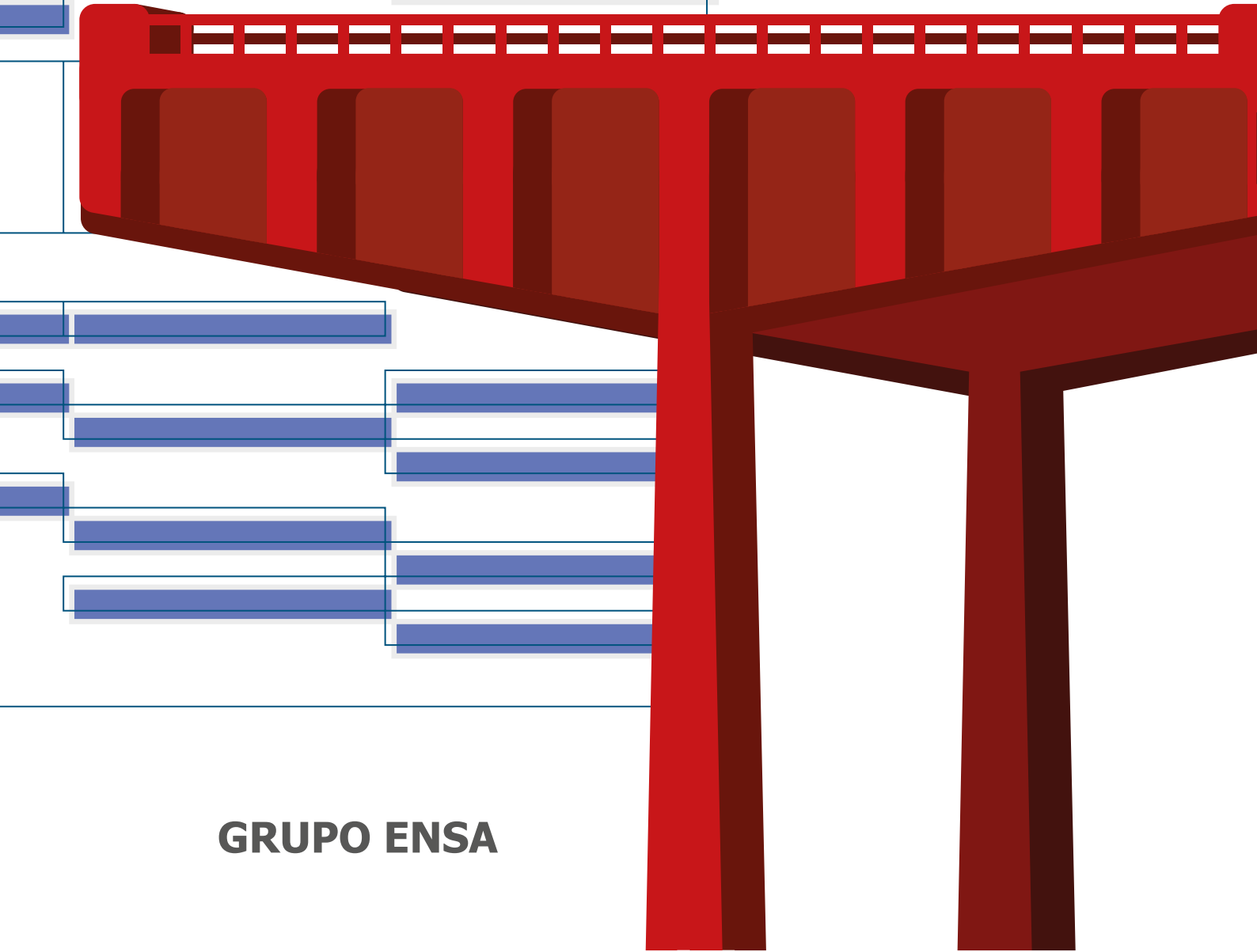




Code of Conduct for Third Parties

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CONTEXT, SCOPE AND AMENDMENT

