

CODE OF ETHICS

ATI Consult





1. TABLE OF CONTENTS

1. THE CODE OF ETHICS AND GOOD CONDUCT	2
1.1 Introduction	2
1.2 Scope of Application.....	2
1.3 Effectiveness and Compliance with the Code.....	3
2. GENERAL PRINCIPLES FOR ACTION	3
2.1 Compliance with legal and other applicable requirements	3
2.2 Human Rights and Fundamental Rights at Work.....	4
2.3 Professionalism and Integrity	5
2.4 Teamwork	5
2.5 Quality.....	6
2.6 Health and Safety at work.....	6
2.7 Environmental Protection.....	6
3. RULES OF CONDUCT	6
3.1 Equal opportunities	6
3.2 Protection of people	7
3.3 Work-life balance	7
3.4 Processing of personal data.....	7
3.5 Conflicts of interest	7
3.6 Use of Company assets, resources and means.....	8
3.7 Knowledge and Information Management.....	9
3.8 Respect for Intellectual Property.....	9
3.9 Gratuities, gifts and other courtesie.....	10
3.10 Anti-corruption and bribery measures.....	10
3.11 Anti-money laundering measures	11
4. RELATIONS WITH RELEVANT STAKEHOLDERS	11
4.1 Relations with clients	11
4.1.1 Quality.....	11
4.1.2 Transparency and good faith.....	12
4.2 Relations with suppliers and subcontractors.....	12
4.3 Relations with partners.....	12
4.4 Relations with competitors.....	12
4.5 Relations with the Government and other Authorities.....	13
4.6 Relations with Society	13
5. IMPLEMENTATION AND COMPLIANCE WITH THE CODE OF ETHICS.....	13
5.1 Organisation.....	13
5.2 Implementation	15
5.3 Communication channels: Ethics Mailbox	15
5.4 Disciplinary measure	15



1. The code of ethics and good conduct

1.1 Introduction

The purpose of the ATI Code of Ethics and Good Conduct, hereinafter "the Code", is to set out the general guidelines for the conduct of ATI and all the staff that make up the Organisation.

It has been drawn up taking into account the recommendations of good governance and the principles of social responsibility. The Code also responds to the crime prevention obligations imposed in the field of criminal liability of legal entities.

The Code is not intended to cover all situations, but rather to determine the behaviour expected of all members of the ATI team in matters of an ethical nature related to the commitments and obligations within the scope of their professional activity, applying the principle of no tolerance for bad practices in terms of ethics and integrity. All employees undertake to conduct themselves in a manner consistent with the principles of this Code.

All employees must cooperate in the development and implementation of the Code to ensure that ATI's ethical values are implemented and assimilated throughout the Organisation.

1.2 Scope of Application

The Code applies to all staff, irrespective of hierarchical level and geographical or functional location.

It also applies to trainees, subcontracted companies or professionals, consortia and joint ventures (JVs) and all stakeholders with whom ATI has dealings.

This Code applies to all Companies and Entities in which ATI has an interest, regardless of the percentage of ownership.



1.3 Effectiveness and Compliance with the Cod

ATI and all employees, in addition to complying with applicable laws, are obliged to:

- Know, comply with and enforce the Code, as well as internal policies, standards and procedures, according to their role, responsibility and workplace.
- Promote the adoption of patterns of conduct consistent with this Code among suppliers, contractors and collaborating companies and pay attention to the conduct of third parties to ensure that their behaviour is consistent with that required at ATI.

Employees who manage and lead teams will have the following additional responsibilities:

- Ensure that the people under their responsibility know, understand and comply with the Code.
- Manage and lead by example.

No employee may justify misconduct on the grounds of ignorance of this Code.

Nor shall they be obliged to carry out any orders or instructions contrary to this Code or applicable laws.

ATI shall communicate, disseminate and make available to all employees the content of the Code and ensure that new employees joining or becoming part of the ATI structure have access to it (publication on the website).

Failure to comply with the rules set out in this Code, without prejudice to any other administrative or criminal liability, may lead to disciplinary action.

