entities belonging to Valoriza, taking into account their own characteristics. For the purposes of this document, the Valoriza Group is considered to be made up of all subsidiaries or majority-owned companies in which, directly or indirectly, including

Temporary Joint Ventures (UTE), Valoriza exercises effective control, regardless of their geographical location.
In all other entities in which Valoriza participates without having effective control, the adoption of guidelines for behavior and conduct in line will be promoted by this Code.

- The members of the administrative and executive bodies and employees of all the Valoriza entities detailed above, regardless of their position or role within the entity, the legal nature of their relationship and their geographical location.
- Those third parties, natural and/or legal persons, related to Valoriza, in those aspects of this Policy that are applicable to them and from whom behavior in accordance with it is expected.
- In general, any person who wishes to inform the organization of the existence of possible breaches and/or infringements.

In the case of activities carried out by Valoriza outside Spain, this Policy must be adapted to the most restrictive local legislation that may be applicable.

This Code, together with other internal policies, demonstrates VALORIZA's commitment to compliance with the law, good corporate governance and transparency.

## 3 Target audience

The Code is aimed at all persons (shareholders, directors, managers, internal or external employees, etc.) who, within any company of the VALORIZA Group, have a contract of any kind, regardless of their position or the functions they perform.

All of them are equally obliged to know and comply with this Code and to collaborate in its correct implementation.

VALORIZA will promote among its suppliers and related third parties the adoption of guidelines for behavior consistent with those defined in this Code.

The application of the Code may be contractually extended to any other natural or legal person who has commercial, collaborative or participatory relations with VALORIZA when, due to the nature of such relations, their activities may affect the Company's reputation.

For the purposes of this Code, all these groups are collectively referred to as "Subject Persons".

This Code is the basis and foundation of the Corporate Governance System and, in particular, of the VALORIZA Group's Regulatory Compliance, Criminal Prevention, Anti-Bribery and Competition Defense Model (hereinafter, the Regulatory Compliance Model) and its implementing regulations.

## 4 Functions of those involved

### 4.1 Governing Body: Board of Directors

The active involvement of the Governing Body of the VALORIZA Group companies is essential to convey a clear message to all stakeholders, in word and deed, that VALORIZA will comply with its obligations, thus setting an example for all.

To this end, it will ensure that the necessary resources are allocated to establish, develop, implement, evaluate, maintain and improve the Culture of Compliance within VALORIZA and, specifically, compliance with this Code and its own commitment to regulatory compliance.

It will adopt values that promote honesty, commitment, professionalism, discretion, responsibility and transparency.

It is expected to pay the utmost attention to compliance with the values and principles of this Code, both in its own actions and on the part of the employees under its management, and to demonstrate, in all its actions, a clear and proactive commitment to its objectives.

They shall also foster an environment in which their employees, their families and dependents feel free to express their concerns without fear of reprisal and to participate actively in the management and resolution of incidents and issues related to compliance with the Code.

### 4.2 General Management and Area Management

The General Management and Area Management of the VALORIZA Group companies must demonstrate their leadership and commitment to compliance with this Code and be a model for employees.

They are expected to pay the utmost attention to compliance with the values and principles of this Code, both in their own actions and on the part of the employees under their management.

They must also foster an environment in which employees feel free to express their concerns without fear of reprisals and actively participate in the management and resolution of incidents and issues related to compliance with the Code.

### 4.3 Employees

Employees must commit to the values and principles set out in the Code and are expected to perform their assigned duties in accordance with established and approved policies, procedures and processes at all times.

Employees are also expected to participate in any training initiatives that are proposed to them or even to propose training activities that may be of general interest to everyone in the area of Regulatory Compliance.

Finally, employees must feel free and confident enough to report concerns, issues or failures in the system, either directly to their superior or through the Ethics Channel. They must be a source of opinion for VALORIZA with the aim of continuous improvement.

## 5 General principles: purpose, vision, mission and values

The mission, vision and values of the VALORIZA Group, incorporated into its Articles of Association, govern the day-to-day activities of all its companies and guide its strategy and all its actions.

The mission, vision and values of the VALORIZA Group are as follows:

**Mission**

To contribute to the creation of a fully sustainable society by offering environmental services focused on the well-being and development of people and their environment.

**Vision**

To be a leader in creating a more sustainable world, where the community is actively involved in waste recovery, transforming it into resources and enjoying urban environments designed for the well-being of its citizens. A future where caring for everyone and teamwork are a priority.

**Values**

- We care for the environment and the well-being of communities
- To be a benchmark in profitability and competitiveness
- We seek efficient and innovative solutions
- We always work as a team
- We believe in talent and promote diversity
- We are a benchmark in the circular economy and environmental solutions sector

## 6 Basic ethical principles

### 6.1 Approach to legality

All VALORIZA's business and professional activities will be carried out in strict compliance with the laws in force in each and every one of the national or international territories in which it provides its services.

### 6.2 Integrity

We maintain impeccable behavior, necessarily aligned with ethics, rectitude and honesty, avoiding in particular any form of corruption or anti-competitive conduct and respecting the particular circumstances and needs of all those involved in the Group's business and professional activities.

VALORIZA promotes rigorous consistency between corporate practices and our Values.

### 6.3 Transparency

We will disseminate, both internally and externally, adequate, truthful, verifiable and accurate information about our management through clear, unambiguous and transparent communication.

### 6.4 Safety

We will provide optimal working conditions and levels of protection in terms of health and safety at work, from the conception of the activity to its full development. We will demand a high level of safety in our processes, facilities and services, paying special attention to the protection of staff, suppliers, customers and the local environment, and communicating this principle of action throughout the Organization.

