CODE OF ETHICS AND BUSINESS CONDUCT

1. Message from the Global Managing Director

At SUNCO Group (hereinafter, "SUNCO") we are aware of the importance of basing our activity on the most rigorous ethical standards, always in compliance with the applicable regulations and legislation.

Therefore, the Board of Directors of SUNCO CAPITAL GREEN ENERGY INVESTMENTS SL (parent company of the SUNCO Group) has approved this Code of Ethics and Business Conduct (hereinafter, the "Code"), which establishes the guidelines for action that should govern both the relationships within the Group and the relationships maintained externally within the framework of the professional activity of SUNCO. This Code should be handed over to our suppliers and service providers, among others.

Likewise, our commitment to transparency, good governance and integrity has led us to agree to implement a Compliance Management System (hereinafter, "CMS").

The purpose of the CMS is to safeguard compliance in our organization with the applicable policies, procedures and mechanisms to our Group.

Furthermore, an Ethical Channel has been implemented and it is available to all SUNCO employees, as well as SUNCO's stakeholders to communicate any unethical conduct or any conduct contrary to current legislation and regulations.

It is not only important to achieve our objectives, but also how we achieve them. This is essential.

Thank you for ensuring compliance with this Code of Ethics and Business Conduct.

Sincerely yours,

Julia Sáez Bea

Global Managing Director of SUNCO Group

2. Purpose and Scope

The purpose of this Code is to establish ethical standards and business conduct in relation to our responsibilities. Although it is not possible to gather every situation or circumstance that we may encounter in our day-to-day business, the Code establishes a framework for our decision-making.

The Code is applicable to all companies of SUNCO Group and it is mandatory for all its executives, members of the various administrative bodies, employees, shareholders, collaborators, service providers, and representatives, as well as those who have completed their employment or statutory relationship, interns and/or job candidates (hereinafter, "**SUNCO Persons**"), regardless of their function, hierarchical level, rank, position, seniority, type of contract or the geographical location where they perform their work.

The communication of the Code will be take place, (a) in the case of employees, executives, collaborators and service providers, at the time of hiring, being incorporated a copy of it to the respective contract becoming an integral part of it and, therefore, implying the assumption of its compliance with part of the obligations assumed by the corresponding SUNCO Person; and (b) in relation to the rest of SUNCO Persons, they will be given a physical copy of the Code as soon as possible, and they must expressly accept its compliance by signing it.

Likewise, the ethical standards and behavioral guidelines contained in the Code may be extended to all those individuals and/or legal entities with whom we maintain professional and/or commercial relationships, such as clients, service providers, suppliers, collaborators, advisors and other stakeholders.

The guidelines contained in the Code shall not replace, in any case, the precepts established in the regulations in force and applicable in any geographical location where SUNCO's professional activities are carried out.

The Code shall be applied jointly and simultaneously with the rest of any of the protocols, regulations and internal policies.

The Code shall be updated whenever the organization deems it necessary, and the Compliance Officer (as defined in section 5 below) undertakes to communicate this update to all SUNCO Persons.

3. Principles of the Code of Ethics and Business Conduct

The company's culture and values (integrity, commitment, curiosity, adaptability and teamwork) inspire the ethical principles of this Code, in addition to being based on compliance with the regulations and legislation in force and applicable in all our areas of activity.

The Code is based on the following ethical principles:

- Compliance with applicable legislation in force.

- Respect for Human Rights.
- Respect and equal treatment: Zero tolerance for discrimination and harassment
- Transparency, good faith and honesty.
- Health and safety.
- Zero tolerance for corruption and bribery in any form.
- Prevention and management of conflicts of interest.
- Environmental protection and respect.
- Confidentiality of personal data.

