

**CODE OF ETHICS AND
CONDUCT OF
QUANTIA**

Integrated Management System



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Management Message

At Quantia, technical excellence and ethical integrity are not alternative objectives; they are simultaneous and inseparable conditions of how we operate. This Code of Ethics and Conduct (hereinafter, the “Code”) expresses Management’s irrevocable commitment to the highest standards of professional behavior, both in our internal relationships and in those we maintain with clients, public administrations, technology partners, and society as a whole.

Quantia operates in highly demanding regulatory environments — public sector, defence, critical infrastructure, and sectors that handle sensitive personal or business information — where trust is a strategic asset. Our company's reputation is built act by act, decision by decision. This Code is not a formal compliance document: it is the practical guide that every person at Quantia must internalise and apply in their daily work.

Management commits to leading by example, to ensuring the resources necessary for the compliance programme to function, and to protecting those who, in good faith, report conduct contrary to this Code.

General Management · Quantia Ingeniería y Consultoría, S.L.

This Code has been approved by Management and is mandatory for the entire organization from the date of its publication

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Chief Executive Officer

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Description:

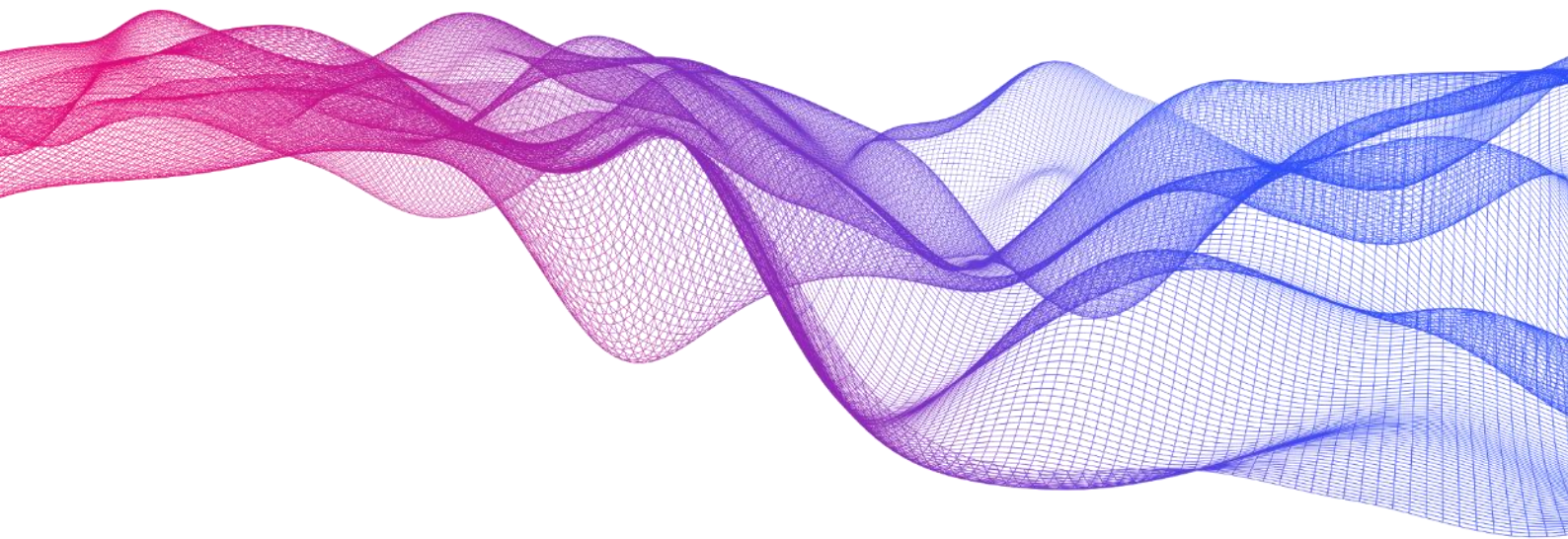
Reference standards: ISO 9001:2015 · ISO 14001:2015 · ENS RD 311/2022 · ISO 19650 · Ley Orgánica 10/1995 (art. 31 bis CP) · Ley 9/2017 LCSP · FCPA · UK Bribery Act 2010 · ISO/IEC 27001:2022 · Ley 14/2011, de la Ciencia, la Tecnología y la Innovación

Scope of application: Entire organization · Suppliers · Business partners

Version control

Version	Date	Section modified	Changes made
1	20-04-2026	All	First issue of the Quantia Code of Ethics and Conduct
2	07-05-2026	All	Alignment of Quantia Code of Ethics and Conduct (ES/EN versions).

