



arteche

# The energy that moves us

CODE OF CONDUCT

ARTECHE Group  
2024



# 1

## Index

Our purpose is to ensure universal access to clean, efficient and quality energy | 1

# 2

## How do we relate to each other?

### Proximity and commitment | 4

To whom does this code apply? | 4

Leading by Example | 4

### Proximity and commitment to people | 5

People's safety, health and wellbeing come first | 5

We respect and support Human Rights | 6

We offer equal opportunities | 6

We develop our people | 6

We respect privacy | 7

We make responsible use of Artech's resources | 7

Our work environment is respectful, transparent and honest | 8

### Proximity and commitment to the environment | 9

We care about the environment | 9

Sustainable development | 10

Our commitment to local communities | 10

Institutional Relations | 10

# 3

## How do we do business?

### Collaboration and perseverance | 12

We are transparent with information | 12

We offer quality solutions | 13

Avoiding conflicts of interest | 13

Our financial records are true and complete | 14

We comply with anti-money laundering laws | 14

We do not tolerate any type of corruption | 15

We respect our business partners | 15

We compete fairly in the marketplace | 16

We export and import in compliance with national and international laws | 16

Protecting trade secrets and confidential information | 16

We do not make improper use of insider information | 17

We protect our assets and those of third parties | 17

# 4

## How do we apply our Code?

Compliance & Sustainability Leader | 19

Our Ethics and Compliance Committee | 19

Our Governing Body | 19

Ethical channel | 20

Guarantees of use of the ethical channel | 21

# 1.



# Our purpose is to ensure universal access to clean, efficient and quality energy



We were born in Vizcaya more than 75 years ago and today, we are one of the technology companies at the global forefront of electric energy. We have achieved this because we work in a culture of collaboration and responsibility towards all the people with whom we interact and in all the communities in which we have a presence.

A way of being in which our **Values** of: **Closeness, Trust, Commitment** and **Constancy** are so internalized that they allow us to develop energy products, solutions and services: innovative, reliable, competitive and adapted to any need of our customers. In Arteché we call it **the energy that moves us** because that energy is generated thanks to our passion and our vocation to always offer the best solution.

Our conviction is that finding solutions to the challenges of our society requires an **open, generous and collaborative attitude** so that all the agents involved innovate hand in hand.

Achieving our purpose is a challenge that can only be met by merging **the skills, knowledge and energy of everyone**.

Our code of conduct is based on our **values** and unwavering **integrity**. In Arteché, all of us work with **trust, closeness and commitment** with the people with whom we relate in our day-to-day work. It is essential to continue developing the business in the **honest and transparent** way we have always done, with a focus on success and long-term sustainability, with a firm commitment to ethics and compliance with the law, doing things right.

**CLOSENESS,  
TRUST,  
COMMITMENT,  
CONSTANCY**



# 2.

How do we relate  
to each other?



# 2.1

## Proximity and commitment



### To whom does this code apply?

The Code applies to **all of us who are part of Arteche worldwide**, including directors, officers, officers and employees of all Arteche Group companies and entities in which Arteche has a controlling interest or exercises effective control. In those in which we do not have a controlling interest or effective control, we will make good faith efforts to implement the Code or a similar set of integrity policies.

Arteche people who work with **third parties**: suppliers, consultants, agents, sales representatives, distributors and independent contractors, must:

- › Inform them of our policies and code of conduct and require their acceptance.
- › Correct them upon learning that a third party did not comply with compliance policies.

With the commitment of all persons subject to this Code that we comply with the principles contained herein, as well as with the laws, rules and regulations applicable in the place where we carry out our activity, and that we act with the utmost respect for internationally accepted ethical practices, in accordance with the Fundamental Rights and Public Freedoms contained in the Universal Declaration of Human Rights and the commitments acquired when signing the United Nations Global Compact.

### Leading by Example

As leaders, we have the responsibility to create a **culture of values, closeness, honesty, trust and commitment** in our teams and with all the people with whom we interact. We must lead by example and be a role model for **transparency** and compliance.

