



# Code of **Ethics** and **Business** Conduct

**Ethics at the Core. Mobility for the Future.**

 **emovis**  
Abertis Mobility Services



*This Code applies to Abertis Mobility Services, S.L.U. (“AMS”) and to all Companies that are controlled by AMS (hereinafter the “Emovis Group”). Any reference to “Emovis” in this Code of Ethics and Business Conduct shall be understood as a reference to any and all Companies that form the Emovis Group.*



## A message from our CEO



At Emovis, **integrity is our way of working**. As we continue to grow, innovate and lead shaping the future of mobility, it's more important than ever that we remain grounded in the values that define who we are: **Excellence, Work as One, Innovation, Accountability, Integrity and Passion**.

This Code of Ethics and Business Conduct - our Code- reflects our commitment to **doing business the right way**. In a world of rapid innovation and transformation, our Code provides the foundation for making ethical decisions in complex challenges and evolving landscapes, setting clear expectations for how we shall conduct ourselves, make decisions and interact with each other, our partners and the communities we serve.

As we drive the future of mobility, the choices we make today will shape how people and goods move tomorrow. Our Code helps us to navigate these choices with clarity and confidence. It empowers us to understand our responsibilities, recognize potential risks, and act with integrity, even when the right path is not immediately clear.

We must not only follow the Code but also model it. We must foster an environment where ethical behavior is encouraged, supported and expected; where concerns can be raised without fear, and where doing the right thing is always the standard.

I encourage you to **read our Code, refer to it often, and use it as a compass**. Let it guide your decisions, inspire your leadership, and reaffirm our shared commitment to integrity. Together, we are not only shaping the future of mobility, but we are also doing so based on a foundation of trust, respect and ethical responsibility.

Kind Regards,

**Christian Barrientos**

Chief Executive Officer



## Accountability

We take **responsibility** for what we do, how we act, and how we perform.

We build a **culture of commitment** by taking ownership of our decisions and actions every day.

## Excellence

We challenge ourselves to seek out ways to meet the **highest standards** in all areas of our business.

We strive for the **best quality and performance**, continuously improving our products, services and processes to exceed customer expectations.

## Work as One

We create a **collaborative culture** where we contribute with our expertise, support one another, and work together toward common goals.

We promote a **speaking up environment** to drive problem-solving, innovation, and success.

## Innovation

We go beyond conventional boundaries, embracing **innovative ideas** to drive growth, success, and progress.

We adopt a forward-thinking mindset, **creating solutions** that tackle today's needs and tomorrow's challenges.

## Integrity

We embody **honesty, transparency, and ethical behavior** in all actions, promoting fairness, dignity, and respect for everyone we engage with.

We advocate **ethical and thoughtful practices** rejecting any behavior or action that goes against our core values.

## Passion

We approach shared goals and daily responsibilities with genuine **enthusiasm**, driving purpose, **perseverance**, and performance while fostering **resilience**.

We face challenges with a **constructive and hands-on attitude**, as opportunities for learning and growth.



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# Our Code. Our Commitment

- 1.1 Ethical Decision-Making
- 1.2 Everyone's Responsibility
- 1.3 Speaking Up and Reporting Concerns

### Ethical Decision-Making

We are committed to **acting with integrity**, excellence, and accountability in all aspects of our work. Our decisions must be made transparently and in accordance with Emovis' essential values, internal policies and applicable laws and regulations, with due consideration for the interests of Emovis, its employees, customers, and partners.

We are also dedicated to the ethical and responsible application of technology, including artificial intelligence, with a focus on maintaining proper oversight, promoting transparency and impartiality. The use of artificial intelligence tools must be only used in accordance with our Code and Emovis security policies.

**This Code applies to all of us** – employees- and any individual whose work is directed or supervised by Emovis. Partners who engage with Emovis are expected to comply with the standards and values outlined herein through adherence to the Emovis Code of Ethics and Business Conduct. If there is ever any conflict between the applicable legislation and the Emovis' applicable internal policies, legislation always prevails.

Violations of the Code may result in disciplinary measures. You are expected to be accountable, and to consult when faced with ethical dilemmas and uncertainty to your Line Manager, the Compliance Office ([compliance@emovis.com](mailto:compliance@emovis.com)), **Ethics & Compliance Line** or Human Resources Department (People Function).





