



Version 6.0

SAMPOL GROUP
CODE OF ETHICS

Approved by Carmen Sampol Massanet on January 28, 2026.



With the Code of Ethics, we want to highlight the **SAMPOL GROUP's commitment to complying with the ethical principles that govern the Company** and to transparency in all areas of activity, ensuring responsible behavior and respecting current legislation at all times in all of the GROUP's relationships with its employees, client portfolio, suppliers, society, and other stakeholders.

The Code of Ethics sets out **the principles and guidelines of conduct**, which are mandatory, aimed at ensuring the ethical and responsible behavior of all the professionals who make up the GROUP, in the course of our activities wherever we may be in the world. The aim is for each person to be aware that they are acting correctly. This means acting honestly and treating our colleagues, as well as our client portfolio, partners, and suppliers, fairly and with dignity.

The Code of Ethics covers a wide range of business practices. Although it does not cover every possible situation that may arise, it does **offer general guidelines on the company's expectations regarding the conduct of its professionals**, their basic ethical and legal responsibilities as representatives of SAMPOL in operations, decision-making, and, more broadly, in the management of the company.

All of us who make up the SAMPOL GROUP must commit to this.

I am convinced that you share these ethical principles with me and that together we will contribute to becoming a responsible company of reference that inspires confidence in our stakeholders.

Carmen Sampol Massanet

CEO SAMPOL Group

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01. INTRODUCTION

Founded in 1934 and with more than 90 years of experience, SAMPOL operates in three main business areas, maintaining the highest quality standards: Energy, Comprehensive Installations, and Technology. SAMPOL covers the entire value chain, from feasibility studies, design, and construction to operation and maintenance. This involvement guarantees high efficiency, reliability, and success. With a presence on three continents, it carries out its business activities with a commitment to contributing to the economic and social development of the communities in which it operates.

1.1. Mission

To be leaders in energy generation and distribution, electrical and mechanical installations (air conditioning and plumbing), and telecommunications infrastructure, actively contributing to social welfare, sustainable development, and value creation for our stakeholders.

1.2. Vision

To be able to respond to the energy and technological needs of our customer portfolio, creating and designing ad hoc solutions through our business units, so that energy and technology offer a better life and more efficient energy consumption.

1.3. Values

The values that underpin our company culture and enable us to establish our behavioral guidelines are as follows:

- **Trust:** Our portfolio of clients and suppliers rely on SAMPOL to undertake QUALITY projects.
- **Commitment:** Responsibility and effort to offer the best applied engineering solution.
- **Innovation:** Key to our history. It has allowed us to overcome challenges and become stronger.
- **Experience:** More than 90 years of experience behind us.
- **Satisfaction:** We seek efficient solutions to achieve the SATISFACTION of our client portfolio.
- **Enthusiasm:** We work with the same ENTHUSIASM as on the first day.
- **Internationalization:** Part of the SAMPOL group's identity.
- **Family:** Three generations at the helm of the SAMPOL group confirm our commitment.

Our most important asset is our highly qualified TEAM OF PROFESSIONALS, who strive every day to ensure that everyone at SAMPOL is committed to integrity, ethical behavior, and professionalism in all our activities.

We want those who work in our organization to feel that acting with integrity is more than just protecting the image and reputation of our company or avoiding legal problems. It is also about maintaining a place where everyone is proud to work.

02. PURPOSE

The purpose of the Code of Ethics is to constitute an express statement of the values, ethical principles, and rules of conduct that should govern the behavior of all professionals who form part of GRUPO SAMPOL in the performance of their work, wherever they may be in the world.

Following this code ensures that the company and the people who form it respond to and comply with current legislation, as well as ethical principles and social responsibility.

03. RECIPIENTS

The SAMPOL Group Code of Ethics applies to all persons who work or collaborate with SAMPOL, regardless of their hierarchical level, geographical or functional location, and the SAMPOL GROUP company for which they provide their services.

Those employees who are also subject to other codes of ethics or conduct and/or internal regulations derived from the national legislation of the countries in which they operate must also comply with them.

