

Code of Ethics

REF. _____

	Name. Position.
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MESSAGE FROM THE PRESIDENT OF EMOVIS

ABERTIS INFRAESTRUCTURAS represented by Santiago Rodriguez Guerrero

The Abertis group as an international leader of management of mobility and telecommunications infrastructures in the areas of toll roads and telecommunications, the abertis group has always been committed to carrying out its activities with honesty and integrity and in accordance with the law, in line with its Code of Ethics.

Given the recent institutional and political crisis and the new legislative changes to combat corruption and fight for transparency, and in order to adapt to the Abertis Group's strong international growth, the Abertis Board of Directors has approved a new version of the Abertis Group Code of Ethics and has requested that the content of this Code of Ethics be implemented at the level of the emovis Group companies.

The present Code of Ethics is the emovis version of the Abertis Code of ethics that is applicable to emovis Group.

As such, we ask you to carefully read this document. The emovis Group Code of Ethics is now the fundamental regulation which governs the emovis Group. Its principles are implemented through internal regulations and are applicable to each companies belonging to the Emovis Group.

This Code of Ethics aims to set out the principles and values which should guide the behaviour of emovis Group employees, as well as that of the emovis Group's customers, local authorities, users, suppliers, subcontractors, partners and consultants.

As an ethical, socially-responsible and environmentally-friendly organisation, the emovis Group attaches the utmost importance to the fair treatment of employees, customers, suppliers, subcontractors, partners, local authorities and users.

Furthermore, the emovis Group formally expresses its condemnation of any type of corruption and its firm commitment to compliance with the law.

Any such act will lead to the automatic imposition of sanctions on the Director/Employee who has breached the Code of Ethics as well as on stakeholders that come into contact with the different companies of the emovis Group. All the departments within the emovis Group will ensure the real and effective application of the principles established in the Code of Ethics.

If you have any doubts regarding the Code of Ethics, you can send a query using the channels made available to you by each of the emovis Group companies.

1. Identification

1.1 Aim

This Code aims to:

- Establish general conduct and behaviour guidelines within the emovis Group.
- Define an ethical framework of reference, which must be complied with and should govern the working and professional behaviour of those subject to it.
- Create a code of conduct for those stakeholders who come into contact with any of the emovis Group companies (employees, suppliers, customers, shareholders, partners, etc.).

1.2 Scope

This Code of Ethics applies to:

- All the employees, including the directors, of all of the emovis Group companies, hereinafter referred to as the **People Subject to this Code**.
- The different stakeholders dealt with by each of the emovis Group companies when this is possible.

2. Body of rules

2.1 People Subject to this Code

All those who are subject to this Code of Ethics must notify the corresponding Ethics and Crime Prevention Committee of any cases of non-compliance with the Code of Ethics and the implementing regulations thereof of which they become aware.

The People Subject to this Code must contribute to the creation of a culture of compliance with the Code of Ethics, its implementing regulations and the rules applicable to the emovis Group. In order to do so, they must comply with the rules applicable to the emovis Group and encourage other emovis Group employees to do the same.

Those People Subject to this Code who hold positions in the Senior Management, management team and middle management and/or have powers to represent any of the emovis Group companies and/or powers of control and organisation must be responsible to procure that the People Subject to this Code comply with the rules which apply to them.

2.2 Guiding principles of the emovis Group for Ethics matters

- We base our activity on the ethical principles of integrity, honesty and transparency, always maintaining a conduct based on good faith.
- We comply with the applicable legislation, as well as with the emovis Group's internal rules may implement.
- **Ethical conduct and compliance with rules take precedence over the emovis Group's results.**
- In the event of a conflict between the applicable legislation and the internal regulations which apply to the emovis Group, the applicable legislation will always prevail.

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- We avoid any personal situations involving the People Subject to this Code directly or indirectly clashing with the interests of any of the emovis Group companies.
- We handle information with the utmost care.
- We use and protect the Company's assets in an appropriate manner.
- We ensure equal opportunities and we do not discriminate against the People Subject to this Code.
- We guarantee freedom from reprisal for anyone who submits a query/notification regarding non-compliance with the emovis Group Code of Ethics and its implementing regulations, whenever the aforesaid are made in good faith and desinterested.