Our responsibilities include preventing, detecting and acting on potential non-compliance issues:

#### Prevent:

- › Promote a culture of values and transparency in our teams, always acting as a model and example of professional ethics, not only with words but also with actions.
- › Ensure that everyone in our team knows and understands this Code, and receives appropriate training on the principles contained in it.
- › Ensure that the people in our charge strictly comply with the Code and never encourage or issue orders that go against ethical behavior.
- › Know and comply with the policies, laws and regulations that apply to Arteche. If we are not sure if this is the case, ask the Compliance department.

#### Detect:

- › Conduct periodic compliance reviews with the help of Compliance or internal audits.
- › Implement control measures to detect compliance risks and violations.

#### Act:

- › Proactively communicate and document any potential non-compliance observed or expressed by any person with whom you interact on a day-to-day basis.
- › By not communicating, you may be complicit in a situation that puts the company at risk.

**WE HAVE THE  
RESPONSIBILITY  
TO CREATE  
A CULTURE  
OF VALUES,  
CLOSENESS,  
HONESTY, TRUST  
AND COMMITMENT**

# 2.2 Proximity and commitment to people



## People's safety, health and well-being come first

At Arteche we guarantee that people perform their duties in safe and healthy places. Our workplaces not only comply with health and safety regulations, but also with the highest international standards.

Safety and health management is integrated into all our processes; Arteche people are responsible for ensuring that operations and workplaces are safe and that we are trained in health and safety.

We transmit these principles and demand compliance with health and safety requirements in our relations with the entire

value chain: suppliers, customers and other collaborating companies.

We report all opportunities and risk situations that can continuously improve our health and safety systems.

**We care about the emotional, physical, social and mental health and well-being of all people** so that together we can build a more resilient organization in which we can offer the best of ourselves.

**WE CARE ABOUT THE EMOTIONAL, PHYSICAL, SOCIAL AND MENTAL HEALTH AND WELLBEING OF ALL PEOPLE**

5



## We respect and support Human Rights

We are committed to respecting all regulations governing human and labor rights recognized in national and international legislation.

We align ourselves with the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the ILO Social Policy, among others.

We support the elimination of all forms of child, illegal and forced labor.

We are committed to respecting freedom of association and collective bargaining at all our locations.

We support and respect the rights of ethnic minorities and indigenous peoples in the places where we operate.

We treat those who are part of our business and value chain with fairness and respect.

## We offer equal opportunities

Our most important asset is our **people**; at Arteche we come from different countries and cultures, we **value this diversity** and consider it as one of our strengths.

We respect people regardless of their origin, age, marital status, sexual orientation, ideology, religion, race, sex or any other physical, personal or social condition.

**We promote** real **equality** of treatment between Arteche's professionals, men and women, going beyond the locally applicable laws, both in terms of access to employment, training, professional development and access to goods and services.

We create an open and safe work environment that facilitates the integration and reconciliation of professional, personal and family life.

We select and evaluate people based exclusively on their academic, personal and professional merits.

We promote the training of our people, fostering **equal opportunities** and the development of their professional careers.

**Our ambition is to be one of the most egalitarian, diverse and supportive companies in the world.**

**OUR AMBITION IS  
TO BE ONE OF THE  
MOST EGALITARIAN,  
DIVERSE AND  
CARING COMPANIES  
IN THE WORLD**



6

## We develop our people

We encourage the **personal and professional growth of all the people** who belong to Arteche's team, making them part of our successful business project and guaranteeing them a dignified and secure job in a diverse and inclusive environment.

We consider our human team to be the driving force of the organization and therefore we invest the necessary resources in developing and motivating the people who are part of Arteche in different ways.

We are committed to an attractive work environment in which, in addition to **attracting and incorporating talent**, we are able to **identify and enhance the talent of the people we already have**. We have a shared project in which each person feels a fundamental part of our achievements.

We recognize and reward the talent of our professionals based on objective and professional criteria.

We are committed to continuously update our knowledge by taking advantage of Arteche's training programs.

## We respect privacy

We respect the **right to privacy** of all persons with whom we interact professionally. We take special care with any personal, medical or financial data.

We do not disclose personal data of Arteche's professionals, unless they give us their consent, or in those cases in which we have legal obligation, or we must comply with judicial or administrative resolutions.

We only process personal data for the legally or contractually stipulated purposes.

We avoid any behavior within our private life that may interfere with Arteche's reputation.

