

CODE OF ETHICS

"CHARGING TOGETHER, S.L."



Fast charging together

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1. INTRODUCTION

This Code of Ethics (the "**Code**") has been developed based on the commitment that CHARGING TOGETHER, S.L. ("**CT**" or the "**Company**") has made to the principles of business ethics and transparency, in all of its areas of activity. The Code establishes a set of principles and standards of conduct, which are intended to be used as guidelines for the behaviour of all of the Company's directors, managers, employees, and suppliers, and it also applies to all subsidiaries that, according to the law, have CT as their parent company (the "**Group**"). It also addresses the prevention obligations in relation to criminal liability for legal persons.

The Company is responsible for performing all activities necessary for achieving the highest possible level of compliance with the Code, and for approving the corresponding policies and procedures.

2. PURPOSE AND VALUES

According to the Board of Directors, the purpose of all companies belonging to the Group is "to accelerate expansion of the ultrafast charging station network, with an extensive rollout of modern, innovative infrastructure for electric vehicles in Spain and Portugal. The aim is to help make the transition towards sustainable mobility a reality, as necessary for improving the quality of life of all people" (the "**Purpose**").

The set of values being applied in order to achieve the Purpose are as follows (the "**Values**"):

1. **Innovation:** We provide our customers with the best ultrafast charging technology, and we seek out the most innovative solutions so we can offer the best user experience.
2. **Sustainability:** By promoting electric mobility, we are doing our part to help make our planet and our cities cleaner, more liveable, and more sustainable, while also minimising the carbon footprints of our customers and shareholders.
3. **Transparency:** We encourage open and honest communication with our employees, customers, and collaborators, to generate trust through transparency in all our activities.
4. **Safety:** We make personal safety and risk management a priority during all of our operations, both physical and digital.

Our Purpose and Values must be used as guidelines to orient the Company's strategy and actions, and they are further developed in the rules of conduct described below.

3. SCOPE OF APPLICATION

The rules of conduct established in this Code apply to everyone at all of the Group's companies, including directors, executives, and employees (the "Professionals"), regardless of their office, geographical location, or position within the hierarchy, and wherever applicable, they apply to the Group's suppliers as well.

The Company will also provide proactive incentives to encourage compliance with this Code by all other external parties it has relationships with, and when permitted by the particular relationship and circumstances, compliance by those parties may be compulsory. In addition, the Company and its subsidiaries must act with due diligence when establishing relationships with external parties, to prevent any association with companies that have management practices that are not in line with the contents of this Code, or that could give rise to any form of legal, financial, or reputational risk for the Company.

The Group's companies are all firmly committed to ensuring that, during their relationships with external parties, they will not be engaging in any practices or conduct that could be considered as irregular or illicit acts, or acts contrary to the law or to this Code. The Professionals are also required to act in conformity with this Code, and to comply with all applicable laws, while also fulfilling their contractual obligations and observing standard best practices in the locations where they operate.

4. RULES OF CONDUCT

The following rules of conduct must be applied as professional and behavioural guidelines, by all companies and persons subject to this Code:

(a). RESPECT FOR HUMAN RIGHTS

The Company declares its firm commitment to fully respecting human rights, in compliance with all Spanish and international laws and treaties on the subject, and in line with the United Nations Sustainable Development Goals (SDGs). As a result of this, the Company categorically rejects all types of inhumane practices, such as child labour, forced labour, sexual harassment or bullying in the workplace, and all forms of modern slavery.

The Company is also committed to promoting the concepts of gender equality, freedom of association, collective bargaining, employment mobility, diversity, non discrimination, and the rights of all minority communities and vulnerable groups.

(b). RESOURCES AND OCCUPATIONAL HEALTH AND SAFETY

The Company has established an appropriate set of rules and policies on the subject of resources and occupational health and safety, with the aim of ensuring compliance with all

preventive measures established in the pertinent legislation, whether in force now or in the future.

The Company will provide its Professionals with the resources they need to perform their functions correctly, and in turn, they are expected to use those resources in a responsible way, exclusively in relation to their professional activities and never for their own personal use. In addition, the Professionals must safeguard confidentiality and comply with the IT security rules at all times. This means that they must not use, copy, reproduce, or transfer any elements of the Company's IT systems or software for any purposes not related to their work. They must also refrain from installing or using any pirated software or apps on any IT equipment provided by the Company, especially if these could cause damage to the systems or have a negative impact on the image or interests of the Group's companies or customers, or on any external parties.

