

**REGULATORY COMPLIANCE SYSTEM
("Compliance")**

CODE OF CONDUCT

GH GROUP

V. 00 – 11th December 2025

Document Information

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Primarily responsible for its supervision	Regulatory Compliance Committee and Board of Directors of GH Group
Author	Regulatory Compliance Committee (RCC)
Business unit or function affected	All Companies, Business Units, Market Units and Management Units of the GH Group
Employees affected	Shareholders, Directors, Managers, Employees and, if applicable, other related parties.
Purpose	Provide guidelines for activities, process management and decision-making at all times within the GH Group, to ensure that its integrity is maintained and that its principles, values and current legislation are complied with.
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1. FRAMEWORK AND PURPOSE

This Code of Conduct (hereinafter, the “**Code**”) is one of the main documents that make up the corporate Regulatory Compliance System (“Compliance System”) of all the companies that make up the GH Group, including its subsidiaries (hereinafter, collectively referred to as the “**GH Group**” or the “**Group**”) at a global level. This Compliance System is the set of policies, procedures, controls, and internal practices adopted by the GH Group to fundamentally:

- Comply with applicable laws and regulations.
- Prevent crimes, fraud, and malpractice.

The purpose of the Code is to set out the Group's ethical commitments in relation to its principles, values, and current legislation in order to establish, regulate, and implement corporate conduct guidelines that represent the Group's identity, inspired by integrity, legal compliance, respect for people and human rights, and social responsibility. This fosters healthy working and collaborative environments and builds relationships of trust with both internal and external stakeholders who may influence the Group's development or be affected by its decisions.

The nature of this Code is not intended to cover all possible situations that may arise, but rather to provide a reference framework for any activity, applying equally to all individuals and representing a commitment to responsible behaviour internally and towards our collaborators, customers, society, and the environment in general.

The purpose of this Code is **to guide and share the ethical behaviour and conduct expected of all professionals who are part of the GH Group**, regardless of their role, position, or geographical location (hereinafter, the “**Group Members**”), without prejudice to the cultural norms or practices of the different countries in which the GH Group operates and is present, provided that they do not conflict with this Code and/or the rules and legislation that are enforceable in each case and in each country.

In addition to this Code of Conduct, the GH Group's Compliance System will include “Compliance Channel Protocols”, “Anti-Corruption Protocols”, “Privacy and Personal Data Protection Protocols”, “Human Rights and Working Conditions Policy”, etc.

2. SCOPE OF APPLICATION

This Code establishes the framework for action of GH Group, with global scope, including all subsidiary companies, and is therefore mandatory for all Group Members worldwide. **It may be adapted to the countries in which the Group operates through complementary or supplementary annexes**, subject to prior approval and authorization by the Regulatory Compliance Committee (“**RCC**”) and the Group's Board of Directors, prior to its implementation and dissemination.

3. RELATIONSHIPS

3.1. INTERNAL RELATIONSHIPS

3.1.1. *Internal conduct*

At GH Group, we believe that a healthy working environment begins with recognising each person as an essential part of the collective project. That is why we strive to create spaces where fundamental rights are respected and safe and adequate working conditions are guaranteed.

Interpersonal relationships must be guided by respect, mutual consideration, trust and integrity, as the basis for human relations within our business group.

The diversity of cultures, beliefs and ways of life enriches our environment and our Group, and it is our responsibility to nurture this diversity, avoiding any behaviour that could undermine people's dignity.

Therefore, attitudes that involve intimidation, discrimination, abuse, disrespect, harassment, or exclusion on the basis of age, gender, marital status, ethnic origin, nationality, sexual orientation, gender identity or expression, religion, opinion, or any other personal or social condition or circumstance are not tolerated. Consequently, any form of disparagement, harassment or violent act, whether coming from superiors, peers or subordinates, is expressly rejected.

Similarly, the use of substances or elements that alter behaviour or interfere with the proper performance of work has no place in our areas of activity or in our relationships with customers, external collaborators, etc.

Furthermore, those in management positions shall promote, at all times and at all professional levels, relationships based on respect for the dignity of others, consideration, fairness and collaboration, which enable the development of healthy relationships and work environments and facilitate professional and personal development, compliance with this Code and a positive and harmonious working atmosphere.

3.1.2. *Recruitment and promotion*

GH Group guarantees that both the recruitment processes for joining the Group and internal promotion processes are carried out according to objective, fair and transparent criteria, based on an assessment of each person's personal profile, merits, qualifications, experience and professional skills.

