

Aqualia **MACE**

Code of Ethics and Conduct

Version Approved by the Aqualia Mace
Board of Directors on February 9, 2022

Aqualia Mace vision defines the future to which we aspire and brings purpose to our actions. We all share the same culture and support the same project.

Vision

Offering comprehensive and innovative solutions for efficiently managing resources and improving infrastructures while contributing to improve citizen quality of life and the sustainable progress of society.

Mission

Efficiently and sustainably design, implement and manage environmental services, end-to-end water management and major infrastructure construction works to improve the lives of citizens.

Values

Results-oriented approach

We pursue improvement and endeavour to achieve goals with a view to making Aqualia Mace a benchmark in profitability and competitiveness.

Honesty and Respect

We want to be recognised as acting with honesty and integrity, earning the trust of our collaborators, clients and providers as preferential long-term partners.

Diligence and Professionalism

We are scrupulous in our work and oriented towards customer service, nurturing our teams' capacity to seek efficient and innovative solutions.

Loyalty and Commitment

We favour diversity, advocate professional development and acknowledge achievement and creativity as the driving force of productivity and progress.

Community well-being and development

We are aware of the value that our services bring to society and are committed to environmental protection and the development and well-being of the communities where we work.

Our Code of Ethics and Conduct provides practical insight into the values shared between FCC Aqualia and Mace for enabling a more robust culture of compliance and supporting the creation of long-term value for our project.

Adherence to the content of the Code may under no circumstances contravene applicable legislation, though should such a situation arise, the content of the Code would be adapted in line with the legal provisions.

The Aqualia Mace Code of Ethics and Conduct

The purpose of the Code of Ethics and Conduct is to encourage all persons having links with Aqualia Mace to observe the most stringent conduct guidelines in their commitment to complying with laws, legislation, contracts, procedures and ethical principles.

Compliance with this Code is mandatory for anyone related to Aqualia Mace, regardless of the type of contract or agreement defining their labour relationship, job position or geographical location in which they carry out their work.

The conduct guidelines in the present Code of Ethics and Conduct also apply to providers, contractors, collaborators and other partners to adopt principles and values similar to the ones set forth herein.

Ethics and compliance model

The Aqualia Mace ethics and compliance model was created to forestall and detect compliance-related risks, including risks related to criminal offences, and minimise the potential impact thereof. The present Code constitutes the highest level guideline of this model, implemented through policies, procedures and internal controls that are regularly reviewed and updated.

This model is adapted to the Aqualia Mace's activities by regularly analysing risks, defining responsibilities and expected conduct, and allocating resources to train employees. Processes are also in place to assess the organisation's level of compliance and ethical corporate culture, and to detect, report and address potential irregularities.

The Board of Directors is responsible for approving the Compliance Model and the Code of Ethics and Conduct, and, ultimately, for ensuring an ethical corporate culture.

Aqualia Mace applies the principle of due control to promote compliance with applicable internal and external regulations, and to prevent, detect and eradicate conduct that is irregular, inappropriate or contravening these regulations.

Ethics and compliance principles

- You must know and observe the pertinent legislation in force in your work.
- You must apply the Code's guidelines to your individual conduct, encourage application thereof throughout the organisation, contribute to generating a culture of compliance, and prevent and correct any conduct that contravenes the Code.
- You must inform the Whistleblowing Line of any conduct that comes to your attention that you believe to be in violation of the Code.

Compliance principles

We observe legislation in force and abide by the rules

We are committed to carrying out our business and professional activities in accordance with the legislation in force wherever we engage in such activities.

We display exemplary conduct

Our practices safeguard the reputation of Aqualia Mace and exemplify ethics, diligence, professionalism and honesty.

We are diligent and accountable for our actions

We apply a standard model of ethics and compliance based on due control with a view to preventing, detecting and eradicating irregular conduct.

Throughout Aqualia Mace, we believe that applying the principle of due control in ethics and compliance includes assessing the ethics and compliance models of our related third parties.