## Everyone's Responsibility

We all, regardless of role or seniority, are accountable for complying with and upholding the principles set forth in our Code.

### This includes:

- Read, understand, and follow the Code of Ethics and Business Conduct.
- Comply with all applicable laws, regulations, and Emovis policies in our day-to-day work.
- Speak up when you become aware of, or suspect, any violations of our Code, Emovis policies, or legal requirements.
- Cooperate fully in any investigations, audits, or reviews carried out by Emovis or authorized parties, providing access to relevant information and refraining from destroying or altering any business-related records or communications.

**Line Managers and Members of the Executive Committee** are entrusted with the responsibility to lead by example. They play a critical role in building a culture based on ethics and compliance.

### They are expected to:

- Encourage team members to ask questions and engage in open discussions about complex or challenging ethical situations.
- Promote a workplace environment where employees feel safe to raise concerns without fear of retaliation.
- Ensure that all team members receive appropriate training and understand how to comply with our Code and all relevant Emovis' policies and procedures.

- Avoid behavior that may unintentionally pressure employees into compromising ethical standards or violating Emovis policies.
- Act when potential misconduct is identified by reporting concerns appropriately and supporting employees who speak up.



## Speaking Up and Reporting Concerns

### Speak-up

We all have the **responsibility to speak up** when something doesn't feel right or when misconduct is observed or suspected, including potential violations of our Code, internal policies, or applicable laws and regulations.

If you are unsure whether an issue constitutes a violation, seek guidance from your Line Manager, the Compliance Office ([compliance@emovis.com](mailto:compliance@emovis.com)) or Human Resources Department (People Function).

**Line Managers** must support team members in raising concerns and avoid conducting their own investigations into compliance matters. Instead, concerns must be reported through the appropriate channels.

### No Retaliation

Emovis strictly **prohibits any form of retaliation** against anyone who reports concerns or participates in investigations in good faith. Retaliation may include threats, harassment, demotion, dismissal, or other adverse employment actions.

**Good faith** is defined as providing information honestly and to the best of one's knowledge, regardless of whether the concern ultimately proves to be substantiated.

False reports made knowingly and maliciously are not protected under this statement and may lead to disciplinary consequences.





## Speaking Up and Reporting Concerns

### Report via Ethics & Compliance Line

We and stakeholders can report concerns through the **Emovis' Ethics & Compliance Line**, which is available 24/7, 365 days per year, or email: [compliance@emovis.com](mailto:compliance@emovis.com). Reports can be submitted **anonymously and will be treated with the highest level of confidentiality.**

Reports are received and assessed by the Compliance Office, and investigations may be conducted by the relevant functions. The Corporate Ethics and Compliance Committee of Criminal Prevention oversees the internal reporting system, ensuring concerns are reviewed thoroughly and appropriately.

If you receive a compliance-related concern you must escalate it to the Compliance Office ([compliance@emovis.com](mailto:compliance@emovis.com)) or via the **Ethics & Compliance Line.**

Reporting through Emovis channels does not limit your legal rights. You retain the right to contact trade unions, works council, relevant authorities or government agencies when you use the Ethics & Compliance Line.





# 2

## Our People

- 2.1 Respectful Workplace
- 2.2 Human Rights and Ethical Labor
- 2.3 Health, Safety, and Well-being

### Respectful Workplace

We foster a respectful environment where **everyone is treated with dignity**. We believe that everyone has the right to work free from any form of discrimination, harassment, intimidation, or abuse, prohibiting them in any situation inside or outside Emovis premises.

We recognize and value the unique differences, experiences, and perspectives that everyone brings to Emovis workplace. We believe that diversity strengthens our culture and drives greater innovation, creativity, and excellence..