## We make a responsible use of Arteche's resources

We have the necessary and adequate resources and means for the development of our professional activity, which Arteche provides us with. We commit ourselves to make an **appropriate, safe and responsible** use of them. We avoid a use contrary to the legislation or internal regulations.

The resources and means that Arteche puts at our disposal are for strictly professional purposes, so any information they contain or generate will not be considered in any case private or confidential. Occasional personal use of Arteche's e-mail, network and Internet systems is acceptable, as long as it is limited and does not interfere with our work obligations.

Arteche will be able to supervise the use we make of the resources and means at our disposal, in the performance of its control functions.

We do not use our information and communication systems to transmit any message that may be considered offensive or inappropriate.

We do not download, access or install software that is not authorized or licensed for use or download on our information systems.



7



## Our work environment is respectful, transparent and honest

We communicate with each other in a **respectful, professional and transparent** manner. We support dialogue and discussions to get to know the opinion of the people of Arteche.

We are diverse, from different geographies, cultures and time zones. We take all this into account when communicating, knowing that this diversity may cause messages to be interpreted differently from the initial objective.

We use the communication channels that Arteche makes available to us in a responsible manner, verifying that what we transmit is appropriate, complies with the principle of trust and facilitates a good working environment.

**RESPECTFUL,  
PROFESSIONAL  
AND  
TRANSPARENT  
INTERNAL  
COMMUNICATION**



## 2.3 Proximity and commitment to the environment



### We care about the environment

We are responsible with our environment, meeting or exceeding the **environmental standards** of the countries in which we operate.

We consider our environmental impact in all major decisions, and seek to minimize it by seeking **efficient use of resources, minimizing waste and pollution, promoting energy conservation**, and conducting and sponsoring research and development projects that promote environmental protection.

We assume our responsibility for the conservation of natural resources and the preservation of biodiversity, and **work to reduce the environmental impact of our products and services** throughout their life cycle, from design to the end of their useful life.

We promote knowledge, responsibility and commitment in relation to the prevention of environmental risks.

We hope that our value chain - suppliers, customers and partners - will share our commitment to environmental protection.

**WE WORK TO REDUCE THE ENVIRONMENTAL IMPACT OF OUR PRODUCTS AND SERVICES**



## Sustainable development

We are committed to society, an indispensable basis for sustainable development in Arteché. To this end, we promote initiatives that improve the quality of life of the communities and countries where we operate.

All Arteché people must contribute to the achievement of Arteché's sustainability goals, supporting **economic progress, governance, environmental care and social development**. We promote the support of charitable, educational and community service activities.

We offer our clients a quality service in a responsible and efficient manner.

In Arteché we understand sustainability as a **creation of value shared** with our stakeholders. The people who are part of the Group, with our customers, our suppliers, and with the whole of the society in which we develop our activity are a fundamental part in the development of our business in a sustainable way.

## Our commitment to local communities

We work to establish strong relationships in the communities with which we interact in the places where we operate. These relationships are based on mutual recognition and respect, trust, participatory dialogue and, ultimately, the **creation of shared value**.

We provide opportunities to local suppliers, promote local employment opportunities, collaborate with universities near the locations where we operate to create collaboration agreements with students and promote volunteer actions in our communities.

## Institutional Relations

We relate to authorities, regulatory bodies and public administrations in general with **transparency, institutional respect and cooperation**. We rigorously comply with the specific legislation and regulations of the governmental companies or public entities with which we have a relationship, acting at all times with total transparency and honesty and fulfilling all contractual and legal obligations. We pay special attention to international provisions on corruption and bribery.

In relations with the Public Administration we must ensure traceability as to the origin and destination of funds, and transparency as to the nature of any contract that may exist between the parties.

We do not give money or gifts in order to facilitate or expedite procedures or formalities of a Public Administration.

**TRANSPARENCY,  
INSTITUTIONAL  
RESPECT AND  
COOPERATION**



10



# 3.

How do we do  
business?



# 3.1

## Collaboration and perseverance



### We are transparent with information

All the people that make up Arteché must **act in a reliable and transparent manner**, and ensure the **reliability and rigor of the financial and non-financial information**, both for internal use and that supplied to the market, providing truthful, complete, understandable and timely information.