2. General principles for action

2.1 Compliance with legal and other applicable requirements

All ATI staff undertake to carry out their activities in accordance with current legislation and internal rules, with no exceptions.



Staff shall behave in an ethical manner, avoiding any conduct that may be contrary to applicable regulations, and/or that may have a negative impact on the reputation, internal operations, or image of the company.

They shall not participate or collaborate with third parties in actions that are against the law or which, although legal, may compromise respect for the principle of legality, or undermine the trust of third parties in the company.

Actions for continuous improvement in this area shall be taken.

2.2 Human Rights and Fundamental Rights at Work

ATI undertakes to respect internationally recognised human rights, which include the rights set out in the International Bill of Human Rights and the principles relating to rights set out in the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, included in the United Nations Global Compact.

ATI subscribes to the principles of the United Nations Global Compact (the Global Compact):

Principles relating to human rights

1. Businesses should support and respect the protection of internationally proclaimed human rights, within their scope of influence.
2. Businesses should make sure that they are not complicit in human rights abuses.

Labour principles

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



Principles relating to the environment

7. Businesses should support a precautionary approach to environmental challenges.
8. Businesses should undertake initiatives to promote greater environmental responsibility.
9. Businesses should encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption principle

10. Businesses should work against corruption in all its forms, including extortion and bribery.

2.3 Professionalism and Integrity

ATI promotes professionalism as a value, characterised by diligent, responsible and efficient work, aimed at the achievement of excellence through continuous improvement.

ATI professionals shall take responsibility for their actions, which shall be ethically acceptable and legally valid.

Integrity is also considered as a guiding principle for conduct, which implies loyalty as regards the interests of the organisation, honesty, good faith, objectivity in decision-making and consistency with the principles and values of this Code.

2.4 Teamwork

ATI promotes cooperation and teamwork to make the best use of all its resources and capabilities. All employees shall work in this spirit of collaboration and share knowledge and resources with others in the organisation to facilitate the achievement of objectives.

The following behaviours are considered inappropriate: withholding or concealing information from superiors or colleagues, providing inappropriate, false or misleading information, lack of cooperation, or any other obstructive behaviour.



2.5 Quality

ATI is committed to its clients and other stakeholders, striving to meet and exceed their expectations. With this in mind, it works to the highest quality standards, implementing continuous improvement in the management and operation of all activities.

2.6 Health and Safety at work

ATI shall constantly implement the preventive measures established in current legislation in order to ensure a healthy and safe environment.

All staff are obliged to know and comply with the rules of protection, health and safety at work, ensuring their own safety and that of others by complying with the preventive measures implemented.

Employees, partners, clients, suppliers, visitors and anyone else wishing to access ATI's facilities may not do so under the influence of alcohol or drugs.

Lack of personal hygiene in the workplace shall not be tolerated, as it is considered a lack of respect for others.

2.7 Environmental Protection

In carrying out its activities, ATI demonstrates its commitment to the environment and seeks to promote energy saving and efficiency, as well as the conservation of natural resources, the minimisation of waste and, in general, the protection of the environment.

3. Rules of conduct

3.1 Equal opportunities

For ATI, people are the organisation's most important asset, as it is they who carry out the projects and on whom the achievement of the objectives depends. Therefore, their professional development must go hand in hand with their personal development.

It is a basic principle to provide the same opportunities to all in access to work and in access to professional promotion, so ATI will apply criteria of non-discrimination and equal opportunities in all its processes.



Nationality, race, colour, origin and social condition, sex, marital status, sexual orientation, ideology, religion and kinship are not taken into account as factors in professional assessment.

Particularly, ATI will promote equal opportunities between men and women in terms of access to employment, training, professional promotion and working conditions.

The guiding principles for professional development and promotion are: talent, effort, performance, implementation, training, experience and potential for future development.

3.2 Protection of people

All people working at ATI shall treat each other with politeness, respect and camaraderie, fostering a pleasant, healthy, safe and non-hostile working environment.

Offensive behaviour, threats, sexual harassment, abuse of authority, discrimination, slander or any other form of physical, moral or psychological aggression shall not be tolerated.