#### **We strongly advocate for:**

- Equal opportunity in all employment decisions.
- Recruiting, rewarding, and promoting based on merit.
- Preventing discriminatory practices.
- Creating a workplace where all individuals feel included and respected,





### Human Rights and Ethical Labor

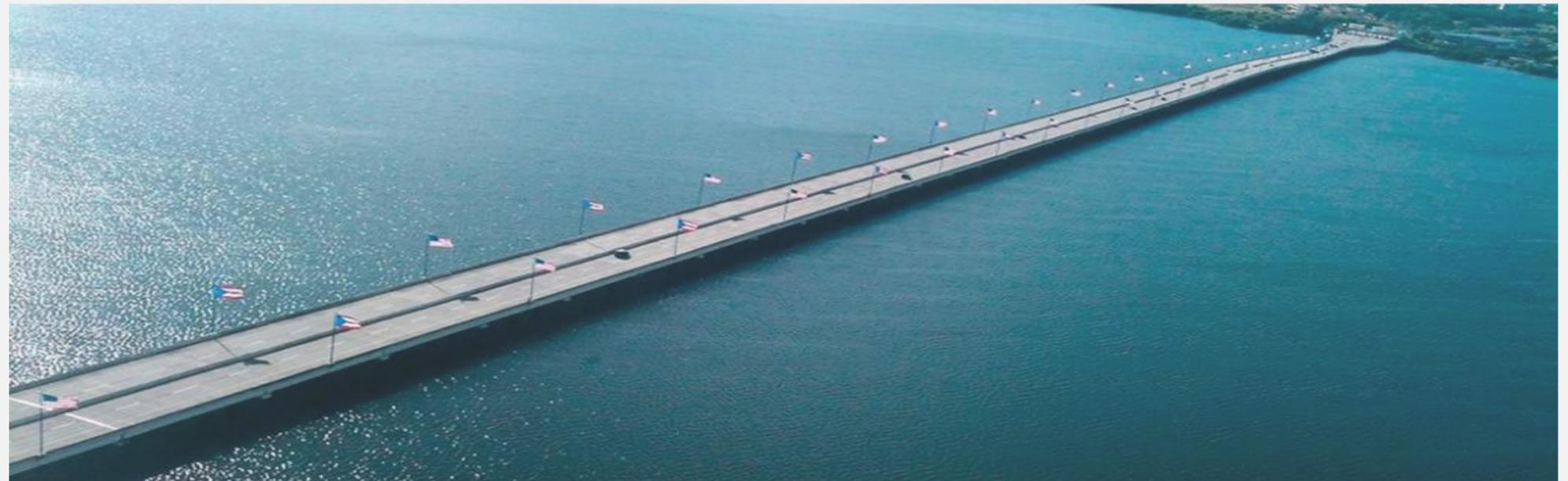
We are fully committed to promoting internationally recognized human rights and labor standards in every aspect of Emovis business operations.

We respect the inherent **dignity, freedoms, and rights of everyone**, actively seeking to avoid involvement in any activity that could lead to human rights violations and will take appropriate measures to address and remediate any adverse impact.

**Emovis strictly prohibit:**

- All forms of forced, coerced, bonded, or compulsory labor, including human trafficking and slavery.

- Child labor in any form, applying strict verification of working age during recruitment.
- Discrimination in any aspect of employment or occupation.
- Retention of identity documents or money deposits as conditions of employment.



### Health, Safety, and Well-being

Emovis is dedicated to providing a safe, healthy, and secure working environment for all of us, customers, partners, and anyone who interacts with our operations. Safety is a **shared responsibility** and a reflection of our core values.

We integrate health and safety considerations into every phase of our **business lifecycle** and expect all to take responsibility for your own well-being and that of others, complying with all relevant health and safety regulations, attending required training, using proper tools and protective equipment.

Emovis strictly prohibits any threaten or violent behavior and working under the influence of drugs or alcohol.

If you see or experience anything that could impact health or safety, you must speak up. Stop work and immediately report any unsafe conditions, incidents, or hazards to your Line Manager, local OHS personnel or Human Resources Department (People Function).



A laptop on a wooden desk displays a video conference with five participants. A hand is visible in the foreground, holding a pen over a document. A smartphone is also visible on the desk to the left of the laptop.

# 3

## Our Business, Customers & Partners

- 3.1 Zero Tolerance for Corruption and Bribery
- 3.2 Putting Emovis' Best Interest First
- 3.3 Extending Emovis' Standards: Business Partners
- 3.4 Competing Fairly and Ethically
- 3.5 Preventing Money Laundering and Terrorist Financing



## Zero Tolerance for Corruption and Bribery

We **conduct business with integrity, transparency, and in full compliance with all applicable anti-corruption laws**, maintaining a strict zero-tolerance policy toward all forms of bribery and corruption, in any location and under any circumstances.