We report irregularities

We bring any incidents or irregularities of which we are aware to the attention of the organisation through the channels in place to do so.

Honesty and Respect

1. We observe legislation and ethical values.
2. Zero tolerance for bribery and corruption.
3. We prevent money laundering and the financing of terrorism.
4. We safeguard free competition and best market practices.
5. We exemplify ethical conduct in the securities market.
6. We avoid conflicts of interest.

Diligence and Professionalism

7. We are diligent in terms of control, reliability and transparency.
8. We safeguard the reputation and image of Aqualia Mace.
9. We use the company's resources and assets efficiently and safely.
10. We oversee the ownership and confidentiality of data and information.

Loyalty and Commitment

11. Our clients are the focal point.
12. Health and safety are paramount.
13. We promote diversity and fair treatment.
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Regulatory compliance is always our starting point

At Aqualia Mace, we are committed to carrying out our business and professional activities in accordance with the pertinent legislation in force and the company's rules and procedures, wherever we operate, including regulations related to international sanctions or restrictive measures, export or import control and dual-use products, as well as the company's rules and procedures.

Respect for the dignity of individuals and their basic rights is a cornerstone of the Aqualia Mace's conduct

All Aqualia Mace employees are required to support this principle, carrying out our professional activities with absolute respect for, and guaranteeing, human and civil rights.

Honesty and compliance with legislation and the rules of the company must be a permanent feature in the day-to-day conduct of all Aqualia Mace employees, and particularly of Aqualia Mace management

Conduct that is concordant with the company's values is part of the criteria used for recruiting and evaluating Aqualia Mace employees, and when necessary, applying disciplinary measures.

Be mindful of the following in particular

Aqualia Mace fosters a relationship of reciprocal cooperation with the authorities of the countries in which it operates. All Aqualia Mace activities must satisfactorily meet their requirements, including tax and social protection obligations, ensuring that state grants, subsidies and other funds extended to Aqualia Mace are used solely and diligently for the purpose for which they were awarded.

In addition to complying with the legislation in force, compliance with the Aqualia Mace's policies and rules is also mandatory and incorporate the requirements of the voluntary principles to which the company has committed, including the United Nations Global Compact, ILO Declaration on Fundamental Principles and Rights at Work and other ILO Conventions.

You should specially consider

Sanctions and International Embargoes

In general, international sanctions and embargoes are coercive measures applied against States, non-state actors or individuals who pose a threat to international peace and security. The most frequent measures are prohibitions of conducting trade or financial activities and bans on visas or travel restrictions imposed by a multilateral agency or state.

The sanctioned countries can be consulted in the following information links:

<https://sanctionssearch.ofac.treas.gov/>
<https://www.sanctionsmap.eu/#/main>

Dual Use Products are defined as products, including software and technology, that can be used for both civil and military or nuclear purposes.

You should be particularly watchful and, in case of doubt, check with the Compliance Function:

- Trade, financial, import and export operations with sanctioned countries, persons or entities.
- Any operations related to Dual Use Products.

Zero tolerance for bribery and corruption

2

Zero tolerance

Aqualia Mace does not tolerate corruption, the giving or receiving of bribes, or any form of extortion. It is prohibited to influence the will of third parties in order to gain an advantage, preferential treatment or a guarantee of obtaining benefits for the company, yourself or others, through any type of payment or consideration, whether monetary or in kind, either directly or via third parties.

Relations with clients, providers, partners, collaborators and persons or entities that have, have had or could have business in common with the Aqualia Mace, must be conducted by authorised persons and respect the limits stipulated in this Code.

Giving and receiving of gifts and invitations

No gifts other than the customary business courtesies or token offerings may be given, and under no circumstances may the purpose of any such gift be to receive preferential treatment in any activity that may be linked to Aqualia Mace.