All staff must be familiar with and accept its content and are obliged to comply with it from the moment they join the company.

GROUP employees who manage or lead teams of people must ensure that the professional staff under their responsibility are aware of and comply with the Code of Ethics and must set an example, acting as role models within the GROUP.

Failure by any person to comply with the Code of Ethics and general rules of conduct may result in disciplinary action in accordance with current regulations, or appropriate legal action, depending on the seriousness of the offense committed.

04. COMPLIANCE CONTROL

The company has set up an Ethics Committee responsible for the interpretation and general integration of the Code of Ethics, as well as for ensuring compliance. The Ethics Committee is made up of:

- **David López.** Director of Human Resources.
- **Bartolomé Bover.** Director of Legal Advice.
- **Yolanda Rodríguez.** Head of Management Systems.

Any questions that may arise among GROUP employees regarding the interpretation of the Code of Ethics, incidents, or non-compliance may be communicated to the Ethics Committee via email at etica@sampol.com

The Ethics Committee will report to Senior Management, on an annual basis or whenever it deems necessary and/or is required to do so, on the measures taken to ensure compliance with the Code of Ethics.

Senior Management, assisted by the Ethics Committee, is ultimately responsible for ensuring the ethical climate of the company, guiding and supervising compliance. The Ethics Committee's responsibilities include:

- **Promoting the dissemination,** awareness, and compliance with the Code of Ethics.
- **Resolve any queries,** doubts, or incidents that may arise.
- **Detect and prevent risks,** establishing control measures in order to assess compliance with the company's ethical culture, as well as detect, evaluate, and act on potential irregular conduct.
- **Ensure that employees or third parties** who report irregular conduct to the company do not suffer any type of retaliation, maintaining their anonymity.
- **To evaluate the degree of compliance** with the Code of Ethics on an annual basis.
- **To establish all procedures and/or protocols deemed necessary** to ensure compliance with the Code of Ethics.

05. ETHICAL PRINCIPLES

5.1. Respect for Human Rights

We are explicitly committed to respecting, defending, and promoting international agreements, current legislation, and principles relating to human rights both in the workplace and in our wider sphere of influence. Our company is a signatory to the Global Compact and is committed to complying with its 10 principles, as well as to reporting periodically on the actions it takes in this area. The 10 principles of the Global Compact are:

HUMAN RIGHTS

- 1.** Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence.
- 2.** Businesses should ensure that they are not complicit in human rights abuses.

LABOR STANDARDS

- 3.** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- 4.** Businesses should uphold the elimination of all forms of forced and compulsory labor.
- 5.** Businesses should uphold the effective abolition of child labor.
- 6.** Businesses should uphold the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

- 7.** Companies should maintain a preventive approach that favors the environment.
- 8.** Companies should encourage initiatives that promote greater environmental responsibility.
- 9.** Companies should favor the development and dissemination of environmentally friendly technologies.

ANTI-CORRUPTION

- 10.** Companies should work against corruption in all its forms, including extortion and bribery.



At SAMPOL, we are also working to implement the Sustainable Development Goals of the 2030 Agenda. Although we prioritize and develop the SDGs most closely related to our activity, we indirectly contribute to the development of all 17 goals promoted by the United Nations.

The 2030 Agenda is a new tool for sustainable development that aims to end poverty, promote prosperity and well-being for all, and protect the environment.

The SDGs represent basic principles for ending poverty, protecting the planet, and ensuring that all people enjoy peace and prosperity.

5.2. Strict compliance with current legislation

We are committed to strictly complying with current legislation in all the countries in which we operate and to monitoring and ensuring that no member of SAMPOL commits any crime defined in the criminal code that could affect the Company or engage in any conduct that, even if it does not violate the law, could damage SAMPOL's reputation and negatively affect its interests.

SAMPOL prohibits all its staff from establishing or maintaining relationships with customers or suppliers who may be involved in any type of illegal activity, such as prostitution, drugs, arms trafficking, human trafficking, extortion, bribery, etc.

We are committed to fighting corruption in all its forms, including extortion and bribery.

5.3. Respect for the Environment

We are explicitly committed to respecting, defending, and promoting environmentally responsible business practices.