No Arteché person will intentionally provide incorrect, inaccurate or imprecise information that may mislead the recipient, or that may affect the Group's market value.

With this objective in mind, a series of specific rules are described below, addressed to all persons involved in the process of preparing Arteché's financial and non-financial information:

- › Act with honesty and diligence in the process of preparing the information.
- › Ensure that all information recorded is derived from transactions and operations actually carried out and that they have been collected at the appropriate time.

- › Ensure that information is recorded accurately, accurately reflecting the totality of transactions.
- › Record and prepare the information in accordance with applicable laws and regulations, and in the case of financial information, under generally accepted accounting principles.
- › Comply with the Group's policies and procedures and follow an effective internal control system.
- › Update and maintain all the knowledge necessary for the performance of the activities developed in the process of elaboration of the information.
- › Correct or report for correction any errors detected that affect the reliability of the information.
- › To inform, as appropriate, the Audit and Compliance Committee, which reports to Arteché's Board of Directors, of any situation that implies a breach of the rules set forth herein.

**ACT IN A  
RELIABLE AND  
TRANSPARENT  
MANNER, AND  
ENSURE THE  
RELIABILITY  
AND RIGOR OF  
FINANCIAL AND  
NON-FINANCIAL  
INFORMATION**

#### Confidentiality of information

The persons of Arteché have the duty to know and comply, as far as applicable to them, with the provisions of the Internal Code of Conduct in matters related to the Stock Market. The persons who have access to any privileged information of the companies of the Group, as this term is defined in the aforementioned regulations, will abide by the obligations, limitations and prohibitions set forth in said regulations and, in particular, will refrain from:

- › To prepare or carry out any kind of transaction in the securities or instruments to which the inside information relates (including the cancellation or modification of an order relating to the security or instrument, where the order was given before the person concerned became aware of the inside information), cancel or modify an order relating to negotiable securities or financial instruments, where the order was given before the person concerned became aware of the inside information.
- › Communicating such privileged information to third parties, except when it is appropriate in the normal exercise of the work or position.

- › Recommending or inducing a third party to acquire or transfer securities or instruments affected by inside information or to cancel or modify an order relating thereto or to cause another to acquire or transfer them or to cancel or modify an order relating thereto on the basis of such information.

Persons must not incur in the improper use of privileged information, they must not use it neither for their own benefit nor for the benefit of third parties. In particular, until information on Arteché's financial results, activities, plans, contacts, product presentations or planned transactions is publicly disclosed, it is considered inside information belonging to the Group and is confidential. Only authorized persons may have contact with analysts and the press. Any information given to the media that is of a financial nature or of such a nature as to influence the opinion of the persons to whom it is addressed on the value of the company must be approved in advance by an authorized person.

## We offer quality solutions

One of our main objectives is to guarantee the quality of our products and services. **Continuous quality improvement** is fundamental to our organization's strategy and to achieving our objectives.

We involve all areas of the organization to promote a culture of quality and report any problem. **Quality is the responsibility of everyone** who works at Arteche.

We comply with all laws and regulations regarding the quality, safety and performance of our products in all countries in which we operate.

The quality of our products and services is a fundamental part of our reputation.

**QUALITY IS THE  
RESPONSIBILITY  
OF ALL THE  
PEOPLE WHO  
WORK AT ARTECHE**



## We avoid conflicts of interest

We are committed to make any decision within Arteche prioritizing the interests of the business over our personal interests.

We do not allow our personal, financial, political, social or family relationships or activities to influence our professional responsibilities at Arteche and interfere with our independence.

We never abuse Arteche's reputation and influence in such a way as to call his good name into question.

We are aware that, even if there is no real conflict of interest, the mere appearance that it may exist may generate problems for us personally and for Arteche, so in case of doubt we immediately communicate it to our manager.

Unless authorized, we do not do business with companies owned or controlled by an Arteche person, or even a family member of an Arteche person.

We do not invest in a supplier, competitor or customer of Arteche if we have direct relations, participation in the selection or evaluation, or negotiation with it.

We do not work for, or provide services or advice to, current or potential customers, competitors or suppliers with whom we deal as part of our work at Arteche.

We do not work with hierarchical dependency with immediate family members or people with whom we are closely related (up to the fourth degree).