The requesting or acceptance of gifts, payments, commissions or any other items for personal benefit is not permitted, whether from current or prospective clients, or from providers or persons related, or seeking to be related, with Aqualia Mace, or from those acting on their behalf. This encompasses the rendering of personal services, offers of work, travel, preferential treatment, special discounts and any other item of value.

Be mindful of the following in particular

Gifts and invitations

The rules laid down in this Code aim to be flexible so as to take into account the different customs and practices of the various locations worldwide in which the company carries out its business, and sufficiently objective to provide useful guidance. This approach allows for the acceptance or giving of promotional gifts, customary business courtesies and token offerings provided all of the following circumstances are present:

- They are not prohibited by law.
- They cannot be considered inappropriate or unprofessional.
- They must be given or received in a transparent manner and only occasionally, and must respect commercial practices and generally accepted social courtesy norms.
- They must have a fair value. Generally speaking, gifts that do not exceed 655 AED in value, or the equivalent in the relevant currency, are deemed to have a fair value. When calculating the amount, all gifts and courtesies received from or given to a third party in a six-month period shall be taken into account.
- They may not be in the form of monetary amounts, securities or items that are readily convertible to cash.
- They must not be accepted or given if they may be perceived as intended to influence professional decisions, in view of the timing or for other reasons.
- They must not have been requested.

Lunch invitations and invitations to sporting, cultural or training events

In general, invitations to lunches and events are acceptable if they are reasonable. Those not exceeding 325 AED per person are generally considered reasonable, taking into account the location, context and nature of the event, and provided they are consistent with the guiding principles.

Attendance at seminars and activities of a purely training-oriented nature are not deemed to be personal benefits, unless the cost, location, context or extras are not suitable for purpose.

We are always on the alert to prevent unlawful activity

At Aqualia Mace we are especially diligent as regards compliance with legislation relating to money laundering and/or the financing of terrorism.

As a rule, Aqualia Mace does not allow cash payment or collection. Exceptions in this regard must be duly documented and authorised, be for a small amount, which must in any case be less than 4,300 AED for payments to third parties, and observe the pertinent local legislation in force.

For jurisdictions and activities in which Aqualia Mace is subject to supervisory and reporting requirements, the implemented due diligence measures must comply with the pertinent legal provisions.

Pay particular attention to the following

- The effective identity of the third party with whom we will be working: client, partner, provider, NGO, etc.
- The origin of the funds we receive as payment.
- Payments received in instalments or structured to avoid any of the registers or systematic reporting in place under the applicable legislation on the prevention of money laundering and terrorist financing.
- Payments that may directly or indirectly be used, in part or in their entirety, to engage in terrorist activities.
- Payments that may not have a commercial purpose or for which there may be no reasonable explanation.
- Payments to and collections from bank accounts, persons or entities residing in tax havens.

We safeguard free competition and best market practices

4

Our goal of becoming a benchmark in the market is a responsibility, not just an advantage

We abide by the rules and principles of free competition of all the markets in which we operate. We act with loyalty, avoiding any conduct that constitutes or could constitute collusion, abuse or restriction of that freedom.

Aqualia Mace prohibits conduct that could hinder the development and continuity of effective competition.

We avoid any conduct that could entail price abuse or manipulation.

Avoid the following under all circumstances

- Abuse of power or a dominant market position.
- Conversations and agreements with competitors who are seeking to coordinate their market activity.
- Fraud in tenders, including the decision as to which parties should be invited to submit a tender and which should be excluded, the terms and conditions of their proposals, price-setting, and any exchange of information regarding the foregoing terms which takes place in conditions that exclude third parties.
- The use of advertising that is misleading or could place the products of competitors and the companies that manufacture them in unfounded disrepute is expressly rebuked.

Access to information with market impact entails restrictions and responsibilities that you must be aware of and observe

Aqualia Mace has internal regulations that are consistent with the obligations laid down in securities market legislation. Aqualia Mace employees and related parties subject to such internal regulations must conform to the restrictions on the use of insider information to which they have access through their professional activity.