Our concern for doing our part to protect our planet focuses on operating in an environmentally safe manner, promoting clean technologies, and developing efficient energy sources to protect our world for future generations.

5.4. Respect for Labor Rights

SAMPOL will respect and guarantee the labor rights of all workers, regardless of their status, and will not tolerate discrimination based on sex, race, religion, or age to their detriment.

SAMPOL will guarantee freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labor; and the eradication of child labor, not contributing in any of its work activities to the exploitation of minors.

5.5. Respect for our Stakeholders

PEOPLE IN THE ORGANIZATION

We are an organization of people, and they are the reason for everything we do. We are proud of our team's personal commitment and achievements. We will work to promote a relationship based on mutual trust, respect, and dedication.

SAMPOL rejects any form of physical, sexual, psychological, or moral harassment or abuse of authority. People in the organization will be treated with respect, fostering a pleasant, healthy, and safe work environment.

We believe in equal opportunities and apply this principle in all of the organization's processes. We respect and strive to increase labor and social rights and benefits, as well as the implementation of preventive measures that guarantee health and safety at work.

The conduct of all SAMPOL employees must protect the company's reputation and be an example of rigor, ethics, and professionalism.

All employees shall commit to the proper use of the company's resources and assets, and to caring for, securing, and protecting information relating to the organization and our stakeholders.

COLLABORATING PERSONNEL

Our collaboration network is our ally and a fundamental element in achieving our MISSION and VISION.

We are committed to establishing an honest relationship based on the creation of value and mutual benefit.

CLIENTS

We are a customer-oriented company. Due to the nature of our business, the relationship between SAMPOL and its clients is maintained continuously through our professionals in each and every area. As a result of this relationship with our client base and partners, SAMPOL has recognized that the most important values are responsibility, commitment, quality, initiative, and innovation.

Therefore, we are a company committed to developing quality products and services that comply strictly with legal requirements and generate value, because we firmly believe that the success of our client portfolio lies in the success of our organization. We will demonstrate honesty in our relationships, provide accurate information, and be independent in our decision-making.

We will strive to maintain fluid communication, understand the needs, expectations, and satisfaction of our customers (who trust SAMPOL), incorporate them into our management, and take the necessary actions to maintain their trust and loyalty.

SUPPLIERS

We want to be perceived as an attractive customer that fulfills its commitments and meets its payments.

Objectivity is the basic principle in dealing with suppliers and making decisions. We also want suppliers who respect our principles and values, as well as social, economic, and environmental regulations.

COMPETITION

We believe in honest cooperation and extend this to our relationships with companies that provide services in our field.

We will strive to establish collaborative relationships based on equality and respect.

SOCIETY

Every company has an impact on the community in which it operates. We are committed to our environment and our community. We recognize the trust placed in our team and act with integrity and honesty in all situations to maintain that trust.

We want to contribute to the economic and social development of our environment by creating jobs, developing social action initiatives, and providing accurate and relevant communication and information about our company.

06. GENERAL RULES OF CONDUCT

A series of general rules of conduct are established that are mandatory for all SAMPOL members from the moment they are hired.

6.1. Loyalty, image, and reputation of SAMPOL

People constitute the image of the Company in every sense, from their personal image and behavior to their ability to understand and comprehend the needs of our stakeholders.

All personnel must attend their workplace taking care of their image and personal hygiene.

Employees who are provided with corporate uniforms must attend their workplace correctly uniformed with the clothing provided and in force. Company vehicles also represent the Company's image. They are for work use only and may not be used for personal purposes outside working hours. They must be kept clean and in perfect condition.

Prudence must be exercised in all interactions, and the relevant authorizations must be obtained before interacting with the media, social networks, participating in conferences, seminars, and any situation with public dissemination related to the company.

Relationships with individuals of dubious reputation, integrity, or image will give the Ethics Committee and/or Senior Management grounds to initiate the relevant investigations and apply the necessary measures to safeguard the company's image.

6.2. Legality and ethical values

All SAMPOL employees shall respect all of the Company's ethical principles and comply with the laws in force in the countries where they carry out their activities, behaving ethically in all their actions.