### 6.5 Respect for Human Rights

All actions taken by VALORIZA and its employees shall scrupulously respect the human rights and public freedoms included in the Universal Declaration of Human Rights, as set out in the **Rights Policy Human.**

Any statements or actions of any kind that encourage or promote hatred, hostility, discrimination or violence against people within the company on the grounds of their membership of the company, for racist or anti-Semitic reasons or other reasons relating to ideology, religion or beliefs, family situation, national origin, sex, sexual orientation or identity, gender, illness or disability are strictly prohibited.

## 7 Internal behavior guidelines

### 7.1 Equal Opportunities and Non-Discrimination

VALORIZA respects the right to equality and non-discrimination on the basis of race, sex, ideology, nationality, language, religion, sexual orientation, age, disability, political or trade union affiliation, or any other personal or social condition of its staff.

VALORIZA effectively respects and recognizes the rights to freedom of association and collective bargaining in the workplace.

VALORIZA is firmly committed to diversity in all areas: gender, functional, cultural, social and generational, in accordance with its **Diversity, Equality and Inclusion Policy.** The VALORIZA Group actively promotes an inclusive work environment in which individual differences are respected and valued, ensuring that everyone feels integrated and accepted, thereby fostering creativity and innovation.

VALORIZA understands that the professional growth of its staff is closely linked to their overall development as individuals. For this reason, VALORIZA is committed to maintaining a talent management policy, offering opportunities for personal and professional development to its staff, as well as continuous training programs designed to enhance their skills and promote inclusion, adding value both to them and to society in general.

All staff will enjoy equal opportunities for professional development. Promotion will be based on objective criteria of merit, ability and performance of professional duties.

To achieve these objectives, VALORIZA promotes training in equality, diversity and inclusion for all its staff and, as a social agent, communicates and shares its guidelines for behavior in society.

All staff must be treated fairly and with respect, regardless of their position or job title, fostering a working environment in which all professionals have a responsibility to treat others with the utmost respect, so as to achieve working relationships free from any offensive behavior or any form of discrimination or harassment.

Under no circumstances shall VALORIZA staff engage in sexual harassment, workplace harassment or gender-based harassment, abuse of authority at work, insults or any other form of aggression or hostility that creates a climate of intimidation. VALORIZA, in accordance with its **Protocol for the prevention and action in cases of harassment and discriminatory acts**, is committed to preventing and acting against this type of behavior, expressing its zero tolerance towards it and its commitment to maintaining working environments where the dignity, freedom and equal treatment of all people working in the VALORIZA Group are respected.

Any Person Subjected to harassment or discrimination within the VALORIZA Group, or who is aware of such behavior, must report it as soon as possible to the Compliance Unit (Responsible for the Internal Information System) through the Ethics Channel available on the VALORIZA Group's public website, www.valorizasm.com and at https://valoriza.canalhelas.com/home. Also via the intranet. Both harassment and discriminatory behavior, as well as the cover-up of such behavior, will result in disciplinary action in accordance with current regulations.

The commitments made by VALORIZA in this section also extend to its value chain, as provided for in our **Supply Chain Management Policy**.

### 7.2 Promoting Personal and Professional Balance

VALORIZA promotes flexible working environments and is committed to a work system based on objectives, results and a culture of "non-presenteeism" that is based on the trust and productivity of its staff, allowing them, as far as possible, to manage their working time, reconciling it with the necessary balance between work, family and personal life.

VALORIZA understands work-life balance as a set of elements and strategies that contribute to ensuring quality in the work and lives of the people who form part of the Group, allowing them to develop in all areas of life, experience a high degree of job satisfaction, attend to family responsibilities and enjoy personal time, as set out in its **Flex Policy.**

Comentado [TH1]: Is this the correct namen of the protocol?

The commitment to promoting this work-life balance among our staff guides the entire VALORIZA Group's strategy in people management, actively promoting and facilitating actions that encourage it.

### 7.3 Abolition of child labor.

VALORIZA will not resort to child labor, nor will it incorporate any product or service derived from it into its business activity in any of the countries in which it operates, ensuring compliance throughout its supply chain with the provisions of the International Labor Organization (ILO) in relation to child labor.

### 7.4 Eradication of forced labor

VALORIZA will not resort to forced or compulsory labor, avoiding hiring suppliers, contractors or external collaborators at risk of engaging in such practices, as set out in its **Supply Chain Management Policy.**

### 7.5 Occupational health and safety.

VALORIZA will provide its staff with a safe and stable environment, committing itself in its **Occupational Health and Safety Policy** to continuously updating occupational risk prevention measures, as well as to scrupulously complying with the applicable regulations in this area in all the places where it carries out its activities, training and informing all staff appropriately. Likewise, VALORIZA ensures that its occupational health and safety standards and policies are applied by the suppliers, contractors, companies and partners with which it operates, as provided for in its **Supply Chain Management Policy Responsible Contractor Policy**, which extends the Group's commitments to the entire value chain.

All staff are responsible for strictly complying with health and safety regulations in order to protect themselves and other staff members or third parties and must report any possible

violations or breaches of these measures that affect occupational health and safety to the Regulatory Compliance Unit through the Ethics Channel.

They must also make responsible use of the equipment assigned to them when carrying out risky activities and disseminate the preventive culture acquired in this area among their colleagues and subordinates, promoting compliance with risk protection practices.

VALORIZA shall take the necessary measures to provide suitable working environments in accordance with applicable regulations and the circumstances of the environment or other circumstances prevailing at any given time.