2.3 Rules of conduct to follow

2.3.1 We base our activity on the principles of integrity, honesty and transparency, always maintaining a conduct based on good faith

All Persons Subject to this Code must act responsibly, honestly, efficiently, in a credible manner and in good faith.

2.3.2 We comply with the applicable legislation and the emovis Group's internal regulations

All Persons Subject to this Code:

- Must comply with the laws in force in the countries in which the emovis Group carries out or attempts to carry out its business activities. As such, the emovis Group encourages all those who are subject to this Code to have knowledge of the legislation and internal regulations which are applicable to the emovis Group's activities.
- Under no circumstances should employees commit action against the legal law or follow orders from their immediate superior which contravene the applicable legislation or regulations within the Emovis Group.

The range of legislation applicable to emovis Group companies is very broad. The following section focuses on compliance with the legislation that applies to all the emovis Group companies, regardless of their location or activity.

2.3.2.1 Compliance with the United Nations Global Compact principles

Abertis adheres to the United Nations Global Compact which defend the values of the United Nations and has adopted its principles of conduct and action with regard to human rights, labour rights, the environment and anti-corruption.

The present Code respects the principles of said Compact.

Respect for Human Rights: emovis Group companies protect and respect universally-recognised fundamental human rights within their sphere of influence and ensure that they are not complicit in human rights violations. In the event of a human rights violation, emovis Group companies implicated will make every effort to remedy any damage caused.

Respect for labour rights::

- The emovis Group guarantees the freedom of association and the effective recognition of the right to collective bargaining.
- The emovis Group does not use all types of forced or coerced labour.
- The emovis Group does not use the child labour.
- The emovis Group guarantees no discrimination in matters of employment and occupation.

Respect for the environment: The Emovis Group adopt a pro-environmental attitude within its activities to protect the environment and will work to promote greater environmental responsibility. All actions by emovis Group companies which could damage the environment are carried out in a preventative manner. Any action carried out by the emovis Group that could entail damage and/or a threat to the environment must be immediately reported to the Environment manager of the company affected within the group and to the Group Emovis in general (Governance Direction).

Fight against corruption: emovis Group companies shall implement actions to fight all forms of active and passive corruption involving People Subject to this Code.

2.3.2.2 Fight against corruption

The emovis Group does not tolerate any form of corruption.

The emovis Group prohibits the People Subject to this Code from:

- Engaging in any act that could appear to promote corruption, pursuant to the legislation applicable in each country.
- Offering or receiving any kind of advantage to or from any physical or legal person belonging to the public or private sector.
- Acting in a manner which compromises the objectivity and transparency of any decision which may directly or indirectly benefit emovis Group companies and/or People Subject to this Code.

The prohibitions listed above are also applied to the suppliers, consultants, subcontractors and/or emovis Group partners through the agreements and contracts entered into with them.

Corruption is checked for and reported nationally and internationally. In the majority of jurisdictions, criminal or administrative liability in matters of corruption falls not only to the **company and/or physical person who engaged in the act of corruption** but also to the parent company of the emovis Group, **Abertis Infraestructuras**. As such, the emovis Group employs the REF Prevention of Corruption regulation, which applies to all Abertis Group companies among which emovis Group. Subsidiaries of emovis may develop their own prevention of corruption rules to adapt them to the specific legislation, customs and traditions, always adhering to and not contravening that established in the emovis Group rule.

The competent Ethics and Crime Prevention Committee should be informed of any doubts relating to corruption or any cases of corruption which have been observed.

2.3.2.3 Prevention of money laundering and the financing of terrorism

The emovis Group shall comply with the national and international provisions set forth to prevent money laundering and financing of terrorism.

To this end, business relations will not be established with people or entities that do not comply with the aforementioned regulations or that do not provide adequate information as regards their compliance therewith.

