



CODE OF CONDUCT

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Message from General Management

Dear Partners:

The Code of Conduct, the Integrity Policy and the Human Resources Policy, aim to guide actions in the company within a framework of honesty, respect and healthy coexistence among our employees, suppliers, customers and the community in general.

Since the foundation of the company, our main values that govern our code of conduct are:

Honesty
Quality
Loyalty
Responsibility
Respect
Service

It is a guide to the way we relate to our co-workers, customers, suppliers and every stakeholder we come into contact with when doing business.

It is important that all of us who work in this company work together and strive to consolidate the culture of integrity and make this code a priority tool for the development of our day-to-day activities and those of our collaborators.

Our success and growth depend on our commitment to the principles and values set out here and it is everyone's duty to respect them. No employee is above the Code of Conduct; compliance with it applies to everyone, regardless of hierarchical level.

If you have any questions about the content of this document, especially when making decisions, please contact the staff designated to provide guidance and support on Code of Conduct issues or your immediate supervisor.

Francisco Montalbán Gómez
CEO



I. Mission, Vision, Objectives and Scope.

Mission:

To offer real technologically unbeatable alternatives to clients and users who require technical gases in their processes.

To achieve maximum excellence as an engineering company in the development of on-site gas generation solutions for Nitrogen, Hydrogen and Oxygen.

To enable our clients to gain in competitiveness, through cost savings.

To increase the safety of the industries and laboratories that use our solutions.

To help the environment by reducing the transport of these gases by road, as is now commonly done.

Vision:

To improve people's lives and their energy independence thanks to the inevitable change we are starting to make in the concept of global energy production.

We have to switch from fossil fuels to renewable energies, and in this transition, Hydrogen plays and will play an increasingly important role.

Our company will have to be a great leader and key player in this technological change at world level. It will provide the technology and solutions to obtain the energy needed to provide light and heat to our society and the fuel to boost transport systems, without greenhouse gas emissions.

Helping to comply with the 2015 Paris Agreements on reducing CO₂ emissions on the planet.

Objectives:

The purpose of the Code of Conduct of **CLAN TECNOLOGICA S.L** is to establish the guidelines of conduct that must preside over the ethical behaviour of all its managers, employees and business partners in their daily performance and in the relations and interactions that the company maintains with all its stakeholders.

This Code of Conduct constitutes a guide for action to ensure appropriate behaviour in the work and performance of the various members of the organisation, in accordance with current legislation.

The instrument considers the principle of due diligence applied by **CLAN TECNOLOGICA S.L** for the prevention, detection, response and eradication of irregularities arising both from breaches of the same and of the established internal rules, including those referring to criminal or other unlawful behaviour.

CLAN TECNOLOGICA S.L. understands that this due diligence requires, among other things, the design and implementation of control models that periodically analyse the risks derived from the matters covered by this Code, ensure knowledge of the organisation's rules, define responsibilities and establish procedures that allow the confidential notification of

irregularities, their investigation and the adoption of the appropriate measures for their correction and eradication.

CLAN TECNOLOGICA S.L. understands that the procedures it has in place, allow it to respond to the above objectives.

The Code of Conduct should be reviewed periodically, in order to ensure that it is in accordance with current legislation and that it takes into account internal changes within the organisation. It is recommended that the Code of Conduct be reviewed annually, either by updating the document or by certifying that it is still in force.

Scope:

The Code of Conduct is addressed to the owners of the company, employees, and in general to all personnel linked permanently or temporarily to **CLAN TECNOLOGICA S.L.**, regardless of the position they occupy or the place where they perform their work. The conduct guidelines contained in this Code of Conduct must be complied with.

On the other hand, **CLAN TECNOLOGICA S.L.** will promote and encourage among its suppliers, collaborators, internal and external, permanent or temporary, the adoption of guidelines of behaviour coinciding with those defined in this Code of Conduct, trying, whenever possible, their express adherence to it, so that the principles reflected in this Code and their compliance are effectively incorporated into the content of the contractual or collaborative relationships established with them.

