

Code of Ethics



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1. Elay Group Code of Ethics

This Code of Ethics sets out the ethical principles that govern the Elay Group. It affects any person who works in the Elay Group and/or acts on its behalf.



2. Objective of the Elay Group

The objective of the Elay Group is to generate wealth, with a view to the long term and in order to distribute this wealth, either directly (distribution of results, salaries, purchases, subcontracting...) or indirectly (taxes, economic aid...) in the environments in which the Elay Group is located.

To the best of our ability, we will also guarantee the health, safety and well-being of all the people who make up the Elay Group, ensuring the means and adopting the necessary measures to do so.

It is also the goal of all the people who make up the Elay Group to give value to our customers. In order to achieve this objective, our attitude, actions and relationships will be in accordance with the provisions of this Code of Ethics.

3. Company Values

The values of the Elay Group are as follows:

- **Honesty.** With l@s trabajador@s, customers, suppliers and other stakeholders.
- **Keep your word.**
- **Respect, not discrimination.**
- With respect to labor relations, **the provisions of the law will be followed.** The objective being the improvement of people and the environment, the work will not be limited to simple compliance with the law.
- **Commitment to the environment.** We will take care of the environment and actively participate in its development.
- **Commitment to the environment.** Respect for and protection of the environment are principles of the company's development.
- **Reinvestment.** The investments necessary for the development and future of the company will be guaranteed.



4. Basic attitudes of the people who make up the ELAY group

The attitudes mentioned below are those that the people who make up the Elay Group must meet. It is the company's commitment to work on these attitudes together with the people who make up the group, always respecting the real limitations of each person.



Defend the profitability of the company:

It is the job of all the people at Elay to seek and defend the profitability of the company, each one from their area and workplace, always respecting the values and principles of the company and complying with the law.

Professionalism:

Taking into account the needs of customers, guaranteeing the safety of people and resources, we will do everything in our power to fulfill our work, correctly and on time.

Group work:

Elay's work model must be Group Work, enabling and promoting the participation of all people.

Initiative, attitude for improvement:

We will look for improvements in the way we do things, always trying to understand the underlying reasons. We will have an attitude of seeking, proposing and materializing possible improvements and developments in any area of work.

Flexibility, availability:

The company and those who make it up will have a flexible disposition and we will adapt to each situation in order to offer an adequate response to those who make up our environment and other stakeholders.

Compliance with rules and procedures:

The company and l@s trabajador@s that make it up, during the performance of their functions, will take into account compliance with the law in force, as well as with the rules and procedures of the company.

Trade Union Rights:

Trade union rights will be respected and trade union activity will be guaranteed.

Non-discrimination:

All the people who make up the Elay Group will show total respect for the people and groups with whom they can maintain any type of relationship: work compañer@s, customers, suppliers, visitors, public institutions or any other type of person or interest group, among others.

All persons shall be treated equally, with dignity and respect, regardless of race, color, age, gender, sexual orientation, religion, nationality, political ideology, socio-economic status or cultural beliefs.

Any aggressive attitude, including any violence, threats or physical or psychological intimidation, will not be allowed.

We will also ask both our suppliers and our subcontractors not to have an aggressive or discriminatory attitude.



Anyone, as soon as he or she suspects or becomes aware of any act against fundamental rights, has the obligation to inform the managers or representatives of the company so that the necessary measures can be taken quickly to restore the rights of the person or persons affected.

5. General attitudes

- Company and/or others' information will be protected and used confidentially. The confidential information of the Elay Group, as well as that of other stakeholders related to Elay, will be kept confidential.
- The protection of confidential data will be guaranteed, complying with the provisions of the law.
- In order to guarantee the protection of the data of the people who make up Elay, as well as the company's information, the provisions of the document "Guide to good practices" of the Information Security Management System will be followed.
- Intellectual property, whether of the company or others, will be respected and any infringement of the company will be rejected.
- The company will never seek profit through the aid or patronage it grants. All this aid will always be granted in compliance with the law.
- The position in the company will not be used to obtain unjustified benefit for the worker, his family or friends.
- In the use of computer programs and systems, the provisions of the law shall be scrupulously complied with.
- No attitude of fraud or fraud that may damage the assets of the company or third parties will be admitted.
- Any breach of trust that may damage the assets of the company or of third parties will be rejected.

6. Attitudes in commercial and commercial relations

All the groups that have a relationship with Elay, that is, soci@s, trabajador@s, customers, suppliers, subcontractors and institutions, are very important for the Elay Group.

Relations with all of them must be honest and ethical, and will be concretized in the following attitudes:

- Development of fair competition.
- There will be no malicious or fraudulent attitudes towards stakeholders.

- Orders that are impossible to comply with will not be given to stakeholders.
- Bribes are neither accepted nor offered.
- Gifts and personal donations are not accepted. Those that are accepted, always within the law, will be sent to the company.
- Under no circumstances shall any type of commercial or commercial contract be signed for the benefit of the company that contravenes the provisions of the law.
- In the face of corrupt acts that may occur in both private and public companies, total intolerance and rejection will be shown.

In order to guarantee all this, the company will adopt the necessary internal measures and their effective compliance will be monitored.

7. Relations with the Public Administration

- Transparency and objectivity will be the norm in the areas of taxation and accounting.
- Transparency and honesty will be basic attitudes in our relations with funcionari@s and public institutions.

8. Occupational health and safety

In order to guarantee the health and safety of all the people who make up the Elay Group, the necessary measures will be adopted and the necessary resources will be guaranteed.

All the people of Elay will adopt the necessary measures to guarantee our safety and that of the people around us. We all made the following commitments:

- a) Everyone will use the PPE corresponding to their position.
- b) We will comply with the standards set forth in the company to ensure the safety of all people.
- c) If we become aware of a violation of the rules by any person, we must immediately inform the corresponding responsible person.
- d) Guaranteeing safety is an inalienable principle for Elay. It is our commitment that in the development of any project all safety requirements are met, identifying and reducing the effects on the safety of the processes.

9. Environment

Since its foundation, Elay has shown a clear and direct commitment to its environment. Elay's attitude will be to promote sustainable development, protecting any type of wealth in the environment (economic, cultural...), ensuring public health and working for the equality of people.



10. Environment

All the people of Elay adopt the commitment to take care of the environment.

The Elay Group makes the following commitments relating to the environment:



a. *Make effective use of resources.*

Each person in the Elay Group is responsible for using the resources that concern them effectively.

Avoiding losses of any kind, reducing the use of raw materials, reusing and recycling must be permanent objectives.

The final waste generated by our activity will be managed as established by law.

In the new resources that are internalized, energy efficiency will be taken into account, carrying out a differentiated examination from the economic one.

b. *Respect for the environment.*

Respect for the environment is an essential principle for Elay. In the development of projects, we are committed to strictly complying with all environmental requirements, seeking to minimize the effects, and identifying and reducing the environmental effects that the processes may have.

11. Compliance

In order to guarantee compliance with the rules and attitudes set out in this Code of Ethics, in the event of any non-compliance, management will apply the necessary measures. For this purpose, the "Company Agreement" document will be taken as a basis.

12. The Code of Ethics, a living document

This document, which includes the principles of the Elay Group, as well as the attitudes and ways of acting of those of us who make it up, must be a living and dynamic document.

All the contributions will be analysed in order to improve our attitudes and ways of acting, as well as our personality. They will be taken into account insofar as they are beneficial towards this objective.

This Code of Ethics will guide our daily actions. Every un@ of nosotr@s we must have internalized it.

This Code of Ethics will be reviewed periodically.