

LIC



CODE OF ETHICS

Letter of presentation



Dear Team,

I am pleased to present the Code of Ethics of our company LEVANTINA INGENIERÍA Y CONSTRUCCIÓN, S.L.

The document we offer you in this communication is not simply text, but rather represents the company's commitment to ethics, integrity and professionalism.

Aware that any action we take has an impact on society, our Code of Ethics implies our commitment to comply with the laws and ethical values on which they are based.

We thank you all for the effort and commitment we need from you to achieve our goal and we ask you to assume the principles set forth in the Code, which will govern all our actions from now on. Please read it carefully and refer to it whenever you have questions or concerns.

This Code is intended to be a practical guide to accountability, trust and commitment. The aim is also for everyone—management, employees, customers and suppliers—to find in it our values and the types of behaviour we reject.

We are aware that each and every one of the company's employees performs their duties to the highest ethical standards, but we must go one step further and make a commitment to the company's governing ethical principles and values.

This is why Management has taken the decision to implement a Code of Ethics and Conduct, which, together with the measures taken in accordance with the Organic Law on Data Protection, the prevention of occupational hazards, environmental protection and the Equality Plan, close the circle of regulatory compliance that has always been in our sights.

All persons to whom this letter is addressed must be familiar and comply faithfully and scrupulously with the Code of Ethics set out below.

We remain at your disposal for your questions or comments about our Code.

Yours sincerely,

Brígido Navarro Giménez.
Administrator



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Definition, purpose and scope of application

The Code of Ethics, which can also be called a *code of conduct* or *code of good practice*, brings together in one single document the principles, criteria and rules of conduct. It constitutes a basic pillar of the company's compliance programme to promote and reflect a positive corporate culture.

This Code of Ethics has several groups of addressees. It applies to the entire company and is binding on all personnel regardless of their position or function. Accordingly, it will be binding for employees, managers, directors and third parties such as the company's suppliers, customers, subcontractors, joint ventures and business partners irrespective of the business area concerned, their national or international location or the work they carry out.

External consultants, self-employed persons and temporary employees shall also be bound by the code when providing services for the company.

The natural or legal persons bound by this Code, as referred to in the previous paragraphs, shall be obliged to subscribe to and comply with this Code. This contribution includes the communication of any non-compliances as they occur.

The purpose of this Code is to establish the principles and values that are to govern the actions of the aforementioned addressees in order to ensure ethical and responsible professional behaviour in the performance of their activity. It also reflects the company's commitment to the principles of business ethics and transparency.

The Code of Ethics is binding and contains provisions aimed at making it effective. This includes the Ethics Channel. This undertaking includes certain obligations and, as such, breaches of the code of ethics and the policies by which it is implemented will be subject to disciplinary penalties.

Definition, purpose and scope of application

The Code is based on values, improves the company's reputation, gives unity and coherence to its self-regulatory system, strengthens employees' sense of belonging to a group and signals the company's corporate culture to third parties.

Furthermore and always in compliance with the law, certain matters covered by this Code will be supplemented by more detailed rules set out in the various Codes for each sector. Any stricter internal laws, practices or procedures applicable to natural or legal persons subject to this Code shall take precedence.

The Code takes into account the principle of criminal liability of legal persons and serves as a basis for avoiding irregular, improper behaviour that could lead to criminal liability for the company.

The Legal Department will inform all persons subject to the code, and it will be published on the company's intranet and website at <https://lic-sl.com>.

The [Ethics Channel](#) is accessible on the company's intranet and website and must be used to report all breaches of this Code, as well as any actions contrary to current legislation and our company's ethics.

Definition, purpose and scope of application

Scope of application

- **Objective**

LIC's Code of Ethics (hereinafter referred to as the 'Code') applies to the Company's business and the actions its professionals take in the exercise of their duties or on behalf of the Company.

- **Subjects**

Compliance with this Code is mandatory for members of the Governing Body, executives and (permanent and temporary) employees.

Albeit indirectly, this Code is also for persons and entities that have a relationship with LIC as suppliers, clients, advisers or intermediaries, etc. Said third parties must be familiar with LIC's rules as set out in this Code and in LIC's Criminal Compliance and Anti-Bribery Management System.