II. Principles and Values.

- **Honesty:** It is the value of telling the truth, being decent, demure, reasonable and fair. From a philosophical point of view, it is a human quality that consists of acting as one thinks and feels.
- **Quality:** Quality is that attribute of things that are of excellent creation, manufacture or provenance, Quality describes what is good, by definition, everything that is of quality implies good performance. Everything that has a qualitative quality implies that it has gone through a series of tests or references which give the guarantee that it is optimal.
- **Loyalty:** The ability of a human being to remain loyal, supportive and grateful to a person or a group of people to whom he or she is bound by ties of friendship and respect.
- **Responsibility:** Responsibility is the fulfilment of obligations, or care when making decisions or doing something, it is the commitment to act in the right way.
- **Respect:** Consideration, with which a person or thing is treated because of some quality, situation or circumstance that determines them and that leads to abide by what it says or establishes or not to cause offence or harm.
- **Service:** Being willing to give one's best to support, help and satisfy others.

III. Working environment.

Those of us who work here have the same opportunities for development, while at the same time we work in a harmonious and respectful environment, which extends to our partners, customers and suppliers. We seek to make our work a satisfying and rewarding experience.

- *Human resources:*

Company owners, employees, and in general all personnel linked permanently or temporarily we all understand that our roles and responsibilities are subject to the professional and ethical requirements defined by the company and Human Resources policy.

- *Diversity, inclusion, harassment and discrimination:*

We are inclusive and respectful, we are careful in our words and actions, we do not harass or bully and we make our differences our strength.

We support and welcome all people, with different religious beliefs and sexual preferences without distinction.

IV. Laws and regulations.

Compliance with laws and regulations is essential. All internal and external members of our company must adhere to established policies and procedures and apply them in every action taken within the company or on its behalf. It is the duty and responsibility of each internal and external party to know, understand, communicate, comply with and enforce the rules, and to report any violations.

- *Anti-corruption:*

No member of the organisation should engage in or promote conduct related to corruption. Such actions are prohibited in any relationship, directly or through a third party, with government entities, public officials or private sector representatives.

According to the Royal Spanish Academy, corruption is a behaviour consisting of a bribe, offer or promise to another person holding public office, or to private sector representatives, for the purpose of obtaining advantages or benefits contrary to the law or which are of a fraudulent nature.

- *Conflicts of interest:*

It is prohibited to:

- a) To obtain a personal benefit, for oneself or for a third party, by offering, giving, demanding or accepting gifts, loans or credits, rewards, commissions or any other inducements.
- b) The private interests of the organisation's personnel interfering or seeking to interfere with the interests of the company.
- c) Any external activity that interferes with and/or hinders the objective performance of the company's own activities.

- Gifts, presents and hospitality:

Offering or receiving gifts, travel, recreation or entertainment has been a common practice for companies to strengthen their relationships, show hospitality and courtesy and promote their products and services, but it is essential to adhere to current regulations or, where appropriate, set limits. For this reason, it is prohibited to offer or give any kind of gifts, presents or hospitality to public servants.

In the case of interactions with private customers, partners and suppliers, no gifts, presents or hospitality should be offered with the intention or apparent intention of influencing their actions or decisions. The giving and receiving of gifts, travel and entertainment should be in accordance with established organisational procedures. An employee who receives a benefit in excess of this amount should notify the company, which will determine how to proceed. Transparency is the general rule in this practice.

- Fair competition:

The company promotes free competition and economic competition by preventing monopolistic practices that seek to prevent the access of competitors or limit their ability to compete in the markets. Business strategies seek healthy and active competition, commercial policies are focused on the benefit of customers and we reject any agreement with other companies to their detriment. It is forbidden to support any activity that represents unfair competition.

