

## Conflict of Interest Prevention Policy

### 1. Introduction

The OBRAS SUBTERRÁNEAS S.A. (hereafter OSSA or the Corporation) Code of Ethics imposes on its employees the duty of avoiding situations that could give rise to a collision between their personal interests and those of OSSA.

### 2. Policy summary

The object of this Policy, expanding upon the previously cited principle, is to avoid the occurrence of any action on the part of the OSSA employees, managers or members of the administration, that might interfere with the Corporation's independent exercise of its activities.

### 3. Scope

This Policy is applicable to all employees, managers and members of the administration of OSSA and refers to both individual and joint actions taken by, or on behalf of, the Corporation.

It applies to all corporations in the OSSA group, including subsidiaries and joint ventures in which the Corporation may have controlling interests.

This Policy extends to all activities, processes and relationships established by the Corporation and its employees, at all levels, be they formally drawn up in a contract, policy, procedure or similar, or be they custom or common practice.

### 4. General requirements

A conflict of interest shall be understood to exist when an employee, manager or member of an administrative organ within the scope of this policy adopts measures or has interests that could pose difficulties for the objective and efficient performance of their work in the Corporation or that could endanger, hinder or put at risk the Group's business objectives.

A conflict of interest arises when a situation, occurrence, relationship, etc., interferes with or influences the professional and independent judgment of an employee, manager or member of the administration.

Conflicts of interest can also arise when employees, managers or members of the administrative organs, their family members or relations, receive undue personal benefits deriving from the position they hold in the Corporation.

#### Negotiating contracts and orders with third parties

- ✓ There shall be no participation, active or passive, in any agreements with third parties when such agreements might result in the third party's interests being put before the interests of OSSA.
- ✓ When relating to third parties, all actions should be impartial and objective, and not subject to financial, personal or family considerations.

- ✓ Any direct or indirect intervention in the management of any type of contract with family members or relations is to be avoided.
- ✓ Receiving or giving any remuneration to clients, suppliers, and any third party in general that might unduly or excessively favor the corporation to which the aforementioned belong, or that goes against the OSSA attentions and gifts Policy in any way, is prohibited.

### Client service

- ✓ The principles of equal treatment, objectivity and transparency are to be maintained and applied in all relationships with clients.
- ✓ No confidential information is to be shared with clients, unless said information must be provided due to a legal order, court mandate or the like, or, when it concerns commercial information, it is necessary for the development of ordinary commercial relations.
- ✓ The employees, managers or members of the administration subject to this Policy shall not take on responsibilities in the carrying out of their activity that enter into conflict with OSSA objectives.

### Conflicts of interest between the personnel and the clients, suppliers or other third parties

- ✓ In the case of a personal relationship between an OSSA employee and a client, supplier or other third party exerting influence on said person's decision-making, the Compliance Committee shall be notified of the existence of said relationship, and, in coordination with the hierarchical superior, it will determine what measures to adopt, among which is the possible removal of the employee from that specific activity.
- ✓ This norm shall be applied regardless of whether the OSSA employee conducts any type of business with the third party with whom he has a personal relationship or kinship, or it is the third party who has a family member or relative on their team who in turn has a personal relationship with an OSSA employee.
- ✓ No employee, manager or member of the administration of OSSA shall work simultaneously for a competitor company, or one that could have conflicting interests.
- ✓ No employee, manager or member of the administration of OSSA shall carry out any job, while working for the Corporation, that could interfere with their ability to perform their activities or fulfill their responsibilities. Moreover, they will not be able to make use of facilities, materials, confidential information or any type of resource for an external job, nor for personal activities.

### Use of a position at OSSA for personal gain

- ✓ Neither OSSA property nor information, nor a position in the Corporation itself, shall be used to obtain personal gains, nor for family members or relations.

- ✓ The Corporation's suppliers shall not be made use of for performing jobs in their particular area when doing so might bring harm to OSSA.
- ✓ No personal business shall be carried out, nor shall business opportunities arising from the position or influence of an OSSA employee be pursued.

### **Purchases, sales and other transactions**

- ✓ Only those employees expressly authorized to do so will be able to handle contracts and orders.
- ✓ Likewise, services provided to clients or requirements to suppliers will be carried out in accordance with the law and the Corporation's internal regulations, without the application of any subjective or personal parameters.

### **Shareholding**

Should the case arise where an employee, manager or member of the administration of OSSA, or one of their family members or relations, has a significant holding in a company which has a relationship of any kind with the Corporation, they must bring this to the attention of the Compliance Committee, in order to adopt the decisions it considers opportune.

### **Measures to take if a potential conflict of interest is detected**

- ✓ In the case that an employee of OSSA detects a possible conflict of interest with regard to their own person or another person within the Corporation, they must bring it to the attention of the Compliance Committee.
- ✓ Likewise, should a change in the circumstances of an employee or a family member or relation possibly lead to a conflict of interest where none existed previously, it must be brought to the attention of the Compliance Committee.
- ✓ When faced with a situation of a potential conflict of interest, all actions shall be halted and the employee or person in conflict removed, until said situation is deemed appropriate or a decision is made to eliminate or discontinue the action that led to the situation.