Document development



1. PURPOSE, SCOPE AND APPLICATION

1.1. Purpose

The purpose of this Code is to establish the ethical principles, standards of conduct and control mechanisms that govern the behaviour of Quantia and all persons acting on its behalf, in order to prevent unlawful conduct, ensure regulatory compliance and reinforce the confidence of clients, partners and public administrations.

1.2. Scope

This Code is of mandatory application to:

- All Quantia employees, regardless of their Areas, Groups and Professional Levels, role or geographic location.
- Members of the management and governing body.
- External collaborators, consultants, subcontractors and suppliers acting on behalf of or for Quantia.
- Business partners and distributors within the framework of third-party collaboration agreements (including agreements with technology manufacturers such as Oracle, Autodesk, etc.).

1.3. Relationship with the Integrated Management System

This Code is a first-level document of Quantia's Integrated Management System (IMS), consistent with the Integrated Management System Manual (MSIM-QAN), procedures PC-01 to PC-05, and the Corporate Policy approved by Management. Its content is binding and complements – without replacing– the applicable legal obligations.

2. CORPORATE VALUES AND PRINCIPLES

The actions of Quantia and of all individuals who are part of it are governed by the following core values:

Value	Operational Description
Integrity	We act with honesty and consistency between what we say and what we do. We do not tolerate deception, manipulation, or the concealment of relevant information.
Technical Excellence	We commit to delivering the highest quality services, backed by our ISO 9001, ISO 14001, ISO 19650 and ENS Medium Level certifications.
Responsibility	We assume responsibility for the consequences of our decisions and act diligently in the management of our clients' and the company's resources.
Transparency	We maintain clear, truthful and timely communications with all our stakeholders, including public administrations and business partners.
Respect	We treat all people with dignity, without discrimination on any grounds, and we promote an inclusive and safe working environment.
Responsible Innovation	We develop advanced technological solutions (BIM, AI, LiDAR, data) with full awareness of their social, environmental and information security impact
Regulatory Compliance	We comply with the applicable laws in all jurisdictions in which we operate and go beyond the minimum legal requirements when ethical standards so require.

3. COMPLIANCE PROGRAMME AND COMPLIANCE STRUCTURE

3.1. Crime Prevention Model (art. 31 bis CP)

Quantia has implemented a Criminal Compliance Programme in accordance with the provisions of Article 31 bis of Ley Orgánica 10/1995, del Código Penal, and the guidelines of the UNE 19601:2017 standard on Criminal Compliance Management Systems. The purpose of this programme is to prevent the commission of offences within the organisation and to exempt or mitigate the criminal liability of the legal entity.

3.2. Compliance Officer

The Quality and Compliance Manager of Quantia assumes the functions of Compliance Officer. Their responsibilities include:

- Overseeing the implementation and effectiveness of the compliance programme.
- Managing the whistleblowing channel and internal investigations.
- Coordinating periodic training in business ethics and anti-corruption regulations.
- Reporting to Management on the status of the programme on an annual basis, within the framework of the Management Review (PC-02).
- Acting as a point of contact with business partners, external auditors and public administrations in matters of compliance.

Quantia team leaders and managers must actively serve as reference figures in matters of ethics and compliance within their areas. In particular, they must:

- (a) incorporate the Code into the onboarding of new employees and periodically explain its practical application;
- (b) verify that those under their responsibility complete the mandatory compliance training;
- (c) maintain an open channel for enquiries on ethical or conduct matters; and
- (d) consider ethical conduct, as well as any identified violations, when assessing the performance, promotion or variable remuneration of their teams.