In this regard, insider information is construed as any specific information that has not been made public and which, had it been publicised, could have, or would have had, a significant influence on the listed price of marketable securities or financial instruments that fall within the scope of application of the Securities Market Act, or on the issuers thereof.

Pay particular attention to the following

- When liaising with third parties, safeguard any information that could affect the listed price of any of the Aqualia Mace divisions.
- Safeguard sensitive information and do not share with third parties any material information that is not publicly available, either for your own personal benefit or for the benefit of related persons or third parties, or with the intention of changing the markets.
- Do not make transactions with assets and securities on which you have insider information.

We avoid conflicts of interest

Duty of loyalty

In carrying out our professional duties, we must act with loyalty and defend the interests of Aqualia Mace, avoiding any situations that could give rise to a conflict between our own personal interests and those of the Company. In the discharge of their duties, Aqualia Mace employees may not act in the interests of personal benefit, either present or future, whether their own or that of related persons.

Board members and directors must also know and apply commercial legislation and Regulations of the Board of Directors in terms of conflicts of interest and in the application of the duty of loyalty in relation to related-party transactions.

Consult the Whistleblowing Line for the following cases, which could entail a conflict of interest

- Involvement, directly or through a related party, in any financial transaction or operation with Aqualia Mace.
- Capability to make decisions on, negotiate or execute contracts on behalf of Aqualia Mace with related or legal persons in which the employee, either directly or through a related party, has financial or personal interests.
- Significant shareholder, director, board member, executive, etc., whether directly or through a related party, of a client, provider or direct or indirect competitor of Aqualia Mace.
- When required to supervise the work or performance of related parties.

- The decision-maker in a tender is a related party.
- In an audit or a review by a regulator or supervisor, the team leader or a team member is a related party.
- Access to hierarchically or functionally dependent positions of a family member is subject to the employment policy of family members in the company and must be authorized by the Human Resources Department.

Related parties are

- The employee's spouse or domestic partner.
- The parents, children and siblings of the employee or spouse (or domestic partner) thereof.
- The spouses or domestic partner of the employee's parents, children and siblings.

Diligence and Professionalism

7. We are diligent in terms of control, reliability and transparency
8. We safeguard the reputation and image of Aqualia Mace
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10. We oversee the ownership and confidentiality of data and information

We are diligent in terms of control, reliability and transparency

7

Information on Aqualia Mace must be drawn up with maximum reliability, complying with applicable legislation and company rules, and diligently safeguarded and archived

We are responsible for carrying out our duties in accordance with the rules and procedures of the company so that we can be accountable for our actions at any given time.

Transparency is a fundamental principle for Aqualia Mace. All our employees must collaborate with internal and external control areas, supervisors, regulators and administrative or legal authorities, addressing their requests and requirements, and quickly and accurately providing the information they need on aspects within our remit.

Pay particular attention to the following

All transactions, income and expenses are to be appropriately accounted for, recognised and documented in their entirety as and when they arise, without omitting, concealing or altering any data or information, such that the accounting and operating records give a true and fair view of the actual situation and can be verified by the control areas and by the internal and external auditors.

Failure to follow these guidelines could be considered fraud.

Evading the company's internal controls will result in a penalty.

We safeguard the reputation and image of Aqualia Mace

8

We are all responsible for safeguarding the image and reputation of Aqualia Mace

Media relations with Aqualia Mace and its employees are to be conducted solely by the Managing Director or employees who have been granted express authorization.

Employees must refer any calls, requests for information, questionnaires or similar approaches from the media to their Responsible Department.

