



**GESTAIR**  
**Registro C.E.re**  
**v1**

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**CODE OF**  
**ETHICS**  
**PENAL RESPONSABI**  
**TY (RPC)**

**DEPARTMENT:**  
**OCI**

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**FECHA:**  
**JULY 2024**

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## 1. MANAGEMENT LETTER

At GESTAIR, we understand that the reputation of our organization and the generation of trust with the rest of the members of the market, such as customers, suppliers, administrations, etc., depend on the conduct of all our collaborators assigned to any work or activity carried out within our organization.

Evidently, failure to comply with any rule, including internal ones, leads to a decrease in the company's credibility, and even to legal liability in the most extreme cases.

In this regard, we would like to emphasize that GESTAIR is firmly committed to the responsible and diligent management of our company, together with a clear vocation to share with our environment "what we do" and "how we do it".

For all these reasons, transparency, comprehensive regulatory compliance and ethical behavior are fundamental and inalienable aspects for us. In this same effort to improve our corporate behavior and social performance, we are committed to complying with all applicable legal regulations, in addition to those that we have imposed on ourselves through our Preventive Compliance Plan established in GESTAIR.

The "we" is the entire GESTAIR team. We are all driven by the same strength and the same desires: to prevent, to effectively avoid non-compliance with regulations, illegal actions, accidents at work, promoting respect for the environment, providing technical studies, training and dissemination as an added value to our work.

The purpose of this document is to serve as an orientation and guide in the relationships established by GESTAIR between suppliers, clients, administrations and the company's own personnel.

All GESTAIR personnel in the exercise of their activities within the organization are obliged to faithfully comply with the provisions of this document, its annexes and updates.

This Code of Conduct establishes a basic and unrenounceable guideline of action for all personnel in procedures and services with legal significance. There may be new circumstances or facts that raise doubts to the users of this Code of Ethics in the way it is applied. For such extraordinary circumstances, GESTAIR makes available to users the INTERNAL CONTROL OFFICE, which at all times will help and guide on issues related to the application of this Code of Ethics.

The company's management would like to express our full support for this text, both in terms of principles and rules of conduct and in terms of conflict management and resolution. We understand that such approval and unwavering support is essential for its correct application in all possible areas related to GESTAIR.

S.C.E. The Management

## 2. SCOPE

This Code affects all personnel who perform their duties within GESTAIR, setting out the ethical and legal principles assumed by the organization, as well as the commitments to good practice and transparency that bind all partners who collaborate with GESTAIR.

Specifically, it should be noted that the principles and provisions of this Code of Ethics are addressed to the members of the Board of Directors, General Management, other control bodies of GESTAIR, in addition to the managers, employees and collaborators linked to the organization with relationships with the following

contractual agreements derived from any title, whether occasional, permanent or temporary.

In addition, GESTAIR requires all suppliers and subcontractors to conduct themselves in accordance with the general principles of this Code.

This Code of Ethics is valid wherever GESTAIR provides its services.

### 3. STATEMENT OF CONTENTS

This Code of Ethics is made up of:

- The fundamentals are the circumstances and values that consolidate and give effectiveness to our activity.
- Our commitments and values set out in this document, indicating the reference values for any action related to GESTAIR.
- By the behavioral criteria for each person involved in relations with GESTAIR, which specifically provide the guidelines and rules to which GESTAIR employees must adhere in order to respect the general principles and to prevent the risk of unethical behavior.
- By the control and support bodies, which describe the control system for compliance with the Code of Ethics and for its continuous improvement in GESTAIR.
- Other documents or recommendations established at any given time by the management or by the existing bodies of the organization.

This document is aimed at implementing a system of cooperation between those involved in relations with GESTAIR, generating a reciprocal benefit for all, respecting at all times the role of each one within the relationships established with GESTAIR. With the acceptance of this document by those involved, a harmonization of principles and values is achieved in all operations in which GESTAIR participates.

