



Code of Ethics

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1. Purpose

This Code of Ethics constitutes a declaration of the operating values and principles that must be applied in EGEVASA in accordance with best market practices, the regulations that apply to our activity and with the ethical and sustainable development principles that today's society demands as well as -pursuant to the shareholding structure of the company with a 51% majority public shareholding corresponding to the Valencia District Council- with the content of articles 52, 53 and 54 of the redrafted text of the Basic Statute for Civil Servants Act (LEBEP) corresponding to Royal Legislative Decree 5/2015 (included in sections 5.1, 5.2 and 5.3 of this Code of Ethics).

EGEVASA's commitment to align our business strategy with these values and principles actively constitutes the achievement of the Sustainable Development Goals (SDGs), established by the international community to address crucial global challenges, and progress in key dimensions such as responsibility environmental, positive social impact and effectiveness in corporate governance, which allows, through ESG criteria, to cause a transformative impact on society.

The company's Code of Ethics must be understood as an essential tool so that each person working in the company knows how to act, understands what EGEVASA expects of their behaviour, as well as who to contact if necessary.

The Code of Ethics must be understood without prejudice to the standards, policies and internal procedures of EGEVASA that apply to the company's activities, the knowledge and application of which is also mandatory.

2. Scope of application

This Code is applicable to all personnel, middle management, management personnel and directors of EGEVASA, in the context of their professional activity.

Moreover, depending on the specific circumstances of each case, compliance (full or partial) with the provisions of this document may be required contractually of companies, whether suppliers, contractors, subcontractors, collaborators or third parties, who provide services on behalf of EGEVASA.

3. Values and principles

Service

We owe it to the general interest to ensure that our actions are targeted at offering citizens a quality, efficient and sustainable service.

Integrity

We act in compliance with the laws that apply to our activity, as well as the best practices in the sector and in accordance with the rules and internal regulations of EGEVASA. Honesty is ever-present in all our conduct.

Transparency

All of our actions and decisions related to our stakeholders and the people that form part of EGEVASA are transparent, recognisable and traceable.

Responsibility

We act with extremely high standards, and are aware of and responsible for the consequences of our decisions.

We accept the mistakes we may make and we commit ourselves to repairing any impacts that occur, taking measures to mitigate or avoid their consequences.

Objectivity

All our actions are presided over by independence and objectivity, meaning that we will make fair decisions in our professional activity.

4. Stakeholder relations

4.1 Employee relations

Respect for the rights of staff

EGEVASA respects and promotes the rights of employees as regards freedom of association, freedom to join a union, and those relative to protection of their personal and family privacy and confidentiality of their communications, among others.

Infringement of these rights is illegal and contrary to the conduct guidelines set out in this Code of Ethics, therefore liable to prosecution and sanction.

Occupational Health and Safety

EGEVASA is committed to providing its professionals with the necessary resources to guarantee a safe workplace, in accordance with applicable legislation, and to continuously improving the existing mechanisms for risk prevention.

All EGEVASA personnel have the duty to comply with the internal regulations on the prevention of occupational hazards, to adequately employ the measures placed at their disposal and to promote the safety of their environment with an exemplary attitude and commitment.

Equal opportunities and non-discrimination

EGEVASA promotes the respect for public rights and freedoms, avoiding any action that may result in discrimination on grounds of birth, racial or ethnic origin, gender, sex, sexual orientation, religion or belief, opinion, disability, age or any other condition or personal or social circumstance. For this purpose, EGEVASA implements policies and actions that promote a policy of inclusion and equal opportunities.

Rejection of harassment in the workplace

EGEVASA rejects harassment and is vigilant of potential situations of harassment in the workplace, whether of a sexual nature, bullying or any other kind, and any conduct conducive to creating a climate of intimidation, humiliation or offence, or that is harmful to the integrity of any person within or outside the organisation.

4.2 Market relations

Integrity in economic-financial reporting.

The economic and financial reporting of EGEVASA will be duly prepared, supervised and filed in accordance with the applicable legal requirements and generally accepted accounting principles, to ensure that it is complete and true. Moreover, the contents of the same will be published pursuant to Transparency Law 19/2013, of 9 December, on Transparency, Access to Public Information and Good Governance. However, the secrecy of classified or legally prohibited matters will be kept secret.

Protection of shareholders' rights.