2.3.2.4 Compliance with accounting and financial regulations

The emovis Group's economic and financial information will faithfully reflect its financial and economic situation and its assets, in accordance with generally accepted accounting principles and the applicable international rules on financial information. No one who is subject to the Code will conceal or distort the information contained in the emovis Group's accounting records and reports, which will be complete, accurate and truthful.

2.3.2.5 Compliance with tax regulations

The emovis Group shall comply with national and international tax regulations. It will also promote the implementation of all actions which are necessary for reducing all significant tax risks and the prevention of behaviour which is likely to generate said risks.

2.3.2.6 Protection of personal data

The processing of personal data should be carried out in a manner that guarantees its privacy, while at all times complying with the current and applicable legislation.

2.3.2.7 Protection of intellectual and industrial property

Intellectual and industrial property created by emovis Group employees will be owned by the emovis Group company to which the employees belong.

All those who are subject to this Code must strive to protect patents, trademarks, copyright, trade secrets, know-how and all other information covered by

intellectual and industrial property rights owned by any of the emovis Group companies.

Furthermore, it is crucial that we respect the legitimate intellectual and industrial property rights of third parties.

2.3.2.8 We avoid any personal situations involving the People Subject to this Code which could directly or indirectly clash with the interests of the emovis Group companies

The People Subject to this Code must avoid any situations in which their personal interests or those of related persons could clash with the emovis Group's interests or with one of its companies. In the event that they find themselves in a situation involving conflict of interest, they should inform the Group Chief Compliance Officer and the emovis President.

Furthermore, the People Subject to this Code being in a situation of conflict of interest with the Spanish stock exchange regulation managing Abertis stock exchange must immediately inform the Group Chief Compliance Officer of Abertis.

Said notifications should be carried out as soon as possible after the possible or real conflict of interest is observed and, in all cases, before making any decision which could be affected by the possible conflict of interest. Furthermore, any changes to situations which have previously been communicated to either emovis or Abertis, including the resolution of said situations, must be communicated to the relevant Chief Compliance Officer.

As regards possible conflicts of interest, the People Subject to this Code:

1. Must not exploit personal advantages gained by virtue of their position in the emovis Group, neither for themselves nor for related persons.
2. Cannot carry out professional activities of a similar nature to those which they may carry out for the emovis Group if doing so could interfere with the interests of the emovis Group.

3. Cannot directly or indirectly, whether personally or through related persons, participate in the governing bodies of other entities whose interests may clash with the interests of the emovis Group.

Without prejudice to the situations involving conflict of interest set forth herein, the People Subject to this Code could find themselves in other situations which could also be understood as posing conflicts of interests. As such, we recommend that if you have any doubt as to whether or not a situation involves a conflict of interest, you notify the Chief Compliance Officer.

2.3.3 We handle information with the utmost care

The emovis Group considers information and knowledge to be two of its main assets and essential for business management, which is why they are subject to special protection. As such, the People Subject to this Code must treat information and knowledge in such a way as to guarantee:

1. **Its veracity:** The veracity of information is a basic principle according to which the People Subject to this Code must truthfully convey all information they have to communicate, both internally and externally.

All of the emovis Group's internal and/or external economic transactions must be clearly and accurately reflected in the corresponding announcements and records.

2. **Professional secrecy:** The People Subject to this Code must respect the principle of professional secrecy, subject to confidentiality, which must be maintained even after the professional relationship with the emovis Group has ended.

When the confidential information belongs to emovis Group companies, the People Subject to this Code must not reveal said information to **third parties, including their friends and family**, except when necessary for business reasons and with the authorisation of the corresponding Ethics and Crime Prevention Committee. In this case, confidential information must not be used for personal gain or that of third parties.

When the confidential information belongs to third parties outside the emovis

Group, being information to which the emovis Group companies have access in the conduct of their activities with their stakeholders, the People Subject to this Code must comply with the confidentiality agreements that the emovis Group companies have entered into with their stakeholders. Said information may only be disclosed when the owner thereof gives their express consent.

In the event that the People Subject to this Code of Ethics are also affected by the ICR, they must comply with the procedure established in said regulation. Furthermore, the processing of inside information must be carried out in accordance with the provisions of the ICR.