RELATIONS WITH THIRD PARTIES. PRINCIPLES AND VALUES

1. Compliance with the law and tax obligations
2. Fulfilment of the workplace health and safety obligations
3. Prevention of bribery, corruption and crime
4. Fair competition
5. Conflicts of interests
6. Confidentiality
7. Copyright and industrial property rights
8. Human rights
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HOW THE CODE OF CONDUCT FOR THIRD PARTIES WORKS

1. Publication and circulation
2. Acceptance
3. Breaches
4. Ethics Channel

ANNEX I. CONFIRMATION OF ACCEPTANCE OF THE CODE OF CONDUCT FOR THIRD PARTIES



Context, scope and amendment

Context

Equipos Nucleares S.A.S.M.E. maintains a firm commitment to complying with the law both by its Governing Bodies and by its Executive Areas and activity units, and stemming from this commitment it integrates in its activity a risk management system aimed at detecting and preventing criminal conducts or corruption practises.

Reinforcing this commitment, Ensa has joined the United Nations Global Compact, implementing its activities within the framework of the 10 universally-accepted principles pertaining to Human Rights, Labour Rights, the Environment and Anti-Corruption, having integrated these principles as fundamental values in the running of its activities.

By publishing this Code we aim to inform third parties of Ensa's intention to define the highest ethical standards that must be met by all significant third parties who are object of the scope of the company and who provide it with any type of service.

Ensa undertakes to inform all third parties with whom it collaborates about the Code and it expects them to inform everyone with whom they work of these principles and values.

These third parties assume the responsibility for the management decisions on the work performed and for the employees who participate in the services provided to Ensa.

Ensa shall abstain from working with those third parties who do not comply with the content of this Code and it reserves the right to terminate commercial relations with those who breach it.

The conditions established in this Code, as well as the levels of service agreed in the contract and supporting documentation, may be audited by Ensa.

Scope

This Code shall be provided and applied, along with the contract, to third parties or suppliers who provide mainly the following services for Ensa:

Type of services:

Base material

Fill material

General Services

Industrial supplies

Design and provision of tools

Provision of services for mechanising parts, sets and equipment.

National and international logistics services

All type of services for computing, consultancy, design and development of computer systems

Staff subcontracting

Outsourcing of inspections and audits on quality

Supply of equipment and machinery, as well as their maintenance, whether through maintenance contracts or one-time job in this field

Supply of chemical and laboratory products

Outsourcing of all type of jobs, whether it is engineering, consultancy or manufacture of tool and/or component equipment services.

If any doubt or question should arise regarding the application of this Code to a third party, an email should be sent to the electronic mailbox of the company's Ethics Channel:

canaletico@ensa.es

Approval and amendment

The Monitoring Commission will regularly review this Code. If there are any significant changes, they will be sent to the Compliance Commission for submission to the Management Committee, which is the competent authority for approval and amendment.

The amended Code will then have to be ratified by the Board of Directors to become effective.

2. Relations with third parties. Principles and values

**Code of Conduct
for Third Parties**

Ensa has a series of corporate conduct principles and ethical values that must be met by third parties with whom commercial relations are established and which are based on business culture good practises and on the United Nations World Compact signed by Ensa in august 2014, which entails maintaining Ensa's high reputation as one of its most significant assets. Details of these are below:

Compliance with the law and tax obligations

1

Ensa's first corporate conduct commitment in its relations with third parties is to always comply with applicable legislation in all countries where it operates, highlighting especially the commitment to seek out any breaches and to collaborate with legal authorities regarding any possible infringement of the law from which direct criminal responsibility may be derived for the company, according to article 31 bis of the current Spanish Criminal Code or any other provision that may replace and/or complement it in the future.

Third parties are expected to act in good faith, strictly complying at all times with applicable legal and tax obligations and with the content established in the corresponding contracts, undertaking, if they are asked, to provide all of the information that is required of them, in a full, true and precise manner.

Comply with labour and social security obligations, ensuring that employees are in a regulated labour situation, that payments due to both the employees and the corresponding agencies are made correctly and on time, and that they have the specific degrees or certifications required to perform their jobs.