Contact Compliance: Quality and Compliance Manager · Quantia Ingeniería y Consultoría, S.L. · calidad@quantia.es · C/ Juan Cabanilles 11, Office 407, 29018 Málaga

3.3. Training and Awareness

Quantia ensures that all staff receive specific training in business ethics, anti-corruption and compliance regulations with a minimum annual frequency. Training is mandatory for all employees and is documented as an IMS record. Staff with responsibilities in the public sector, defence or business partner management receive additional training tailored to their risk profile. Evidence of the training provided is retained in accordance with the provisions of procedure PC-03.

3.4. Compliance Risk Assessment

On an annual basis, and whenever significant changes occur in the business model or regulatory environment, Quantia conducts a compliance risk assessment that identifies, evaluates, and prioritizes the risks of unlawful conduct. The results are integrated into the Management System Review by Senior Management and into the QMS risk map (PC-02).

4. ANTI-CORRUPTION, BRIBERY AND IMPROPER PAYMENTS

4.1. Zero Tolerance Policy

Quantia maintains a zero-tolerance policy towards any form of corruption, bribery, or improper payment, whether active or passive, direct or through intermediaries. This policy applies in all jurisdictions in which the company operates and covers both the private and public sectors.

The following conduct is expressly prohibited:

- Offering, promising, giving or authorising the payment of any economic or other advantage to public officials, employees of private companies or any third party, with the aim of obtaining or retaining business or an undue advantage.
 - The prohibition on offering, promising or providing undue advantages also applies when the benefit is directed at persons connected to the public official or employee of a publicly-owned entity, including, among others, their spouse, partner, children or other direct family members. For these purposes, the concept of advantage or benefit of value must be understood in a broad sense and includes, in addition to money, gifts, travel, invitations to leisure activities, donations made on behalf of the person concerned and contracting or employment opportunities within the limitations established in section 4.3.
- Soliciting or accepting any undue advantage in the exercise of one's own functions.
- Making facilitation payments, even if of small amounts.
- Using intermediaries, agents or business partners to channel payments that would be unlawful if made directly.

4.2. Regulatory Reference Framework

Applicable regulations: Ley Orgánica 10/1995 (arts. 286 bis, 419-427 CP) · Convención de la OCDE contra el Soborno · U.S. Foreign Corrupt Practices Act (FCPA) · UK Bribery Act 2010 · Directiva (UE) 2017/1371 (PIF) · Ley 2/2023 reguladora de la protección de las personas que informen sobre infracciones normativas.

4.3. Gifts, Hospitality and Courtesies

Gifts, invitations, and courtesies are only acceptable when they are of symbolic value (below €300)[CG1.1], do not influence business decisions, are transparent, and are properly recorded. It is prohibited to offer or accept cash gifts or cash equivalents, or any courtesy that could be interpreted as an attempt to influence a business decision. Any gift received exceeding the stated threshold must be reported to the Compliance Officer and, where appropriate, returned or donated to a charitable organization.

This threshold is independent of meal allowances and per diems regulated under Article 35 of the Collective Agreement.

Regardless of their amount, all business courtesies — including gifts, invitations or hospitality — must be subject to an additional criterion of prudence and reputation: if their existence were to become public, could it compromise the image of impartiality of Quantia or the recipient? If the answer is yes, the courtesy must not be offered. In the case of employees or representatives of

the Public Administration or entities with public participation, the general rule shall be to offer no benefit or courtesy, unless expressly authorised by the Compliance Officer.

4.4. Donations and Sponsorships

Corporate donations and sponsorships must be approved by Management, documented, and exclusively directed toward legitimate purposes. Donations to political parties or individual candidates in the name of Quantia are prohibited.

5. FREE COMPETITION AND ANTITRUST

Quantia competes in the market in a fair, honest manner and in compliance with competition law. The following conduct is expressly prohibited:

- Agreements with competitors on prices, commercial conditions, market or customer sharing (cartels).
- Exchange of commercially sensitive information with competitors.
- Practices of abuse of dominant position.
- Any agreement or concerted practice that has as its object or effect the restriction, prevention or distortion of competition.