## Our financial records are accurate and complete

As a listed company, Arteche has the obligation and commitment to provide complete, accurate and truthful accounting and financial information that accurately reflects the economic, financial and equity reality of the company.

We understand that our investors, creditors, customers, business partners, employees, government agencies and the general public have a legitimate interest in our financial records. Therefore, we are committed to the **accuracy, transparency and truthfulness** of all our business, financial and operational records, as well as to the prevention and detection of any type of fraud.

We comply with applicable laws and regulations, internal accounting, financial and tax reporting and reporting guidelines and standards, and submit our records to annual external audits.

We have internal control systems that ensure the integrity, accuracy and reliability of our accounting, record keeping and financial and non-financial information.

## We comply with the laws related to money laundering

Money laundering seeks, through a series of transactions, to make funds that originated in criminal activities appear to be from legal activities.

In Arteche we are committed to **comply with all applicable laws in the fight against money laundering** and terrorist financing. That is why we have implemented processes to prevent them.

We verify the origin of funds, identify and undertake business with reputable partners, monitor compliance with their payment policy and conduct financial transactions in compliance with applicable money laundering laws and regulations.

**WE COMPLY WITH ALL THE APPLICABLE LAWS IN THE FIGHT AGAINST MONEY LAUNDERING**



## We do not tolerate any type of corruption

In Arteche we do not tolerate bribery and corruption in any of its forms. We are committed to **comply with all applicable laws** in these matters in the countries where we operate.

There are cultures in which, in order to develop or strengthen a commercial relationship, gifts or other types of commercial attentions are important; in Arteche they are admitted, but to a reasonable degree, and they will never have as an object, or give the appearance, of wanting to unjustifiably influence the decision making of the person who receives them. Likewise, we make sponsorships or donations, but only to promote corporate objectives.

Arteche values its reputation as a company **that does business with integrity, transparency and honesty**, building relationships based on trust. We should not jeopardize it by offering undue payments.

We do not offer or accept, directly or indirectly, gifts or attentions that may be interpreted as intended to receive or provide favorable treatment in any activity with which Arteche is related.

We never offer or accept cash, gift cards or other media that allow the transmission of money, as well as goods that can be easily settled in cash.

When in doubt as to whether or not something is acceptable, we will consult our manager and/or the Compliance team.



## We respect our business partners

Business relationships with our partners (shareholders, customers, suppliers, agents, distributors, administrations and other collaborators) are based on **trust and respect**, in a framework of collaboration, working closely with them.

requirements and standards established by law.

We carefully select and evaluate our suppliers and other business partners based on **objective criteria and impartiality**, avoiding any conflict of interest or favoritism.

We require our suppliers of goods and services to adhere to the Arteche Supplier Code of Conduct.

Sustainability is key in the management of our relationships with our partners.

15

We are **transparent** in our communication with our partners, provide truthful information that does not mislead them, and protect confidential information and personal data to which we have access in the course of our relationship with them.

We offer our customers high quality products and services, equal or superior to the



## We compete fairly in the marketplace

**We compete fairly in the marketplace,** based solely on the merit of our products and services.

We strictly comply with current antitrust regulations.

We are aware of the trust of our customers, so we never enter into agreements with competitors against them.

We refuse to disclose information about our competitors that we have obtained improperly or in breach of confidentiality.

We never enter into agreements (direct or indirect) with a competitor on pricing, product allocation, markets, territories, customers or tenders, production limitations or collective boycotts.

We take special care when participating in business partnerships not to exchange commercially sensitive information with competitors (prices, quantities, and other elements that could influence a business decision).

## We export and import in compliance with national and international laws

Arteche is a global company with international operations; as such, we comply with all trade sanctions and export control laws applicable to our activities. These laws are sometimes very complex and may even apply to intercompany transactions, and violations of these laws can result in severe penalties.

We ensure that we have the appropriate authorizations for the import and export of goods, services, technology and information, and we review transactions that could involve sanctioned countries or countries with which trade has been prohibited.

We do not ensure that we are up to date with export control laws if our work involves shipments to international borders.

We have updated the list of sanctioned countries, entities and persons; we verify that the client or final recipient and consignee, the bank where the payment will be made, among others, are not sanctioned.