The assessment of immediate family members of shareholders, directors, managers or employees who wish to join the Group's teams will be carried out using objective and professional criteria and systems and through appropriate selection processes based on their qualifications, performance and experience.

GH Group encourages professional development and internal growth, facilitating and promoting access to new responsibilities based on demonstrated talent, commitment and performance. GH Group is therefore committed to promoting internal talent, prioritising team development and enhancing opportunities for development and training, thereby contributing to the professional growth of the people who form part of the Group.

3.1.3. *Work-life balance*

GH Group recognises the importance of balancing professional life with personal and family life as a fundamental part of the well-being of Group Members. It, therefore, promotes measures that favour work-life balance, always within the Group's legal and organisational framework.

To this end, flexible environments that respect people's situations and rights must be provided, promoting a working environment that is compatible with personal development, helping people to reconcile, as far as possible, the demands of work with the needs of their personal and family lives. In any case,

Group Members must make responsible use of these measures, contributing to the development of balanced and sustainable relationships within teams and the organisation.

3.2. RELATIONSHIPS WITH THIRD PARTIES

3.2.1. Clients

Relationships with our clients must be based on respect, regulatory compliance, transparency and the development of spaces of trust. GH Group is committed to offering high-quality services tailored to their needs and expectations, guaranteeing compliance with the commitments made.

We promote lasting relationships with our customers, based on honesty, responsibility and continuous improvement. Every interaction should be an opportunity to strengthen the bond of trust, act with integrity and bring real and sustainable value to those customers, with a long-term vision.

All contracts, agreements and communications with clients must be clear, understandable and accessible, avoiding ambiguities that could lead to misinterpretations or unethical practices.

Furthermore, protecting customers' data and confidential information is an absolute priority. It must be treated with strict confidentiality and in compliance with current regulations on data protection and the protection of confidential information and trade secrets.

3.2.2. Suppliers

GH Group considers its suppliers (understood in the broadest sense, also including subcontractors, technology centres, consultants, etc.) to be strategic allies in the creation of value, and therefore relations with them must be governed by principles of integrity, objectivity and transparency. Suppliers will be selected based on technical, ethical and economic criteria, with particular emphasis on quality, reliability, commitment to sustainability, legal compliance and respect for human and labour rights.

All procurement processes must be fair, documented and traceable, avoiding

any type of favouritism, conflict of interest or unfair practice that could compromise the impartiality or quality of the goods and services provided.

Suppliers are also expected to behave in line with GH Group's ethical commitments, including protecting shared information, respecting confidentiality and trade secrets, and collaborating to achieve high standards in terms of quality, safety and social responsibility.

GH Group also promotes sustainable practices in its supply chain. Suppliers who implement responsible environmental policies, reduce their ecological impact and optimize the use of resources will be positively valued. Environmental management is a key factor in the evaluation and continuation of business relationships.

3.2.3. Competitors

GH Group upholds fair and ethical competition as the fundamental basis of its market conduct. Under no circumstances will unfair, deceptive, or anti-competitive practices be tolerated. Relations with competitors must be guided by mutual respect and strict compliance with applicable competition and market protection laws and regulations.

Group Members are obliged to refrain from adopting any practice, reaching agreements or entering into contracts or pacts that may violate the applicable regulations governing the defence of competition or unfair competition.

Therefore, and by way of example only and in no way exhaustively, at GH Group we do not intervene in price-fixing agreements with competitors, nor do we participate in bid manipulation to predetermine a winning bid. Likewise, we do not participate in market sharing or customer allocation agreements with competitors, nor do we enter into agreements to limit production, alter the quantity and/or quality of products and/or services, or engage in any other conduct that could pose a risk to competition law.

Furthermore, it is prohibited to obtain confidential information from competitors through improper or unethical means, as well as to spread rumours, false data, or make unfair comparisons that could damage their reputation.

GH Group is committed to competing through innovation, quality, and service excellence, not through practices that compromise its integrity.

3.2.4. Public Administrations

Relations with Public Administrations must always be lawful, transparent and respectful.

Group Members who interact with authorities and public bodies must act in accordance with current legislation, following established internal procedures and maintaining a professional, honest and objective attitude at all times.

It is strictly forbidden to offer, promise, solicit or accept gifts, presents, payments, favours or any other benefit that may be interpreted as an attempt to influence administrative decisions or corrupt or bribery practices (detailed in section 4.1 of this Code).