Corruption occurs when someone abuses their professional position to gain an improper advantage for themselves or others. Common examples include offering or accepting bribes, kickbacks, or inappropriate gifts, especially when interacting with Political Exposed Person (“PePs or Public Officials”) or partners.

**Emovis prohibits all forms of bribery, including:**

- Offering, promising, giving, soliciting, or receiving anything of value -whether directly or indirectly - to influence a business decision.
- Providing personal benefits such as cash, loans, vacations, or other non-business-related items.
- Making facilitation payments -payments made to expedite routine government actions.
- Using personal funds or third-party channels to carry out actions that would not be permitted using company resources.
- Providing or accepting anything of value could create even the appearance of improper influence.

**When interacting with PePs**, special care must be taken to ensure compliance with legal and ethical standards. You are required to report meetings with PePs in accordance with the Engagement with PePs Instruction and must avoid any conduct that could be perceived as an attempt to exert improper influence.

You must always ensure that gifts, entertainment, hospitality, sponsorships, donations, and employment opportunities comply with **Emovis policies, regulations and laws**. Emovis also maintains a firm stance on political neutrality: not contributing, directly or indirectly, to political parties or individual politicians.



## Putting Emovis' Best Interests First

We must always prioritize the best interests of Emovis above personal or external interests. A conflict of interest arises when personal relationships, financial interests, or outside activities influence -or appear to influence- our ability to make objective, fair decisions on behalf of Emovis.

**Conflicts of interest** require immediate transparency and proactive management to protect the trust we build, ensuring that our decisions remain free from undue influence or bias.

### You are expected to:

- Identify any situations where your personal interests could conflict with Emovis' interests.
- Disclose any potential or actual conflicts promptly through email to the Compliance Office ([compliance@emovis.com](mailto:compliance@emovis.com)) or Human Resources Department (People Function). Avoid situations that could impair your judgment or create even the appearance of a conflict.

Examples of potential conflicts include:

- Doing business with family, friends, or former colleagues.
- Hiring or supervising someone you have a personal relationship with.
- Engaging in outside employment or business that interferes with your responsibilities at Emovis or involves company confidential information.
- Holding financial interests in suppliers, customers, or competitors that may influence your decisions.





## Extending Emovis' Standards: Business Partners

We believe that our values must extend to everyone we do business with. This includes suppliers, contractors, consultants, distributors, joint venture partners or other third parties who act on our behalf (“business partners”).

We expect all our business partners to uphold the same **high ethical standards** and comply with all applicable laws, regulations, and human rights principles.

### **Our expectations from business partners:**

- Conduct business ethically and legally.
- Protect confidential information.
- Respect human rights, health, and safety.
- Avoid conflicts of interest.
- Engage transparently and honestly.
- Sign and follow Emovis' Code of Ethics and Business Conduct.

### **You are expected to:**

- Act as a responsible steward of Emovis' reputation when engaging third parties.
- Select partners based on merit and a proven commitment to ethical business practices.
- Stay vigilant to warning signs and ensure that all business partners' relationships are actively managed and documented.
- Never allow or encourage a third party to do anything that Emovis team members are prohibited from doing.
- Seek guidance from Procurement or Compliance Office ([compliance@emovis.com](mailto:compliance@emovis.com)) if you have questions about a business partner's relationship.



### Competing Fairly and Ethically

Fair and free competition is fundamental to market economies and benefits all participants. We are fully committed to complying with all applicable antitrust and competition everywhere we operate. Violations of competition laws damage Emovis' reputation and can lead to severe penalties, legal actions, and personal liability.

#### You are expected to:

- Never engage in agreements or discussions with competitors that could restrict competition. This includes price fixing, market allocation, sharing competitively sensitive information, or any cartel-like behavior.

- Avoid discussing prices, discounts, profit margins, market shares, client allocation, or sales territories with competitors. If such topics arise, leave the conversation immediately and notify the Legal department.
- Do not misuse confidential or competitive bidding information belonging to others.
- Always seek legal guidance before including any clauses in contracts with customers or suppliers that may raise antitrust concerns.
- Avoid abusing a dominant market position and follow proper procedures in mergers and partnerships.

If you have questions or concerns about antitrust laws or competitive conduct, consult Legal Department promptly.