4. Ethical and Business Conduct Guidelines

Our activities must be developed in a safe and trusting environment with all our stakeholders, where excellence and compliance with the expectations they place on SUNCO are prioritized. Therefore, we require:

4.1 Compliance with applicable legislation in force.

4.1.1. Compliance with legislation

All personnel must act in accordance with applicable legislation in force, avoiding any conduct, practice or behavior that contravenes the law and may be considered illegal or unethical.

4.1.2. Intellectual and industrial property

We respect our own or third parties' intellectual and industrial property rights even when the labor or professional relationship with SUNCO has been terminated. It is strictly forbidden to reproduce, distribute, plagiarize, transfer or copy any product without the prior written authorization of its owner.

4.1.3. Confidentiality and Trade Secrets

SUNCO Persons shall refrain from disclosing to any person or company, in Spain or abroad, any information relating to SUNCO's affairs, activities, contracts, finances, business contacts, customers or any other matter relating to SUNCO, without express authorization from SUNCO, except where necessary for the performance of their duties or where such disclosure is in the best interests of SUNCO. In addition, SUNCO Persons shall adopt all necessary measures to prevent the publication of trade secrets or any other type of information.

SUNCO Persons, and any other third parties (with whom ad hoc confidentiality agreements should be reached) shall maintain strict secrecy regarding any confidential information concerning the details and peculiarities of the operations and activities of the Group and/or its subsidiaries or associated companies, i.e. any information of any nature that is not generally known outside the Group.

The obligation to keep trade secrets means that SUNCO Persons may not make use of any information relating to SUNCO's transactions or potential transactions, nor may they disclose to anyone, except with express authorization from SUNCO, any confidential information or trade secrets relating to the activities of SUNCO or its affiliates, nor may they provide any information about inventions, research, business plans or market studies conducted or contracted by or for SUNCO and/or its subsidiaries and affiliated companies.

In any event, SUNCO Persons, and any other third parties (with whom ad hoc confidentiality agreements should be reached) agree to, at their sole discretion, either destroy or return to SUNCO any documents, samples, materials, drawings or plans relating to SUNCO's activities that it may have in its possession when it terminates their relationship with SUNCO.

Any breach of the obligation of secrecy described herein shall be just cause for disciplinary dismissal or contractual termination with any third party, and SUNCO may, if it deems appropriate, claim appropriate compensation for damages caused.

4.2 Respect for Human Rights

At SUNCO we respect, protect and promote the human rights recognized in the Universal Declaration of Human Rights proclaimed by the United Nations General Assembly in Paris on December 10, 1948, and the main international agreements in this regard.

4.3 Respect and Equal Treatment: Zero tolerance for discrimination and harassment

We promote a safe, inclusive, respectful, dignified work environment, free of any type of physical violence, sexual, psychological or workplace harassment, practicing zero tolerance for any of the aforementioned situations.

We firmly condemn any type of act or conduct of discrimination based on sex, gender, ideology, religion, sexual orientation, illness or functional diversity in the organization.

4.4 Transparency, good faith and honesty

At SUNCO we maintain a relationship of trust with our stakeholders based on honesty, transparency and the application of good faith in the performance of our competencies.

4.4.1. Corporate image and reputation

The image and reputation of the organization is an essential asset to preserve and generate trust in our stakeholders.

Statements and publications on behalf of SUNCO shall be carried out only by authorized persons, and corporate logos and material shall only be used when authorized to do so.

SUNCO's social media shall only be used by those authorized to do so and after the approval of the Group's chief executive.

4.4.2. Responsible use of information assets and IT resources

SUNCO Persons are obliged to a responsible use of the assets and resources provided, using them exclusively for the performance of professional purposes. Nevertheless, a personal use is not excluded, as long as it is moderate and does not influence the development of daily work.