The risk of non-authorised people gaining access to confidential and/or inside information must be minimised.

The People Subject to this Code must consider any information whose nature they are unsure of as being confidential.

- 3. Communication between People Subject to this Code:** The information and knowledge which is generated within emovis Group companies should flow efficiently between the People Subject to this Code in order to facilitate the management of the emovis Group's activities and foster the development of the People Subject to this Code. **Under no circumstances shall inaccurate, incorrect or incomplete information which could mislead the person receiving it be provided.**

The People Subject to this Code should provide the emovis Group's knowledge by disseminating it within the emovis Group companies and making it available to the information systems that are in place within the emovis Group companies.

- 4. The reputation of emovis Group companies:** Any Person Subject to this Code who is asked by the media about any aspect relating to the emovis Group, or who is required to participate in a public act on behalf of the emovis Group, should consult with the corresponding department of the emovis Group which is in charge of external and/or internal communication beforehand, so that said department can provide an opinion thereon. In all cases, the information given relating to the emovis Group must be transparent, truthful and consistent.

All those who are subject to this Code should place the utmost care on preserving the image and reputation of emovis Group companies when carrying out all of their professional activities. Whenever they appear or present themselves on their own initiative as an employee or director of the emovis Group, in any social medium (internet, social networks, etc.), they must ensure that the emovis Group image is used correctly and appropriately and that respect for the ethical values promoted by the emovis Group is upheld.

2.3.4 We use and protect the company's assets

a. Assets.

The People Subject to this Code must protect the emovis Group's assets, guaranteeing that they are used suitably and efficiently, and protecting them from unsuitable use. These said assets may only be used for the benefit of emovis Group companies.

b. Information and communication systems.

The use of information and communication systems must be professional. The company reserves the right to monitor and regulate the personal use of said systems, in accordance with provisions established in the applicable legislation and also with any eventuals internal agreements.

The emovis Group's information and communication systems, along with the contracting thereof, must comply with the emovis Group's security regulations.

2.3.5 We ensure equal opportunities and we do not use discrimination

2.3.5.1 Relationship with employees

The emovis Group does not tolerate any form of workplace harassment.

The emovis Group ensures equal opportunities and that there will be no discrimination among the People Subject to this Code based on gender, race, country of origin, religion, beliefs, age, sexual orientation, nationality, ideology, marital status or disability.

The principle of equal opportunities applies both to access to jobs and internal promotions, and to the personal and professional development of the People Subject to this Code. The emovis Group will promote work-life balance policies that help people to achieve the necessary balance between their personal and family life and their working life.

The relationship between the People Subject to this Code must be governed by mutual respect, integrity, transparency and trust, as well as by conduct that guarantees the personal dignity of them all.

Furthermore, the People Subject to this Code must act with a spirit of collaboration, making the knowledge and resources that could facilitate the attainment of the emovis Group's objectives and interests available to the other entities of the emovis Group.

a. Selection and promotion

The selection and promotion of the People Subject to this Code is based on their competencies and how they perform their professional duties as well as on the integrity of their professional track record. The competencies, performance of professional duties and professional integrity of the People Subject to this Code must be accredited and substantiated for their selection and promotion.

b. Training

The management is responsible for monitoring and maintaining the mandatory trainings to the People Subject to this Code. The entire employees are eligible to receive some trainings matching the company's needs and related to the employees work position, or, some training which would encourage a professional integration, would help the employee to keep his/her position, and/or would promote the professional development and the competencies.

c. Communication

Communication with the People Subject to this Code must be clear, both when evaluating their performance and when setting expectations.

d. Working conditions

Working conditions must be safe for the health of the People Subject to this Code. Furthermore, the emovis Group will ensure that its suppliers and subcontractors apply similar occupational health and safety regulations.

The emovis Group will provide its employees with the resources and knowledge required to perform their duties regarding the health and safety management.