Our actions must be directed towards value creation and ensuring sustainable growth. We must make every effort to work under criteria of economic sustainability and thus comply fairly with the expectations of shareholders.

4.3 Customer and consumer relations

Corporate communications.

All communications from EGEVASA to customers and consumers must be truthful, clear and not misleading, in particular during the stages of procurement, rendering and, where appropriate, termination or cessation of service.

EGEVASA will inform citizens about those matters or items that they have a right to know, and facilitate the exercise of their rights and compliance with their obligations, and whereby such communications are always presided over by good taste and respect.

Commitment and continuous improvement.

EGEVASA employees must strive for excellence in our services and each day endeavour to exceed the expectations of customers and consumers.

Customer and consumer protection

Given the nature of our activities, EGEVASA plays a key role in ensuring the health and safety of persons. For this reason, we must comply with all legal and regulatory requirements that may apply to our businesses, without exception, particularly those concerning the quality of our services. We will act diligently, avoiding any potential conduct that may jeopardise the health of people and, should this occur, we will immediately rectify situations of risk in accordance with internal regulations and procedures.

Prevention of corruption and conflicts of interest in customer and consumer relations

On no account are we to propose, accept or take part in any corrupt practices that may arise during the process of selling or marketing our products and services.

The acceptance or provision of advantages, benefits, gifts, etc. is forbidden with the sole exception of business courtesies that are appropriate, reasonable and for

operational, promotional or educational purposes, offered or accepted in the ordinary, foreseeable and unforced course of a commercial situation. These courtesies should never be offered or accepted as a means to influence the commercial or professional decision of a person.

On no account will influence be exerted over public officials or those with public duties, whether directly or via third parties, or advantage taken of a personal relationship with such persons, in order to obtain business or advantageous resolutions in favour of EGEVESA or other persons, particularly in the context of bid procedures.

4.4 Supplier relations

Selection and contracting of suppliers.

The selection process of our suppliers will be transparent and will address not only quality and cost criteria, but also social, environmental, and social responsibility criteria aligned with the principles and behavioural guidelines included in this Code.

EGEVASA will always carry out responsible management of its critical suppliers, auditing and evaluating their performance in ethical and sustainable terms and ensuring compliance with its social and environmental practices.

Prevention of corruption and conflicts of interest in supplier relations.

On no account are we to propose, accept or take part in any corrupt practices that may arise during the process of purchasing or contracting of products and services.

The acceptance or provision of advantages, benefits, gifts, etc. is forbidden with the sole exception of business courtesies that are appropriate, reasonable and for operational, promotional or educational purposes, offered or accepted in the ordinary, foreseeable and unforced course of a commercial situation. These courtesies should never be offered or accepted as a means to influence the commercial or professional decision of a person.

Ethics and sustainable development in the supply chain

EGEVASA promotes that our suppliers, contractors, and all people involved in the supply chain behave in accordance with the standards of ethics and integrity contained in this Code, as well as compliance with applicable laws and regulations.

Likewise, EGEVASA will promote sustainable development among its suppliers through participation in sustainability initiatives and programs, as well as by promoting long-term relationships based on trust and shared responsibility.

4.5 Community relations

Positive impact on our environment.

The actions of EGEVASA must contribute, directly and indirectly, to sustainable development and the protection of society in general and of our local environment in particular.

In this regard, the Environmental protection is an EGEVASA priority. Not only must we comply with environmental legislation, but we must also strive to protect the local environment, committing ourselves to prevention and the environmental impact of all our activities, promoting the reasonable and efficient use of resources, and also demanding such conduct from our suppliers and contractors.

Likewise, we must also protect and promote our cultural and heritage environment.

Donations to political parties

EGEVASA prohibits the use of its corporate funds to finance, directly or indirectly, any political parties or their foundations, federations, coalitions or electoral groups.

Money laundering

EGEVASA will focus on detecting operations with other individuals or legal entities that reveal signs of money laundering risk.

EGEVASA will never collaborate or enter into relations with suppliers, customers or third parties that may be involved in irregular or illegal activities.

5. Code of Conduct for EGEVASA staff

5.1 Duties of EGEVASA staff

EGEVASA staff must diligently perform the tasks assigned to them and oversee the general interests subject to and in observance of the Constitution and the rest of the legal system, and they must act in accordance with the following principles: objectivity, integrity, neutrality, responsibility, impartiality, confidentiality, dedication to public service, transparency, exemplariness, austerity, accessibility, efficiency, honesty, promotion of the cultural and environmental setting, and respect for equality between women and men, which inspire this Code of Conduct for EGEVASA staff in accordance with the ethical and conduct principles.