Pay particular attention to the following

- Information on Aqualia Mace's results and business performance must always be managed by the areas and bodies charged with investor relations.
- No information published via the Aqualia Mace's internal channels may be published in external media without the authorisation of the Managing Director.
- Setting up social media accounts (websites, blogs, etc.) for Aqualia Mace it is only allowed under the Managing Director authorization.
- Only employees who have been granted express authorization may post information or opinions via Aqualia Mace's social media accounts, and they must apply the internal rules of conduct and act respectfully when doing so, using good judgement and common sense, choosing the information they share carefully.
- In your own personal use of social media, you must not refer to your employee status or make any other reference whereby the published content could be attributed to Aqualia Mace.
- Only use the corporate identity (logo, brand) and Aqualia Mace's name to enable you to carry out your professional activity satisfactorily, and in accordance with the internal guidelines on brand usage.

The company's assets must be safeguarded and used responsibly and efficiently

Aqualia Mace provides its employees with the necessary means and resources to carry out their professional activities. These must be used efficiently and in accordance with internal regulations, and the necessary measures must be taken to prevent their loss or theft, or any damage or deterioration thereto.

Aqualia Mace has internal regulations to ensure that employees are making appropriate, lawful and responsible use of Technology resources, which include IT tools and e-mail.

We are all accountable and responsible for acting with due diligence. We cooperate with both administration and audit divisions of Aqualia Mace in their monitoring and control of the use of these resources when they so require.

Pay particular attention to the following

- Safeguard the company's assets and reputation.
- Comply with the regulations on physical and information security, immediately reporting any security breach, suspected attack, manipulation or unlawful use you may observe.
- Note that any information created, received, sent, downloaded, stored or processed by any means may be accessed, reviewed, copied, recorded or deleted by Aqualia Mace in accordance with the approved internal procedures.

We oversee the ownership and confidentiality of data and information

10

We are all obliged to safeguard information and data to prevent unauthorised access

As employees of Aqualia Mace, we often handle confidential information of an economic, financial, technical, personal, business or administrative nature (hard copies or in digital format), which is of great value to Aqualia Mace and is subject to intellectual property and data protection laws in the jurisdictions in which we operate.

Anyone working for Aqualia Mace is required to comply with the company's current rules on Information Security and Data Protection, and to respect the measures in place within Aqualia Mace to prevent external parties and employees from accessing such information and/or data without authorisation.

Remember that the duty of confidentiality remains in force even after your relationship with Aqualia Mace has ended.

Pay particular attention to the following

Information that is the property of the company must only be used for work-related purposes.

Software usage must always be in accordance with the licence terms and conditions and must not infringe third-party rights.

All passwords are the property of the company.

Loyalty and Commitment

11. Our clients are the focal point
12. Health and safety are paramount
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Our clients are the focal point

11

Our clients are at the core of our activities. We therefore endeavour to forge long-lasting relationships that are based on mutual trust, honesty and professional responsibility, and which bring added value to our clients

We focus our efforts on getting to know our clients, offering products and services that meet their needs, pursuing excellence and prioritising customer satisfaction in our service offering.

We devise, design and market products and services of the highest quality, bringing value to our clients that sets us apart with respect to other market offerings.

We encourage commitment to innovation.

We are fair in our client relations

We describe the characteristics of our products and services transparently, providing information that is thorough, true, complete and easy to understand.

We respect the commitments undertaken and act with integrity.

Achieving our goal of zero accidents is everyone's responsibility

Occupational health and safety is a distinguishing factor for Aqualia Mace, and an essential requirement in protecting the health and safety of our employees and collaborators. Aqualia Mace has a strategy and specific occupational health and safety action plans in place that is consistent with the legislation in force.

All employees are required to comply and ensure compliance with the health and safety regulations and the rules regarding the use of personal protective equipment.

Pay particular attention to the following

Do not take risks that could jeopardise anyone's physical integrity or their health. Strictly comply with the health and safety regulations for your own protection and that of other employees and third parties.

Use the equipment assigned to you responsibly, especially when carrying out high-risk activities, and encourage compliance with risk prevention practices.

Working under the influence of alcohol or drugs is prohibited. Consult the medical service if you are taking medication that could affect your safety as you carry out your work.