Staff members shall not be permitted to collaborate with third parties in the violation of any law, nor shall they participate in any action that compromises respect for the principle of legality.

All company personnel are obliged to comply with social, economic, and environmental laws in the performance of their duties and responsibilities within the company, in addition to the requirements, rules, and guidelines developed by the company. In case of doubt or possible conflict, common sense should be applied and the immediate superior or the Ethics Committee should be consulted.

6.3. Professionalism, integrity, and self-control

All SAMPOL staff shall act in the exercise of their duties assigned to them by virtue of their positions with the utmost professionalism, integrity, and self-control in their decisions and actions, assessing whether these are ethically acceptable, legal, and desirable for society and the company.

Personal integrity in the execution of procedures and controls is a fundamental part of the company. Honesty in all actions and transactions carried out is an essential requirement.

6.4. Use of computer tools, email, and the internet

SAMPOL provides all Company personnel with the computer resources necessary for the performance of their professional activities. Computers, mobile phones, and other terminals or computer tools such as email and internet connections are work tools owned by the Company and provided by it to employees so that they can perform their job duties more efficiently.

All staff shall use these resources responsibly and appropriately and shall protect them from any misuse that could harm the interests of the company.

SAMPOL's computer equipment and systems, and correlatively all information accessed and/or transmitted from them, including the Internet, social networks, and email, shall be used exclusively for professional purposes.

Intellectual property laws must not be violated, nor must the security of the company's communication systems be compromised.

The company reserves the right to periodically check the content of the sites visited and the time spent on each connection and, bearing in mind that it should only be used for professional purposes, does not guarantee the confidentiality of any email or Internet connection, access to social networks, or downloads of programs or content sent or acquired through the computer terminals made available to employees.

It also reserves the right to install and consult software for monitoring, controlling, and tracking any operation carried out on its equipment and facilities.

The Company's freedom to establish the necessary mechanisms for the computer system to detect the Internet portals visited, the number of emails, and the addresses to which such emails have been sent from each user is recognized.

In the following cases, the Company may carry out, in addition to general records, a specific record that could include the opening of emails and attached files:

- a.** When there are reasonable indications that crimes or offenses may be being committed, whether criminal, administrative, or labor-related, through the use of email or the Internet.
- b.** When there are reasonable grounds to suspect abuse or misuse of emails, email addresses, or the Internet.
- c.** When harassment or other types of harm caused by email to colleagues, subordinates, customers, suppliers, advisors, or persons closely linked to the company in any capacity can reasonably be presumed to exist.

In the cases described above, the Company may also review messages sent using the company's computer system or from personal email accounts if the company's computer resources have been used. In such cases, the employee concerned will be notified in advance and informed of their right to be present during the review. However, all information contained on the server will remain the property of the Company.

Email messages sent to an external person are inherently insecure, as they can be misdirected or easily intercepted, read, and modified without detection. For this reason, they should not contain confidential company information. Before using the Internet as a regular means of communication with a third party, the underlying risks should be considered.

Only software and applications purchased and provided by the company may be used on the computer equipment made available to employees by Grupo SAMPOL. Software may only be installed by IT Department staff or personnel authorized by this department.

It is therefore expressly prohibited to install, store, and use any third-party software not provided by Grupo SAMPOL on Grupo SAMPOL computers. Specifically, and by way of example, the installation and/or use of games, music files, rental programs, utilities, etc., without prior authorization from the IT department is expressly prohibited.

Engaging in conduct contrary to this policy may not only lead to the introduction of viruses into internal local networks, but may also result in the illegal use of unlicensed applications, for which Grupo SAMPOL cannot be held responsible.

If an employee considers that they need a computer application or program that has not been installed on their computer by the Grupo SAMPOL IT department in order to perform their duties, they may request it through their line manager, giving reasons for their request.

6.5. Confidentiality of information

In their daily work, employees have access to a great deal of information, data, aspects related to working methods, methodologies, and documentation, as well as internal management information, customer information, and supplier information.