### Preventing Money Laundering and Terrorist Financing

We strictly comply with all laws and regulations related to anti-money laundering (AML) and counter-terrorism financing. Money laundering involves disguising the origins of illegally obtained funds to make them appear legal and terrorism financing is the provision of funds or resources to support terrorist activities or organizations.

We are dedicated to conducting business only with reputable partners and ensuring that all funds involved in our transactions come from

**legitimate sources:**

- Verifying the identity and legitimacy of partners, customers, suppliers, and third parties before and during our business relationships.
- Maintaining financial record-keeping and strictly follow AML laws, sanctions, and import/export controls.

- Avoiding any business with individuals or entities suspected of involvement in money laundering, terrorist financing, or illicit activities.
- Cooperating with tax authorities to combat fraudulent tax practices and comply with applicable tax laws.
- Be cautious with unusual payment methods, currencies, or amounts that deviate from agreed contracts.
- Conduct thorough due diligence on business partners to safeguard Emovis' reputation.

**You are expected to:**

- Understand and comply with sanctions, export controls, and licensing requirements before engaging in any business transactions when required.
- Never make or accept payments to/from unrelated third parties, unknown bank accounts, or accounts in countries with weak AML controls, high corruption, or strict banking secrecy laws.



# 4

# Our Company

- 4.1 Safeguarding Company Assets & Intellectual Property
- 4.2 Respecting and Protecting Personal Data
- 4.3 Integrity in Books and Records
- 4.4 Responsible and Consistent Communication



## Safeguarding Company Assets & Intellectual Property

We each play a role in protecting our tools, data, know-how and information that drive our innovation, performance, and long-term success. As stewards of these valuable assets, we each have a duty to use them responsibly and protect them from loss, misuse, or unauthorized access.

### Company assets may include:

- Physical assets: equipment, devices, supplies, and facilities.
- Digital and financial information: data, records, and systems.
- Confidential and proprietary information: pricing strategies, business plans, customer and employee data, trade secrets, and technical know-how.
- Intellectual property (“IP”): inventions, designs, technology, trademarks, and software created at or for Emovis.

- Third-party or partner information entrusted to Emovis under confidentiality.

### You are expected to:

- Use Emovis’ assets only for legitimate business purposes.
- Keep confidential and proprietary information secure and only share it with authorized individuals.
- Never discuss confidential topics in public places, on social media, or over unsecured communication channels.
- Respect ours and others’ intellectual property. Do not attempt to obtain or use third-party confidential information inappropriately.
- Do not take or use Emovis information after leaving the company. These assets always remain the property of Emovis.

- Follow cybersecurity best practices such as keeping devices up to date, avoiding suspicious links or downloads, using strong passwords, and encrypting sensitive emails.
- Report any suspected security threats immediately to Global Security or Local IT Department.



## Respecting and Protecting Personal Data

We believe that respecting people begins with respecting their privacy. In everything we do, we are committed to handling personal data responsibly, transparently, securely and in full compliance with data protection laws.