For greater transparency, all documentation, information or communication sent to Public Administrations must be truthful, complete and sent through authorized channels.

Group Members must avoid any situation that could generate a conflict of interest in their relationship with public entities, including contracting with current or former public officials in situations that may violate the rules of incompatibility or integrity.

3.2.5. Media and social networks

Any public participation that implies a direct or indirect connection with GH Group, whether through interviews, publications, media appearances, social media, or any other format, **must have prior express authorization from the Director of the corresponding Unit and the Group's General Management.** This authorization may also be required from the Group's Board of Directors if the matter is significant or could have internal or external repercussions. This authorization is mandatory before making any statements on behalf of the organization or that could be interpreted as official positions.

Technical or commercial communications made in the normal course of professional activity are excluded from this obligation, provided that they are in the general interest of the Group and do not compromise its image, confidentiality or reputation.

Only certain institutional figures, such as the Group's General Management or members of the Board of Directors, are authorized to issue public communications on behalf of the Group, without prior authorization.

When using personal social media, Group Members must act responsibly, prudently, and loyally toward the Group, avoiding any behaviour that could be interpreted as unauthorized institutional representation. Even on private profiles, comments or opinions that affect the Group are not part of the conduct guidelines of this Code and are therefore not permitted.

Furthermore, it is prohibited to use corporate channels, such as official accounts or internal communication resources, to express personal opinions or to disseminate content that does not correspond to the established purposes and/or that could compromise the Group's image and reputation. Likewise, in internal communications related to business or institutional matters, the inclusion of personal opinions must be avoided, always prioritizing objectivity, respect, and the protection of the Group's general interests.

Finally, if sensitive issues or concerns related to the Group arise in professional or personal practice, these should be channelled through the established formal channels, such as the relevant internal bodies or the Compliance Channel, rather than being addressed publicly.

4. WE ACT ETHICALLY AND WITH INTEGRITY

4.1. CORRUPTION AND BRIBERY

Both corruption and bribery are practices incompatible with our way of working and our ethical commitments. At GH Group, we have a zero-tolerance policy and an absolute ban on corruption and bribery, whether directed at public figures, individuals or legal entities.

It is strictly prohibited to offer, promise, solicit or accept any type of bribe, illegal commission or unjustified advantage, either directly or through third parties. This prohibition applies to all relationships, both with public and private entities, including customers, suppliers, agents, distributors, subcontractors, financial institutions, public officials (domestic or foreign), political parties and any other party with whom commercial or institutional ties are maintained.

Facilitation payments or unofficial benefits shall not be permitted for the purpose of expediting processes, obtaining permits or influencing administrative or commercial decisions. Similarly, influence peddling or the use of any mechanism designed to conceal corrupt practices is prohibited.

GH Group acts diligently when selecting and interacting with third parties, ensuring that it has a thorough understanding of the individuals or entities with which it collaborates, in order to avoid integrity risks and comply with current regulations.

Any gift, invitation or hospitality offered or received must be reasonable, occasional, transparent and consistent with internal rules, avoiding in all cases any interpretation as an attempt at undue influence or covert remuneration.

GH Group does not make political contributions, nor does it allow donations or sponsorships to be used for purposes that are contrary to the organisation's values. All contributions must be duly justified, authorised and aligned with the established social and legal purposes.

Any sponsorship, donation or benefit of this kind shall in all cases require the prior authorisation of the General Management and the Group's administrative body.

4.2. GIFTS AND INVITATIONS

Group Members must refrain from offering or accepting gifts, invitations or other forms of “hospitality” in the course of their professional activities, unless all of the following conditions are met simultaneously:

- That its value is equivalent to courtesy or favourable treatment.
- That it does not influence or condition commercial or institutional decisions.
- That it does not violate any legal or internal regulations of the specific territory.

- That it does not compromise the integrity or reputation of the Group or third parties.
- That it complies with customary practices in the business environment.

For the purposes of this Code, “hospitality” is considered to include business meals, invitations to cultural or sporting events or similar activities, invitations to conferences, paid holidays, etc.

If there is any doubt as to whether a gift or invitation is appropriate, it should not be accepted or given until it has been previously consulted with the General Management or the Group's administrative body.

In any case, this section is subject to the provisions of section 4.1 above, on “Corruption and Bribery”.

4.3. PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

One of the main objectives of money laundering is to conceal the true origin of funds obtained through illegal activities, making them appear to be legitimate income. At GH Group, we take responsibility for preventing any of our companies from being used as a vehicle to legitimise illicit gains or from being involved, directly or indirectly, in operations related to the financing of terrorism.