5.2 Ethical Principles

General interest

Their action will seek to satisfy the general interests of citizens and will be based on objective considerations focused on impartiality and common interest, irrespective of any other factor that expresses personal, family, corporate, clientele or any other positions that may clash with this principle.

Principles of loyalty and good faith

Staff will ensure that their actions are aligned with the principles of loyalty and good faith with the company EGEVASA, where they provide their services, and with their superiors, colleagues, subordinates and the public at large.

Respect for fundamental rights and public freedoms

Their conduct will be based on respect for fundamental rights and public freedoms, avoiding any action that may result in any discrimination on grounds of birth, racial or ethnic origin, gender, sex, sexual orientation, religion or belief, opinion, disability, age or any other condition or personal or social circumstance.

Non-existence of conflicts of interest

EGEVASA staff will abstain in those matters in which they have a personal interest, as well as in any private activity or interest that may pose a risk of raising conflicts of interest with their position.

They will not contract economic obligations or intervene in financial transactions, patrimonial obligations or legal transactions with persons or entities when it may involve a conflict of interest with the obligations of their position.

Integrity

They will not accept any favourable treatment or situation that implies a privilege or unfair advantage, on the part of individuals or private entities.

They will not influence the speeding-up or resolution of the administrative procedure or formalities without just cause and in no case when it involves a privilege for the benefit of the holders of public positions or their immediate family and social environment or when it entails an impairment to the interests of third parties.

Diligence

They will diligently perform the tasks that correspond to them or which are entrusted to them and, as the case may be, they will resolve any procedures or records for which they are responsible within the allotted time.

Service

They will exercise their attributions according to the principle of dedication to service, refraining not only from conduct contrary to this, but also from any others that compromise neutrality in the exercise of public services.

Confidentiality and discretion

They will keep secret any classified information or any other for which disclosure is legally prohibited, and will maintain due discretion over those matters they are aware of because of their position, without being able to make use of the information obtained for their own benefit or that of third parties, or to the detriment of public interest.

Principles of efficiency and effectiveness

EGEVASA staff will act in accordance with the principles of efficiency, economy and effectiveness, and will monitor the achievement of the general interest and the fulfilment of the organisation's objectives.

5.3 Conduct Principles of EGEVASA staff

- They will treat citizens with care and respect, as well as their superiors and other persons who work in EGEVASA.
- The performance of the tasks corresponding to their job will be carried out diligently and in compliance with the established working day and schedule.
- They will heed the instructions and professional orders of their superiors, unless they constitute a clear infringement of the legal system, in which case they will immediately inform the pertinent inspection bodies.
- They will inform citizens about those matters or items that they have a right to know, and facilitate the exercise of their rights and compliance with their obligations.
- They will administer public resources and goods with austerity, and will not use them for their own benefit or those of close associates. They will also have a duty to ensure their conservation.
- They will refuse any gift, favour or service in advantageous conditions that go beyond the usual, social and courtesy uses, without prejudice to the provisions of the Criminal Code.
- They will guarantee the constancy and permanence of the documents for their transfer and delivery to those subsequently responsible.
- They will keep their training and qualifications up-to-date.
- They will heed the occupational health & safety rules.
- All personnel have the obligation to inform their superiors or the competent bodies of the proposals they deem appropriate to improve the performance of the functions of the unit where they work. For this purpose, it will be possible to foresee the creation of the appropriate competent authority to centralise reception of proposals from EGEVASA staff to improve service efficiency.

- They will undertake to deal with the public in the requested language whenever it is official in the territory.

5.4 Other general patterns of behaviour

- All computer devices and resources placed at the disposal of EGEVASA employees are for exclusively professional use, in accordance with the internal regulations and procedures. Their personal or non-professional use is explicitly prohibited.
- EGEVASA reserves the right to control and monitor the computing resources and media made available to users, provided that said control complies with the principles of prior information, necessity, justification, suitability, proportionality, and transparency.
- All information that we may have access to in our professional activity will be considered confidential information, with the exception of what we have to make public through the transparency portal. All EGEVASA employees must observe the internal regulations and procedures concerning the processing of information and take great care to prevent unauthorised access, disclosure, improper modification or manipulation.
- In the context of our professional activity we will protect and make responsible use of all the assets and rights of other people to which we have legitimate access, especially those that are protected by intellectual or industrial rights or any other confidential information from other companies.