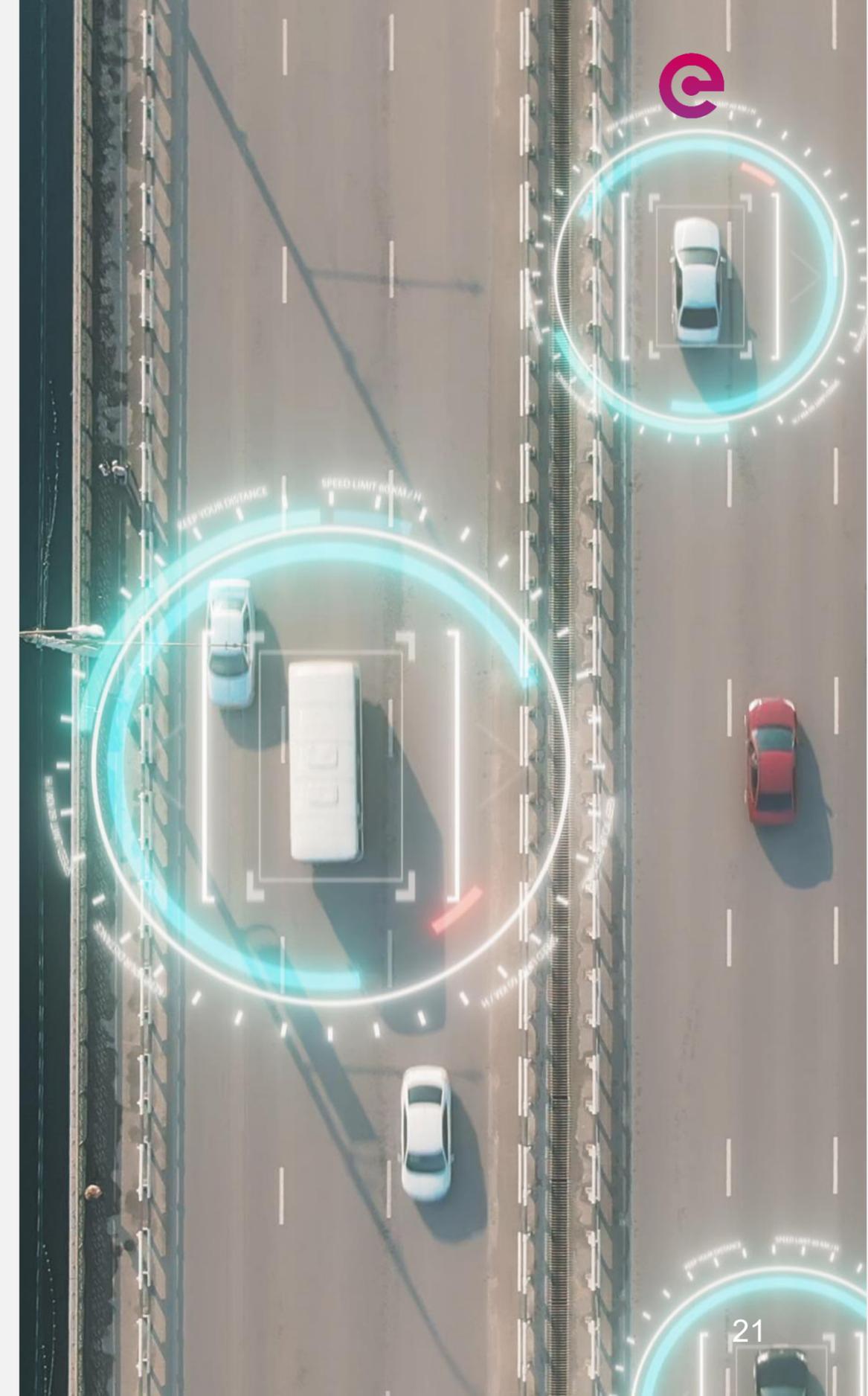
Personal data refers to **any information that can identify an individual, directly or indirectly**. This may include names, home addresses, and contact details; national identification numbers, financial and bank account information; photographs, email addresses, and login credentials.

We are all responsible for safeguarding this information. **You are expected to:**

- Only collect, access, use, or share personal data when authorized and necessary for your work.

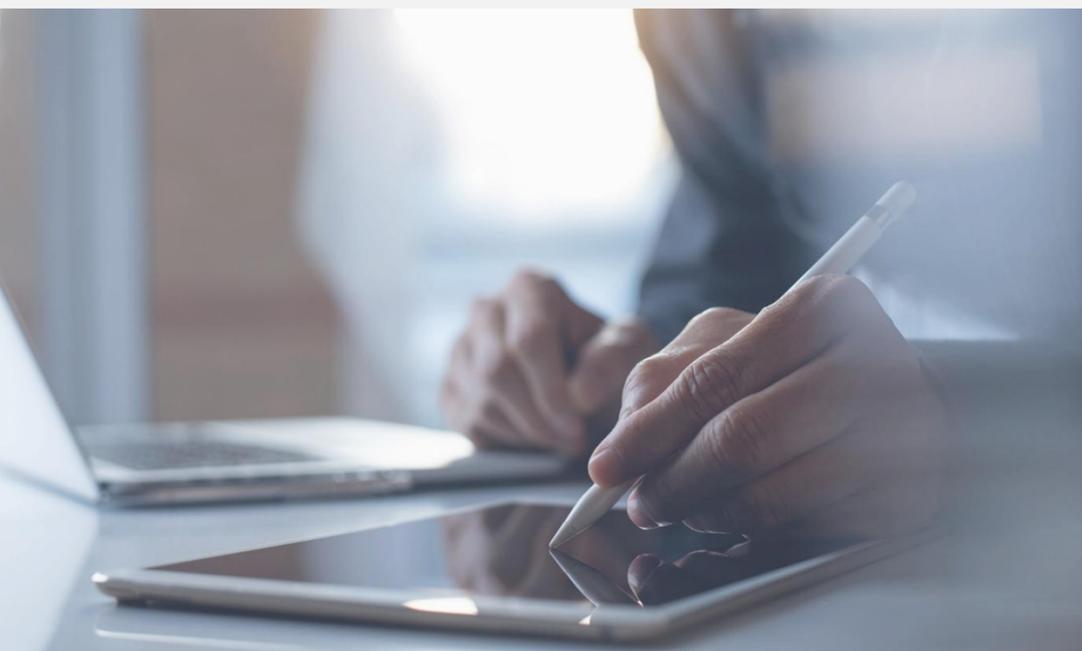
- Understand which types of personal data require extra protection, such as health, financial, or government-issued information, and apply heightened safeguards.
- Ensure data is collected and processed with the individual's awareness and, where required, their consent.
- Store personal data only on Emovis approved systems and tools.
- Report any suspected data breaches, misuse, or unauthorized access immediately to [dpo@emovis.com](mailto:dpo@emovis.com).