Therefore:

- SUNCO's guidelines on computer security must be followed, as well as requesting authorization from the person directly responsible for the installation of specific applications necessary to perform our work.
- It must not be installed, used or distributed software or files that could affect the security of the systems, make unauthorized copies or perform actions that allow the entry of computer viruses.
- In relation to corporate email accounts, they shall be used responsibly and shall be intended for professional use, as it is a work element owned by SUNCO.
- SUNCO’s devices (inside and outside the work environment) shall be used in a responsible manner.
- SUNCO must be immediately notified of the loss of any portable device.
- Any damage, malfunction or improper content must be reported upon receipt of the equipment so that the incident can be resolved.
- Any misuse of information assets and IT resources, if detected, must be reported.
- In case it is necessary due to the role occupied by any SUNCO Person, he/she must make responsible use of remote access to the information systems, and therefore may use such remote connection only for strictly work-related purposes, complying at all times with the confidentiality obligations set forth in the corresponding contract and in the Code itself.

Also, under Article 20.3 of the Spanish Workers' Statute Law, SUNCO is empowered to adopt the measures it deems most appropriate for monitoring and control to verify compliance by SUNCO Persons to whom it applies, of their obligations and duties, keeping in its adoption and implementation due consideration for their human dignity and taking into account the actual capacity of disabled workers, if any. In this sense, SUNCO guarantees:

- That its control will be limited to verifying that the e-mail is used for the purpose for which it was intended. The messages contained therein will be accessed when there are indications of activity contrary to the Code and the provisions of the respective contract, that is, in case of having detected an abusive, illegitimate use or because it is considered that it affects the optimal development of the activity, although it will be avoided at all times violating the privacy of SUNCO Persons.
- That monitoring shall not be used as a means of access for control purposes, as long as such access is indispensable, avoiding direct access to the equipment of the affected SUNCO Person, this monitoring shall only be authorized as a last resort in exceptional cases.
- That if any SUNCO Person is absent from his or her place of work for an extended period of time, for an entirely work management purpose, SUNCO will be able to access the SUNCO Person's equipment.

In addition, SUNCO will back up the entire system.

4.5 Health and safety

Ensuring and promoting a safe and healthy work environment is essential for the development of our activity during the working day. We work to avoid and prevent dangerous situations that may pose a risk to the mental and physical integrity and/or health of SUNCO Persons.

We inform our immediate superior and/or the Compliance Officer (as this term is defined in section 5) of any safety deficiencies for their immediate correction, and we encourage respect for and compliance with health and safety regulations in the workplace, taking care of our own safety and that of our coworkers.

4.6 Zero tolerance for corruption and bribery in any of its forms

4.6.1. Against corruption and bribery

We maintain honest and transparent relationships with our stakeholders and do not tolerate corruption in any form. Furthermore, we prohibit any practice aimed at influencing people to obtain any benefit through unethical practices.

We also do not accept gifts or hospitality that may influence a business, professional or administrative relationship, unless they are of irrelevant value.

4.6.2. Compliance with accounting, tax and fiscal obligations.

At Sunco, we comply with our tax obligations and enter financial information into SUNCO's systems completely, clearly and accurately in accordance with applicable regulations.

4.7 Prevention and management of conflicts of interest. Exclusivity.

SUNCO Persons should not put their personal, financial or other interests ahead of SUNCO's interests, nor engage in activities that may directly or indirectly harm SUNCO's interests or in activities that compete or may compete with SUNCO, unless expressly authorized in writing by a member of SUNCO's executive team.

In case of being in a situation of conflict of interest, real or potential, SUNCO Persons must inform their immediate superior and/or through the channels enabled by the Ethical Channel (as this term is defined in section 6) so that the appropriate preventive measures are taken and refrain from participating in the corresponding activity or decision.

SUNCO Persons agree, during the entire term of their relationship with SUNCO, not to provide employment or professional services to any other person or entity, even when the activity of such other person or entity does not represent competition for SUNCO, except with the prior written authorization of SUNCO.

If a SUNCO Person has made any investment prior to the signing of his/her contract, it must be immediately notified to SUNCO to exclude that particular investment from this exclusivity commitment.