Regulatory framework: Ley 15/2007, de Defensa de la Competencia · Reglamento (UE) 1/2003 · Artículos 101 y 102 del TFUE.

In case of any doubt about the legality of a commercial practice from a competition law perspective, the employee must consult the Compliance Officer before acting.

6. PUBLIC SECTOR: INTEGRITY IN PROCUREMENT

6.1. Commitment to Integrity in Public Procurement

Quantia has a well-established track record in providing services to Spanish public sector entities, including local, regional and national administrations, and bodies linked to the defence, energy and infrastructure sectors. The company commits to participating in public tender processes with full transparency, technical rigour and scrupulous respect for procurement regulations.

For the purposes of this Code, the public sector or publicly-owned entity shall be understood to include not only the Administration in the strict sense, but also public service companies, public universities, publicly-owned healthcare centres, international organisations of a public nature and any entity whose capital is predominantly held by public funds. The conduct requirements applicable in this area must be observed with particular rigour in all such relations

6.2. Standards of Conduct in Public Tenders

- It is prohibited to obtain privileged information about public tenders through channels other than the official ones.
- Tenders submitted must faithfully reflect the company's actual capabilities and market prices.
- Any form of coordination of bids with other tenderers (bid rigging) is prohibited.
- No payments will be made nor advantages offered to public officials or employees to influence award decisions.
- **Quantia** has not had, in the last 7 years, any public contract terminated for non-compliance, nor has it been disqualified from contracting with the public sector in any jurisdiction.
- Quantia has not been subject to investigation for violation of the FCPA, the UK Bribery Act or any other anti-corruption law in the last 7 years.
- Quantia will periodically update this information in order to comply with the principles of transparency and fair communication set out in this document.
- In the execution of contracts with the public sector, Quantia must ensure that no organisational conflict of interest exists that could generate privileged access to non-public information, confer an unjustified competitive advantage or affect the objectivity of the services provided. Any real or potential situation of this type must be reported immediately to the Compliance Officer.
- Before initiating conversations about a possible engagement, collaboration or provision of services with a person who is an active public official or who has recently left the Administration, the Compliance Officer must be consulted beforehand. Certain regulations may impose restrictions on the subsequent professional activity of former public employees, and non-compliance may affect the integrity of public procurement processes.

6.3. Regulatory Framework

Applicable regulations: Ley 9/2017, de Contratos del Sector Público (LCSP) · Real Decreto Legislativo 3/2011 (TRLCSF) · Directiva 2014/24/UE · Ley 19/2013, de Transparencia, Acceso a la Información Pública y Buen Gobierno · Ley Orgánica 10/1995 (arts. 419-427 CP, cohecho).

6.4. Quantia Public Sector Strategy

Quantia directs its public sector activity towards the provision of differential technological value in the areas of infrastructure digitalisation (BIM/GIS), information security (ENS), artificial intelligence applied to asset management, and data solutions for decision-making in public entities. Target verticals include: Central Government Administration, Regional Governments, Municipalities and other local entities, as well as their autonomous bodies, publicly-owned companies and instrumental bodies.

7. RELATIONS WITH PUBLIC ADMINISTRATION AND LOBBYING

Quantia may maintain legitimate relationships with representatives of the Public Administration within the framework of its commercial and technical activity. These relationships must be governed by the following principles:

- All communications with public officials in the context of ongoing tenders or contracts must be transparent, documented and carried out through the established official channels.
- Interest representation activities before public institutions (lobbying) must be carried out in accordance with applicable regulations and with full transparency.
- It is prohibited to offer employment, contracts or any other advantage to public officials or their family members in order to influence decisions that affect Quantia.
- Any contact with public officials related to procurement procedures must be reported to the Compliance Officer[FC1.1][CG1.2].