5.5 Ethical knowledge management

The ethical management of knowledge will be governed by the principles of EGEVASA, including the appropriate research design following the projected protocols, the good use of the material and economic resources related to said knowledge or generated as a result of it, ensuring the recognition of all those involved, and ensuring that all those who have participated actively and significantly in the work as a whole appear as authors or co-authors.

The knowledge generation process will ensure the protection of nature, biological diversity, genetic resources, and ecological processes against any possible negative impact that it could generate. It is recognized that equity and justice give all

participants the right to access their results. The limits to this right are confidentiality, professional secrecy or the common good of society.

6. Reporting channel

6.1 Reporting irregularities

As a result of our commitment to continue standing out as an ethical, integrated, and transparent organization, EGEVASA has an Ethical Channel that allows all people linked to EGEVASA at work or professionally to communicate confidentially, even anonymously, those behaviours that are not aligned with the values and principles, internal rules or applicable legislation.

To this end, EGEVASA makes the following communication channels available to its interest groups:

- Written and verbal (voice message): accessing from the corporate website or the following link: <https://egevasa.canaletico.app/>
- In person, requesting an appointment through the communication form at <https://egevasa.canaletico.app/>
- Postal mail: for the attention of the person responsible for the Ethical Channel at Calle Gran Vía Marqués del Turia, 19 – 46005 (Valencia).

EGEVASA staff have the obligation to report any irregularities, risks or non-compliance with respect to the Code of Ethics, internal regulations, or current legislation, of which they are aware or suspect in the context of their professional activity.

The communications will be received by the Head of the EGEVASA Ethical Compliance Channel, and if they are accepted for processing, the actions will continue with the investigation, decision, and closure phases, in accordance with the “Information Management Procedure of the EGEVASA Ethical Channel”. This procedure protects the reporting person and the people involved, ensuring that the personal data of the people involved are treated confidentially, and guaranteeing the absence of retaliation of any kind for anyone who uses the Ethical Channel in good faith.

6.2 Doubts or Queries

Additionally, any doubts or queries that may arise in the interpretation or application of the Code of Ethics may also be made submitted via the Reporting Channel.

7. Implementation of and compliance with the Code of Ethics

7.1 Monitoring bodies

The EGEVASA Ethic Committee, supported by the Compliance Manager, is the main guarantee for the application of the Company's Code of Ethics.

For this reason, it has been given all the necessary tools with which to monitor its implementation and to detect any infringements to its provisions.

The Ethic Committee shall particularly ensure the adoption of the necessary procedures for the establishment and constant review of the opportune ethical standards within the Company, and incorporate, promote and oversee compliance with the Code of Ethics in EGEVASA.

Moreover, the Ethic Committee, supported by the Compliance Manager, shall have the following duties:

- Ensuring dissemination, understanding of and compliance with the Code of Ethics.
- Interpretation of the Code of Ethics and providing guidance in case of doubt.
- Facilitating the resolution of conflicts in relation to the application of the Code of Ethics.

7.2 Internal dissemination

This Code of Ethics shall be distributed internally and placed at the disposal of the entire workforce, managers, executives and board members of EGEVASA.

All persons to whom the Code of Ethics is addressed have the duty to know, accept and apply its provisions in the context of their professional activity. In this sense, all persons holding positions of responsibility within the organisational structure

of EGEVASA have particular significance as role models and ensuring dissemination of and compliance with the Code of Ethics among their teams and dependent persons.

Furthermore, in order to ensure proper understanding of the Code of Ethics, EGEVASA shall put in place a dissemination plan to promote awareness of the ethical principles and standards espoused by the Company.

7.3 Disciplinary procedure

EGEVASA shall not tolerate infringement of this Code of Ethics and shall not offer protection to any persons who may have taken part in any such action.

Breeches of the provisions of the Code of Ethics, cooperation in or covering up any such breeches may lead to the application of sanctions in accordance with the applicable disciplinary procedure and, in particular, with those set out in the Collective Bargaining Agreement in force and the Workers' Statute.

This Code of Ethics was approved by the Board of Directors of EGEVASA, held on March,25, 2025.