4.8 Environment protection and respect

Respect for and protection of the environment and the surroundings where we operate is a maxim for SUNCO. That is why we are committed to reducing the impact of our activity on the environment regarding Greenhouse Gas Emissions (GHG): we calculate our Carbon Footprint annually.

Furthermore, we strive to reduce and correctly manage the waste generated by our activity, we are committed to an optimal and responsible consumption of electricity, water, other natural resources and fuels, and we use environmentally friendly materials and products whenever possible.

4.9 Confidentiality of personal data

In accordance with the General Data Protection Regulation (GDPR), SUNCO Persons must ensure the confidentiality of data in the performance of their activities in compliance with current data protection regulations. In addition, legitimate and appropriate databases must be managed in favor of the exercise of data subjects' rights.

5. Internal regulatory compliance oversight bodies

SUNCO's Board of Directors, as the ultimate responsible for the implementation and promotion of effective regulatory compliance oversight measures:

- It has approved the implementation of a Compliance Management System (hereinafter, "CMS"), whose main objective is to safeguard the observance in our organization of the policies, procedures and mechanisms applicable to our Group, respecting the current and applicable legislation, ensuring compliance with the regulations.

- It has set up a Compliance Committee (as this term is defined in the "*CMS Procedure: Structure and Roles"*), which is the entity's body that, in a coordinated manner and with the support of the Board of Directors, will ensure the correct implementation of the CMS.

In addition, the Compliance Committee:

- It has approved the "*Compliance Management System (CMS) Procedure: Structure and Roles"*.

- It has appointed a Compliance Officer (as this term is defined in the "*CMS Procedure: Structure and Roles*"), who will be the person in charge of managing, supervising and communicating the implementation of any of SUNCO's protocols, regulations and policies in collaboration, support and supervision of the Compliance Committee. In addition, the Compliance Officer will act as Secretary of the Compliance Committee, being responsible for presenting the items to be discussed in the agenda and compiling all the necessary documentation for the meetings of the Compliance Committee.

- It has appointed a Data Protection Officer (as this term is defined in *the* "*CMS Procedure: Structure and Roles*"), whose function will be to ensure compliance with current data protection regulations.

- It has created an Ethical Channel available to all the company's stakeholders to report possible breaches of the Code and/or any of the regulations, policies and procedures in force and applicable.

- It has approved the "*Protocol for the Operation of the Ethical Channel*".

6. Ethical Channel

This channel has been created to allow any person involved in the Sunco Group's activities to communicate or report facts, irregularities, risks, actions or omissions that may involve the commission of offences, breaches of the regulations and laws applicable to the Group, as well as conduct contrary to the Group's protocols and procedures or to ethics. This is therefore an effective communication mechanism for any communication made by a whistleblower involving an action or omission that may constitute (I) relevant unlawful conduct under Italian Legislative Decree no. 231 of June 8, 2001, or breaches of the relevant organizational and management models adopted by the Italian companies of the Sunco Group pursuant to the aforementioned Legislative Decree; or (II) a serious or very serious criminal or administrative offence or that may constitute a breach of European Union law provided that:

1. Enter within the scope of the European Union acts listed in the Annex to Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019;

2. Affect the financial interests of the European Union; or

3. Impact on the domestic market.

That said, in the event that information outside this material scope of application is communicated, Sunco reserves the right to pursue its investigation, but the reporter would not be covered by retaliation protections.

Any other doubts, complaints or queries about your employment situation should be channeled through the corresponding procedures other than the Ethical Channel.