## Protecting trade secrets and confidential information

At Arteche we consider that business secrets are one of the most important intangible assets for companies.

We understand a trade secret to be any information, relating to any area of a company (technological, commercial, organizational, financial, etc.) that is not generally known to the industry, that has been reasonably protected to keep it secret, and is of value to the company.

We consider it unlawful to exploit the secret when it is accessed through a confidentiality or similar agreement that limits its use.

We do not accept confidential information that is not related to our work. If someone tries to provide it to us, we reject it and inform our manager.

We are aware that the obligation to protect confidential information continues even if we stop working at Arteche.

## We do not make improper use of insider information

In Arteche we do not use Privileged Information, neither of Arteche nor of other companies, with the purpose of acting or trying to act, directly or indirectly for personal benefit.

We understand as Inside Information any material information that is not available to the general public and that a reasonable investor would likely use as one of the elements of the basic motivation for his or her investment decisions.

We do not engage in transactions based on Inside Information, such as the purchase or sale of shares or options, or the cancellation of stock purchase orders, either for us or for third parties.

We do not suggest, recommend or induce others, such as friends or family members, to trade securities on the basis of Inside Information to which we have had access.

## We protect our assets and those of third parties

In Arteche we protect the trademarks, patents, trade secrets and any information subject to a property right, both of Arteche and of third parties with whom we are related.

We reasonably study Arteche's new products, services and software in order to detect possible inventions and trade secrets of third parties.

If we are going to handle intellectual property we ask ourselves: who is the owner, do I have authorization to use it, can I share it with other people, is the user's license or access rights still valid?

We obtain permission from the rights holder before making copies of non-Arteche copyrighted written, photographic or graphic materials, including any content found on the Internet.



# 4.

How do we apply  
our Code?



## Compliance & Sustainability Leader

In Arteche we have the figure of Compliance & Sustainability Leader, two functions that are closely linked by **values, ethics and corporate responsibility**. His mission is to ensure that we behave in accordance with our **values, sustainability and regulatory compliance**.

It is concerned with improving the impact of our operations on the environment and society and also seeks to do so in a responsible and compliant manner.

## Our Ethics and Compliance Committee

This is the supreme, autonomous and independent control body, responsible for ensuring compliance with regulations. This body is responsible, among other functions, for receiving communications regarding complaints of non-compliance with this Code and/or consultations on its interpretation. Likewise, it is responsible for the supervision and execution of the Corporate Compliance Program, and the attributions contained therein.

