



moeve

# Code of ethics and conduct



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# Message of our CEO

At Moeve, we transform energy and mobility to improve the world. This mission drives our values and shapes our strategy for 2030, under the banner of 'Positive Motion'. This vision has guided our company's transformation towards Europe's energy transition, ensuring it's fair and inclusive, with no one left behind.

As part of our journey towards net zero, Moeve's mandatory Code of Ethics and Conduct is a key strategic tool that defines the appropriate behaviors expected from all our employees and stakeholders. It also helps us to share with third parties with whom we collaborate on ethical principles and conducts that we regulate.

All of us who work at Moeve have the responsibility to act with integrity and honesty, always safeguarding the company's reputation and generating positive impacts for society.

For this, ethics, respect, and responsibility will guide us as we lead the production of green molecules, such as green hydrogen and second-generation (2G) biofuels, along with sustainable chemistry and mobility. These efforts will accelerate our decarbonization journey and that of our customers.

Moeve's Corporate Governance System outlines the principles that govern our company's actions, ensuring we operate in line with environmental, social, and governance (ESG) criteria.

Moreover, our Integrity Channel is available to all Moeve employees and third-party collaborators, offering a platform to report, in good faith, any breaches of the Moeve Code of Ethics and Conduct, or other applicable internal and external regulations. Reports are handled with complete confidentiality, free from retaliation, and can be made anonymously if desired.

Ethical behavior, legal compliance, and transparency should always be at the forefront of our daily actions, as we continue to prioritize the safety, well being, and development of all our teams and communities.

Ethics is fully embedded in Moeve's corporate culture, because we care about people. It is also essential to our collective effort to protect the planet and build a sustainable energy future.

We are facing the change and challenges of the energy transition with optimism, enthusiasm, and courage, leading sustainable and innovative projects where legal compliance and zero tolerance for inappropriate behavior are essential.

As a global energy company, everyone at Moeve collaborates with respect, honesty, and integrity, working alongside our customers, suppliers, and shareholders to deliver exceptional results. All of this is with the aim of continuing to progress towards decarbonization and sustainability.



**Maarten Wetselaar**  
CEO de Moeve

# Who must follow the code

**Our Code of Ethics and Conduct applies to all directors, managers and employees of Moeve and subsidiaries of the Moeve Group, understood to be companies in which Moeve has a controlling interest (“Moeve” or the “company”), regardless of the type of employment contract they have. Such persons will collectively be referred to as “employees” in the Code.**

In companies where Moeve has a non-controlling interest and which are not subsidiaries of the Moeve Group, every reasonable effort will be made to ensure that either they adopt our Code or have ethics programs in place that are consistent with our standards.

Third parties (consultants, partners, non-operated joint ventures, contractors, suppliers and their related entities) who work for or on behalf of Moeve must also act in a manner that lives up to our Code and its principles. For this reason, we expect and must do our best to encourage such third parties to develop and implement ethics programs and standards that are aligned with ours. In cases where Moeve believes that such persons have failed to comply with our policies or their contractual commitments, it reserves itself the right to take the appropriate actions.

Moeve operates in countries around the world where local laws or customs may require special guidance in addition to what is provided in our Code. In instances where there may be a discrepancy between a local requirement and our Code, the most stringent standard shall apply and under no circumstances shall any practices or behaviors violate our principles or the Code.

This Code is supplemented by a set of related policies that offer additional and more detailed guidance on what to do and how to act in the most difficult and challenging situations. Although Moeve makes every effort to provide employees with clear guidelines on their obligations and

responsibilities, it cannot address every single situation. The absence of explicit guidance in a particular situation does not exempt anyone from their responsibility to obey the law and uphold the highest standards of ethical conduct at all times.

Where you feel you need more specific guidelines on what to do in a given situation, ask for help from your supervisor/line manager and/or the Ethics & Compliance Office at [Integrity Channel](#).





# Complying with the law and doing business ethically is everyone's responsibility

Each one of Moeve's employees is responsible for safeguarding the company's integrity and reputation, always acting with honesty and integrity and in line with our corporate values, which represent who we are, our identity as employees and as a company.

## Our values



We care about **people**



We delight our **customers**



We look after the **planet**



**Together** we create more value



We dare to be **entrepreneurial**

## Our purpose

We transform energy and mobility to improve the world together



This should be our way of being and doing, even in difficult or compromising circumstances or under pressure. When confronted with one of these situations, ask yourself the following questions before taking action:

1. Is it legal?
2. Is it consistent with our values and principles?
3. Does it comply with both the letter and spirit of our Code?
4. Is it allowed under our company's policies and procedures?
5. Would I feel comfortable if my actions or decisions were publicly known, ended up in the news or if I had to explain it in court?
6. Would I be able to openly talk about or admit what I'm doing without feeling ashamed or embarrassed?