#### 4. OUR FUNDAMENTALS: GESTAIR'S FUNDAMENTALS AND PRINCIPLES

Our list of values is derived from the principles:

- Credibility > Commitment and honesty of employees > Proximity and respect for people > Competence and professionalism in the provision of services.
- Creative and innovative capacity of the team to bring added value to the companies within our framework of action.
- Transparency and social and legal responsibility.
- Faithful compliance with all current regulations, control and self-control of our internal and external collaborators.
- Ethical and moral commitment to equality, non-discrimination and non-harassment, privacy, industrial and intellectual property, confidentiality, the environment, efficient and legal waste management, free competition, the correct conduct of the civil service, fiscal responsibility and other social contributions.

And, from all of the above, the commitments and values are deduced, as well as the behavioral criteria set forth in this document.

#### 5. OUR COMMITMENTS AND VALUES

From all of the above, we highlight our commitments and values that bind all GESTAIR personnel:

- **Non-discrimination and impartiality.**
  - ✓ GESTAIR prohibits any type of discrimination, whether in commercial, labor or any other type of relationship for reasons of age, sex, sexual tendencies, health status, religious, political or moral beliefs, except for those of a positive nature that may be established by the legislation in force at any given time.
  - ✓ Not to allow or tolerate under any circumstances behaviors, attitudes or situations of sexual harassment and harassment based on sex.

- **Honesty.**

- ✓ All GESTAIR employees must respect the laws in force at all times, this Code of Ethics and the rest of the company's internal regulations. At no time and under no circumstances can the pursuit of GESTAIR's interests justify conduct that does not comply with this Code of Conduct.
- ✓ GESTAIR respects the Intellectual and Industrial Property of third parties and the corresponding national and international regulations.
- ✓ It is not permitted to receive or offer gifts, invitations or donations in excess of the permitted limit.
- ✓ Collaborate at all times with the activity of public officials in acts or proceedings within their competence. Any type of action or circumstance that could obstruct such activity shall be avoided, especially in the case of inspections.
- ✓ Under no circumstances is it permitted to offer or deliver any type of gift or present to a public official, understood as any person who renders services in the Public Administration or in any of its Bodies or Agencies. Small advertising gifts, promotional gifts or company merchandising, whose estimated value does not exceed 150 euros, shall not be considered gifts or presents.
- ✓ It is not permitted to benefit third parties or to grant unjustified advantages in the procurement of goods or services. Suppliers of goods and services are contracted under objective criteria of reliability, availability and value for money.
- ✓ The company's resources will only be used for business purposes.

- **Acting in the event of possible conflicts of interest.**

- ✓ In the event that anyone linked to GESTAIR has any type of conflict of interest related to their activity with GESTAIR, they shall refrain from acting, reporting such situation to the Internal Control Office, which will expressly rule on the recommended conduct according to the principles and values advocated in this document.

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- **Confidentiality.**

- ✓ GESTAIR undertakes to protect and implement the necessary measures to maintain the integrity and confidentiality of the information processed by Gestair. This obligation also includes any collaborator of Gestair, and any type of treatment.
- ✓ All information processed by any GESTAIR collaborator will be considered confidential, and may not be disclosed except for legal reasons or express agreement. In compliance with the regulations in force, the duty of secrecy will last even after the contractual relationship has ended.

- **Privacy.**

- ✓ GESTAIR must follow an advanced system of compliance with current regulations on personal data protection. In compliance with such regulations, GESTAIR expressly prohibits all its collaborators from any access, disclosure, research or conduct contrary to such regulations.

- **Use of GESTAIR media**

- ✓ All physical or digital media made available by GESTAIR to its employees and collaborators are the property and ownership of the company. The use of such media is determined for strictly professional purposes, including e-mail. Conduct that may jeopardize the security or integrity of data held by the organization or its own or third party information systems shall be avoided.

- **Shareholder relations.**

- ✓ The relations of senior management with Gestair's shareholders are based on the principle of institutional respect, reciprocal trust, transparency and faithful compliance with current regulations. Of special protection are the relations established with possible minority shareholders, if any, and this Code of Ethics expressly prohibits any abuse of a dominant position or imposition of abusive agreements.

- **Human Resources.**

- ✓ GESTAIR's personnel is the basis for the effective management of the organization. The positive attitude and aptitude of all its personnel are encouraged and promoted, including a complete and permanent training program, both for



management matters as well as the ethical foundations and values developed in this Code of Ethics.