If you are unsure how to handle personal data, consult your Line Manager or Data Protection Officer.





## Integrity in Books and Records



Books and records integrity is fundamental to how we build trust with our colleagues, customers, partners and regulators. We all must safeguard our books and records ensuring the reliability of our business information. Fraud, false records, or attempts to bypass internal controls are strictly prohibited and may result in disciplinary actions or legal consequences.

### You are expected to:

- Never make false, misleading, or incomplete entries in financial documents, reports, or systems.
- Record all financial transactions completely, accurately, and in a timely manner in line with Emovis' accounting policies and legal requirements.
- Use the correct general ledger ("GL") accounts and verify costs regularly for accuracy.
- Only enter into written contracts with customers, vendors, or third parties, and ensure they reflect the true substance of the transaction.
- Avoid vague, questionable, or poorly documented third-party invoices or payments.
- Comply with signature, approval, and spending authority processes before committing Emovis to any financial obligation.
- Ensure all expenses and supporting documentation are complete, truthful, and clearly justified.
- Never destroy, alter, or conceal records in response to or in anticipation of an audit, investigation, or legal matter.
- Report any suspected fraud, irregularities, or financial misconduct immediately to Finance Department, Legal Department, or through Ethics and Compliance Line.

## Responsible and Consistent Communication

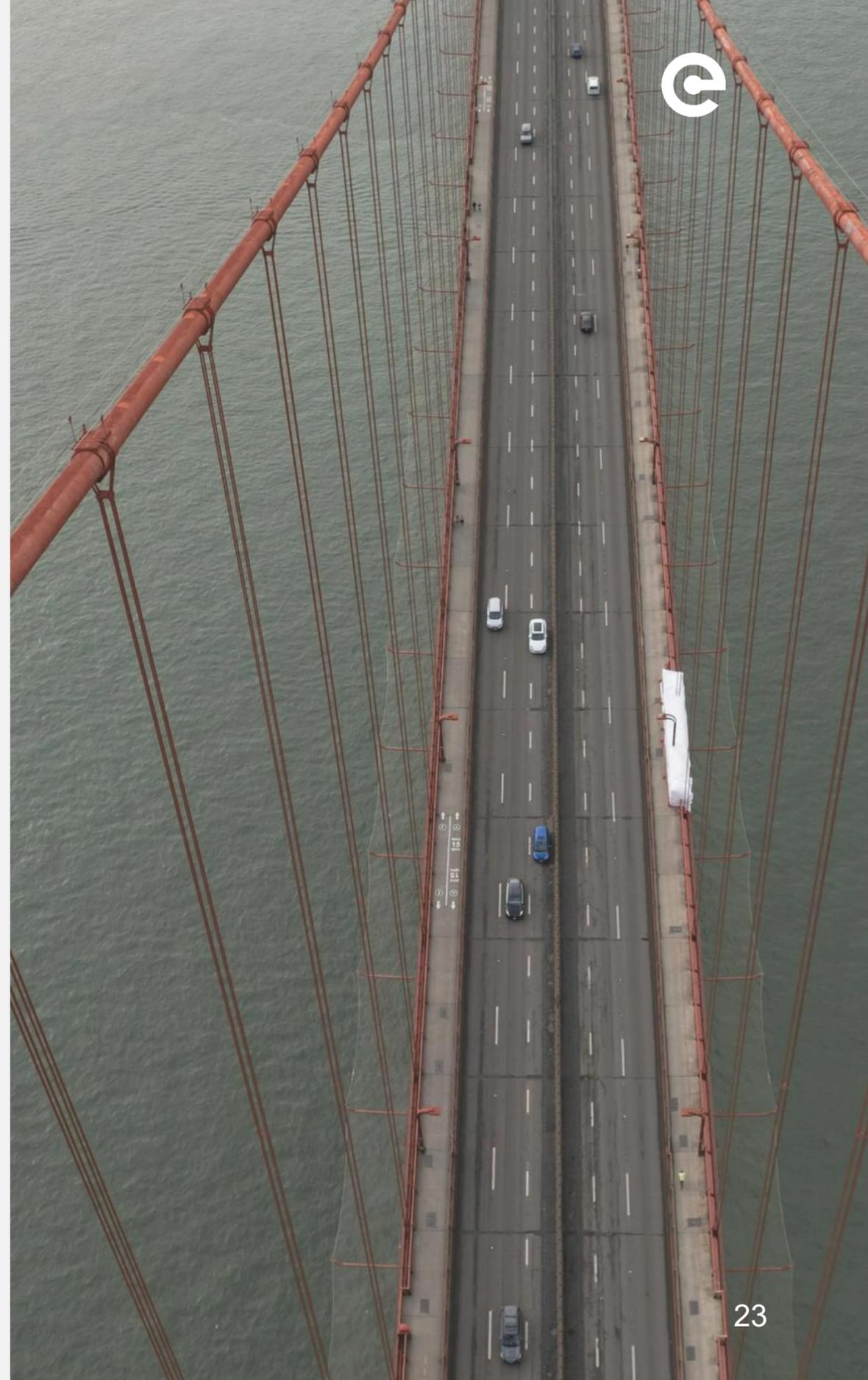
How we communicate—both inside and outside the company—shapes **how we are perceived and trusted** by our customers and business partners. To protect Emovis' reputation and ensure consistent messaging, only authorized individuals may speak on behalf of the company.

All external communications, including those with the media, events, or public forums, must follow company **communications guidelines** and be coordinated with the Marketing and Communications Department.

To maintain responsible and ethical communication, **you are expected to:**