The introduction, distribution and consumption of drugs and alcohol, or any other addictive substencies in the workplace is prohibited in accordance with the existing legislation and with the provisions of the Internal Regulation ("Règlement Intérieur").

e. Citizen Involvement

The emovis Group respects the personal engagement of each employee in citizen involvement. These activities of citizens must only be executed privately and cannot be assigned to the Group.

2.3.5.2 Relationship with customers

The emovis Group focuses on conceiving, designing and offering services of the highest quality to our customers, thus providing them with a differential value with respect to other options on the market. As such, the emovis Group fosters its commitment to quality by establishing the resources and measures required to ensure the maximum quality in the provision of its services.

The People Subject to this Code must be committed to treating customers fairly, providing them with accurate information, and always aiming to provide an excellent service.

2.3.5.3 Relationship with suppliers, partners, investors and non-profit organizations

a. Selection

Supplier, consultants, partners, investors, non-profit organizations and subcontractors selection processes must comply with the principles of equity,

objectivity and transparency. Selection will be based principally on quality, cost and adherence to deadlines.

When selecting suppliers and subcontractors the People Subject to this Code must avoid the conflict of their personal interests with those of the Abertis and emovis Group companies. In the event of a conflict as described above, they should inform the corresponding Ethics and Crime Prevention Committee thereof by filling out the Declaration of Conflict of Interest form, so that said committee can issue an opinion thereon.

b. Contracts

When contracting with a supplier or a subcontractor, the contract must include anti-corruption and anti-money laundering clauses in accordance with the emovis Group Code of Ethics and its implementing regulations. Furthermore, depending on the nature of the services being provided, they should also include environmental and social clauses. At the same time, contracted suppliers, subcontractors and partners must observe the conduct and action guidelines established by the United Nations Global Compact.

Contractual conditions agreed upon by the different parties will also be respected.

2.3.5.4 Relationship with government bodies

Given the nature of the services provided by emovis Group companies, said companies base their relationships with the national and international public sector on the principles of transparency and equal opportunities, and reject any actions aimed at gaining an advantage over competitors when said action is contrary to the applicable legislation.

Furthermore, the emovis Group will collaborate with government bodies while ensuring scrupulous compliance with their resolutions at all times.

2.3.6 We guarantee freedom from reprisal for anyone who issue a warning

The person "issuing a warning" to the emovis Group will be guarantee of freedom from reprisal when the warning will respect the following criterias:

- The person issuing a warning **must have known about the alleged facts personally**
- The person issuing a warning must **act in good faith**
- The person issuing a warning must **act selflessly**, and
- The person issuing a warning must proceed the **disclosure in a usefull and proportionate manner** safeguarding the interest involved

Good faith will be distinguished from bad faith or defamation through the analyse of proofs showing the reality of the facts already committed or about to be committed.

If any person who is subject to this Code feels that they have suffered from unfounded reprisals after issuing a warning which would be qualified as non-compliant to the four above criterias (act in good faith, act selflessly, have known about the alleged facts personally or proceed the disclosure in a usefull and proportionate manner safeguarding the interest involved) they should immediately notify the corresponding Ethics and Crime Prevention Committee thereof and the emovi President.

3. CODE IMPLEMENTATION

The emovis President

The duties of the President include:

- The approval of the emovis Group Code of Ethics as well as any substantial modifications made thereto.
- The creation of the emovis Corporate Ethics and Crime Prevention Committee and the approval and modification of its regulations.

The emovis SAS employees representatives

They were consulted in compliance with the relevant laws

Other companies from the Emovis Group

The directors and officers of eEmovis subsidiaries companies, in contact with the Legal Department of Emovis Group, adapt and submit the Code of Ethics to the Emovis

validation, the shareholders.

Emovis Group Chief Compliance Officer

The duties of the Chief Compliance Officer of the emovis Group companies include:

- The resolution of conflicts of interest involving people to whom the Internal Conduct Regulations apply.
- The immediate notification of any declarations of conflicts of interest to the emovis Corporate Ethics and Crime Prevention Committee.
- The immediate notification of corrupt act he/she would be aware of to the emovis Corporate Ethics and Crime Prevention Committee.