- ✓ All GESTAIR personnel must base their professional conduct on the values and foundations of this Code of Ethics, emphasizing honesty and collaboration.
  - ✓ Equal opportunity is an essential principle of GESTAIR's personnel relations in both internal and external processes.
  - ✓ All GESTAIR personnel perform their duties in decent, reliable and safe conditions, subject to the labor legislation applicable in each case and especially that related to the prevention of occupational hazards.
  - ✓ GESTAIR respects the personality and dignity of individuals, and for this reason, any type of discrimination based on religious, union, ideological, ethnic, age, disability, sex or convictions is absolutely prohibited. GESTAIR expressly declares that attitudes of sexual harassment and harassment based on sex represent a serious attack on the dignity of persons and their fundamental rights.
  - ✓ All GESTAIR personnel are committed to comply with current legislation and to collaborate with the competent authorities.
  - ✓ GESTAIR will ensure at all times that all employees have a reliable and safe environment, including a work environment free of sexual harassment and / or sexual harassment, thus complying with all regulations on Occupational Risk Prevention, in any activity.
- **Fairness and transparency.**
    - ✓ In the contractual relations that GESTAIR maintains with its suppliers, the company undertakes to act in an equitable and correct manner, avoiding at all times any abusive action or action that violates the dignity or moral or sexual integrity of the collaborators. Any employee, internal or external, has access to the Internal Control Office established by Gestair to assist in the application of this document.
  - **Integrity.**
    - ✓ GESTAIR, as part of its corporate mission, guarantees the physical and moral integrity of its collaborators in the sense and scope determined by the legislation in force at all times. GESTAIR establishes working conditions that respect individual dignity, in safe and healthy work environments. No

In the event that any such conduct is detected, the appropriate measures will be taken, including informing the competent authorities and the internal control bodies so that they may adopt the appropriate measures. Any employee, internal or external, has access to the Internal Control Office established by Gestair to assist in the application of this document.

- **Truthfulness of the information provided.**

- ✓ When contracting with GESTAIR's suppliers, it is required to provide complete and transparent information on the supplier's capabilities and resources so that GESTAIR can always have the necessary criteria and information to make decisions based on a true and fair view of the supplier.
- ✓ In the same sense, all declarations to the administrative authorities shall represent a true and fair view of the company's situation.

- **Competition.**

- ✓ GESTAIR is a faithful defender of the principle of free competition, and therefore permanently abstains from any price concertation or collusive agreement with companies in the sector.
- ✓ Any express or tacit agreement on quotas, prices, services, sales, with third parties is expressly rejected.

- **Environmental protection.**

- ✓ GESTAIR is a responsible company, aware of the need to protect the environment and reduce environmental impact, reducing the risk of pollution and leaving a better world for future generations.
- ✓ In this sense, GESTAIR undertakes to comply faithfully with the regulations in force at all times on environmental matters as well as with the principles of sustainable development, waste management, responsible use of natural resources and protection of biodiversity.

## 6. PERFORMANCE CRITERIA

In the event of any circumstance or conduct that violates or violates the principles and values reflected in this document, GESTAIR will apply the appropriate corrective measures, including disciplinary measures where appropriate.

Any internal or external collaborator who becomes aware of any type of non-compliance with this Code of Ethics must report such circumstance to his or her hierarchical superior or, if applicable, to GESTAIR's Internal Control Office.

GESTAIR's competent body will evaluate the facts in each case and propose the appropriate corrective measures.

## 7. CONTROL AND SUPPORT BODIES

Both the General Management and all GESTAIR managers are aligned with the objective of complying faithfully with the regulations in force at all times.

GESTAIR's Board of Directors is the supervisory and control body, which ultimately validates and approves security policies.

Specifically, GESTAIR has created an internal management body called the Internal Control Office, which has specialized personnel to manage any doubts, queries or incidents that may arise from the application or monitoring of this Code of Ethics.

Any interested party may contact the Internal Control Office by e-mail at [oci@gestair.com](mailto:oci@gestair.com), or by telephone at 916259973.