### 7.6 Confidential and Private information

VALORIZA is aware that information is one of its main assets, essential for the management of its activities. For this reason, it has developed an **Information Security Policy** whose objective is to preserve the integrity, availability and confidentiality of information and, in this way, minimize the risks arising from its disclosure and misuse.

Comentado [TH2]: Is this the correct name, or is the the Data Protection Policy? t

All information that is owned or held by VALORIZA companies and is not public in nature is considered restricted and confidential. Therefore, all Subject Persons are obliged to maintain the strictest confidentiality regarding any information they access as a result of their professional activities. This duty of confidentiality shall remain in force indefinitely, even after the relationship (employment or otherwise) with the Group company has ended.

Likewise, Subject Persons shall not disclose, disseminate or use confidential information for unauthorized purposes or purposes unrelated to the company's interests, as this constitutes a breach of loyalty to the VALORIZA Group, with the sole exception of those cases in which such disclosure is legally required or permitted.

Relationships with other members of staff, shareholders, customers, suppliers and competitors shall be conducted with the utmost discretion, without disclosing confidential information about the Company, other companies in the VALORIZA Group or its staff and customers , and without engaging in any anti-competitive behavior or behaviour that could constitute unlawful or unfair competition. Staff must prevent any commercially sensitive information from becoming known to competitors.

### 7.7 Data protection

All VALORIZA employees who have access to personal data and other business information are required to comply with their duty of secrecy and commitment to confidentiality.

VALORIZA will process the personal data necessary for the proper provision of its services in accordance with the applicable data protection regulations and, in particular, the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR) and Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD).

To this end, all staff with access to personal data or other internal information relating to the activity must respect and comply with all technical and organizational measures that have been implemented.

VALORIZA shall only process personal data for legitimate purposes and with the informed consent of the data subject, except in cases where exceptions are provided by law. Likewise, the security measures established for the protection of this data must be complied with, thus preventing its alteration, loss, unauthorized processing or access.

Internal procedures and rules established mainly in relation to the protection of personal data must be complied with, in particular the **Data Protection Policy.**

All confidential information to which access is granted must be kept confidential for an indefinite period of time, with the utmost discretion, and the information to which access is granted must not be disclosed or used, either directly or through third parties or companies. These obligations shall remain in force even after the end of the relationship between the obligated party and VALORIZA**.**

Furthermore, all VALORIZA staff undertake not to carry out sabotage or actions that hinder the operation of the company's computer systems or those of third parties to which they have access, and not to use them to commit illegal acts against privacy or to infringe the guidelines on non-discrimination, harassment at work or any other reason unrelated to logical use in the workplace.

The company's computer systems shall not be used abusively, for personal purposes or for actions that could affect VALORIZA's reputation.

Any questions regarding the processing of personal data can be channeled through personal data can be channeled through:

Data protection channel: **protecciondedatos@valorizasm.com.**

Contact details for the Data Protection Officer: **dpo@valorizasm.com.**

### 7.8 Use and protection of assets

VALORIZA provides its staff with the resources necessary to carry out their professional activities and undertakes to provide the necessary means to protect and safeguard them.

The VALORIZA Group is the exclusive owner of the property and rights of use and exploitation of computer programs and systems, equipment, telephones, computers, storage devices, email and internet access systems or internal and external databases, manuals, videos, projects, studies, reports, trademarks, trade names, inventions, designs, copyrighted works, trade dress and trade secrets, and other works and rights created, developed, perfected or used by its personnel, within the scope of their activities or based on the Group's computer facilities.

If, within the employment relationship, any creation is developed that is eligible for protection by industrial or intellectual property rights, these rights shall belong exclusively to VALORIZA.

Staff shall not use these resources for personal or non-professional purposes and/or for activities that are not directly related to the interests of the VALORIZA Group. They shall also be responsible for protecting those resources entrusted to them in connection with their work,

taking the utmost care in their custody, in accordance with the Group's regulations on the use of information and communications technology resources.

In order to ensure the operation and proper functioning of information systems, and in order to prevent any type of abuse or fraudulent use thereof, VALORIZA reserves the right to periodically monitor and analyze all equipment and systems made available to its staff, within the framework of the provisions of current regulations on the protection of individual rights.

In any case, the use of the VALORIZA Group's assets, resources and means by staff must comply with security and protection protocols, as well as with internal corporate regulations on the use of ICT resources established, where applicable, by the Group.

Likewise, VALORIZA staff shall not remove or allow a third party to remove such resources, or any property, effects or assets of any kind entrusted to them by virtue of their duties.

### 7.8.1 Conflicts of Interest

VALORIZA staff must always act, in the fulfilment of their responsibilities, with loyalty and in defense of the interests of the company to which they belong and of the VALORIZA Group as a whole, in line with the **Conflict of Interest Protocol.**

VALORIZA allows its staff to carry out activities other than those they perform for the VALORIZA Group, provided that they are carried out with full respect for their contractual obligations to the Group and do not compete, conflict or collide with their duties and responsibilities as VALORIZA Group staff. In particular, staff may not perform tasks, work or provide services that are identical or equivalent to those they perform for the VALORIZA Group for the benefit of companies that carry out activities that may compete directly or indirectly with those of the Group.

VALORIZA Group staff must avoid situations that could give rise to a conflict of interest, i.e. situations in which their personal interests (or those of a third party linked to them by any personal, economic or professional relationship) are contrary to those of VALORIZA.