Therefore, we apply reasonable verification and analysis measures to the entities with which we collaborate.

It is important that Group Members ensure that they apply the relevant controls established by the Group and that they always comply with internal procedures relating to paying management.

They must also comply with internal guidelines on due diligence, and if they detect suspicious or unusual behaviour or transactions, they must report this to their line manager and use the Compliance Channel, which is confidential.

4.4. COMMERCIAL COMPLIANCE

GH Group maintains a firm commitment to complying with all laws, regulations and controls applicable to international trade, including customs regulations, export and

import requirements, and trade sanctions imposed by national and international bodies.

The Group conducts its business under strict standards of integrity, ensuring that its operations, including the circulation of products, technologies, software and technical information, comply with the legal restrictions in force in each country or region where it operates.

In addition to the mandatory legal framework, GH Group voluntarily assumes certain additional obligations derived from international certifications and standards of good practice, which reinforce its status as a responsible and reliable operator before the competent authorities.

It is strictly prohibited to carry out actions that circumvent, violate or attempt to evade trade controls or sanctions imposed by official bodies. All persons involved in foreign trade operations must act with due diligence and responsibility, ensuring the traceability, legality and transparency of the processes in which they are involved.

4.5. CONFLICTS OF INTEREST

A conflict of interest is understood to be any situation in which the particular interest of a person, or of someone with whom they have a direct or indirect link, may interfere or conflict with the interests of GH Group. Group Members must always act in defence of the Group's interests, ensuring that professional decisions are not influenced by personal, family or third-party interests.

In order to protect objectivity and integrity in decision-making, those who find themselves in a potential conflict situation must refrain from participating in decisions, meetings or accessing information related to the matter in question. Likewise, they must not intervene, represent or influence on behalf of GH Group when there is a personal interest involved.

Whenever possible, external activities (professional, commercial or contractual) that may involve competition or exchange of goods and services with the Group as a whole, or with any of its subsidiaries individually, should be avoided without express authorisation.

In case of doubt or when a conflict is detected, it must be reported immediately, honestly

and in writing to the relevant superior. The latter, if necessary, must refer the matter to the competent body (General Management and Board of Directors of the Group) for analysis and resolution.

Transparent and preventive management of conflicts of interest protects both the person involved and the Group, and is a fundamental duty of all Group Members.

5. WE CONDUCT OUR BUSINESS RESPONSIBLY

5.1. HUMAN RIGHTS AND SOCIAL VALUES

GH Group is committed to implementing a policy of well-being for Group Members in the performance of their duties and functions within the Group, and to respecting internationally recognised human rights and working conditions. This commitment to compliance is set out in the Group's "Human Rights and Working Conditions Policy".

We reject any form of forced or compulsory labour, forced marriage, sexual slavery and any type of modern slavery. We also reject child labour, and the applicable regulations regarding the minimum age and conditions required for employment, as regulated in each country, must be respected.

GH Group is committed to offering fair and safe working conditions that comply with current legislation and collective agreements or other applicable regulations in each territory. This includes the payment of adequate remuneration proportional to the work performed, both in terms of time and responsibilities assumed, thereby promoting the development and well-being of Group Members.

The limits established for the maximum length of the working day are respected, and compliance with the provisions of the applicable regulations on working time is ensured.

Likewise, GH Group recognises and respects all workers' rights in terms of union representation, association, collective bargaining and any others recognised in labour legislation.

The right of trade union representatives to perform their duties effectively, with adequate access to workplaces, shall also be guaranteed, provided that this does not interfere with the normal course of professional activity and in accordance with the provisions of

the applicable labour regulations in this regard.

And we demand that our partners and suppliers act responsibly, based on legal compliance and respect for fundamental rights.

5.2. HEALTH AND SAFETY

At GH Group, **occupational health and safety and the well-being of all Group Members are fundamental priorities** and an integral part of our organisational culture. We are committed to providing safe, healthy and dignified working environments for all those who form part of the Group, as well as for third-party collaborators who may be affected by our activities.

Compliance with occupational health and safety regulations is mandatory in all countries where we operate. However, at GH Group we adopt internal standards that, in many cases, exceed the legal minimums, with the aim of ensuring suitable and accident-free working environments.

Each person is responsible for knowing and applying the established prevention and protection measures, as well as for correctly using the equipment, tools, substances and safety devices required in their workplace. It is also mandatory to use the personal protective equipment (PPE) provided by the Group correctly, taking care of one's own health and that of colleagues, and respecting the facilities and equipment made available.