Upon signing the acceptance of this Code (see Appendix I), they state that they are up to date in all legal and tax obligations.

2

Fulfilment of the workplace health and safety obligations

Promote a safe and stable work environment and take the occupational hazard prevention steps required for each job. The requirements set forth by Ensa and applicable legislation must be strictly met, and third parties with whom Ensa contracts are responsible for their fulfilment during performance of the contracted activities.

Prevention of bribery, corruption and criminal offences

3

Third parties with whom Ensa has contract relations shall perform their professional activities with a conduct that is based on integrity and professional ethics, working against corruption in all its forms, including eliminating extortion and bribery. The persons subject to this Code of Conduct shall abstain from promoting, facilitating, participating or covering up any type of money laundering operations and operations that are outside of the scope of current legislation.

Do not offer or accept, or ask for any benefit or advantage of any nature that is not justified, with the intent to gain the company's favour with third parties. Third parties that are subject to this Code of Conduct shall firmly reject any type of corrupt practise, especially bribery.

They shall also avoid committing criminal offences that they may be exposed to due to their activity. They shall inform the company in the event that any court case is ongoing through the criminal court, or if they were involved in criminal proceedings in the last 4 years (accusation or definitive sentence). For this purpose they will contact the Ethics Channel through the email address: canaletico@ensa.es

4

Fair competition

Ensa is firmly committed to free market competition. It is expected of third parties that whenever they coincide with one or more competitors for a business transaction, they avoid carrying out practises against free market competition aimed at favouring their company's interests. They shall especially not participate in any type of misappropriation of confidential information, any meeting with one or more competitors to fix prices, or other elements that determine the tender which they are applying to, nor will they participate in the manipulation of tenders or collusion pertaining to operations affecting Ensa.

It is expected that third parties will understand and comply with all current anti-monopoly and fair competition laws.

Conflicts of interests

5

Third parties shall avoid any contracts that entail a conflict of interest. There is a conflict of interests when one of the target third-parties of the Code of Conduct must make a decision that affects at the same time Ensa's interests and the interests of the target person, of their family members or people with whom they have an equivalent affective relationship, or business or organisations where the target person or all of the persons mentioned have interests that may be affected by the outcome of the decision.

The following are some examples of the situations that lead to a conflict of interests:

- To receive or to recommend the awarding of an Ensa contract to a company that is the workplace of a family member of the person in charge of making the decision.
- To make a business decision that could directly benefit a close friend of the person in charge of deciding, either because that person will pay money with that decision or because the company they work for will benefit from that decision.

When the third party target of the Code of Conduct is considered to be in a conflict of interest situation, they must inform the company of this through the email address set up to this purpose on the company's Ethics Channel: canaletico@ensa.es

6

Confidentiality

Ensa has access to information on clients and suppliers that is provided under the contractual obligation to confidentiality. The company undertakes to not disclose and to protect this confidential information. This obligation must be undertaken and fulfilled by third parties who have access to this confidential information.

Ensa's operations generate information that is valuable to the company, the disclosure of which could harm its interests or its operations on the market. Ensa undertakes to regulate in a clear and reasonable manner the identification, handling and protection of its confidential information. Persons under this Code of Conduct must be familiar with and comply with these regulations.

Ensa takes special care to protect the personal information that it has access to in the course of its business, always complying with applicable legislation. The third-parties under this Code of Conduct in charge of handling or filing the legally protected personal information are under the obligation to be familiar with applicable legislation and to ensure its due application and compliance.

In the same way, the target third-parties of this Code of Conduct must be familiar with and comply with the various applicable legal regulations for the handling, archiving and storage of classified information.

Copyright and industrial property rights

7

Third parties who have contractual relations with Ensa may not use Ensa's name, logos, brands or any other identification elements, except in those cases where it has obtained express authorisation to do so.

Likewise, third parties who, by virtue of their contractual relation with Ensa, are aware of the industrial property rights on patents, utility models, industrial designs that the company holds on certain products, shall abstain from using, publishing or marketing them, etc., unless otherwise agreed or if they have obtained a License granted by Ensa. In any case, they shall be governed by the confidentiality rules agreed between both parties.