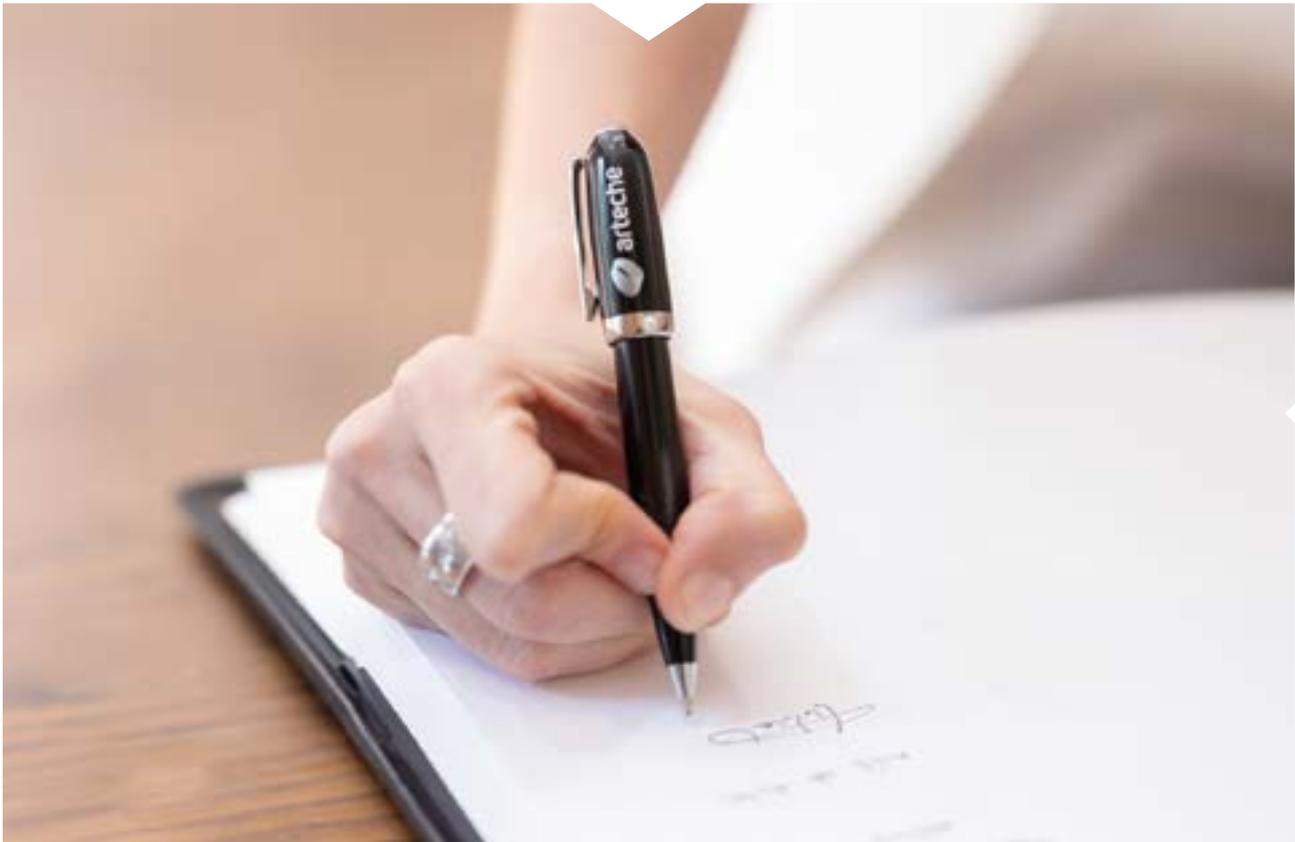
This body may act on its own initiative or at the request of any person subject to this Code. Its decisions are binding for the company and for the persons employed in Arteche.



## Our Administrative Body

Arteche's Board of Directors endorses its commitment to ethics and compliance with the approval of this Code.

Likewise, it will approve the annual report on the regulatory compliance program prepared by the Ethics and Compliance Committee.



## Ethical channel

All persons at Arteche or who have a relationship with Arteche and who have obtained information about violations in a work or professional context have an obligation to act upon any behavior that may be in violation of our Code, our professional standards or any of our internal policies.

Arteche offers us a channel through which **we can make a consultation or report any possible irregularity**: our Ethics Channel, accessible both on our intranet and on our external corporate website.

The communication of possible irregularities must always respect the **principle of truthfulness**; this channel must not be used for purposes other than those that seek compliance with the Code of Ethical Behavior and its internal policies.

It is a bidirectional channel and allows the informant, even if anonymous:

- › The communication of subsequent facts or information.
- › Receipt of the resolution or notification of inadmissibility.
- › Possibility of maintaining contact with the informant at all times.

**CHANNEL  
THROUGH WHICH  
WE CAN MAKE  
AN INQUIRY  
OR REPORT  
ANY POSSIBLE  
IRREGULARITY**



## Guarantees of use of the ethical channel



- › **Confidentiality:** When a possible irregularity is reported, whether anonymously or not, we guarantee the maximum reserve and confidentiality of the report. We guarantee the confidentiality of the personal data of both the whistleblower and the person reported, and of any other personal data to which we have access during the course of the investigation.
- › **Objectivity and impartiality:** The Ethics and Compliance Committee is responsible for ensuring objectivity and impartiality in the reception, investigation and, where appropriate, the adoption of corrective measures for any communication received through the Ethics Channel. Likewise, it is committed to respond to all communications received.
- › **No retaliation:** We have a specific commitment to prohibit retaliation against anyone who submits a query or complaint, formally or informally. Reporting a possible irregularity will never jeopardize the professional development or any other condition of Arteche's people.
- › **Principle of truthfulness:** We protect anyone who raises a concern honestly, whether or not it is ultimately concluded that a breach of the Code has occurred.

However, intentionally making a false accusation, or knowingly lying to persons charged with following up on a complaint, will be considered a violation of the Code.