In addition, the Group promotes continuous training and awareness in occupational health and safety, and encourages its staff to actively participate in occupational risk prevention team initiatives. If any risk situation or breach is detected, it must be reported immediately to the person directly responsible or through the channels set up for this purpose.

5.3. DIVERSITY AND INCLUSION

At GH Group we firmly believe that diversity enriches and strengthens our Group. That is why we promote an inclusive environment where everyone can develop and contribute their unique value, regardless of their origin, identity or personal or social circumstances.

We promote a culture based on respect, equal opportunities and non-discrimination, both internally and in our relationships with customers, suppliers, contractors and collaborators. We categorically reject any form of discrimination, whether based on sex, sexual orientation, gender identity or expression, age, health, ethnicity, religion, nationality, marital status or other personal or social conditions.

These principles are present in all our decisions, especially in the processes of selection, recruitment, training, promotion, working conditions and external relations. We recognise the rights of all individuals to develop, train and prosper within the Group, in terms of equal rights. Every individual should have the same opportunities to participate, contribute and prosper within the Group.

Differences should not be a cause for division or exclusion, but rather an opportunity to build a more inclusive environment, where special attention is also paid to the integration of people with functional diversity.

If Group Members become aware of any situation involving discrimination, they must report it through the channels established for this purpose.

5.4. ENVIRONMENT

We take active responsibility for protecting the environment, integrating sustainability as an essential principle in all our operations. We are committed to complying with, and whenever possible, exceeding, legal and regulatory requirements in environmental matters, as well as reducing the environmental impact of our activities.

We promote the efficient use of natural resources, the minimisation of waste and emissions, energy saving and the prevention of pollution. In addition, we work proactively to promote initiatives, technologies and practices that encourage activity that respects different footprints (carbon, water, waste, other greenhouse gases (CH₄, NO₂, etc.), chemical footprint, plastic footprint, etc.) and the development of practices and transition to more sustainable models.

This commitment also extends to our value chain: we collaborate with customers, suppliers and other stakeholders who promote environmentally responsible behaviour, always seeking solutions that reduce the environmental footprint of our products, services and processes.

6. WE PROTECT OUR ASSETS AND INFORMATION

6.1. CONFIDENTIAL INFORMATION

The data and information we generate, both internally within the Group and from third parties, are essential elements for the Group, so it is important that its professionals use them responsibly.

At GH Group, we treat information with seriousness and responsibility. Any information that is not public, whether about Group Companies or related internal and external parties, must be treated with complete discretion and used only for authorised and legally permitted professional purposes.

Group Members are prohibited from sharing internal information with persons outside the organization, unless expressly authorised in writing, and it is guaranteed that such persons are bound to maintain confidentiality. This includes presentations, internal documents, plans, procedures and working methodologies, financial results, strategies, personal data or any other sensitive information, regardless of format (oral, written, digital).

Group Members should not make unnecessary copies of confidential documentation.

The duty of confidentiality continues even after the relationship with the Group has ended. Any person who ceases to collaborate with GH Group must return the information and materials used during their activity, without retaining copies of any kind.

6.2. INTELLECTUAL AND INDUSTRIAL PROPERTY

At GH Group, we actively value and protect our intangible assets, such as patents, trademarks, copyrights, designs, plans, technical knowledge, technological developments and any other element that belongs to our intellectual and industrial property. These assets are essential to our competitiveness, identity and long-term growth.

All technical developments, innovations, knowledge, designs, methodologies, processes or results generated within the framework of research, development and innovation (R&D&I) activities or the normal activities of the Units, whether individually

or as a team, during the employment or professional relationship with the GH Group, are the exclusive property of the latter. This includes both developments made with the Group's resources and those derived from its activity, prior knowledge or information accessed by virtue of the position or function held.

Group Members are responsible for using these resources appropriately and taking the necessary measures to prevent their loss, misuse or unauthorised disclosure. Similarly, they are expected to show the utmost respect for the intellectual and industrial property rights of third parties, refraining from copying, using or sharing protected information without proper authorisation.

When sharing protected information with individuals outside the organisation, this must be done with knowledge of the content and specific purpose, and always under contractual protection that limits its use, thereby ensuring confidentiality and control.