8

Human rights

The responsibility for observing human rights is not exclusive to governments or sovereign states. Human rights are important both for individuals and for the organisations that individuals create. Part of the commitment undertaken by the World Compact and signed by Ensa is that the corporate community has the responsibility to ensure that human rights are observed, both at the workplace and in its widest sphere of influence.

Observance and support for human rights also reinforces company relations with stakeholders and third parties.

Observance of human rights principles and values contributes to:

- Support and observe human rights that are proclaimed internationally.
- Make sure to not be an accomplice to human rights abuse.
- Eliminate all forms of forced or mandatory labour.
- Effectively abolish child labour.
- Facilitate equality and non-discrimination. Ensa guarantees equal and non-discriminatory treatment for all of its staff, and extends this to all third parties with whom it has contract relations, regardless of race, colour, religion, gender and sexual orientation, nationality, age, pregnancy status, degree of disability and other legally-protected circumstances. Ensa is firmly committed to its equality policies and all persons under this Code of Conduct must act accordingly, be familiar with and favour these policies.
- Prosecute harassment conduct at the workplace, including sexual harassment. Persons under this Code of Conduct must be familiar with and apply the company policies on prevention and prosecution of workplace harassment.

Environmental protection is one of the main guiding principles governing Ensa's corporate operations, always in accordance with the laws and other regulations on environmental protection.

Ensa has a suitable system of environmental management rules and procedures, adapted to current laws in each case, which enable the identification and mitigation of the various environmental hazards, especially regarding waste disposal, handling of hazardous materials, and the prevention of discharges and filtration.

Ensa will provide the target third-parties of this Code of Conduct with information on all company internal rules and procedures on environmental protection that affect their activity and level of responsibility.

We expect third parties to actively work towards protecting the environment, applying the necessary measures to avoid and minimise any possible negative environmental or social impact on its surroundings, and third parties are encouraged to have a certified Environmental Management System.

3. How the Code of Conduct for Third Parties works

**Code of Conduct
for Third Parties**

Publication and circulation

1

This code will be published on the Ensa website.

<https://www.ensa.es/>

It will be provided along with the third-party contract so that it can be accepted (see Appendix I).

2

Acceptance

All third parties target of this contract must confirm their understanding and acceptance of the principles and values mentioned in this Code, by accepting them (see Appendix I).

Breaches

3

Ensa shall abstain from working with those third parties who do not comply with the content of this Code and it reserves the right to terminate commercial relations with those who breach it.

4

Ethics Channel

All questions, requests for authorisations and possible reports pertaining to this Code or to bad conduct by Ensa staff shall be sent through the company's Ethics Channel.

canaletico@ensa.es

This Channel will be managed internally by the Head of the Ensa Compliance Department, and the Monitoring Commission for the Crime Prevention Plan shall be notified.

4. Annex I. Confirmation of acceptance of the Code of Conduct for Third Parties

**Code of Conduct
for Third Parties**

Code of Conduct for Third Parties

Mr./Mrs., as representative of the Company, which holds a relationship with Equipos Nucleares S.A, S.M.E. for the provision of services of:

.....
.....
.....
.....

Undertakes to meet all of the requirements established in the Code of Conduct for Third Parties (1), and specifically Ensa’s principles and values based on best market practises and on the principles of the United Nations World Compact.

- Fulfilment of legal and tax obligations.
- Fulfilment of the workplace health and safety obligations.
- Prevention of bribery, corruption and criminal offences.
- Fair competition.
- Conflicts of interests.
- Confidentiality.
- Copyright.
- Human rights.
- Sustainability.

The Ethics Channel canaletico@ensa.es will be used to request authorisations or to inform on crimes; conflicts of interests and misuse of intellectual property as mentioned in this Code.

Full name:
ID:

Signed:

In _____ on the ____ of _____ of 20 ____

(1) This confirmation shall be submitted by the third party along with the signed services provision contract and it will be kept by the person in charge of contracting the services of Equipos Nucleares S.A., S.M.E.

Code of Conduct for Third Parties



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