6.1. Means of communication

The means of communication established for the Ethical Channel are:

- Face-to-face meeting upon request by the informant, which will be held within a maximum period of 7 days. The meeting may be requested by telephone: (+34) 689 70 22 54.
- Specific forms available to interested parties to be sent to the Ethical Channel. The minimum content shall be as follows: the date of the day on which the communication is submitted and the facts that are the object of the complaint (data of the person or persons involved in the facts, date of the facts reported and list of the facts to be reported).
- E-mail: canaletico@sun.co
- Postal mail to the attention of Ethical Channel: CALLE GOYA 6, Planta 2,28001, MADRID

Communications regarding indications or suspicions of non-compliance will be handled in accordance with the provisions of the "*Protocol for the Operation of the Ethical Channel*". Likewise, the channels indicated may be used to resolve questions, interpretations or concerns about the Code of Ethics and/or the operation of the Ethical Channel.

It is understood that, with respect to the Italian companies of the Sunco Group, the protection provided by Legislative Decree 23/2024 does not apply to reports received by e-mail. Therefore, in order to exercise this protection, it is necessary for the informant to use the other forms of reporting indicated above.

6.1.1. Confidentiality of the use of the Ethical Channel

SUNCO guarantees the confidentiality of the people who make use of the Ethical Channel as well as the management of all personal data of those involved in the procedure in accordance with current and applicable regulations on data protection.
In addition, any form of retaliation against those who make communications in good faith and on the basis of reasonable grounds is prohibited.

This channel has been created so that any person related to the activity of the Sunco Group can communicate or report facts, irregularities, risks, actions or omissions that may involve the commission of crimes, breaches of regulations and laws that apply to the Group, as well as conduct contrary to the protocols and procedures of the Group or ethics. The controller of personal data is Sunco Capital Green Energy Investments, S.L. The main basis of legitimacy of the processing of personal data is the public interest (article 6.1.e of the RGPD) although there may be a legal obligation (article 6.1.c of the RGPD) and legitimate interest (article 6.1.f of the RGPD). Your data will not be disclosed to third parties unless they have to be made available to Judges and Courts. Personal data will only be kept for the time necessary to decide whether to initiate an investigation into the facts reported. In any case, they will be physically deleted after three months, unless the purpose of the conservation is to leave evidence of the functioning of the model of prevention of the commission of crimes by the legal person, in which case they will be anonymized.
Communications that have not been acted upon may only be recorded anonymously in the Ethical Channel procedure, without the obligation to block provided for in Article 32 of Organic Law 3/2018, of December 5, being applicable.
All the information provided is confidential and, in NO CASE, the personal data of the informant are known to the person(s) reported, having taken all necessary measures to preserve their identity. We ask you for data and contact information in order to request, if necessary, more information, but they are not mandatory fields.

At any time, it can be exercised the rights of access, rectification, deletion, opposition, limitation and portability, by sending a written communication to the email address info@sun.co. In any case, a complaint can be filed in the AEPD through its website: www.aepd.es.

Access to the data contained in connection with the Ethical Channel procedure shall be limited to the members of the Compliance Committee and the Compliance Officer in accordance with their powers and functions as defined in the "*Compliance Management System Procedure (CMS): Structure and Roles*".

6.1.2. Disciplinary measures for violations of the Code of Ethics.

Certain violations of the Code contravene applicable law and could have serious consequences for individuals, including fines, penalties or imprisonment.

In addition, SUNCO, upon such failures by SUNCO Persons to comply with this Code or any of SUNCO's internal regulations, policies and procedures or applicable law, will impose disciplinary action, up to and including termination of employment, in strict compliance with applicable labor laws and regulations.

Regarding any non-compliance by any third party, appropriate measures will be taken in accordance with the contractual relationship with them, also considering the legislation and regulations in force.

6.2 How can we know if a conduct, action or decision is contrary to the Code of Ethics?

We must ask ourselves the following questions: Is it illegal? Does it violate any law? Is it contrary to the values or principles of the entity? If our conduct were made public, would it be considered unprofessional or inappropriate?

If the answer to any of the questions is YES, we must refrain from such conduct. Likewise, if you have doubts about the compliance of an action with the Code of Ethics, you should consult with your immediate superiors and/or submit the doubt through the Ethical Channel.