- Never speak on behalf of Emovis unless you are specifically authorized to do so.

- Refer all media inquiries to the Marketing and Communications Department.
- Clearly state that opinions expressed on personal platforms are your own, unless you are acting in an official, approved capacity.
- Do not share confidential, non-public, or sensitive company information—internally or externally—unless you are authorized, and the recipient is legitimated to know.
- Do not engage in or share false, misleading, or harmful information, and never post anything that could damage Emovis' reputation.
- Use sound judgment, professionalism, and respect in all forms of communication, whether written, spoken, or online.





# 5

# Our Social & Environmental Engagement

## 5.1 Sustainability and Social Impact



### Sustainability and Social Impact

Our commitment to sustainability and social impact is a vital extension of our core values. We recognize that our responsibility goes beyond business success; it includes contributing positively to the communities we serve and protecting the environment for future generations.

#### Giving Back to Communities

We actively **empower and support local communities** to drive meaningful, lasting impact. Our initiatives are carefully assessed to ensure alignment with Emovis' strategic priorities. We strive to support initiatives that generate the greatest social value, upholding rigorous due diligence to avoid any conflicts of interest or association with improper practices.

#### Environmental Stewardship

Emovis is committed to **minimizing the environmental footprint** of our operations, products, and services. Sustainability is embedded across all units and processes, guiding us to reduce negative impacts on ecosystems, especially focusing on reducing carbon footprint of our organization and activities.

Every employee is **expected to:**

- Support Emovis' environmental goals and contribute actively to reducing the impact of our operations, products and services.
- Comply with all relevant environmental laws, regulations, and standards where we operate.
- Ensure transparency by providing accurate environmental data and documentation.





**Ethics at the Core.  
Mobility for the Future.**

**2025**