Ethics and Crime Prevention Committees

The emovis Group decides to constitute an Ethics and Crime Prevention Committee:

This committee is established at the head office of the emovis Group, it is the competent body within the group being able to uphold the Code of Ethics and to implement regulations thereof.

The Ethics and Crime Prevention Committee is the consultative and administrative body related to the Code of Ethics. It periodically holds meetings, a president is appointed to the head of the Committee, all the Ethics and Crime Prevention Committee members must respect the following rules:

- Act according to independent and equitable criteria.
- Maintain the confidentiality of all information and actions carried out.
- Ensure that reprisals are not taken against employees or third parties implicated in the query/notification.

Queries/notifications will only be revealed outside of the corresponding emovis Group Ethics and Crime Prevention Committees when strictly necessary (e.g. when legally required), and safeguards will always be in place to maintain confidentiality.

Emovis Group Managers with human resources functions

The Human Ressources teams of the emovis Group are committed to raise awareness on the application of the Code of Ethics within the Group. The aim will be to insure a good communication of the main "Global Compact" ideas and to validate the good

understanding of the issues to respect the Code of Ethics in everyone's daily routine.

At the end of this process, the Code of Ethics will be signed by all participants.

The emovis group recommend a specific module dedicated to business ethics (non corruption, money laudring prevention) for the departments/teams the more concerned about those risks (Ex: Direction and Business Devlopment)

The Human Ressources teams of the emovis group shall disseminate the Code of Ethics to all new employee by giving him/her a copy he/she would have to sign back when entering an emovis entity.

In the eventuality of a substantial amendement of the Code of Ethics, the Human Ressources teams of the emovis Group shall inform all the employees and to make them sign the new Code of Ethics version.

Respect of the Emovis Group Code of Ethics

The People Subject to this Code must respect it. The partners or the business relationship of the emovis Group must respect the Code principals for any subject they would be concerned of and would have been communicated to them.

Any person subject to the Code who violates the rule will be punished in accordance with the local law applicable, depending on the relationship existing between the person and the company of the emovis Group. The sanctions could go as far as a dismissal or a contract termination.

The consequences of non respecting the Code and/or of its applicable rules will not only affect the person responsible but also all the person subject to the Code who would have helped to commit the offence.

In case of violation of the principles defined by the Code of Ethics and/or its implemented regulations by a partner or any person with whom the emovis Group is having a business relationship, emovis shall have the right to terminate the contract or to end the business relationship.

Information channels

The emovis Group has established formal channels, monitored by the chairs of the corresponding Ethics and Crime Prevention Committees, to allow the People Subject to this Code to:

1. Submit any query they may have regarding the interpretation of this Code of Ethics, its implementing regulations and the applicable legislation and internal rules.
2. Report cases of non-compliance with this Code of Ethics, its implementing regulations and the applicable legislation and internal rules.

Those who are subject to this Code may submit queries and notifications using:

- o The email address to the relevant **Compliance officer** named for each subsidiaries companies or the following mail adresse: emovis SAS, Responsable Conformité, 86 rue Henry Farman 92130 Issy-Les-Moulineaux
- o **The Ethics and Crime Prevention Committees:** emovis SAS, Comité d’Ethique et de Prevention Pénales, 86 rue Henry Farman 92130 Issy-Les-Moulineaux
- o The e-mail address, canal-éthique@emovis.com.

The procedure for submitting queries/notifications and the content thereof will be established in the implementing regulations of this Code of Ethics, in accordance with the local legislation applicable.

Internal control

The emovis Group reserves the right to carry out checks, in accordance with current legislation, with the aim of testing the application of the present Code and preventing activities that could affect the legal compliance, confidentiality, integrity or availability of information.

4. STATEMENT

All supporting documents for queries/notifications and their subsequent monitoring and investigation, as well as their resolutions, will be transmitted to the Ethics and Crime Prevention Committees.

5. DEFINITION

Abertis: Abertis Infraestructuras S.A.

Abertis Infraestructuras, S.A. Internal Conduct Regulation for Matters related to the Stock Market: Governs the conduct of the people affected by the ICR and, in turn, by the Abertis Group Code of Ethics, when they carry out actions affected by the Stock Market Law.