Quantia employees may participate in political or civic activities on a personal basis, provided that they do so using their own resources and outside working hours. Under no circumstances may Quantia's means, facilities, email accounts, equipment, or assets be used for political purposes, nor may political parties, candidates, or third parties use them for such purposes. Employees must also make it clear that any political opinions they express are strictly personal and do not represent Quantia's position. It is prohibited to pressure, influence, or condition other employees to support, vote for, or contribute to any specific cause, party, or candidate.

8. EXPORT CONTROLS, INTERNATIONAL SANCTIONS AND AML

8.1. Economic Sanctions and Boycotts

Quantia strictly complies with all economic sanctions and trade embargoes imposed by the European Union, the United Nations, the Government of Spain and, to the extent applicable to its activities, by the United States (OFAC) and the United Kingdom (OFSI). It is prohibited to carry out commercial transactions, provide services or transfer technology to persons, entities or countries subject to international sanctions.

Likewise, Quantia will not participate in economic boycotts that are not authorized under Spanish or European legislation.

8.2. Export Controls

Certain products, technologies and services developed by Quantia — particularly in the areas of defence, information security and dual-use technologies — may be subject to export controls. Before any international transfer of technology, software or services, the project manager must verify the applicability of export control regulations with the Compliance Officer.

Regulatory framework: Reglamento (UE) 2021/821 (bienes de doble uso) · Ley 53/2007, de control del comercio exterior de material de defensa · Regulation (EU) 833/2014 and subsequent amendments · OFAC regulations (United States) · Export Control Order 2008 (United Kingdom).

8.3. Anti-Money Laundering (AML)

Quantia applies due diligence measures in the knowledge of its clients and business partners, in accordance with Law 10/2010, on the prevention of money laundering and terrorist financing. In particular:

- The actual identity of clients and partners is verified before establishing significant business relationships.
- Cash payments of high amounts or uncertain origin are refused.
- Suspicious transactions detected are reported to the Executive Service of the Money Laundering Prevention Commission (SEPBLAC).
- A record of transactions carried out is maintained in accordance with the established legal deadlines.

9. CONFLICTS OF INTEREST

A conflict of interest arises when the personal interests of an employee or manager interfere, or may interfere, with the interests of Quantia or with the fulfilment of their professional obligations. The proper management of conflicts of interest is particularly critical in projects with public sector, defence and infrastructure clients, where the technical and strategic information handled has high competitive value.

9.1. General obligations of employees

Employees must:

- Declare any situation that may give rise to a real or potential conflict of interest, using the procedure described in section 9.3 of this Code
- Refrain from participating in decisions in which they have a direct or indirect personal interest.
- Not use their position at Quantia to obtain personal benefits or benefits for connected third parties.
- Report any external professional activity (secondary occupation, participation in competing or supplying companies) for assessment and, where applicable, authorisation by Management.

9.2. Guarantee of non-use of privileged client information

Quantia expressly commits not to use technical, strategic, commercial or any other nature information obtained in the context of a contract with a client to obtain competitive, commercial or any other type of advantages for its own benefit or for third parties, neither during the term of the contract nor after its termination.

This guarantee is materialised through:

- The signing of the **Security and Confidentiality Agreement** by all internal and external personnel who access client information, in accordance with the provisions of procedure PC-03. This agreement is a prior and indispensable condition for the commencement of any employment or collaboration relationship with Quantia.
- The commitment not to disclose client information to third parties without express authorisation, set out in procedure PC-04, which establishes that all information provided by the client for the development of the service is the property of the client and Quantia commits not to make improper use of it.
- The implementation of the functional and organizational segregation measures described in section 9.4 of this Code.

9.3. Conflict declaration and management procedure

In any situation that may constitute a conflict of interest, the employee must act as follows:

Step 1 – Detection and immediate communication

The employee who detects a real or potential conflict of interest situation must report it without delay to the Compliance Officer, preferably using the corporate email calidad@quantia.es, with the subject: "*Declaración de conflicto de interés – [Nombre] – [Fecha]*".

The communication must include:

- Description of the situation and the parties involved.
- Project or contract affected.
- Nature of the personal or external interest.
- Proposed mitigation measure, if the employee has identified one.