If your answer to any of these questions is "no", take a moment to discuss your concerns with your supervisor/line manager and/or the Ethics & Compliance Office so they can give you the appropriate advice on how to proceed.

And don't forget to:

- Read, familiarize yourself with and understand the Code. If you have any questions, seek advice from the Ethics & Compliance Office through the [Integrity Channel](#).
- Complete the ethics training assigned to you by the company and always adhere to the Code of Ethics and Conduct.
- Demonstrate, through your words and actions, your commitment to the highest standards of integrity and ethics, acting in accordance with the Code in every one of your daily activities.
- Notify the Ethics & Compliance Office in good faith on any actual or suspected violation of the Code of Ethics and Conduct, our internal regulations or applicable laws as promptly as possible.

Remember that if you are a supervisor or manager, you have a responsibility to embody ethical conduct, demonstrating your genuine and honest leadership by:

- Making sure that your team knows, understands and complies with this Code and any other applicable regulations.
- Leading by example.

- Providing guidance and support to your team whenever they have any doubts or concerns.
- Fostering an environment where people feel comfortable about sharing their thoughts and opinions.
- Listening to and addressing any concerns raised.
- Making sure that no one who truthfully and in good faith reports a suspected violation suffers any retaliation for doing so, and appropriately handling any possible breaches of the Code of Ethics and Conduct that may arise.







01

**Our commitments  
to our employees**

## 1.1 Workplace health and safety

- Always making the health and safety of our employees and service providers our top priority, under the principle that all accidents are preventable, and allocating the necessary resources to achieve this goal.
  - Protecting the integrity of our operations and establish control measures and emergency plans to reduce the consequences of potential major accidents, providing protection and safety for the people who work for the company, as well as the assets, processes, environment and communities around its facilities.
  - Taking the necessary preventive measures to avoid negative impacts and incidents (industrial and personal).
  - Informing, training and raising awareness among our employees. about safety issues, strengthening the tools and mechanisms to enable workers and their representatives, where applicable, to actively take part, providing the right resources to foment awareness and engagement and regularly reporting on the company's performance.
  - Requiring our suppliers and contractors to be adequately trained on safety and risk prevention before formalising the contract.
  - Ensuring the health and safety of our customers and the communities at large throughout the lifecycle of the products we manufacture and sell.
  - Promoting sustainable and effective management systems by planning, implementing, evaluating and reviewing activities for continuous improvement, in line with the company's context and the strategy.
  - Ensure that workplaces are safe workplaces with zero tolerance for the consumption, possession and distribution of alcohol and drugs, promoting healthy habits.
- **We rely on you to...**
- Actively take part in all mandatory training activities.
  - Look after the health and safety of the people you engage with on a daily basis and be particularly careful when dealing with health and safety issues, making sure that the required personal protective equipment is used as needed.
  - Identify, anticipate and evaluate occupational health and safety related risks before making any decisions in order to adopt the most appropriate preventive or mitigating measures.
  - Propose and implement preventive measures.
  - Be aware of what is happening around you and report and stop any activity you observe that could lead to an accident or unsafe situation.
- Remember: safety and well being is a precondition before starting any work.**

## 1.2 Harassment prevention, respect and equal opportunity

- We do not tolerate any form of physical, sexual, psychological or verbal harassment, bullying or abuse among our employees or any other conduct or behavior that may create an intimidating, offensive, humiliating or hostile work environment.
- Our commitment to the United Nations SDG (Sustainable Development Goals) makes us even more determined to ensure fair and equal opportunities in the workplace, where diversity is valued and non-discriminatory practices are applied when it comes to hiring, promoting or compensating our employees.





## We rely on you to...

- Encourage dignified employment, scrupulously respecting people's right not to be victims of forced labor or any other form of labor exploitation within Moeve and among Moeve's business partners, suppliers, customers or any other stakeholder.
- Treat everyone with respect, dignity and courtesy and never threaten, humiliate, harass or use suggestive, derogatory or degrading language or actions, making sure to adapt your behavior to local customs.
- Report to the Integrity Channel any situations of harassment or inappropriate behavior that you may experience or witness.
- Act impartially and make sure that your feelings, prejudices and personal preferences do not get in the way of any job-related decisions you make involving the hiring, evaluation, promotion, training, development, disciplinary action, compensation or dismissal of any employees.
- Respect other people's boundaries and avoid inappropriate or unwelcome physical contact or behavior.
- Respect and honor the right to disconnect so that everyone can enjoy, outside their normal working hours, their leisure and family time, paid leaves and holidays.