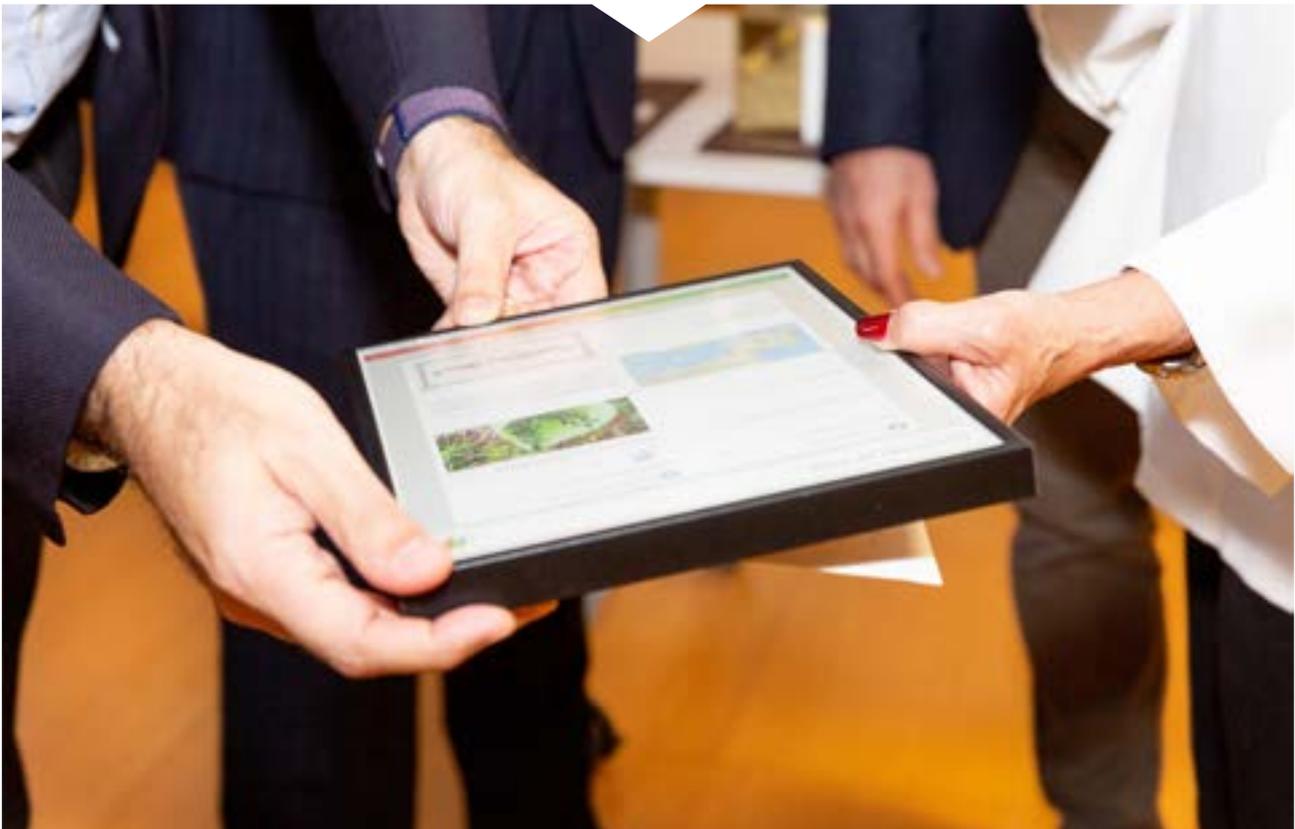
Our goal is to ensure that all complaints are handled fairly and appropriate action is taken to address any reported issues. We hope that this channel will enable our organization to remain a safe and ethical place for all employees.

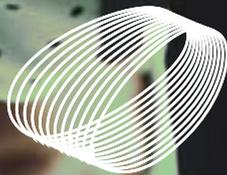
You can report confidentially by providing your name and contact information or, if you wish, 100% anonymously. All inquiries are treated confidentially and securely.

You can access the **Channel** both from Arteche's website and from Sharepoint.

<https://whistleblowersoftware.com/secure/arteche>

ALL INQUIRIES  
ARE HANDLED  
CONFIDENTIALLY  
AND SECURELY





arteche  
Moving together