Step 2 – Assessment by the Compliance Officer

The Compliance Officer will acknowledge receipt within a maximum period of **48 working hours** and will assess the situation within a maximum period of **7 días hábiles**, and may request additional information from the employee or Management.

Depending on the severity and nature of the conflict, the communication channel may vary:

Type of conflict	Recommended channel
Minor or potential conflict (external activity, gift received)	Email to calidad@quantia.es
Conflict in an active project with a public or defence client	In-person meeting or video call with Compliance Officer + Management
Conflict involving a manager or the Compliance Officer themselves, or with possible criminal implications	Direct communication to General Management

Step 3 – Resolution and documentation

The Compliance Officer will issue a resolution by email that may include: authorisation with conditions, the employee's abstention from the matter concerned, reassignment of duties or, in serious cases, commencement of disciplinary proceedings. The resolution will be filed as an IMS record.

9.4. Mitigation measures: functional and organisational isolation

When a Quantia unit or team is executing a project for a specific client, the technical, strategic and commercial information of that project will be functionally isolated and, when necessary, physically isolated from units that may provide subsequent or competing services to the same client or in the same area.

The applicable isolation measures are:

- **Information access isolation:** Document management systems (SharePoint, Notion, among others) will be configured with access permissions restricted to the project team. No external member of the team will have access to the project documentation without the express authorisation of the Project Manager or the Compliance Officer.
- **Team separation:** In high-sensitivity projects (defence, critical infrastructure, strategic public sector), dedicated teams will be designated that will not simultaneously participate in projects for competing clients or in the same tender process.
- **Communication restrictions:** Internal communications relating to the project will be limited to authorised channels and participants. It is prohibited to share project information in general company channels.
- **Post-project cooling-off period:** Once a project is completed, the team that executed it may not use the information obtained to advise third parties competing with the client for a minimum period of **6 months**, unless expressly authorised by the client.

These measures will be supervised by the Compliance Officer within the framework of the internal IMS audits.

10. DATA PROTECTION, CONFIDENTIALITY AND INFORMATION SECURITY

Quantia operates under the **National Security Framework (ENS)** at its **Medium level**, in accordance with Royal Decree 311/2022. Information protection is a strategic pillar of the company. All internal and external staff, without exception, sign the **Security and Confidentiality Agreement** as a prior condition to commencing their activity at Quantia, in accordance with procedure **PC-03**. This agreement regulates confidentiality obligations, the handling of client and project information, and the consequences of non-compliance. All employees must:

- Handle client, project and company information with the utmost confidentiality.
- Comply with the information security policies established in Quantia's ISMS.
- Not disclosing confidential information to third parties without express authorization..
- Immediately report any security incident or data breach to the Security Manager.

- Comply with the General Data Protection Regulation (GDPR, EU Regulation 2016/679) and Organic Law 3/2018 (LOPDGDD) in the processing of personal data.

Compliance responsible Valid Medium-Level ENS certification · Statement of Applicability of the ISMS · Information Security Policy · Record of Processing Activities (GDPR).

Quantia is in the final stage of certification under ISO/IEC 27001:2022. Security controls, the Statement of Applicability (SoA) and information security risk management are governed by this standard and are mandatory for all personnel regardless of the formal certification status.

The use of artificial intelligence systems, whether internal or third-party, must strictly adhere to the principles of confidentiality, integrity, and availability of information. It is expressly prohibited to input any confidential client information, personal data, or Quantia's strategic information into unauthorized AI tools without prior notice. The use of AI models must ensure the traceability of the data used and the absence of biases or improper uses that could compromise service quality or regulatory compliance.

11. SUSTAINABILITY AND ENVIRONMENTAL RESPONSIBILITY

Quantia is certified to ISO 14001:2015 and commits to minimising the environmental impact of its operations. Employees must act in accordance with the company's Environmental Policy, which includes pollution prevention, efficient use of resources and compliance with applicable environmental legislation. Significant environmental aspects and impacts are identified, evaluated and managed in accordance with procedure PC-02.