Aqualia Mace is committed to generating a healthy living culture through initiatives aimed at promoting physical exercise and healthy eating, prompting employees to look after their health and well-being, and encouraging adoption of healthy habits, thereby reducing accident rates and absenteeism.

We aim to create a fair and diverse working environment that fosters professional and personal development

Fair treatment is a guiding principle. Aqualia Mace devises programmes, internal procedures and initiatives aimed at creating an enriching working environment that is free from discrimination of any kind and favours diversity.

When hiring and promoting employees, Aqualia Mace always bases its decisions on achievement and on objective and transparent performance evaluations.

We do not tolerate

- Direct or indirect discrimination regarding gender, race, age, nationality, religion, sexual orientation, disability, family origin, language, political ideology, membership of a political party or trade union, or any other factor bearing no objective relationship to working conditions, regardless of whether contemplated or not in the applicable legislation of the pertinent jurisdiction.
- Mobbing or sexual harassment.

We are committed to our environment

14

Our mission includes working towards sustainable development, and we therefore endeavour to make efficient use of resources and minimise our environmental impact

Aqualia Mace operates under the following premises:

- Efficient use of resources.
- Prevention of negative environmental impacts and the protection of ecosystems and historical, cultural and archaeological heritage.
- Reduction of greenhouse gas emissions.

We strictly comply with environmental legislation and act according to a principle of prevention

Aqualia Mace executes and collaborates on environmental protection projects. Employees may not liaise with any agency, civil servant or government representative, the media or the authorities without the authorisation of the pertinent department.

Be mindful of the following in particular

Familiarise yourself with the Aqualia Mace's Environmental Policy and encourage its application within the scope of your functions, and demonstrate your commitment to the criteria of respect and sustainability it embodies. Adopt best practices to make a positive and effective contribution to the achievement of objectives. Endeavour to minimise the environmental impact of your activities and use of the facilities, equipment and work resources at your disposal, seeking to use them efficiently.

Help in promoting best practices in the companies with which we collaborate by sharing your knowledge, being constantly vigilant, and enhancing the implementation of the different activities in which they take part. Insist on compliance with the environmental requirements applicable in each case.

When in doubt, be cautious

Conserve natural areas

If your work at Aqualia Mace involves you in urban development, building or land transformation projects, be sure that these respect the cultural, historical, artistic and natural heritage that could be affected.

Seek efficiency

As a guideline, minimise waste and pollution, conserve natural resources, and promote energy savings and emissions reduction.

Investments in the community must be transparent and adequately documented

Aqualia Mace works in the development of society and citizens, transparently promoting a range of initiatives and projects to meet relevant social needs.

The sponsorships, collaborations and donations undertaken by Aqualia Mace will be extended, observing objective criteria associated with its activities, to prestigious and ethically minded entities that have a suitable organisational structure to guarantee the correct administration of such resources.

Any collaboration or sponsorship, including those accorded in kind, must be duly authorised, documented and, wherever possible, monitored to ascertain the ultimate purpose or the use made of the contribution.

All sponsorships and donations must be authorised

Investments in the company: sponsorships, collaborations, donations and voluntary work must be authorised by the Managing Director.

This concept includes any services rendered as well as the granting of facilities, services or products to clients or providers.

We extend our commitment to our business partners

16

In our relations with providers, contractors, partners and collaborators, we seek to establish a balanced and transparent collaboration framework that fosters stable, long-lasting business relationships which maximise the benefits for all parties

At Aqualia Mace, we share our commitment to ethics and compliance by promoting up-to-date workplace health and safety practices and encouraging collaborations with those who conform to advanced social, environmental and ethical standards. They may do this by adhering to this Code, including specific clauses in contracts or having compliance models in place that are compatible with the Aqualia Mace's model.

Our partners, collaborators and providers must

Demonstrate ethical conduct in their business relations and openly reject corruption, bribery and fraud.

Protect human rights and the fundamental labour rights acknowledged worldwide in the Universal Declaration of Human Rights and in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and other ILO Conventions.