Staff who may be affected by a conflict of interest - direct or indirect, actual or potential - shall refrain from representing the VALORIZA Group, as well as from intervening or influencing decision-making in this regard, and shall bring this situation to the attention of the Regulatory Compliance Unit (or the position to which it delegates) prior to the decision being made on the advisability of carrying out the activity, the execution of the operation or the conclusion of the business that gave rise to the conflict of interest.

Any related-party transaction between VALORIZA Group companies and Group personnel must be expressly authorized by the Compliance Unit or the position to which it delegates. A related-party transaction is considered to be any transaction or contract in which VALORIZA personnel have a direct or indirect interest.

The internal operating regulations and the Articles of Association shall take precedence in conflicts of interest and related-party transactions involving persons or entities subject to their scope of application.

## 8 Commitments and Guidelines for Conduct

All those involved in complying with this Code undertake to comply with and respect at all times the legal regulations in force in all areas of activity and, in particular, in certain areas listed here.

### 8.1 Competition and defense of competition

VALORIZA undertakes in its **Regulatory Compliance Policy on Competition Defense** to compete fairly in the markets, respecting and promoting the rules and principles of free competition for the benefit of all economic operators and complying at all times with the competition defense regulations in force in all the markets in which it operates.

The Persons Subject to the Policy shall avoid any behavior that the regulations identify as a possible unlawful restriction of competition, such as, among others, collusive or unfair conduct or conduct that involves abuse of a dominant position.

The VALORIZA Group promotes a strong culture of respect for competition law and develops appropriate regulatory instruments and control and management systems to prevent the risk of infringements, such as fraud in public tenders, anti-competitive agreements with competitors, market sharing, price fixing, the exchange of commercially sensitive information or misleading advertising.

The detection of any possible anti-competitive practice, or any doubts in this regard, must be reported to the Regulatory Compliance Unit as soon as possible through the Ethics Channel.

### 8.2 Assets and socio-economic performance

VALORIZA advocates responsible behavior at all times, aimed at preserving and protecting its own assets as a fundamental part of its activity.

VALORIZA staff must act with transparency in financial management at all times in order to avoid irregularities such as misappropriation, fraud or situations of insolvency.

In its dealings with its clients, VALORIZA establishes conditions of responsible behavior aimed at offering transparency and quality of service at all times, as reflected in its **Contracting Policy.**

Shareholders, directors and staff engaged in accounting or financial tasks must at all times comply with the appropriate protocols for accountability, authorization of the use of financial resources and any other means of financial control.

All VALORIZA Group transactions must be clearly and accurately reflected in the files and books of its companies.

In particular, VALORIZA Group staff involved in the recording, preparation, review or reporting of financial information shall be familiar with and comply with both the applicable legal regulations and internal control procedures, prohibiting, among other practices: the recording of transactions in off-balance sheet accounts not recorded in the official books; the non-recording of transactions carried out or the incorrect recording thereof; recording non-existent expenses, income, assets or liabilities; recording entries in the accounting books with incorrect

indications of their purpose; the use of false documents; and the deliberate destruction of accounting documents before the deadline established by applicable law.

### 8.3 Transparency of information, creation of sustainable value and corporate governance

VALORIZA considers transparency in information to be a basic principle that should govern its actions. VALORIZA reports in an adequate, useful and consistent manner with its programs and actions. In particular, it ensures that the information communicated to shareholders, institutional investors and proxy advisors, as well as, in general, to the markets on which its shares are listed and the regulatory bodies of those markets, is accurate, complete and up to date, adequately reflects its financial situation and the results of its operations, and is communicated in compliance with the deadlines and other requirements established in the applicable regulations and general principles of market operation and good governance that VALORIZA and its group of companies have adopted and in the **Communication Policy** .

VALORIZA Group staff undertake to communicate both internal and external information in a truthful, clear, complete and up-to-date manner. Under no circumstances will they provide incorrect, incomplete or inaccurate information or information that could confuse the recipient by not reflecting a true and fair view.

VALORIZA's business activities and strategic decisions, both nationally and internationally, will focus on creating sustainable value for its shareholders and other stakeholders, transparency in its management, adopting best practices and recommendations for corporate governance, regulatory compliance, sustainability, and strict observance of the rules in force at any given time in this area ( ).

### 8.4 Relationships with third parties linked to the Valoriza Group

In its business relationships with third parties, the VALORIZA Group duly exercises its due diligence obligations by selecting those who are governed by general values and principles aligned with those of this Code of Ethics and who adopt guidelines for behavior consistent with it.

In its relations with these third parties, the VALORIZA Group seeks to establish a transparent framework for collaboration that allows and facilitates the achievement of mutual objectives, always in compliance with current legislation.

#### 8.4.1 Relationships with customers

VALORIZA is committed to the total quality of its products and services, acting in accordance with nationally and internationally recognized best practices, providing the necessary resources to achieve excellence and establishing appropriate measures to ensure that the quality policy is known and implemented by all Persons Subject to it, who must act with integrity towards the Group's customers, with the objectives of achieving the highest levels of quality, excellence in service provision and the long-term development of relationships based on trust and mutual respect.

It focuses on identifying and resolving business challenges and identifying opportunities in the different lines of business to develop solutions with a high impact on sustainability, seeking efficiency in our operations also , as set out in the **Innovation Policy**.

### 8.4.2 Relationships with business partners

VALORIZA establishes a relationship with its partners in joint ventures based on trust, transparency in collaboration and reasonable cooperation, always in compliance with current legislation and, in particular, within the limits permitted by competition law.