Quantia integrates in its environmental management the commitments arising from the **United Nations 2030 Agenda** and its Sustainable Development Goals (SDGs), with special attention to SDGs 7 (affordable and clean energy), 11 (sustainable cities and communities), 13 (climate action) and 17 (partnerships for the goals). In keeping with these commitments, Quantia provides **specific sustainability training** for all its staff on an annual basis, integrated into the IMS training plan, which includes content on climate change, circular economy and environmental best practices in digital work. Likewise,

12. LABOUR RELATIONS AND HUMAN RIGHTS

Quantia respects and promotes the fundamental rights of all persons who work in the company or in its value chain. In particular:

- Any form of forced labour, child labour or trafficking in persons is prohibited.
- Equal opportunities and non-discrimination on grounds of sex, origin, religion, sexual orientation, disability or any other condition are guaranteed.
- A working environment free from harassment, intimidation or violence is promoted.
- The rights of trade union representation and collective bargaining in accordance with Spanish labour legislation are respected.
- Working conditions comply with the Workers' Statute and occupational risk prevention regulations (Law 31/1995, LPRL).
- The right to Digital Disconnection is respected, a right reinforced in the new Collective Agreement.

13. USE OF COMPANY RESOURCES AND ASSETS

Quantia's assets – including IT equipment, software, data, intellectual property, facilities and working time – must be used exclusively for legitimate professional purposes. It is prohibited to:

- Use company resources for significant personal activities or for personal benefit or that of third parties.
- Install unauthorised software on company systems.
- Access, copy or disclose company information without authorisation.
- Use Quantia's intellectual property (methodologies, tools, source code, BIM models) outside the scope of authorised projects.

The use of digital means in remote working will be governed by what is agreed in Article 41 of the Collective Agreement.

Within the framework of R&D projects formally recognized or certified as such –including those with public funding, under consortium arrangements or in collaboration with universities and technology centres– employees must strictly comply with the conditions for exploitation of results established in the applicable consortium agreement, financing contract or collaboration agreement.

It is expressly prohibited to use client data, confidential information from commercial projects or Quantia's technical assets as input for R&D activities without prior knowledge of the client or Management. This restriction applies with particular rigour to the training, fine-tuning or validation of artificial intelligence models, the use of point clouds, BIM models or geospatial data of contractual origin, and any dataset containing personal or strategic information.

he intellectual property generated in R&D projects formally recognized or certified as such – including algorithms, trained models, methodologies, source code, and technical documentation— must be subject to prior evaluation before its use, exploitation, or disclosure. Such evaluation, carried out by the R&D project manager together with Management, shall determine the applicable ownership based on the agreement of the parties participating in the R&D project, financing contract, or collaboration agreement in force. This classification is independent of the intellectual property generated in Quantia's commercial projects, which is governed by its own contractual agreements.

R&D outputs susceptible to publication, presentation at conferences or external disclosure must be reviewed in advance by Management to verify the absence of confidential client information or data subject to contractual or regulatory restrictions. This review is not a mandatory prior condition for any act of disclosure.

Quantia applies the same information security, traceability and access control standards to its R&D activities as those governing its commercial projects, regardless of the source of funding.

14. WHISTLEBLOWING CHANNEL AND REPORTING MECHANISM

Quantia has established a confidential whistleblowing channel in accordance with Ley 2/2023, de 20 de febrero, reguladora de la protección de las personas que informen sobre infracciones normativas (transposition of the Whistleblowing Directive 2019/1937/EU). Any employee, collaborator or third party may report, anonymously if they wish, conduct contrary to this Code or applicable legislation.

Whistleblowing channel: calidad@quantia.es

Person responsible for management: Quality and Compliance Officer

Guarantees: Absolute confidentiality · Prohibition of retaliation · Acknowledgement of receipt period: 7 days · Resolution period: 3 months

Quantia guarantees that no person who reports an infringement in good faith will suffer retaliation, discrimination or professional harm of any kind. Reports made in bad faith or with the intention of unjustifiably harming third parties may give rise to disciplinary measures.

This whistleblowing channel also integrates the harassment protocols on grounds of sexual orientation or identity.