- **Territories**

The Code is applicable in any national or international territory or jurisdiction, where LIC carries on its business, without the need for a subsidiary, branch or permanent establishment.

Principles and values

The organization's ethical principles and values are the foundation for the company's activities.

Accordingly, our values are:

- **Integrity and good faith.**
- **Respect for legality and ethical values.**
- **Respect for Persons, Human Rights and Civil Liberties.** Employees are obliged to respect each other and create a pleasant, healthy and safe working environment. They are also responsible for creating friendly professional relationships and avoiding all forms of harassment, intimidation, abuse, disrespect and any kind of physical or verbal aggression. The company will take timely and appropriate action in the event of any of the above, including disciplinary measures. Any report of harassment or discrimination will be investigated promptly and thoroughly while maintaining the utmost confidentiality. Any retaliation against persons who report such situations or who assist in their investigation shall be unacceptable and may also result in disciplinary action.
- **Positive work climate.**
- **Responsibility and prudence** in the actions of the addressees of this Code, which will imply the scrupulous monitoring of the internal procedures in place, especially in matters of occupational hazards prevention, in compliance with legal or internal regulations governing the activity in question, and in training and education for it to be carried out successfully.
- **Transparency and impartiality** in the taking of any kind of decision.

Principles and values

- **Equal opportunities, career development and non-discrimination** both in access to work and promotion. Discrimination on grounds of sex, race, religion, marital status, sexual orientation or any other differentiating factor is inadmissible.
Under no circumstances shall:
 - a person be hired to "return an unjustified favour" done by the candidate in their previous employment;
 - a person be hired because they can guarantee unjustified treatment in the organization's favour.
- **Teamwork** and collaboration is configured as an instrument of opportunity and personal and professional growth.
- **Enhancing innovation and process efficiency** to better serve our customers and drive our growth.
- **Quality as a basis for growth.**
- **Tone from the top:** Managers will be role models in their behaviour and compliance with the Code.
- **Corporate image and reputation**, which employees must make part of their work at all times. Corporate image and reputation is one of the most valuable assets to preserve the trust of customers, suppliers, subcontractors, business partners, authorities and society in general.

Corporate policy

It is a matter of offering the highest quality and satisfaction to both customers and business partners. All actions are carried out under this commitment, and we are characterized by the rigorous fulfilment of our commitments.

Our policy is based on the following principles:

1. Customer focus

The constant search for their satisfaction, which implies our own satisfaction.

2. Quality

The quality of the work and services provided is one of the company's maxims. This can be seen in the importance and transcendence of our work, and in the various quality, environmental, occupational hazards prevention and equality certificates we have obtained. We highlight the following of said certificates:

- Certificate of compliance with the ISO 9001 standard.
- Certificate of compliance with the ISO 14001 standard.
- Certificate of compliance with the OSHAS 18001 standard.
- Equality Plan. "Fent Empresa. Iguals en Oportunitats" seal.

3. Commitment

With workers, suppliers and customers. We meet agreements and conditions from start to finish.

4. Strength and firmness

As values, strength and firmness are constants in our work. We refer to strength in our business policy and firmness in meeting targets to ensure the performance and profitability of every business area.

5. Opportunities

We are enterprising and are always looking to evolve and expand our scope of action. We carry out extensive preliminary market studies.

6. Staff

Our priority is to take care of our staff, offering opportunities for workers to grow as professionals. Well-knit teams are a company's greatest asset, and we pride ourselves on the coordination and cooperation of each and every department. Keeping our staff motivated is one of our priorities.

7. Progress

Research, development and innovation (R+D+I) is important. We seek to develop methods to be at the forefront of our sector, increasing our know-how as professionals on a daily basis.

8. Union

We seek to unite our assets so that the sum is greater than the parts. All our departments work together to improve the final project based on common quality criteria.

9. Honesty

We foster honesty at work. This is why we have our clients' complete trust and confidence.

Knowledge, acceptance and compliance

The Code of Ethics is binding for all the company's employees and for third parties who have voluntarily undertaken to comply with it. Every member of the company will be informed.

All necessary means may be used to disseminate the company's values and principles and to enforce compliance with the standards of conduct set forth in the Code. The company's administration and management will be a benchmark for their behaviour and compliance with the Code.

The Code must be expressly accepted by each addressee, who must make an express commitment to comply and accept that the principles and values of the Code govern their conduct.