Confidential information: Written or verbal information containing, but not limited to, technical, financial and commercial information, models, names of possible customers or partners, proposed commercial operations, reports, plans, market projections, data, analysis, work papers, compilations, comparisons, studies or other documents whose disclosure could directly or indirectly damage the owner of said information.

Emovis Group: Companies over which emovis S.A.S. has or may have direct or indirect control, this consisting of:

- Holding the majority of the voting rights,
- The power to appoint or dismiss the majority of the members of the Board of Directors, or
- Holding the majority of the voting rights by virtue of agreements made with third parties.

The emovis Group companies are free to have their own codes of ethics and implementing regulations, which must never contravene the principles of the emovis Group Code of Ethics.

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Emovis Group Assets: The emovis Group's assets are made up of movable and immovable property: shares and/or holdings, money, equipment, vehicles, tools, computer equipment, software, brands, domain names, industrial and intellectual property, information regarding the company, the knowledge and outcome of employees' work, etc.

Emovis Group Code of Ethics: The emovis Group Code of Ethics is the fundamental regulation which governs the emovis Group, by establishing general conduct guidelines which must be followed by all those people included in the scope of this document. No internal regulations of emovis Group companies may go against the Code's stipulations

Good faith: Belief by the People Subject to this Code that they are acting correctly.

ICR: Internal Code of Conduct of Abertis Infraestructuras relative to the financial markets law respect

Implementing regulations for the emovis Group Code of Ethics: The rules which implement the emovis Group Code of Ethics in order to adapt it to the specific legislation, customs and traditions of the countries in which the different emovis Group companies are located.

Information and communication systems: These include IT systems, internet, email and telephones, as well as any other information and communication technology currently provided by the emovis Group or which it provides in the future (video conferencing, unified messaging, telepresence, etc.).

Inside information: Specific information that refers directly or indirectly to marketable securities and/or financial instruments of any kind which grant the right to acquire Abertis Group securities, or to securities affected by legal or financial operations under study or negotiation by the Abertis Group, which has not been made public and which, if made or having been made public, could significantly influence or has significantly influenced their value in a market or organised procurement system.

Public information and data is not considered to be inside information.

The Abertis Infraestructuras, S.A. Internal Conduct Regulation for Matters related to the Stock Market (hereinafter the **ICR**), which applies to some of the People Subject to this Code, known in the ICR as the People Affected, elaborates on the definition of inside information.

Internal regulations: Self-imposed rules, procedures, instructions and documentation in emovis Group companies which implement the emovis Group conduct guidelines established in the emovis Group Code of Ethics and in its implementing regulations.

Legislation: Regulations issued by any public authority.

Notifications: The communication by the People Subject to this Code or by stakeholders of cases of non-compliance with the emovis Group Code of Ethics, its rules and/or its internal implementing regulations.

Partner: a person or a company holding a close relation with the emovis Group and which could be affected by actions or future of the emovis Group: suppliers, consultants, clients, shareholders, employees, investors, public body or non profit organisation.

Query: The presentation of any doubt/concern related to the behaviour of the People Subject to this Code or of emovis Group stakeholders as regards compliance with the emovis Code of Ethics, its rules and/or internal implementing regulations.

Related persons: The ICR defines related persons as:

- i) Spouses, husbands or any person connected by an emotional relationship.
- ii) Dependent children.
- iii) Other relatives who live with them or are dependent on them at least a year before the date on which the transaction is carried out.
- iv) Companies or legal entities in which they hold an executive management position, for which they are responsible for the management thereof, which they have created for their own benefit, which have economic interests equivalent to their own or which they effectively control under the terms set forth in the Stock Market Law.
- v) Intermediaries or people with whom they act in concert.

Stakeholders: Entities or individuals which may be significantly affected by the activities of any emovis Group company and whose actions may affect the organisation's ability to successfully develop its strategies and achieve its objectives. Suppliers, consultants, customers, shareholders/partners, employees, investors, government bodies and non-profit organisations are all emovis Group stakeholders.