Display a high level of commitment insofar as meeting workplace health and safety standards, guaranteeing a safe and healthy working environment and proactively implementing measures that help to minimise workers' exposure to risk.

Respect the environment in all their activities not only by complying with legislation but also by undertaking their activities so as to minimise negative environmental impacts and engaging in sustainable environmental management. Specifically, when providers conduct their activities at Aqualia Mace premises, they should ensure that their employees are aware of and comply with the applicable internal and external environmental regulations.

We will undertake due diligence procedures for the purpose of complying with these principles, considering ethical aspects and the professional and financial suitability of the parties with whom we do business.

What we expect of everyone working at Aqualia Mace

Aqualia Mace will not tolerate any manner of noncompliance with the Code of Ethics and Conduct. No employee, no matter what their category or position, is authorised to request that other employees breach the guidelines set forth in the Code.

Failure to comply with this Code could give rise to disciplinary measures in accordance with labour legislation and applicable legal liabilities.

Know, understand and apply the conduct guidelines laid down in this Code and its implementing and complementary policies and procedures

While this Code does not encompass all the situations that could arise, it nevertheless establishes clear conduct guidelines. Your obligation is to apply the principles that gave rise to the Code in every decision you make. If you are in doubt over any particular case, you should consult the Compliance Function.

Consider the following before making any decisions:

Does it contravene any laws or regulations?

Does it go against the values and policies of Aqualia Mace?

If my conduct were made public, would it be considered inappropriate or unprofessional?

Always be cooperative and responsible with regard to identifying situations of actual or potential noncompliance with the ethical principles and rules of conduct contained in this Code.

Prevent misconduct. It is your obligation to report any inappropriate conduct you hear of or witness through the Whistleblowing Line

Whistleblowing Channel

The Whistleblowing Line is a tool available to all employees to assist in identifying potential noncompliance with or breaches of the Code of Ethics and Conduct and the associated regulations, and to anticipate potential weaknesses with a view to reinforcing the culture of compliance within Aqualia Mace. You may also use it for consultations and to make suggestions aimed at improving internal control.

Communications through the Whistleblowing Line are received and processed by the Compliance Function and confidentiality is guaranteed.

Investigation

The Compliance Function investigates all reports promptly and diligently, recommending the appropriate measures to resolve the issue. Information is analysed applying objective and unbiased criteria.

Anti-retaliation measures

It is strictly forbidden to take any measures whatsoever against a Aqualia Mace employee as retaliation for having reported an irregularity.

False reports

Appropriate disciplinary measures will be adopted when internal investigation finds that an irregularity has been reported falsely and in bad faith.

You may report any potential infringement of the Code of Ethics and Conduct or the associated regulations using the following channels:

E-mail:

whistleblowingline@aqualiamace.com

Post:

Post office box 19312
28080 Madrid
Spain

Solemn declaration Informed and in agreement

The employees are periodically required to sign a solemn declaration undertaking to abide by the Code of Ethics and Conduct of Aqualia Mace.

By signing this declaration, I hereby certify that:

I am aware of and have read the Aqualia Mace Code of Ethics and Conduct.

I understand the obligations, prohibitions and conduct guidelines set forth therein.

In my professional duties, I act in accordance with its principles and values, and comply with the provisions thereof.

I collaborate with the Compliance Function in applying the Code of Ethics and Conduct.

I am aware that Aqualia Mace has a procedure in place for reporting non-compliance and that it is my obligation to report through this procedure any instances of non-compliance that come to my attention.

I collaborate to instil a culture of compliance, I lead by example and I encourage the channelling and resolution of doubts regarding the Code of Ethics and Conduct.

NAME:

SIGNATURE:

DATE:

The Code of Ethics and Conduct is regularly updated to incorporate new regulatory requirements, improvements arising from compliance reviews and best practices. Visit the Aqualia Mace's website (www.aqualiamace.com) to view the valid version.

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