CT requires all of its Professionals to scrupulously comply with the guidelines established on occupational health and safety. As part of this compliance, they are strictly prohibited from concealing the occurrence of any accidents or safety incidents in the workplace, or falsifying any documents or records related to occupational health and safety, or performing or encouraging the performance of any activities that do not comply with those guidelines.

To support these commitments, CT will implement the appropriate protocols, and will give its Professionals the resources and training they need to ensure the existence of a safe and healthy work environment.

(c). PREVENTION OF CONFLICTS OF INTEREST

CT fosters a culture of professional integrity and responsibility, especially with regard to preventing conflicts of interest. These conflicts can potentially arise in almost any situation, whenever the interests of an individual directly or indirectly come into conflict with the interests of any of the Group's companies. Any person may be understood as having a conflict of interest when they are involved in a matter that affects them personally, or that affects someone connected to them.¹

All Professionals have an obligation to actively defend the Company's interests, and they must refrain from gaining any personal benefits, or providing benefits to any other persons, from opportunities that arise in the context of their work, or by making use of CT's assets or information. When performing any of their professional activities, they must not tolerate any situations where individual interests are being prioritised over the interests of the customers, the Company, or the shareholders.

They must also avoid participating in any situations that could give rise to actual or potential conflicts of interest, including those involving connected persons; and they must refrain from

¹ A "connected person" is understood to mean any person listed in section 231 of the Spanish Corporate Enterprises Act (*Ley de Sociedades de Capital*).

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participating in the corresponding negotiations or transactions, with the aim of ensuring that their own interests are never being prioritised over those of the Group's companies.

In addition, the Professionals must refrain from using for their own benefit, or for the benefit of any other parties, any confidential and/or privileged information made available to them when performing their professional activities.

If any situation arises that could represent a conflict of interest, or whenever there are any uncertainties about a potential conflict of interest, the person involved must address the situation by immediately notifying their supervisor and/or another person the Company has designated. In all cases, they must do this before the business activity or transaction in question is actually carried out. Finally, anyone involved in a potential conflict of interest must refrain from participating in any related decision-making that could affect the Company or the Group.

(d). COMPLIANCE SYSTEM

The Company has a compliance system that is focused on identifying, preventing, managing, and mitigating the risk of irregular conduct and unlawful or illegal acts in connection with the Group's activities. This system is designed to ensure that the Company performs its business activities and transactions in conformity with all legislation in force, and in line with its ethical principles and internal rules. This system also actively promotes a culture of compliance among its Professionals, suppliers, collaborators, and all other external parties, by implementing and updating a set of policies, protocols, procedures, instructions, and best practices. All of these have been designed as a way of establishing effective mechanisms for assessing, preventing, managing, controlling, and reacting to risks of this nature.

(e). TRANSPARENCY

One of the Company's most important rules of conduct involves the need for transparency and accuracy in relation to the information it reports. For this reason, it is committed to ensuring that all types of information, including financial information and the contents of the annual financial statements in particular, represent an accurate and complete disclosure of the Company's financial situation, in accordance with all applicable laws.

It must be understood that any concealment or distortion of the Company's accounting records or financial information, or any lack of honesty when reporting that information or information of any other type, represents a direct infringement of this Code. In the same way, providing any intentionally inaccurate, ambiguous, or confusing information must also be understood as a breach of this Code. Any conduct of this type must be understood as unacceptable, whether involving internal relationships within the Group, or external relationships established with customers, suppliers, investors, public authorities, private institutions, or society in general.

(f). PROFESSIONAL INTEGRITY AND RESPONSIBILITY

At all times when performing their work, the Professionals have an obligation to act in compliance with the principles of professional integrity and responsibility.

Integrity means acting in an honest and respectable way, during all business activities and personal relationships. Compliance with this principle is essential for building and maintaining trust and respect, regardless of whether the relationships involved exist within the Group, or externally with customers, suppliers, investors, public authorities, private institutions, or society in general.

Professional responsibility means the duty to act with due diligence and care during all work performed, as well as when complying with responsibilities and taking decisions. It also means maintaining open and transparent communications, and taking full responsibility for all actions performed, which includes correcting errors whenever necessary.

The Professionals must strictly comply with all laws and regulations in force in the jurisdiction where they work, based on the spirit and purpose of those legal provisions, while also complying with the rules from this Code of Ethics.

Professional responsibility also requires reporting, and escalation to the appropriate level, of any activities that seem irregular, unsafe, unethical, or potentially illicit or illegal, as well as any that could represent a breach of the obligations from this Code.