### 8.4.3 Relationships with suppliers, contractors and collaborators.

The selection processes for suppliers, contractors and collaborators of VALORIZA Group companies will be carried out with impartiality, objectivity and transparency, applying criteria of quality, timeliness, cost and sustainability, avoiding conflicts of interest between personal interests and those of the VALORIZA Group, and promoting the selection of those who have adopted principles of behavior and management, as well as social, ethical, environmental and health and safety standards, in line with those of this Code.

This is established by VALORIZA in its **Supply Chain Management Policy**, its **Contracting Policy** and its **Responsible Contractors Policy**, through which the Group extends the commitments made in this Code to its entire value chain.

## 8.5 Relations with governments and authorities. Respect for the law in force in the territories where the Valoriza Group operates.

VALORIZA declares its political neutrality and promotes lawful, respectful and transparent cooperation with the governments and authorities of the territories where it operates, as dictated **by** its **International Sanctions Compliance Policy**, committing itself to faithfully and respectfully comply with all legal obligations to which it is subject in those territories, including, among others, obligations arising from social protection systems or tax regulations in force in each territory, avoiding illegal tax avoidance or obtaining undue tax benefits. Similarly, the **Regulatory Compliance Policy on Crime Prevention and the Regulatory Compliance Policy on Competition Defense** provide further examples of the VALORIZA Group's firm commitment to complying with the laws of all the countries in which it operates, in these cases in the areas of anti-corruption and competition defense respectively.

Subject Persons shall avoid any conduct which, even if it does not violate the law, could damage the reputation of the VALORIZA Group in the eyes of the community, governments, authorities or other bodies in the country, and have adverse consequences for its business. No Subject Person shall collaborate with third parties in the violation of any law, nor shall they participate in actions that compromise respect for the principle of legality.

Subject Persons shall act with honesty and integrity in all their contacts or transactions with government and administrative authorities and personnel, ensuring that all information and certifications they submit, as well as any statements they make, are truthful, clear, complete and up to date. In particular, they shall ensure that public aid, subsidies and other funds from which VALORIZA may benefit are used exclusively for the purpose for which they were granted.

Likewise, the Persons Subject to the Code shall not obstruct requests for information from public officials or the performance of any other function that they carry out in the legitimate exercise of their powers, collaborating with them provided that such powers are protected and comply with applicable laws.

### 8.6 Anti-corruption measures

The VALORIZA Group is committed to conducting its activities with integrity, honesty and transparency, complying with applicable anti-corruption regulations in its relations with both public and private entities and expressly prohibiting the obtaining of any commercial benefit or advantage in a corrupt, illegal or improper manner. VALORIZA expresses this firm commitment to zero tolerance against any form of corruption in the VALORIZA Group's **Anti-Corruption and Relations with Public Officials and Authorities Policy**, a commitment that the Group extends to its entire value chain through its Supply Chain Management Policy.

VALORIZA fights against corruption in all its forms.

To this end, an Anti-Corruption and Relations with Public Officials and Authorities Policy has been approved, which will be mandatory for all stakeholders as a complement to this Code.

#### 8.6.1 Bribes

The VALORIZA Group prohibits and duly sanctions the offering and acceptance of bribes, in both the public and private spheres. Thus, VALORIZA prohibits the use of any form of illicit payment, by any means whatsoever, that involves a material or moral advantage for the recipient and is made with the aim of obtaining any advantage or favorable treatment in its relations with third parties.

It is also prohibited for Subject Persons to accept bribes for their own benefit, for the benefit of persons associated with them and/or for the benefit of VALORIZA Group companies.

Contributions may not be made to political parties, trade unions or similar entities in terms that are not expressly permitted by the legislation of the country in which they operate.

Similarly, the VALORIZA Group prohibits the making of facilitation payments, even if they are permitted by applicable local regulations. These payments involve the delivery of money or objects to public officials in order to facilitate or expedite the completion of ordinary administrative procedures (e.g. obtaining a visa or license) and do not involve any discretionary act on their part (the procedure is legal, but the payment speeds up or facilitates its completion).

In order to prevent any contribution by VALORIZA from concealing an improper payment, bribe or any other rejected practice, fraud in accounting records or the incurring of any expense, payment or transaction not authorized by the Group in accordance with the internal regulations applicable in each case is also prohibited.

#### 8.6.2 Gift and Hospitality Policies

Subject Persons must comply with internal policies and procedures regarding the offering and acceptance of gifts and hospitality, which prohibit their use as a covert form of bribery, both in relations with the public sector and between private individuals.

In any case, they may not accept gifts, hospitality, services or any other kind of favor from any person or entity that could affect their objectivity or influence a commercial, professional or administrative relationship.

Likewise, Subject Persons may not offer, directly or indirectly, gifts, hospitality, services or any other kind of favor with the aim of unlawfully influencing the relationships that the recipients have or may have with VALORIZA.

For the purposes of applying this Code, gifts or favors that comply with, among others, the following requirements set out in the Group's internal regulations shall be considered permissible:

- Those that are permitted by the legislation of the country applicable in each case;
- Those that are given or received in accordance with customary commercial practice or generally accepted social courtesy;
- Those that do not seek to affect or influence any commercial, professional or administrative relationship, or any business decision, nor are they linked, directly or indirectly, to illegal acts or undue benefits;
- Their recipients are not public authorities or officials (or persons linked to them), except in cases such as gifts and courtesies of protocol, courtesy or institutional events;
- They must not be contrary to the values adopted by VALORIZA in accordance with this Code of Ethics;
- They do not damage the reputation and image of VALORIZA or its business; and
- They consist of objects or courtesies that have a reasonable value.