3.3 Work-life balance

ATI is aware of the importance of a balance between personal, family and working life and will therefore promote measures aimed at facilitating such a balance.

3.4 Processing of personal data

ATI respects the right to privacy, especially with regard to personal data.

Employees who have access to the personal data of colleagues undertake to maintain their confidentiality and not to disclose them, except with the consent of the data subject, or as required by law.

3.5 Conflicts of interest

Independence in carrying out professional activities is essential for performance inspired by freedom, fairness and loyalty to the organisation.



A conflict of interest may arise when personal interests are contrary to or collide, directly or indirectly, with the interests of ATI and may interfere with the performance of professional duties, or involve any transaction or operation in a personal capacity.

Personal interests are considered to include any kind of professional or personal advantage for employees, their family members or third parties related to them.

In general, when employees are faced with a situation in which a conflict of interest arises, the following guidelines for conduct shall be followed:

- They shall act with professionalism and loyalty and in defence of the interests of ATI, refraining from giving priority to their own interests or those of third parties over those of ATI.
- They shall inform their line manager of any circumstances that may affect the independence of their actions.
- They shall refrain from taking part in decisions in which they or their circle of relatives and acquaintances have a personal interest.

3.6 Use of Company assets, resources and means

The resources made available to employees by the company shall be used only for their intended professional purpose and never for private activities.

All employees shall protect ATI's assets and use them in the intended manner, preserving them from damage, loss or theft and ensuring they are not misused to the detriment of ATI or third parties. The employees are obliged to protect resources, including information and knowledge generated within the company.

In general, employees shall refrain from using company property for personal or private gain, using common sense and discretion to assess whether they are using such property in a responsible manner.

Direct or indirect theft of ATI assets may result in dismissal and criminal prosecution.

Employees shall not engage in personal activities that interfere with or impede the performance of professional activities during working hours.



With regard to applications, computer equipment and access to Internet browsing, employees shall not compromise, under any circumstances, the functionality and security of computer systems.

3.7 Knowledge and Information Management

ATI promotes the sharing of knowledge and information generated within the organisation, encouraging its transmission in order to improve the management of activities and the development of individuals.

All the information and knowledge generated within the organisation is the property of ATI, in the terms referred to in current legislation and internal regulations.

For the control of information and knowledge, the established procedures shall be followed, bearing in mind the duty to refrain from disclosing such knowledge to the outside world.

The management of ATI shall periodically inform all employees of the strategic lines defined, the objectives and their monitoring, with the aim of coordinating efforts and involving staff in order to ensure the achievement of the established goals.

All employees are obliged to maintain the confidentiality of classified information to which they have access as a result of their work.

Likewise, it is forbidden to disclose information or data that could benefit or give advantage to third parties in their relations with ATI, even if the latter is not harmed (privileged information).

The duties of confidentiality remain in force as long as the information retains its confidential nature, even when the employee's employment relationship has ended. Upon termination of the employment relationship, for whatever reason, the ATI employee may not copy, reproduce or transfer any confidential or proprietary information or documentation acquired as an ATI employee, in whatever form, nor disclose or use such information.

3.8 Respect for Intellectual Property

In all project documents - commercial documents and public communications - ATI Ingeniería shall acknowledge and respect the intellectual and industrial property rights of other professionals outside the company.



It shall also demand the right to have its work acknowledged as its own.

3.9 Gratuities, gifts and other courtesies

Under no circumstances shall ATI staff use unethical practices to influence the will of people outside the organisation in order to obtain any benefit for the organisation or for themselves. They shall also establish mechanisms to prevent third parties from using such practices in their dealings with ATI.

In general, the giving or acceptance of payments, gifts or gratuities with the idea of receiving possible favours or considerations, whether real or not, is not permitted.

Gratuities, gifts and other courtesies shall only be accepted when their economic value is insignificant or merely symbolic. This category includes promotional and advertising gifts. Such gifts shall be given or received in a transparent manner and on an occasional basis, as a matter of generally accepted social practice or courtesy. Such practices may not be contrary to ethical values or the law, and must not damage ATI's reputation.