Each member of the company shall confirm that they have had access to this code, that they accept it and that they understand what it entails. For this purpose, we shall keep a record of all employee compliances received.

No member of the company, regardless of level or position, is authorized to ask an employee to contravene this Code of Ethics, and no one may justify their conduct on the grounds of an order from a superior or ignorance of this Code.

The code of ethics is part of the employer's power as manager. Accordingly, its content is effectively part of the employee's professional obligations. In addition to the obligations set forth expressly in the employment contract, it also includes those arising from the general principle of good faith.

Operations and information register

Employee relations.

1. Development of professional activity.

Those bound by the Code undertake to comply with applicable laws, the company's internal procedures and the values and principles set out in this Code.

Employees must avoid all conduct that may be damaging for the company's reputation or have an adverse effect on its interests.

All employees must be aware of the laws governing their work and, where appropriate, ask their superior for the necessary information.

No employee shall knowingly collaborate with third parties in the violation of any law, or participate in any action that compromises the principle of legality.

The company shall ensure that all members of the company are aware of the external and internal regulations that apply to their functions.

In the event of non-compliance with the law, employees must inform the company via the Ethics Channel.

2. Equal opportunities.

The company's employees are its greatest asset and will be regarded as such.

The company will promote the personal and professional development of its employees and foster a positive working environment. Relations between employees shall be governed by respect and they shall

Operations and information register

remain vigilant regarding any form of violence, abuse or discrimination at work. Company employees must treat each other with respect in a pleasant and safe working environment, and they have an obligation to treat colleagues, subordinates and superiors in a fair and respectful manner.

Promotions shall respond to the principles of merit and ability as defined in the job requirements, with the company ensuring equal opportunities and the promotion of a corporate culture based on merit.

The company shall ensure compliance with labour regulations in terms of employment.

Employees shall cooperate in the fulfilment of these objectives by preventing, detecting and reporting any irregularities they come across.

Special attention will be paid to integrating people with disabilities into the labour market.

3. Diversity.

Under no circumstances will discrimination or inequality in any field be tolerated, be it on grounds of race, age, political ideology, sex, religion, disability or origin.

The company fosters a culture of diversity and equality. We promote a non-sexist image and one of our fundamental values is zero tolerance of gender discrimination and the use of any type of sexist language.

All members are aware of the Equality Plan and participate in its implementation regardless of their position.

4. Training.

Operations and information register

All members of the work teams undertake to continue their professional training so that they can carry out their functions better and more efficiently; and they must also attend the training courses or days set by the company.

The heads of each department identify their staff members' training requirements and decide which individuals are to participate in the relevant training courses.

The aim is to provide training tailored to staff members' personal requirements within the framework of the general needs of the company.

5. Conciliation of work and family life.

The company is particularly interested in the conciliation of family and working life, and therefore, whenever feasible, offers its employees flexible working hours. The company adapts to their needs to create a perfect symbiosis between family and working life, from which both the employees and the company will benefit.

The members of the work teams undertake to use all the personal means at their disposal to coordinate their timetable as effectively and efficiently as possible so that the company and its customers are satisfied at all times.

6. Conflicts of interest

Employees shall avoid situations where their personal interests conflict with the company's.

Regardless of their rank or function, employees may not use information obtained at the company to gain particular advantages or business opportunities or provide services to competitor companies.

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If there is any doubt as to whether an activity to be carried out may involve a conflict of interest, the department managers and, where appropriate, the body in charge of compliance with this Code shall be consulted.

All employees must disclose any external activities, financial interests or relationships that may enter into a conflict of interest or have the appearance of a conflict. They must also comply with the law and company policies.

If an employee is considering standing for election or, when the time comes, accepts a political post that could affect the company's business, they must inform the company's management without delay.

7. Fair competition and antitrust.

Any activity by members or employees who, by means of unfair, dishonest or anti-competitive conduct, seek to eliminate competition is both prohibited and rejected.

Acting unfairly towards competitors and taking advantage of information that may be considered confidential and could have been obtained illegally are prohibited.

Customer and market relations.

The company and each of its members are committed to complying with competition laws, avoiding any practice that limits or restricts competition.