Gifts or courtesies offered to or received by Subject Persons that do not comply with the requirements contained in this Code and in the **Policy on Accepting and Offering Gifts and Courtesies** and the procedure that develops it, and are therefore not permitted, must be refused or returned, unless expressly authorized by the Regulatory Compliance Unit, or the position to which it delegates, obtained in advance and through the procedures described in the corresponding internal regulations.

In case of any doubt regarding the authorization, acceptance or giving of gifts and hospitality, the Regulatory Compliance Unit should be consulted.

### 8.6.3 Donation and Sponsorship Policies.

Subject Persons must comply with internal policies and procedures regarding donations and sponsorships, in particular with the **Donations and Policy Sponsorships** and the procedure that develops it, which prohibit the use of donations and sponsorships as a covert form of bribery, both in relations with the public sector and between private individuals.

Sponsorships may only be made with the prior authorization of the Regulatory Compliance Unit or the position to which it delegates, and it shall only proceed with those sponsorships that comply, among others, with the following requirements set out in the Group's internal regulations:

- They are permitted by the legislation of the country applicable in each case;
- Their purpose is to contribute to creating a strong VALORIZA Group brand that is aligned with its strategy and its Purpose, Mission, Vision and Values; and under no circumstances may they be intended to: (i) affect or influence any commercial, professional or administrative relationship, any business decision or be directly or indirectly linked to illegal acts or undue benefits or h ; (ii) benefit, promote or serve the personal interests of any member of the Group;
- Be granted to entities of recognized prestige and moral solvency without any evidence, based on the best public information available, of any history contrary to this Code;
- They are not contrary to the values adopted by VALORIZA in accordance with this Code of Ethics;
- Do not damage the reputation and image of VALORIZA or its business; and
- Do not incur any of the prohibitions set out in internal regulations, such as, among others, (i) the prohibition of disproportionate or unreasonable sponsorship amounts, (ii) sponsorship of political parties, their foundations, trade unions or congresses and similar events that are carried out in terms that are not expressly permitted by the legislation of the country in which they are carried out; and (iii) sponsorship made through cash contributions.

### 8.6.4 Money Laundering prevention

VALORIZA has various internal controls in place aimed at preventing and avoiding money laundering operations involving funds derived from criminal or illegal activities, or that may be used to finance terrorism, among other purposes.

Subject Persons must pay special attention to cases where there are indications of a lack of integrity on the part of the persons or entities with whom they do business, immediately reporting any incidents in this regard through the Ethics Channel available on the Group's external website.

### 8.6.5 Intellectual and Industrial Property

VALORIZA employees must respect their own and others' intellectual and industrial property rights, including, among others, patent rights, trademarks, domain names, reproduction rights (including software reproduction rights), design rights, database extraction rights and rights over specialized technical knowledge.

The use of works, creations or distinctive signs of intellectual or industrial property belonging to third parties is expressly prohibited without proof that VALORIZA has the corresponding rights and/or licenses.

Only duly authorized trademarks, images and texts relating to VALORIZA may be used in marketing and advertising activities.

In their dealings with third parties, VALORIZA employees shall scrupulously follow the rules and procedures regarding the protection of intellectual and industrial property in order to avoid infringing the rights of third parties.

### 8.6.6 Obligations to the Tax Authorities and Social Security

In order to contribute to the sustainability of public expenditure as set out in Article 31 of the Spanish Constitution, VALORIZA undertakes to comply with current legislation in all areas of its activity with regard to its obligations to the Tax Authorities and Social Security, rejecting any type of fraud.

In relation to tax obligations, VALORIZA, with the collaboration of its employees, undertakes to: Reduce significant tax risks and prevent conduct likely to generate them, and avoid the use of opaque structures for tax purposes, such structures being understood as those in which, through the interposition of shell companies in tax havens or territories that do not cooperate with the tax authorities, they are designed for the purpose of preventing the Tax Agency or the National Tax Inter from knowing who is ultimately responsible for the activities or who is the ultimate owner of the assets or rights involved.

It undertakes to collaborate with the Tax Agency in detecting and finding solutions to any fraudulent tax practices that may arise in the markets in which VALORIZA operates, in order to eradicate existing practices and prevent their spread.

### 8.6.7 Market Defense

VALORIZA competes fairly in the market and does not allow its employees to act in a deceptive, fraudulent or malicious manner.

To this end, in the course of its commercial activities, VALORIZA promotes its services on the basis of objective and transparent standards, avoiding misleading, ambiguous or inaccurate information that could be misleading. This promotes transparency and accurate, timely and adequate information.

## 8.7 Labor rights

VALORIZA respects the labor rights recognized by law for all its staff in relation to trade union rights, decent working conditions and contracts regulated in accordance with the laws applicable to both national and foreign staff.

In relation to the hiring of personnel who are not nationals of an EU country, their rights will be respected at all times, but so will the obligations to check the appropriate permits for entry into the EU or for work.

Any form of forced or coerced labor is strictly prohibited. Employment offered by VALORIZA will always be freely promoted and employees will have complete freedom to resign in accordance with applicable regulations without being forced or coerced to remain with the company.

Likewise, discrimination in employment and occupation on the basis of race, colour, sex, religion, political opinions, national origin, social background or physical or mental disability is strictly prohibited.

Selection processes will be based on the ability to perform the job offered without distinction, exclusion or preference based on other issues.

Any type of harassment in the workplace is also strictly prohibited and will be punished if detected. To this end, all members of VALORIZA are required to be familiar with and comply with the **Policy on Prevention and Action in Cases of Harassment and Discriminatory Acts**, which complements this Code.