All valuable gifts received shall be placed at the disposal of ATI, which shall keep a detailed record, including the details of the individual or legal entity that gave the gift, and the use and final location of the item concerned.

The acceptance of any kind of remuneration for services resulting from the professional activity of employees is forbidden. In particular, acts of bribery or commission are strictly prohibited. These include the direct or indirect offer or promise of any kind of undue advantage, any means of concealment, as well as influence peddling.

Failure to comply with this rule shall lead to the consequences and penalties included in the disciplinary measures. In addition, it may cause significant damage to ATI's reputation and cause it to incur criminal liability.

3.10 Anti-corruption and bribery measures

All Quotations submitted to clients are previously validated and approved, in both technical and economic terms, by the persons in charge designated for this purpose.

The payment of any commission, bonus, compensation or discount, in cash or in kind, which cannot be openly stated in the contract signed between the parties, is strictly forbidden.



Likewise, it is also strictly forbidden to offer, give or receive any kind of personal compensation, advantage or gift, unless it is merely symbolic and of a very low economic value, paid by a third party for having entered into a contract with a client or supplier, or offered or paid to a third party to unduly benefit third parties or the organisation itself.

Any act that could compromise current or future decisions in business relationships shall be rejected.

Reminders regarding compliance with the Code of Ethics shall be issued to all staff on a regular basis.

All newly recruited staff shall be provided with such documentation and receive an initial training on these issues.

3.11 Anti-money laundering measures

No transactions in goods or services may be carried out if they are known to be of illicit origin or may have an illicit outcome.

Attention should be paid to the origin of payments received, taking into account factors such as the country of origin of payments (e.g. tax havens), the currency of payment used if different from that originally agreed upon and any unforeseen extra payments.

No relationships may be established with individuals or entities that do not provide the information required by law or where it is not possible to identify the beneficial or controlling owner.

4. Relations with relevant stakeholders

4.1 Relations with clients

4.1.1 Quality

ATI undertakes to provide quality services, in terms of generating long-term value for all stakeholders. To this end, it shall provide the necessary resources to meet and, if possible, exceed client expectations by implementing continuous improvement measures.

ATI's employees shall act with integrity when dealing with clients, aiming to provide a quality service and fulfil the commitments made.



4.1.2 Transparency and good faith

In dealing with clients, a collaborative relationship shall be established based on transparency, trust, a spirit of cooperation and respect for the confidentiality of information, as well as the principles set out in this Code.

Contracts with clients shall be drafted in a clear and simple manner. Under no circumstances shall clients be provided with misleading, ambiguous or unclear information that could lead to error.

4.2 Relations with suppliers and subcontractors

ATI shall use criteria of transparency, objectivity, impartiality, confidentiality, non-discrimination, quality and cost in the selection of suppliers and subcontractors, prohibiting any conflict of interest or favouritism in their selection.

All information, of whatever type, provided by suppliers or subcontractors in the selection processes shall be treated confidentially by any ATI staff having access to it.

ATI staff shall follow established procedures for the selection and assessment of suppliers and subcontractors.

ATI shall require suppliers and subcontractors to adhere to its Code or to ethical and conduct commitments comparable to those set out in the Code.

4.3 Relations with partners

A collaborative relationship shall be established with partners based on transparency, trust and cooperation, as well as on the principles set out in this Code.

4.4 Relations with competitors

Relations with competitors shall always be cordial, fair, honest and in accordance with free competition.

In the drafting of reports on competitor projects or facilities, the utmost fairness, equity and objectivity shall be maintained, based on verified facts and on a thorough and methodical analysis of the issues raised.



4.5 Relations with the Government and other Authorities

Relations with the Government, regulatory bodies and other public authorities shall be based on the principles of cooperation and transparency.

All ATI employees shall act with honesty and integrity in their contacts with public authorities and government officials, ensuring that all information and statements are truthful and complete.

4.6 Relations with Society

The guiding principle of ATI's relations with Society shall be the general interest, together with transparency, cooperation and sustainable development.