The company and each of its members shall ensure that truthful information is provided in the company's promotional activities, and that no false information is given that could be misleading for customers. Any

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kind of misleading advertising is also forbidden; it must be in honest in all cases. Information about competitors that could be brought to the company's notice in breach of confidentiality will be rejected.

The security of payment means, data protection and fraud prevention will be ensured.

Any employee entering any information in the company's IT systems must ensure that it is reliable and accurate.

Supplier relations.

Relations with suppliers shall be governed by respect, and they will be selected according to objective, transparent criteria.

In this case, compliance with the code will be part of a supply or service agreement and non-compliance may lead to the possibility of withdrawal from the agreement. For this purpose, the code may be provided as an annex to the agreement.

Internal procurement procedures shall be scrupulously respected, decisions shall be justified and related documentation shall be kept for internal or external audits.

Extreme care shall be taken to protect suppliers' confidential information.

Suppliers must agree to respect human and labour rights in their own companies.

It is expressly forbidden to directly or indirectly accept, offer or solicit gifts, favours or compensation that may influence decision-making in relation to the supply chain. The receipt or offer of gifts of "low value" shall be admissible, with the category of "low value" including gifts of a value of €50 or less. Any doubts as to what is included in this concept must be consulted with the company's Ethics Committee, and the acceptance of

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gifts of greater value must also be submitted to the Administrator for the corresponding decision. In any case, cash gifts are prohibited.

All employees involved in supplier and external collaborator selection processes are obliged to proceed objectively and impartially, applying transparent criteria and complying with the relevant internal regulations.

Partner Relations.

The company undertakes to provide all Partners with accurate information, avoiding the creation of doubt, mistrust or deception.

The company obliges all Partners to strictly comply with all current regulations and respect all recognized human rights and ethical standards.

In addition to each other, all Partners must treat all members of the company's workforce with respect and dignity, and all staff must treat all other members of the partner companies in the same way.

The company prohibits the use of forced labour, child labour and discrimination, etc.

Relations with institutions, authorities and civil servants.

The company's employees' relations with authorities, institutions and public officials shall be governed by international standards for the prevention of corruption and bribery.

Any decision taken in this area shall respect applicable internal and external rules and shall be documented for internal or external controls.

Operations and information register

Under no circumstances shall the company offer, solicit or accept gifts, favours or compensation from authorities, institutions or civil servants. Exceptions to this rule are gifts or hospitality considered proportionate and reasonable in accordance with local practice. In any case, cash gifts are prohibited.

So-called "**facilitation payments**", i.e. giving small amounts of money to public officials to obtain certain routine administrative procedures, is prohibited. This prohibition must be respected even if in one of the countries in which LIC operates, such facilitation payments are socially accepted and customary.

Compliance with obligations arising from the award of subsidies or aid shall be carefully and expressly monitored.

The company may make **donations** only to foundations, associations and non-governmental non-profit organizations with a recognized track record, as well as to organizations and entities in the public sector capable of certifying the social action for which the corresponding contribution is made.

In the case of donations intended to finance a specific programme or action, the beneficiary entity must provide proof of the implementation of said programme or action.

Donations to political parties and entities, as well as entering into sponsorship agreements with such entities, are prohibited.

All donations made by the company shall be reported to the Ethics Committee, which must authorize those that involve the payment of an annual amount equal to or greater than 5,000 euros.

The Ethics Committee shall create and maintain a register of the donations made by the company, indicating the beneficiary entity, the object of the contribution, the specific action financed and the amount contributed.

Operations and information register

Appropriate financial and accounting records must be kept. It is essential to ensure that financial and accounting records are complete, accurate and not misleading, as this information is the basis for both internal and external reporting to governmental and regulatory authorities and other entities.

All books, records and accounts, including time sheets, sales records, invoices, receipts and expense reports, must be complete, accurate and reliable.

The falsification of any document or any misrepresentation of data relating to a particular transaction is not permitted.

Transactions must be recorded in a timely manner and supported by appropriate documentation.

No expenditure shall be incurred or paid out of company funds unless authorized by the competent person.

All economic transactions must be carried out with the utmost transparency and clarity; they must also be indicated and recorded in the respective books and media.

Fraud prevention measures

The person in charge of accounting will be required to regularly reconcile customer and supplier balances on a quarterly basis.

Payment and other documents shall be controlled on a regular basis.