## 9 Commitments and guidelines for conduct

### 9.1 Commitment to Environmental Protection.

VALORIZA is committed to carrying out its activities in a way that minimizes the adverse environmental impacts resulting from its operations and achieves a high level of quality in its processes, projects, facilities and services, paying special attention to protecting the local environment and the relationship between its staff, supply chain, customers and other stakeholders with the environment.

Specifically, the Group implements this commitment in its **Quality, Environment and Energy Management Policy**, its **Climate Change Policy**, its **Water Policy**, its **Biodiversity Policy** and its **Circular Economy Policy**, which incorporate environmental protection and conservation principles into VALORIZA's processes, such as the application of circular economy principles (efficiency in the consumption of resources, energy and water, minimization of waste and its correct management), contribution to the fight against climate change and protection of biodiversity and ecosystems.

VALORIZA also ensures that suppliers, contractors and partner companies with which it operates comply with the standards, environmental protection policies and commitments undertaken by the Group, as established in its Supply Chain Management Policy.

One of the basic principles of action in this area is the identification, assessment and management of environmental risks, establishing preventive and mitigating controls for these risks that promote more efficient work processes that are respectful of the environment and, of course, in strict compliance with all applicable legislation and regulations.

To achieve this objective, VALORIZA allocates the necessary resources for proper protection and promotes environmental awareness and training among the Persons Subject to the Policy, encouraging innovation and digitalization activities that improve processes.

### 9.2 Contribution to the development of local communities

VALORIZA's commitment to sustainable development also involves contributing to the social and economic development of the local communities with which it interacts through the creation of direct or indirect local employment, minimizing the negative impact of our activity on populations, and promoting dialogue with community stakeholders.

VALORIZA respects the rights of indigenous peoples and ethnic, religious and linguistic minorities living in the areas where it operates.

## 10 Compliance monitoring

### 10.1 Compliance Unit

To ensure the effectiveness of this Code of Ethics, the VALORIZA Board of Directors delegates the supervision of the functioning of the VALORIZA Group's Regulatory Compliance and Criminal Prevention Model and is supported by the Regulatory Compliance Unit, a collegiate body of an executive and autonomous nature, composed of representatives from various areas of the Group appointed by the Board of Directors.

VALORIZA decides on the appointment of this Regulatory Compliance Unit, whose main function, among others, will be to monitor the correct development and implementation of the guidelines for conduct established in this Code.

The Regulatory Compliance Unit will ensure compliance with the provisions of the VALORIZA Code of Ethics. It will therefore deal with any conflicts that may arise in relation to the Code and establish action plans to resolve them and safeguard the ethical culture.

Interested parties may contact the Regulatory Compliance Unit through the Ethics Channel itself.

The Compliance Unit has the authority, resources and means necessary to effectively implement and enforce the internal control measures of the Regulatory Compliance Model that are appropriate for preventing and detecting possible breaches of the Code, as well as for remedying their effects should they occur.

All these control measures are reflected in the VALORIZA Group's integrity, criminal and competition risk maps, helping to mitigate the Group's exposure to these risks at all times.

To this end, the content of the Regulatory Compliance Model will be subject to appropriate communication, awareness-raising and training actions, and will be updated periodically and when appropriate based on regulatory changes, modifications to the Group's structure or improvements arising from its reviews.

### 10.2 Ethics Channel

The VALORIZA Group has an Ethics Channel, which is the corporate communication channel designed to facilitate the formulation of any queries regarding the scope and applicability of this Code of Ethics and, in general, the VALORIZA Group's Regulatory Compliance Model, as well as to report in a secure, confidential and, where appropriate, anonymous manner about possible breaches of the guidelines and conduct regulated in this Code of Ethics, in the Model as a whole, or any infringement of applicable internal or external regulations.

This Channel is the preferred and appropriate means for reporting, among other things, possible criminal or corrupt conduct or violations of competition rules, against which VALORIZA maintains an express commitment to zero tolerance.

The VALORIZA Group's Ethics Channel, which forms part of its Internal Information System, is available to VALORIZA staff and third parties at the following address:

**https://valoriza.canalhelas.com/home**

The VALORIZA Group's **Internal Communications System Policy** and the **Internal System Management Procedure Information** guarantee that complaints relating to matters within its scope of application will be properly investigated by the Group (in the case of anonymous complaints, provided they contain sufficient information to do so), guaranteeing, in all cases, that the identity and privacy of the persons concerned will be protected, protection against reprisals for whistleblowers acting in good faith, compliance with personal data protection legislation, a reliable and objective analysis of the possible infringement, and maximum respect for the presumption of innocence and the honor of the persons allegedly involved in it.

### 10.3 Action before Inspection Bodies.

All VALORIZA staff are obliged to cooperate at all times with any inspection bodies that may require information in the context of an investigation or inspection of the company's activities.

The most common inspections may come from bodies such as the Tax Agency, Labor, the Bank of Spain, the Spanish Data Protection Agency, bodies responsible for environmental control, or other supervisory bodies in the sector in which VALORIZA provides its services.

Therefore, in the event of an inspection, we must:

- Once we have been notified of the visit or arrival of the inspectors, we will ensure that all those who may be involved in adequately meeting their requirements are present on that day.
- On the day of the inspection, we will cooperate with the inspectors at all times.
- Any maneuver that delays, hinders or obstructs the inspection will be avoided.
- All information provided or decisions made must be approved by Management in collaboration with the Compliance Unit, which will be the only parties authorized to provide documentation.