All Professionals must also make use of the Internal Reporting System referred to in Point 8 of this Code, to report any facts or events they become aware of that could represent irregular, illicit, or unlawful acts, or acts that infringe this Code and/or the Group's internal rules (this especially includes any conduct that could constitute a criminal offence, a serious or very serious administrative infraction, or an infringement of European Union law). This obligation is without prejudice to the possibility of reporting any issues or observations to Spain's Independent Whistleblower Protection Authority (AAI), or to any other competent institution, body, or entity.

(g). PREVENTION OF BRIBERY AND CORRUPTION

All forms of bribery and corruption must be understood as entirely incompatible with the principles that form the basis for this Code. The Company therefore fully rejects any conduct related to corruption in its various manifestations, and will investigate any potential occurrences.

Whether taking place directly or through an intermediary, the Professionals must never offer, promise, give, request, or accept any benefits or advantages, personal favours, remuneration

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of any type, or inappropriate gifts, in relation to any external parties, when done for the purpose of completing or even influencing a transaction, or in order to gain some other

advantage. This applies to both public-sector and private entities, in any situations where a financial benefit could be generated for the Company and/or Group or for any other party. They must also refrain from accepting any benefit or advantage in exchange for giving preferential treatment to a particular party. In addition, the Professionals must refrain from performing any activity, or behaving in any way, that could create the appearance of inappropriate conduct of this type, or give rise to suspicions that it could exist.

In order to prevent these practices, CT requires compliance with all applicable anti-corruption and anti-bribery laws, and for this purpose, it applies a rigorous, proactive focus, to ensure that all activities and transactions performed by its Professionals are transparent and lawful. This is because even the appearance that acts of corruption or bribery could exist can have serious consequences, from a legal perspective and also for the Group's business operations and reputation.

As part of this commitment, the Company applies the principle of due diligence in order to prevent, detect, and eradicate all forms of irregular conduct, regardless of their nature. It applies this due diligence in relation to subjects that include, among others, risk analysis, definition of responsibilities, and training for the Professionals and for the Company's suppliers and directly connected external parties. It also supports these efforts by establishing formal procedures, especially those that provide a secure environment for confidential reporting of irregular conduct.

When interacting with regulatory and supervisory bodies, and with any other public-sector officials or agencies, the Professionals must always comply with the rules of conduct related to transparency, integrity, and professional responsibility. This does not mean that they cannot defend the Company's interests by addressing any legitimate disputes that arise with those authorities, with regard to how the applicable legal provisions are being interpreted or applied, provided they always observe those rules of conduct when doing so.

(h). INTERNACIONAL TRADE LAWS

The Professionals have an obligation to comply with all international trade laws, while also acting with due diligence and meeting all applicable requirements from the Company's compliance system.

(i). PREVENTION OF MONEY LAUNDERING

The Professionals must refrain from participating in any form of money laundering, and they must refuse to do business with anyone they suspect could be connected to illegal

activities. If they observe any signs of money laundering they must report them, and this includes suspicious transactions or activities that involve complex or opaque structures, or sources of funds with unclear ownership.

Money laundering consists of performing illegal transactions that involve assets derived from unlawful conduct, or that are used to support criminal acts or terrorism.

(j). GIFTS, FAVOURS, AND HOSPITALITY

The Professionals must refrain from offering or accepting any type of gifts, favours, or hospitality, including material goods, invitations, travel, and any other form of benefit, regardless of whether this occurs in relation to their work or in their personal life. However, giving and receiving gifts, favours, or hospitality may be acceptable if the following conditions are all simultaneously met: (i) their economic value is insignificant or symbolic; (ii) they comply with general rules of courtesy or standard commercial practices; and (iii) they do not contradict any laws, governance and sustainability policies, or generally accepted business practices.

If the Professionals have any uncertainties about whether it is appropriate to offer or accept some particular gift or benefit, they must consult with their supervisor or another person designated by the Company, to obtain their authorisation in advance. Also, when deciding whether to offer or accept any type of gift, favour, or hospitality, the Professionals must always take into account the anti-bribery and anti-corruption rules of conduct included in this Code.

(k). ENVIRONMENTAL PROTECTION

The Company carries out its activities with a focus on environmental respect and protection, and it meets or exceeds the standards established in all applicable environmental legislation. The aim is to minimise the potential environmental impact of the Company's operations, while encouraging activities that contribute to environmental protection, with a special emphasis on sustainable mobility.

The Professionals must comply with all applicable environmental laws and regulations existing in the jurisdictions where they operate, and this commitment must extend to cover all suppliers and collaborators throughout the entire value chain, regardless of their geographical location.

(l). CUSTOMER RELATIONS

The Company is committed to maintaining high standards in relation to transparency, information, and consumer protection, while at the same time encouraging responsible and sustainable consumption.