It is forbidden to use the postal service to send cheques made out to the bearer, as well as other similar means of payment, as they can be altered or modified.

Document storage

The company complies with legal and regulatory requirements regarding the retention and disposal of documents and records. All records and information shall be treated in a manner that ensures the following:

- The archiving, storage and retrieval of recorded information is always performed in an organized manner.
- Record-keeping, in whatever format, meets legal, fiscal, regulatory and operational requirements.
- Records and their backups are protected.
- The necessary documentation is available in the event of legal proceedings.
- Documents that are no longer of value in both paper and electronic format are disposed of in an appropriate and timely manner.

The company has a document retention plan which identifies each of the categories it maintains by year and record number. The plans for retaining records indicate when the retention period begins and for how long the documents should be retained.

The company uses certain IT systems to control the access to and use of information by authorized personnel, where appropriate.

In its IT systems, the company has put anti-virus, anti-malware, anti-spyware and anti-spam measures in place to protect its IT equipment and all the information it holds.

The company automatically blocks authorizations, access accounts and staff control when workers terminate their employment.

All the company's employees agree not to misuse the IT media made available to them.

Confidentiality of information

All information generated by the company's activities is considered confidential.

Confidential information means information that could be disclosed orally, in writing or by any other means, to which any member of the company has access while employed at the company.

All workers at the company are obliged to be particularly prudent and reserved in any public statement, and are obliged to seek authorization to make any intervention in the media, where applicable.

Intellectual and industrial property rights

The company recognizes its commitment to protecting its own and third-party copyrights, patents and trademarks, and requires the same commitment from its suppliers.

We are all committed to reporting any irregularities in this area.

Particular attention must be paid to the inclusion of copyright notices on company materials, information, products, services and any documents for public distribution.

In their dealings with third parties, employees must scrupulously follow the relevant rules and procedures to avoid infringing third-party rights, respecting the valid intellectual property rights of others.

Organic Law on Data Protection

The company complies with the strictest data protection standards and respects all the rights and obligations involved.

It is strictly forbidden to disclose to third parties personal data obtained from suppliers, employees, customers and public administrations.

The company must safeguard data that is obtained, stored or exchanged in the course of its day-to-day business.

With regard to the Organic Law on Data Protection, files have been compiled on the following: suppliers, customers, human resources, CVs.

Gifts, commissions and remunerations policy

Giving or receiving gifts and invitations to leisure activities can affect objectiveness and judgement, and in extreme cases can also violate anti-corruption and anti-bribery regulations and laws. Accordingly, everyone at the company must be very diligent in this area.

The solicitation and acceptance of any kind of payment, gifts or commissions in connection with professional activities from clients, intermediaries, suppliers or third parties is prohibited. Invitations, promotional items, occasional hospitality or courtesies other than cash—and within reasonable limits—are excluded from this prohibition. In the event of doubt in this regard, the Ethics Committee, which is responsible for compliance with this Code, must be consulted.

Use of company goods and services

Efficiency will inspire the use of the company's goods and services.

The company provides employees with access to e-mail, the Internet, intranet, telephones and other forms of communication technologies to make their work more productive and effective as and when necessary. It is everyone's responsibility to maintain the confidentiality, integrity and availability of our technology and communications infrastructure.

It is the employee's responsibility to use the company's resources responsibly, efficiently and appropriately for their professional activity.

Technological infrastructures shall be used for professional purposes only.

The downloading or installation of illegal or unlicensed software, applications or content is not permitted. Intellectual property laws shall be respected in all cases.

All information relating to usernames, passwords and authentication devices on IT systems must be controlled and kept secret, and any possible security risks or incidents in this regard must be reported.

The company's IT resources and services may be subject to review by the company. In all cases, such reviews shall comply with applicable regulations.



The company undertakes to comply with and integrate the national or international agreements and conventions by which it may be bound by virtue of its business in its internal regulations.

All employees must comply with the laws in force in the countries where they work in accordance with their spirit and purpose, and must behave ethically at all times.

Money laundering and terrorist financing

The company is firmly committed to the fight against money laundering and terrorist financing and, in particular, to ensuring that it is not used for any illegal activity.

Accordingly, it assumes special consideration and awareness of the following:

Situations in which there may be indications of a lack of ethical values by persons, entities or groups with whom operations or business are being carried out.

