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1. Corporate statement

TEF develops its business activity with a firm commitment to acting in an ethical, responsible and transparent manner. The company considers integrity, respect for people and compliance with regulations to be fundamental elements in ensuring sustainability and the trust of all interested parties.

This Corporate Policy establishes the reference framework that guides the behavior of the organization and all the people who form part of it. This document defines the principles that regulate business conduct, respect for human rights and working conditions within the company.

TEF recognizes that its activity has an impact on society, on people and on the environment in which it operates. Therefore, the organization is committed to developing its activities in a responsible manner, promoting business practices that contribute to sustainable development and the well-being of its employees and partners.

2. Policy objective

The objective of this policy is to establish the principles and norms that should guide the behaviour of the company and all its staff.

This policy has the following purposes:

- to promote a corporate culture based on ethics and responsibility
- to guarantee respect for human rights
- to ensure fair and safe working conditions
- prevent conduct contrary to the law or the company's values
- strengthen the trust of customers, employees, providers and other stakeholders

3. Regulatory framework and international standards

This policy is based on current legislation and recognised international standards relating to human rights, business ethics and working conditions.

The main reference frameworks include:

- International Bill of Human Rights
- Fundamental Conventions of the International Labour Organization (ILO)
- Sustainable Development Objectives of United Nations
- General Data Protection Regulation (GDPR)

- Spanish labour legislation
- Applicable European regulations

When there is a difference between the applicable legislation and the principles recognised in this policy, the stricter standard shall always apply.

4. Scope

This policy applies to all people who are part of TEF or who act in its behalf.

This includes:

- employees
- directives and intermediate commands
- temporary or subcontracted staff
- external partners
- suppliers involved in the company's activities

All these individuals must act in accordance with the principles set out in this policy.

Managers and supervisors have an additional responsibility to promoting these principles and to establish an organizational culture based on ethics, respect and transparency.

5. Principles of business conduct

5.1 Integrity and professional ethics

TEF develops its business activity in accordance with the highest standards of integrity and professional ethics.

All decisions and actions taken by employees must be carried out with honesty, responsibility and respect for people and the organization.

5.2 Compliance with legislation

The company strictly complies with all laws, regulations and standards applicable to its business.

This includes compliance with regulations related to:

- labour legislation
- industrial security

- data protection
- environmental regulations
- trade regulations

Employees must always act in accordance with legislation and the company's internal policies.

5.3 Prevention of corruption

TEF maintains a zero-tolerance policy towards corruption, bribery and any form of fraud.

No employee may offer, promise or accept undue benefits that could influence professional decisions.

Gifts or invitations may only be accepted when:

- they are of symbolic value
- they are related to professional activity
- they do not create undue commitments

5.4 Conflicts of interest

Employees must avoid situations in which personal interests may interfere with the interests of the company.

When there is a possible conflict of interest, this must be disclosed transparently to the relevant manager.

5.5 Transparency and accuracy of information

TEF maintains complete, accurate and transparent financial and accounting records.

All operations must be registered in accordance with applicable accounting and tax regulations.

Corporate information must be:

- accurate
- complete
- clear
- properly documented

6. Protection of assets and information

Company assets must be used exclusively for professional purposes and for the benefit of the organization.

These assets include:

- equipment and tools
- IT systems
- technical or commercial information
- strategic documentation

Employees must protect the company's and its customers' confidential information from unauthorised access or misuse.

The duty of confidentiality remains in force even after the employment relationship has ended.

7. Human Rights Policy

TEF recognises the importance of respecting and promoting human rights in all its operations.

The company is committed to preventing any form of violation of people's fundamental rights.

7.1 Equality and non-discrimination

TEF promotes a working environment based on equal opportunities and mutual respect.

No form of discrimination or harassment will be tolerated on the grounds of:

- gender
- ethnic origin or nationality
- sexual orientation
- religion or beliefs
- age
- disability
- ideology

Everyone should be treated with dignity and respect.

7.2 Freedom of association

The company respects the right of employees to join trade unions, participate in employee representation and engage in collective bargaining.

These rights may be exercised freely and without reprisal.

7.3 Prohibition of child and forced labour

TEF strictly prohibits:

- child labour
- forced labour
- any form of labour exploitation

This commitment also extends to suppliers and partners.

8. Working Conditions Policy

TEF is committed to providing fair and safe working conditions for all its employees.

8.1 Working conditions

The company complies with Spanish labour legislation regarding:

- recruitment
- working hours
- wages
- breaks
- social security

Employees will receive clear information about their working conditions and pay.

8.2 Health and safety at work

The health and safety of employees is a priority for the company.

TEF undertakes to:

- comply with occupational health and safety regulations
- providing appropriate training

- identify and reduce risks in the workplace

All employees must actively contribute in risk prevention.

9. Protection of personal data

TEF complies with the General Data Protection Regulation (GDPR) and with Spanish data protection legislation.

The personal data of employees, customers and suppliers will be processed in a manner that is:

- lawful
- secure
- transparent
- limited to necessary professional purposes

The misuse of personal information is strictly prohibited.

10. Environmental responsibility

TEF recognizes the importance of protecting the environment and is committed to conducting its business responsibly.

The company promotes measures aimed at reducing the environmental impact of its operations, including:

- efficient use of energy
- responsible management of electronic waste
- control of hazardous materials
- compliance with applicable environmental regulations

All employees are expected to contribute to these objectives through responsible practices in their daily work.

11. Responsible supply chain

TEF expects its suppliers and business partners to share the ethical principles set out in this policy.

The company may require its suppliers to comply with standards related to:

- human rights
- fair working conditions
- regulatory compliance
- environmental protection

12. Whistleblowing channel

TEF has an internal whistleblowing channel that allows potential breaches of this policy applicable regulations to be reported.

The aim of this system is to detect and correct conduct that may affect individuals, the company, society or the environment.

Reports can be made in the following ways:

- identified
- confidential
- anonymous

All reports will be analysed and investigated impartially.

13. Oversight and compliance

TEF's management is responsible for ensuring the effective implementation of this policy.

The company may carry out monitoring, training and control measures to ensure compliance.

Failure to comply with the principles set out in this policy may result in disciplinary action in accordance with applicable employment legislation.

14. Review and updating

This policy will be reviewed periodically to ensure it remains in line with current legislation, international standards and the company's needs.



Ferran Forges Prados
Direcció

Sant Boi de Llobregat, March 20, 2026