ATI shall seek to promote the development of the societies in which it carries out its activities, through the hiring of local workers/companies, training of workers, etc.

ATI's economic and financial information shall faithfully reflect its economic, financial and equity situation, in accordance with generally accepted accounting principles.

5. Implementation and compliance with the code of ethics

5.1 Organisation

In order to implement, develop, supervise, control, monitor and follow up the fulfilment, effectiveness and adequacy of the Code of Ethics, a specific control body has been created called the "Compliance Committee", whose activity and work shall be directed and coordinated by the company's Head of Administration/Legal Support.

The Compliance Committee shall be made up of a working group of company employees whose knowledge, functions, experience and integrity make them suitable for such duties, and who shall be appointed and dismissed by the company's Board of Directors.

In this respect, the members of the Compliance Committee shall enjoy full autonomy and independence in the performance of their duties. They shall have in-depth knowledge of the organisation and its activity, and have no regular duties that could result in a conflict of interest in enforcing compliance with the Code.



The Compliance Committee shall meet every six months to assess compliance with this Code and the effectiveness thereof and shall meet immediately, at the request of any of its members, should any breaches become apparent.

Likewise, the Compliance Committee shall meet when there are changes in the management structure and scope of activity of the organisation, when decisions or circumstances are adopted that affect or may affect the effectiveness of this Code or when changes or updates are proposed for its improvement.

The Compliance Committee shall report to the company's Board of Directors on the results of its activities. Its meetings shall be formalised in the respective minutes.

The functions of the Compliance Committee shall be to:

- Ensure the correct implementation of the Code of Ethics as a means of creating a culture of compliance and integrity based on respect for the Law and ethical values, which, inspired by the Management, shall prevail in decision-making and affect all areas of the company.
- Foment business ethics, promoting its dissemination, information and training.
- Continuously assess the suitability and effectiveness of this Code; monitor compliance, effectiveness and adaptation of this Code to regulatory developments, as well as to the organisational structure of the Company and the scope of its activity.
- Propose to the Board of Directors any amendments or developments it deems appropriate to ensure compliance with the applicable regulations in order to safeguard the Company from criminal liability.
- Supervise, control and monitor the correct implementation of the Code, for which purpose complaints and communications made through the Ethics Mailbox shall be received and investigated. Records shall be kept of the complaints and communications received.
- Investigate any conduct it may identify that could give rise to the commission of a crime or expose the Company to criminal liability, and inform the Board of Directors of such conduct.
- Establish the recommendations, penalties and disciplinary measures it deems appropriate and, where appropriate, report possible offences, collaborating with the authorities in their investigation.



5.2 Implementation

In order to implement the Code of Ethics, a compliance programme has been established with the necessary mechanisms to:

- Prevent and control the commission of crimes and significantly reduce the risk of their commission, through the implementation of an effective organisational and management model that includes surveillance measures, as well as staff training.
- Supervise the operation of and compliance with this Code of Ethics with regard to the prevention model implemented.
- Detect and investigate possible criminal conduct and implement the necessary measures to remedy it.
- Deter conduct that may expose the Company to criminal liability.

Likewise, the compliance programme establishes mandatory training at different levels, which implies the implementation of courses aimed at creating and developing an internal culture of compliance and integrity applicable to all employees.

All staff are included in the company's general compliance plan according to levels of responsibility and the information to which each employee has access.

5.3 Communication channels: Ethics Mailbox

There is a whistle-blowing channel called the "Ethics Mailbox" that allows employees to exercise their right to report any breach of the rules set out in the Code of Ethics.

It is a communication channel via e-mail that allows staff to report any risks and breaches, confidentially and anonymously, to the body responsible for overseeing compliance with the Code of Ethics.

Employees may also raise issues related to the integrity of the company or their colleagues and possible breaches of the Code of Ethics.

This mailbox also collects information on cases of human rights violations.

5.4 Disciplinary measures

The Compliance Committee shall review the cases and establish penalties according to the damage caused and the impact of the damage on the organisation or stakeholders.