Payments made in cash which may be suspicious due to the nature of the transaction or to the exchange of currencies used in relation to those previously established, including the origin.

Any situation where irregular payments or funds can be suspected to be the result of illegal activity must be reported immediately.

Occupational health and safety

Compliance with all safety, health and occupational hazards prevention regulations must be strictly controlled.

Members of work teams must make responsible use of safety equipment when carrying out activities that may be considered hazardous.

Supervisors shall bring to the attention of their immediate superior any situation capable of creating a hazard for the work teams' health or safety.

Any situation or conduct that may create a risk or danger for members of the work teams is prohibited.

The company applies occupational health and safety policies and establishes preventive measures in accordance with current legislation.

For all the above reasons, the company seeks to apply the health and safety policies and its standards in its investee and supplier companies, and in general, in any company with which it collaborates or is associated.

All company personnel must know and respect all the above in order to be able to detect any situation or circumstance that may affect the correct development of their activity.

The company has drawn up an Occupational Hazards Prevention Plan. It also provides its staff with all the resources and information they need for their day-to-day work in a reliable and healthy environment.

ISO 45001 certification has been implemented, demonstrating a high level of performance in occupational health and safety, and controlling risks in accordance with the occupational health and safety policy and objectives.

ISO 45001 certification contributes to the following:

Occupational health and safety

- Reduced number of accidents at work.
- Strict compliance with prevention legislation, integrating it in the organization.
- Promotion of a preventive culture by integrating prevention in the company's general system.

The possession, use, purchase, sale, attempted sale, distribution or manufacture of illegal drugs at the workplace, as well as the use of alcohol, illegal drugs and the misuse of prescription drugs while performing work-related activities is strictly prohibited. Concealing work-related accidents or very serious incidents, falsifying safety records or ordering breaches of safety rules and regulations is also strictly prohibited.

Employees who contravene this policy will be subject to disciplinary action.

Environmental commitment

The company undertakes to ensure respect for the environment, to minimize the environmental impact of all its activities and to disseminate among its employees a culture of respect for the environment as a principle of conduct in their actions.

The company is committed to providing its employees with a safe and healthy working environment and we are all committed to working in a manner that ensures compliance with environmental regulations, avoiding any negative impact on the environment.

The company's employees must be aware of and accept this policy and proceed at all times in accordance with the criteria of respect and sustainability. They must also adopt habits and behaviour based on good environmental practices and make positive contributions to achieving the targets set. Employees must also strive to minimize the environmental impact of their work and the use of facilities, equipment and resources placed at their disposal.

These principles shall form part of relations with external contractors or collaborator companies.

Here, it is important to note that the company has implemented the ISO 14001 standard, which affects all aspects of a company's management of its environmental responsibilities. This is yet another example of the company's commitment to improving its environmental performance. This is a set of standards based on procedures and guidelines for the company to build and maintain a sustainable environmental management system.

Compliance, control and disciplinary regime

Failure to comply with the Code may lead to consequences for employees, together with administrative and criminal consequences.

The content of the Code derives from good faith in employment and one of the grounds for disciplinary dismissal in Article 54 of the Workers' Statute is the breach of good faith, which ensures its binding character.

This consists of setting up a channel for reporting irregular practices or behaviour by employees, distributors or suppliers in the company's chain of operation. The company will use an IT application on the corporate website set up as a communication channel for this purpose.

It shall apply to any irregularity or behaviour contrary to the ethics and values on which this Code of Ethics is based, or to report breaches of current legislation.

All matters received must be thoroughly investigated and resolved by the Ethics Committee. The person who has sent the communication must be responsible for what they report, undertaking to provide truthful information. They will also be informed of the result of the investigation and of the measure adopted as a result.

The resolution and the action to be taken must always correspond to the Ethics Committee and/or the Administrator of the company.

Updates to the Code of Ethics

The Code of Ethics will be updated in accordance with any legal, jurisprudential or corporate changes that may occur.

This Code of Ethics may also be updated as required.

Approval of the Code of Ethics



This Code of Ethics shall be approved by an Extraordinary General Meeting of Members convened for said purpose. It will come into force on the same day it is approved, be published on the corporate website and sent to all members of the company.

Lic

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