- Money laundering:

CLAN TECNOLOGICA S.L. is firmly committed to the prevention of money laundering. Under no circumstances, we will participate in activities aimed at giving the appearance of legitimacy or legality to goods or assets of criminal origin. Any activity related to resources of illicit origin or linked to money laundering is prohibited. Employees must only engage in lawful business activities.

- Privacy and confidentiality of information:

All professionals who are part of **CLAN TECNOLOGICA S.L.** must comply with current legislation on personal data protection and the procedures implemented in this area and undertake to maintain confidentiality and to make discrete use of the data and information to which they have access in the performance of their duties, in accordance with internal and external regulations. In case of doubt, and unless otherwise indicated, all information to which the employees of **CLAN TECNOLOGICA S.L.** have access in the performance of their work activity must be considered reserved and confidential.

V. Financial statements and accounting.

The accounts, books, records and financial statements must accurately reflect all transactions carried out on behalf of the company and comply with the requirements of generally accepted accounting principles and policies. Expenditures must be properly supported and it is prohibited to distort the nature of any transaction or falsify documentation. In the event of an audit, true, reliable and complete information must be provided.

Documents must be kept in accordance with applicable regulations.

VI. Suppliers' Code of Ethics.

The aim of this code of conduct for suppliers is to disseminate and promote responsible values and behaviour in the work and professional activity of the supplier companies in their different areas of activity. The Code of Conduct for suppliers formalises the minimum ethical, social, environmental and legal requirements that all suppliers must accept and comply with in order to collaborate with **CLAN TECNOLOGICA S.L.**, assuming, likewise, the commitment to extend it to its own supply chain. In case of subcontracting by the supplier, he will be responsible for his contractors to carry out their activity also complying with all the principles contained in this document. This code applies to all suppliers of **CLAN TECNOLOGICA S.L.** and its subcontractors, and the minimum requirements to be accepted are the following:

Suppliers are expected to pay particular attention to the following issues by implementing policies and processes appropriate to the size and circumstances of each supplier:

Human rights and labour standards:

Every supplier shall respect the principles of the Universal Declaration of Human Rights and the conventions that develop it, as well as the recommendations of the International Labour Organisation with respect to the rights of workers in the performance of their activities. In particular, the supplier shall promote and respect, inter alia, the following principles:

- Take reasonable measures and make good faith efforts to avoid human rights abuses or human rights related illegalities.
- Integrate equal opportunity and non-discrimination criteria, making selection, promotion, access to training and any other people management practice based on professional merit and objective assessments.
- Not allowing any type of discrimination associated with ethnic or cultural origin, sex, gender identity, sexual choice, disability, nationality, religion, age, social origin or ideology, among others. Prohibit the use of child labour, complying with all international, national and local laws, regulations and declarations regarding the minimum working age. Prohibit forced or compulsory labour of any kind.
- Respect freedom of association and the right to collective bargaining.
- Provide safe and hygienic working conditions and comply with applicable occupational health and safety regulations.
- Pay decent wages with respect to the legally established minimum wages.
- Do not allow excessive working hours and encourage work-life balance.
- Not to subject their employees to any kind of physical or verbal abuse or any other form of intimidation.
- Prevent harsh or inhumane treatment in employment practices.
- Comply with the requirements of Regulation (EU) 679/16 on the Protection of Personal Data or any other current legal regulations on data protection applicable to the place where it carries out its activity.

Environment:

- Minimise the use of substances hazardous to health and the environment; manage hazardous waste responsibly.
- Use materials and resources efficiently; give preference to reusable, recycled and recyclable materials.
- Obtain materials from sustainable and local sources whenever possible.
- Use energy efficiently and minimise harmful emissions.