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The Company has implemented strict protocols to protect its customers' privacy and the confidentiality of their data. These are designed to prohibit any disclosure of information to third parties unless the customer's express consent has first been obtained, or unless required by a mandatory legal obligation or court order.

All process involved in collecting, using, and processing personal data take place in conformity with the data protection laws, and with respect for the rights of the customers, as established in the applicable legislation pertaining to information society services and e-commerce, among other subjects.

In addition, the contracts entered into with customers use simple and transparent language, and the customers are always provided with complete information about the services, products, and prices being offered and the various options available to them, both prior to and during the contractual relationship.

(m). PROFESSIONALS

All Professionals must comply with the Company's policies, rules, and procedures, as well as with any instructions issued for purposes of their implementation. The Professionals have an obligation to act with absolute impartiality and objectivity, and always in accordance with the contents of the previous sections of this Code, to avoid any form of outside influence that could compromise their integrity.

In addition, the Professionals must maintain a commitment to complying with the procedures that CT has established at any given time for selecting successful tenders and awarding contracts.

Moreover, all Professionals who have access to personal data must treat that information with maximum confidentiality, in compliance with the data protection legislation in force, and with the same level of care they would apply to their own personal data.

Finally, the Professionals will be given adequate training to ensure that they are able to comply with the guidelines from this Code, especially those from this section, and they must also confirm their commitment to this Code by signing a written declaration.

(n). COMPETITION

The Group's companies and Professionals must avoid any conduct or activities that could infringe any anti-trust legislation or legislation on defence of competition, and at all times, they must act in compliance with the firm commitment that the Group's companies have made to maintaining effective competition in the markets where they operate.

In particular, the Group's companies and their Professionals must reject any form of anti-competitive practices such as collusion, market abuse, and unlawful sharing of information. Specifically, sharing of information will only be allowed in the context of the Company's

business activities, when necessary to achieve the Company's objectives and when taking place in compliance with all applicable legislation.

In addition, the Group's companies and Professionals must provide any assistance and cooperation requested by competition defence authorities when exercising their duties,

especially in relation to any investigation of conduct that could represent an infringement of anti-trust laws or laws on defence of competition.

Finally, the Group's companies and their Professionals must foster an internal culture of compliance with anti-trust laws and laws on defence of competition, and they must ensure that their relationships with external parties (customers, suppliers, associations, etc.) comply with, and actively promote compliance with, all such legislation.

(o). CHARITABLE ACTS

The Group's companies must refrain from making any charitable contributions, either themselves or through any intermediaries, when supporting causes that do not pertain to progress for the communities where they operate, promoting equality and social justice, protecting vulnerable groups, encouraging innovation and environmental protection, providing leadership in the fight against climate change, or generating quality employment based on diversity, inclusion, and belonging.

All contributions made by the Group's companies, whether donated to charitable, community, or cultural causes, or causes of any other nature, as well as the recipients of those contributions, must comply with the following requirements, regardless of the legal form of the contribution (such as through a collaboration agreement, sponsorship, donation, or any other form of transaction): they must have a legitimate purpose, must not be anonymous, must be formalised in writing, and when monetary in nature, must be made using a form of payment that provides evidence of the contribution and that allows the recipient to be identified. Contributions made in cash are prohibited.

Before making any contributions of the types described in the previous paragraph, the proposing Corporate Area or Business Area must comply with all approved internal rules on this subject.

In all cases, the document formalising the contribution must specify that it is conditioned upon the beneficiary remaining in compliance with the requirements and conditions that allowed approval of the contribution, and that the contribution must always be dedicated to the purposes initially agreed.

The Group's companies are strictly prohibited from making any direct or indirect contributions to political parties, including federations, coalitions, or voter collectives, regardless of whether they do this themselves or through an intermediary, and regardless of the legal format involved, such as donations, loans, or advance payments.

(p). EVENTS WITH PUBLIC BROADCASTING

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The Professionals must be especially cautious when speaking or participating at professional workshops or seminars, or at any other events that could be subject to public broadcasting, and where they will be participating as Professionals representing the Group's companies. They must ensure that the messages they are giving are in line with those of the Group, and they must inform the office that performs the communication function sufficiently in advance.

Their participation must also be authorised in advance by their supervisor and/or another person the Company has designated.

(q). EXTERNAL BUSINESS ACTIVITIES

Approval in advance from the office responsible for the human resources function will also be required for the following types of external business activities:

- (i).** Appointment of any Professionals to the directorship bodies or other executive offices of professional or industry organisations or associations, or active participation in these, when representing the Group's companies.
- (ii).** Any other type of external business activities that could have a negative effect on the Professionals' dedication to their employment duties, or that could create a conflict of interest.