The entire SAMPOL team must maintain the strictest confidentiality regarding all confidential information to which they have access as a result of their work and must refrain from using it improperly for their own benefit or that of third parties.

All persons who have access to personal data of their own employees, collaborators, or subcontractors must maintain the strictest confidentiality of the data, being subject to professional secrecy, without its content being disclosed to third parties, except in the normal course of their work or duties and provided that those to whom the information is disclosed are subject to professional secrecy.

If there is any doubt about the nature of the information, it shall be considered confidential unless otherwise indicated.

The duty of confidentiality shall remain in force even after the employment relationship has ended. The employee undertakes to maintain absolute confidentiality both during the term of the employment contract and after its termination in relation to all information of which they become aware or to which they have access in the performance of their services for the employing commercial entity.

SAMPOL informs that video surveillance systems are in operation at its headquarters and certain worksites, duly signposted, which control access, tool and/or machinery storage areas, and passageways where materials are loaded and unloaded.

The recordings made with these systems are the property of the company and will be stored for a maximum of 120 hours. Any employee may be recorded in the course of their professional activity as long as they are within the scope of operation (viewing) of the systems, and the company may make use of these recordings if it detects any behavior that may constitute a breach of contractual good faith, ensuring that the employees' representatives will be informed for verification purposes.

6.6. Conflicts of interest

Conflicts of interest in business relationships must be avoided, as they undermine the principles of efficiency, honesty, and transparency that must govern SAMPOL's activities.

SAMPOL staff shall not participate in processes or decision-making in which there may be a conflict between their own interests and those of the Company. Therefore, professional decisions must be based on the best defense of the group's interests, so that they are not influenced by personal or family relationships or other particular interests of Company staff.

6.7. Gifts and presents

Gifts and presents may not be given or accepted. They will be accepted on an exceptional basis if they are of symbolic economic value, if they are tokens of courtesy or attention and are customary and accepted commercial practices, or if they are not prohibited by law. Gifts, favors, or benefits beyond what is customary in the sector or common sense will not be accepted, and under no circumstances will cash be accepted.

No Company employee may give or accept gifts that influence, may influence, or could be interpreted as influencing decision-making.

Special care shall be taken with invitations to our customers. Under no circumstances shall the company accept or pay for invitations to establishments whose activities do not comply with our company's ethical and moral standards.

If there is any doubt about what is or is not acceptable, the gift shall be declined or the Ethics Committee shall be consulted.

6.8. Bribery, fraud, and corruption

All actions carried out by SAMPOL shall be performed with integrity, avoiding any form of corruption and complying at all times with applicable anti-bribery and anti-corruption regulations.

No person within the company shall make payments or offer gifts in order to obtain economic, competitive, or any other type of advantage, whether to public officials or to personnel of other companies or entities.

Nor may money be received from customers or suppliers, even in the form of a loan or advance payment.

6.9. Prevention of money laundering

All staff shall comply with applicable legislation and pay special attention to cases where there are indications of a lack of integrity on the part of individuals or entities with whom they have business relationships, such as unusual payments to individuals or entities resident in tax havens or to accounts opened in offices located in tax havens, extra payments not included in contracts, etc.

6.10. Respect for individuals

All employees are required to treat their colleagues, superiors, and subordinates fairly and respectfully.

Relationships with other stakeholders shall be based on professional respect and collaboration.

- **Customers:** Company staff must be respectful, honest, and ethical in their relationships with our customers. They must be especially careful with customer service and treatment, communication, and punctuality, striving to exceed customer expectations. Proposals made must be tailored to customer needs, honest, and contain clear and accurate information.
- **Suppliers:** The supplier selection process will be based on criteria of objectivity and impartiality, avoiding any conflict of interest or favoritism when selecting them.

Quotes provided by suppliers will be treated confidentially and may not be disclosed to third parties without the consent of the interested parties or unless required by law.

- **Partners and collaborators:** relationships will be established based on trust, mutual benefit, and respect for free competition.

07. VALIDITY

This Code of Ethics shall come into force upon its approval by the CEO and shall remain in force until a new revision or update is approved.



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