Anti-corruption:

- Promote transparency in the conduct of its business.
- Do not engage in any form of corruption, including extortion and bribery.
- Be up-to-date with the payment of the different taxes established by law.
- Comply with auditing and accounting obligations in accordance with applicable legislation.
- Comply with legislation on the prevention of money laundering.
- Implement control measures for the prevention of crime within the entity.
- Respect the principles of confidentiality of the information to which they have access as a result of their relationship with **CLAN TECNOLOGICA S.L.** in the performance of their professional activity.

COMPLY WITH CURRENT LEGISLATION

The supplier of **CLAN TECNOLOGICA S.L.** must comply with the applicable legislation of the countries in which it operates, avoiding any conduct that, even without violating the law, may damage the reputation of REPM and produce adverse consequences for the company or its environment. In the event that the supplier is faced with conflicting requirements, the supplier shall seek alternatives that allow the supplier to respect internationally recognised human rights.

BY ACCEPTING AND SIGNING THE SUPPLIER CODE OF CONDUCT, EACH SUPPLIER COMMITS TO:

- Respect this code, for as long as they maintain their status as a REPM supplier.
- Participate in the verification activities of this code that **CLAN TECNOLOGICA S.L.** may establish.
- Implement corrective actions, if necessary, as a result of any verification activity carried out by **CLAN TECNOLOGICA S.L.** in their organisation.
- Communicate to **CLAN TECNOLOGICA S.L.** any information they consider relevant in relation to the requirements established in this code.

CLAN TECNOLOGICA S.L. will ensure the continuous application of these principles by the suppliers, and may request audits to check their degree of compliance.

The non-compliance by the supplier of the contents of this code may have different consequences in the contractual relationship with **CLAN TECNOLOGICA S.L.**

Depending on the importance of the non-compliance, these may range from a mere warning, and may go as far as disqualification as a supplier of **CLAN TECNOLÓGICA S.L.** without prejudice to other legal or administrative actions that may be applicable.

Communication and good faith are encouraged in the relationship between **CLAN TECNOLÓGICA S.L.** and the supplier, so that the supplier can communicate at any time to **CLAN TECNOLÓGICA S.L.** the breach of any conduct established in this code and its intention to solve it.

VII. Channel for queries and complaints.

- Contact lines

All CLAN TECNOLÓGICA S.L. professionals have the obligation to immediately report any irregular practice, illicit or unethical behaviour of which we may have knowledge or witness. Access to this channel can be made by post to C/ Industria 5, 1ª planta, módulo 15, 41927 Mairena del Aljarafe, Sevilla.

- Confidentiality of the report

The company will guarantee the confidentiality of the report, the parties and the investigation.

- Non-compliance with the Code of Conduct.

The company values the assistance of its staff in identifying any practices contrary to internal procedures or violations of current regulations and undertakes to immediately address any of these cases. Employees who report such occurrences must be assured that there will be no retaliation against them.

- Expected behaviour

Act in a professional, safe and ethical manner in accordance with our ethical principles and values.

Know and comply with the provisions of this Code and the rules, policies and procedures that implement it, as well as applicable laws, regulations and standards.

Report as soon as possible any possible non-compliance with breach of the law or this Code.

Cooperate fully in investigations and audits.

Help our business partners to understand the provisions of this Code and the obligatory nature of its compliance in their professional relationship with **CLAN TECNOLÓGICA S.L.**

VIII. Diffusion and knowledge of the Code of Conduct.**SANCTIONING REGIME:**

Corruption, trading in influence and breaches of competition law expose both those responsible for the act itself and the company to heavy disciplinary, civil and criminal sanctions. And this, irrespective of the country in which the fraudulent acts are carried out (depending on the provisions laid down in the applicable legislation in this area).

ENFORCEMENT OF THE CODE:

The Code of Labour Coexistence and the Procedures Manual come into force from September 4, 2023, and have no end date. Therefore, any modifications, additions and adjustments that may be necessary will be published through the Company's communication and technological media.

FRANCISCO MONTALBÁN GÓMEZ -CEO
CLAN TECNOLÓGICA S.L