### 10.4 Breaches of the Code of Ethics and obligations of persons subject to it

Subject Persons breach their duty of loyalty to the VALORIZA Group if they engage in conduct that may violate the rules and regulations set out in this Code or that is prohibited by it, by the Regulatory Compliance Model as a whole or by any other applicable internal or external regulations or rules, including those of a criminal, civil, commercial, administrative or tax nature.

In particular, VALORIZA is specifically committed to preventing particularly serious breaches, such as, among others, criminal conduct, conduct classified as punishable by international multilateral organizations (corruption, coercion, collusion, fraud and obstruction), and violations of anti-corruption or competition law, which are expressly prohibited.

Any commission by a Subject Person of any of the above irregularities constitutes a breach of this Code of Ethics and, in general, of the Regulatory Compliance Model, with the relevant disciplinary system being applied in accordance with VALORIZA's Corporate Governance System, collective agreements or legally applicable regulations, which may lead to termination of the relationship with the VALORIZA Group, without prejudice to any other liabilities that may be enforceable against the offender.

No Subject Person shall be obliged to comply with orders or instructions that are contrary to the law, this Code of Ethics or, in general, any of the rules or regulations referred to above. If such a situation arises, Subject Persons must report this fact to the Compliance Unit as soon as possible through the Ethics Channel set up by the Group.

Likewise, it is the obligation of the Persons Subject to the Code who detect or become aware of the commission of possible irregular conduct such as that mentioned above to report it as soon as possible to the Head of the Ethics Channel through the same Channel. In case of doubt about the appropriateness of a particular action, the Persons Subject to the Code shall make the appropriate enquiry through the aforementioned channel.

The Channel Manager shall be responsible for investigating, processing, examining and proposing disciplinary measures in relation to any breach of this Model.

In the exercise of these functions, they may request the collaboration of other bodies, departments, areas, persons or companies of the VALORIZA Group, including the Regulatory Compliance Unit, which shall be obliged to comply with their requests. This duty of cooperation includes the obligation to respond to requests made by the Channel Manager in the context of any internal investigations arising from possible breaches, the obligation to correctly execute the processes and controls implemented by VALORIZA in the area of regulatory compliance, and, likewise, the obligation to participate in mandatory training and refresher courses on the knowledge and application of the Regulatory Compliance Model organized by VALORIZA.

## 11 Publicity of the code

This Code will be made available to all interested parties and will be available on the VALORIZA website at the following link: www.valorizasm.com.

The Code will be subject to appropriate communication, training and awareness-raising actions to ensure its proper understanding and implementation by all those involved.

## 12 Approval and entry into force

This document was approved by the Board of Directors of VALORIZA SERVICIOS MEDIOAMBIENTALES, S.A. on 31/03/2026. Upon its entry into force, this Code repeals any other internal regulations on the subject that may have existed until now.

This document will be duly disseminated to all our stakeholders through the usual communication channels of the VALORIZA Group. The content of this document will be reviewed in accordance with the needs determined by the company's strategy, as well as when arise relevant legal, organizational or technical circumstances that justify its immediate adaptation. It will also be updated periodically to reflect any regulatory changes, structural modifications to the Group, or the incorporation of improvements resulting from reviews of the Criminal Compliance Management System, Anti-Bribery and Competition Defense or the Regulatory Compliance Model.

**The current version of the document will be available to all VALORIZA stakeholders at www.valorizasm.com.**

## ANNEX: Summary of policies by type of offense

| Type of offence / criminal risk | Mitigating policy / mechanism |
|---|---|
| Workplace Harassment | **Protocol for the prevention and action in cases of harassment and discriminatory acts** |
| Sexual Harassment | **Protocol for the prevention and action in cases of harassment and discriminatory acts** |
| Discrimination | **Diversity, Equality and Inclusion Policy** |
| | **Policy on Prevention and Action in Cases of Harassment and Discriminatory Acts** |
| Forced Labour | **Supply Chain Management Policy** |
| Occupational Health and Safety Offences | **Occupational Health and Safety Policy** |
| Breach of Confidentiality | **Information Security Policy** |
| Data Protection Breaches | **Data Protection Policy** |
| Conflict of Interest | **Conflict of Interest Protocol** |
| Anti-competitive Practices | **Regulatory Compliance Policy on Competition Defense** |
| Corruption / Bribery | **Anti-Corruption and Relations with Public Officials and Authorities Policy** |
| Gifts & Hospitality (corruption risk) | **Policy on Accepting and Offering Gifts and Courtesies** |
| Donations / Sponsorships (corruption risk) | **Donations and Sponsorships Policy** |
| Money Laundering | Planned development of a specific **Anti-Money Laundering Policy.** |
| Environmental Offences | **Quality, Environment and Energy Management Policy** |
| | **Climate Change Policy** |
| | **Water Policy** |
| | **Biodiversity Policy** |
| | **Circular Economy Policy** |
| Supply Chain Violations | **Supply Chain Management Policy**<br>Planned development of a **Supplier Code of Conduct.** |
| Contractor / Supplier Misconduct | **Responsible Contractors Policy** |
| Procurement / contracting risks | **Contracting Policy** |
| Innovation / misleading practices | **Innovation Policy** |
| Transparency / disclosure issues | **Communication Policy** |
| International sanctions / regulatory breaches | **International Sanctions Compliance Policy** |
| Criminal risk (general) | **Compliance Policy on Crime Prevention** |
| Ethics reporting / whistleblowing | **Internal Communications System Policy** |
| | **Internal System Management Information Procedure** |