## 1.3 Asset management and controls

- Company assets include physical assets such as land, facilities, equipment and inventory, as well as intangibles, such as our brand, reputation, intellectual property, know-how, proprietary information, IT systems and programs, etc.
- Moeve undertakes to provide its employees with all the necessary equipment and resources to perform their professional duties and responsibilities.
- As Moeve employees, we are all responsible for properly using corporate assets and protecting them from misuse, abuse, destruction or loss.



## We rely on you to...

- Use the Moeve's brands image correctly and responsibly and do not use them in personal communications in contexts unrelated to the company actual business activities. Complete the mandatory training and utilize those resources provided by the company to ensure proper use.
- Avoid participating in, abetting or permitting any actions or situations involving robbery, theft, improper use, fraud, destruction, loan, sale or disposal of assets in an unauthorized manner.
- Be diligent and do not to share your access card to the facilities.

## 1.4 Information management

- Moeve will apply appropriate technical and organizational measures to ensure an adequate level of security and protect information against any risk of leakage, unauthorized internal or external access, manipulation, or destruction, whether intentional or accidental.
- Information that is no longer needed will be disposed of in accordance with the requirements of applicable data protection and privacy laws.
- We are committed to guaranteeing the protection of privacy rights and the appropriate use of personal data, whether belonging to our employees or other stakeholders, and we abide by all applicable laws in the countries where we operate.



### We rely on you to...

- Classify information in accordance with the internal regulations approved for this purpose, always complying with the security measures associated with the classification level.
- Be careful and use sound judgement when speaking, writing, printing or sharing any kind of company information with non-authorized persons, taking into account the level of criticality of the information being handled.
- Pay special attention when you are in public places and handling Moeve information, and avoid tasks that require the use of confidential information unless you can ensure that no one will have access to such information.
- Always secure company equipment or devices and remember never to leave them unattended and to protect them carefully.
- Do not access, download, store, use or send inappropriate, unauthorized or illegal content on company devices and exercise extreme caution when faced with suspicious emails or links.
- Use strong passwords to access the company information systems, change them regularly, and do not share them with third parties.
- Immediately report any security incident or suspicious activity that may compromise the integrity, confidentiality or availability of information using the company's established communication channels.





## 1.5 Use and development of artificial intelligence



We rely on you to...

- We are committed to the responsible and ethical use of Artificial Intelligence (AI hereinafter) in accordance with applicable regulations, the Ethical Principles of AI and our AI Policy. This commitment is materialized through compliance with its ethical principles, which can be consulted in the appendix.
- Keep your knowledge, skills and abilities in the use and development of AI up to date by attending all the training sessions that are organized in this area and by using all the tools that Moeve puts at your disposal in order to be highly qualified at all times and to understand the implications.
- Be responsible in the use and development of AI in your daily activities. Take advantage of all the opportunities its use offers while being aware of the potential risks it may entail.
- Maintain your critical spirit, not assuming that the answers provided by generative AI applications are always true. Your human perspective will be essential for the ethical use of AI.
- Report any situation where you are aware that an AI system or development does not follow any of the ethical principles of Artificial Intelligence.





02

**Our  
commitments  
as a sustainable  
company**



## 2.1 Environmental management and energy transition

- To minimise, and where possible avoid, negative impacts and to maximise, as far as possible, positive impacts on the ecosystem, in particular on water resources, waste, soil, biodiversity, atmosphere, noise, odours and light.
- To ensure that employees have the relevant knowledge, training and awareness on environmental issues, providing the resources to promote awareness and regularly reporting on the company's performance.
- Use resources efficiently, by ensuring that the value of products and materials is retained in the economy as long as possible, minimizing waste generation and optimizing waste management promoting efficient water management and supporting the circular economy.
- Promoting sustainable and effective management systems by planning, implementing, evaluating and reviewing activities for continuous improvement, in line with the company's context and the strategy.
- Promoting research and innovation, environmental stewardship and sustainable consumption.
- To mitigate CO<sub>2</sub> emissions associated with our activities, whether at our facilities or as a result of our product portfolio, in line with its climate action and energy transition ambitions.



We rely on you to...

- Become familiar with, understand and uphold all applicable environmental regulations and standards, and help develop and take part in all environmentally-related training activities, as required.
- Ensure that sustainability criteria and considerations are integrated into all your activities and demonstrate the necessary care and diligence when handling environmental issues.
- Use resources efficiently, extending their lifespan and minimizing waste generation.
- Use water resources reasonably and properly, helping to improve their quality and endeavoring to reduce the associated water footprint.
- Be alert to what is happening around you and report any environmental accidents, incidents or concerns.
- Encourage sensitivity and awareness on the effects of climate change, the need for energy conservation and the shift to low-carbon products.