The image of GH Group, including its brand and any distinctive signs, must only be used in accordance with corporate policies and guidelines, preserving its reputation and consistency across all channels and materials, taking special care not to include it in third-party products or other items. Furthermore, avoid misrepresenting the image, for example, by suggesting that such products have been made by the Group when they have not been and do not meet our standards.

6.3. CYBERSECURITY

At GH Group, we protect information, systems and digital assets as an essential part of the security of our business. All devices, technologies, tools, applications and IT platforms provided by the company, including computers, telephones, emails and software, are the property of the Group and must be used appropriately, legally and in accordance with this Code and other internal regulations, and always for professional purposes.

Each Group Member is responsible for actively contributing to cybersecurity, ensuring the correct use of corporate technologies and adopting good practices, such as:

- Use secure passwords and keep them confidential.
- Use corporate accounts and email addresses exclusively for professional activities.

- Avoid any action that circumvents or weakens security controls, including network scans, installation of unauthorised software, or execution of programmes, commands, or automations outside of approved protocols.
- Only use authorised systems and tools to store, transmit or back up information.
- Protect digital resources from malware, accidental data loss or unauthorised access.
- Do not leave computer equipment or other devices “within reach of third parties”. For example, in cars...

GH Group implements protective measures such as security testing, threat and vulnerability monitoring, and mandatory cybersecurity training programmes, which must be completed by all Group Members.

Furthermore, we live in an era in which Artificial Intelligence (“AI”) is the order of the day. At GH Group, it is expressly prohibited to enter any type of confidential information, whether our own or that of third parties, into AI applications, unless it has been completely anonymised. This measure reflects our firm commitment to the protection of sensitive data and compliance with current regulations, including the new European Regulation on Artificial Intelligence and other regulations that may be applicable in other countries.

Where permitted by law, the Group reserves the right to monitor the use of technological systems at any time and without prior notice to ensure compliance with its policies.

6.4. FRAUD AND THEFT

We are committed to using all of the organizations’ resources and assets, both tangible and intangible, appropriately, responsibly and exclusively for legitimate purposes. This includes financial accounts, inventories, tools, vehicles, materials, replacement parts, electronic devices, confidential information, data and intellectual property.

All financial transactions must be based on actual events and documented accurately, promptly and in accordance with applicable accounting principles and internal policies. The inclusion of false, manipulated or misleading data in reports, accounting records, invoicing to third parties, invoicing by third parties, movements in financial accounts, investments, etc. will not be tolerated.

It is also prohibited to use the Group's assets or information for personal purposes, extract or appropriate confidential information after the end of the employment relationship, inflate invoicing, enter into parallel financial agreements or approve expenses that do not comply with the contractual conditions.

It is also not permitted to claim reimbursements for personal expenses as if they were professional expenses.

Protecting the Group's assets is a shared responsibility, and any suspicion of fraud, misappropriation, theft or misuse must be reported immediately through the established channels.

7. BREACH OF THE CODE OF CONDUCT

Any breach or deviation from any of the guidelines for conduct established in this Code by one or more Group Members will result in the opening of a case by the Regulatory Compliance Committee, which may lead to the corresponding sanction established internally, as well as any sanctions that may be applicable in accordance with the Workers' Statute, the applicable Collective Agreement and, in any case, the laws of the jurisdiction where the breach occurs.

The consequences of this breach will affect not only the offender, but also any GH Group professional who has allowed such breach through action or omission.

8. REPORTING PROTOCOL

All Group Members or external collaborators may report any action that violates this Code through the GH Group Compliance Channel, with subsequent communication to the RCC, where appropriate.

This channel guarantees the confidentiality of information, the protection of personal data, and the absence of reprisals against whistleblowers.

Communications may be made anonymously or by name, depending on the preference of the informant, and will be treated with the utmost diligence and respect for the rights of all parties involved.

All communications submitted will be investigated, and the outcome will be communicated to the informant via the contact details provided, if any.

The Compliance Channel is available in the following link:

[GH Cranes & Components Whistleblower System | Home](#)

9. APPROVAL, ADHERENCE, UPDATING AND REVISION

This document has been approved by the Board of Directors (BoD) of GH Group, remaining fully in force as long as no changes are made to it.

Any update to its content as a result of the continuous improvement of the conduct and behaviour guidelines of the Group Members must be approved by the BoD.

The RCC will constantly monitor the application of this Code and will propose appropriate amendments in the following circumstances:

1. When significant breaches of the Code become apparent.
2. When significant changes occur in the Group, in its control structure or in the activities it carries out.
3. When there are relevant legal or jurisprudential changes that advise or require it.