The Group's companies must allow their Professionals to participate in community and public activities, provided these activities do not interfere with their work at the Group's companies, or affect their company's reputation.

With regard to political parties and other types of entities, institutions, or associations with public purposes, any connections, memberships, or collaborations must take place in way that is clearly personal in nature, to prevent any relationships being formed with the Group's companies.

If any Professionals create, join, participate, or collaborate on online social network sites, forums, or blogs, they must make it clear that the opinions or statements they are sharing are their own personal views, and in all cases, they must refrain from using any images, names, or branding of the Group's companies when opening online accounts or signing up to use any such forums or websites.

5. SUPPLIERS

When selecting suppliers and service providers, the Company must always apply objective, impartial criteria, while avoiding any conflicts of interest or favouritism.

The Professionals have an obligation to comply with the internal procedures established for the contract awarding processes, especially those relating to supplier approval.

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During any selection process, the prices and other information submitted by the potential suppliers must be treated as confidential and must not be disclosed to any third parties, unless required by law, or unless consent has first been obtained from the parties involved, or unless taking place in compliance with a judicial or administrative ruling.

Any Professionals who have access to personal data relating to suppliers must treat that information as confidential, and must comply with all applicable provisions from the legislation on personal data protection.

All information that the Professionals provide to their suppliers must be accurate, and must not represent any attempt to deceive or manipulate.

The Company must make its suppliers aware of its environmental and social commitments and principles, while also encouraging them to participate in complying with them. This especially applies to those related to the promotion of circular economy and the fight against child labour, forced labour, involuntary labour, and all forms of modern slavery.

The Company must perform oversight to ensure that its suppliers are complying with this Code, to the full extent it applies to them, and if any non-compliances occur, it must respond by taking the appropriate actions.

6. ACCEPTANCE AND COMPLIANCE

Compliance with this Code must be understood as compulsory for all Professionals, as well as for all external parties that have agreed to comply with it, to the extent applicable. For this purpose, CT is committed to distributing this Code to all of its Professionals, and to all external parties in cases where relevant, especially by making it available at its website.

At the time when they are first hired or contracted by the Group, all of the Professionals must formally agree to comply with this Code, and they must do this again each time their contracts are renewed, and under any other circumstances the Company considers appropriate. In addition, the Company will periodically require its Professionals to undergo additional training and make declarations regarding their knowledge and understanding of the rules of conduct established in this Code, and regarding their compliance with those rules. They will also have a communication channel available, which they can use to submit any questions or address any interpretive uncertainties they may have.

The Company expects all of its Professionals to maintain a high level of commitment to this Code, and compliance with the Code will be one of the metrics used during all of their performance evaluations. The appropriate sanctions will be applied in all cases of non-compliance, after the situation has been analysed based on the principles and values established in the Code, the legal provisions in force, any applicable collective bargaining agreements, and the pertinent internal procedures and protocols.

It is strictly prohibited for any of the Professionals, regardless of the position they hold or its hierarchical level, to ask another Professional or a supplier, collaborator, or customer to perform any illicit or illegal acts, or any that are contrary to the Code.

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All Professionals must also understand that they will not be able to justify any inappropriate, illicit, or illegal acts, or acts contrary to this Code, by claiming that they were told to commit those acts by their supervisor or hierarchical superiors.

7. INTERNAL REPORTING SYSTEM

The Company will provide an Internal Reporting and Whistleblower Protection System, for Professionals and suppliers, and other external parties described in the applicable

legislation. This system will be made available at the Company's corporate website, and it will guarantee anonymity and confidentiality for those reporting facts or events related to the Company. This reporting could include possible irregularities, non compliances, or acts contrary to the principles from this Code, or contrary to any other rules or procedures from the Group's system of internal rules, or acts that infringe the legislation in force.

The Company's Internal Reporting System will provide appropriate protection against any retaliation that could be directed towards individuals who report any of the acts or omissions described in section 2 of Spanish Law 2/2023 of 20 February, on protection of persons who report infringements of the law and on anti-corruption measures (Ley 2/2023, de 20 de febrero, reguladora de la protección de las personas que informen sobre infracciones normativas y de lucha contra la corrupción), using the procedures envisaged in that same law. This system also represents a way of strengthening the Company's culture of information and communication, as a mechanism to prevent and detect threats and contribute to their correction.

8. APPROVAL, ENTRY INTO FORCE, AND AMENDMENT

In accordance with the Company's Corporate Governance Policy, the Board of Directors is responsible for oversight and periodic updating of this Code, which was approved at the Board's meeting held on 12 December 2023.

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