All persons subject to this Code must collaborate loyally and fully in any internal compliance investigations that are initiated. This obligation includes providing truthful information, attending to the requirements formulated within the framework of the investigation and, when

legally appropriate, facilitating access to corporate devices or other elements necessary for the review. Failure to cooperate, concealment of information or obstruction of an investigation shall constitute serious violations of this Code.

15. FORMACIÓN Y COMUNICACIÓN DEL CÓDIGO

Quantia considers training in ethics and regulatory compliance an essential element of its corporate culture and a strategic investment in the quality of its team. The compliance training programme is structured as follows:

- **Initial training:** All new employees receive training on this Code during the onboarding process, before starting their duties.
- **Periodic training:** Annual training for all employees on business ethics, anti-corruption, and compliance regulations. The content is tailored to the risk profile of each role.
- **Specific training:** Staff with responsibilities in the public sector, defence or business partner management could receive additional training in the highest-risk areas (FCPA, UK Bribery Act, export controls, AML). This training is planned according to active projects and regulatory developments.
- **Ongoing communication:** The Code and its updates are published on the corporate SharePoint and communicated to all employees. Relevant business partners and suppliers can consult the Code on the corporate website and, when necessary, it will be included as part of contractual agreements.

Training records are retained as evidence of the QMS in accordance with procedure PC-03.

16. DISCIPLINARY REGIME AND CONSEQUENCES OF NON-COMPLIANCE

Non-compliance with this Code constitutes a breach of the employee's contractual and labour obligations and may give rise to disciplinary measures proportionate to the seriousness of the conduct, including:

- Verbal or written warning.
- Suspension of employment and salary.
- Termination of the employment contract for justified cause.
- Termination of contracts with suppliers, collaborators or business partners.
- Referral to the competent authorities when the conduct may constitute a criminal offence.

Disciplinary measures will be applied in accordance with the Workers' Statute, the applicable collective agreement and Quantia's internal procedures, always guaranteeing the right of defence of the person concerned.

In turn, disciplinary measures will also be strictly governed by the provisions of Chapter IX (Disciplinary Regime), Articles 21 to 26 of the XIX Collective Agreement

17. REVIEW AND UPDATE OF THE CODE

This Code will be reviewed on an annual basis by the Compliance Officer, within the framework of the Management Review (PC-02), or on an extraordinary basis when relevant regulatory changes, modifications to the business model or compliance incidents so require. Updates will be approved by General Management and communicated to the entire organisation.

ANNEX A — INDIVIDUAL ADHERENCE DECLARATION

By signing this document, the undersigned declares that they have read, understood, and accepted the full content of Quantia Ingeniería y Consultoría, S.L.'s Code of Ethics and Conduct, and undertakes to comply with it in the performance of their professional duties.

Furthermore, they declare:

- Not to have knowledge of any conduct contrary to the Code that has not already been reported to the Compliance Officer or to calidad@quantia.es.
- To have received initial training on the content of the Code.
- To be aware of the whistleblowing channel and the reporting mechanisms available.
- To understand that non-compliance with the Code may give rise to disciplinary measures as set out in section 16.

Full name

ID/NIE

Position/Role

Department

Analyst (I/II)/Consultant/etc.

BIM/Development/R&D

Date

Signature

Instructions: Once signed, this document must be sent to the Quality and Compliance Manager at calidad@quantia.es and admin@quantia.es for filing as a QMS record. It will be retained for the entire duration of the employment or contractual relationship and for a minimum of one additional year after its termination.

Note: This annex may be replaced by equivalent mechanisms of adherence and acceptance of the Code of Ethics implemented within Quantia's corporate onboarding and training processes, provided that documented evidence of individual completion and acceptance is maintained. In the absence of such mechanisms, the signing of this document remains mandatory.

An abstract graphic composed of numerous thin, glowing green lines that form a complex, organic structure resembling a plant stem or a fiber-optic network. The lines are most concentrated in the lower half of the image, where they form a thick, bright green base, and then fan out and become more sparse and delicate as they rise towards the top. The overall effect is one of dynamic energy and growth.

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