## 2.2 Human rights

We have a steadfast commitment to protect and defend basic and universally-recognized human rights, particularly with regard to:

- Labor,
- The most vulnerable groups, such as children, young people and the elderly,
- Freedom of association and collective bargaining,
- Fair and respectful treatment, equal opportunities and non-discrimination, and
- Prevention of human trafficking.



We rely on you to...

- Ensure that all our business activities strictly comply with and uphold human rights laws and regulations and require our business partners to uphold the same values and share our commitment to promoting human rights.



## 2.3 Control, governance and compliance in our operations

- We are committed to transparency in our business operations, complying with applicable laws and regulations in the countries and jurisdictions where we conduct our activities.
- Delegations of Authority regulate the decision-making processes in the company. We will not accept or tolerate anyone acting outside his or her power and delegated authority for each specific case.
- We have the necessary and appropriate control mechanisms, aligned with the relevant regulations, to ensure that our accounting and financial records clearly and accurately reflect transactions. We currently report, in a transparent manner, our financial and non-financial information in our Integrated Management Report available on our corporate website.



We rely on you to...

- Understand and comply with regulations that are applicable to your activity, especially those that may have financial or reputational repercussions for Moeve.
- Act within the limits and authorities granted in the relevant Delegation of Authority.
- Ensure that all decision-making processes are traceable and accurately record all transactions, adhering to the principles of truthfulness and transparency.
- Record all business and financial transactions in the correct time-period and make sure that all transactions comply with the relevant international financial and non-financial reporting standards.
- Monitor activities under your responsibility, applying the relevant internal controls to ensure compliance with company policies and regulations.



## 2.4 Anti-bribery and corruption

- Moeve prohibits any type of bribes, kickbacks, improper advantages or other acts of corruption, such as giving or receiving gifts or hospitality by means of cash or in kind payments, whether in the public or private sector.
- Moeve allows gifts and hospitality to be exchanged as common business courtesies only if they are of a token value and are part of the normal course of business; however, gifts or hospitality that exceed certain reasonable limits and may create an appearance of impropriety are strictly forbidden.
- Never promise, offer, give, request, accept or receive, directly or indirectly, payment or anything of value in return for favorable treatment, to influence a business outcome or to gain any business advantage.
- Make sure that any company events or incentive travel that you organize are for legitimate business purposes and not to influence a business decision and apply objective selection criteria when inviting our clients.
- Properly document all payments made with the corresponding invoice or receipts that fully and accurately describe the type and purpose of the payment and record all expenses completely and accurately in our internal processes.



We rely on you to...

## 2.5 Anti-money laundering and counter-terrorist financing measures

- We conduct our businesses in compliance with the law. Therefore, we avoid doing any kind of business with persons and/or entities whose aim or purpose may involve or be supportive of money laundering or terrorist financing.
- We undertake to abide by all applicable tax regulations, and we implement our tax policies in a way that seeks to uphold the best interest of society as well as the company's long-term business objectives, endeavoring to avoid tax risks or inefficiencies when executing business decisions.
- We cooperate with the competent tax authorities in identifying and combating fraudulent tax practices that may occur in the markets where we operate.
- Never make or receive payments to or from third parties or bank accounts unrelated to a transaction or that are not specified in the corresponding contract, taking special care not to accept contractual provisions where the third-party unilaterally specifies the place where we should receive a payment.
- Never do business with customers, suppliers or partners involved in commercial activities using funds from illegitimate sources of where you may suspect this is the case.
- Never accept or transfer funds coming from or going to countries with strict banking secrecy laws, weak anti-money laundering controls, tax havens or where corruption is known to be widespread.
- Exercise good judgment when dealing with potential business partners and conduct appropriate and thorough Third-Party Due Diligence on your counterparties to protect Moeve's reputation.



We rely on you to...



03

**Our commitments  
in our external  
relationships**



## 3.1 Conflicts of interest

- We respect the privacy of our employees and their right to operate a business or work on a freelance or employed basis, as long as this does not interfere with their work performance, violate any exclusive employment agreements or compromise their ability to act in Moeve's best interest.
- Work-related decisions should be based on defending Moeve's interests, and free from any personal or family influences or any other type of personal interests.



We rely on you to...

- Avoid being involved in any decisions that create or may be perceived to create a conflict between your personal interests and the interests of Moeve.
- Never use your position in the company, or its assets, information or resources, for personal gain, with the exception of teaching/educational activities, provided that certain criteria are met.
- Never use Moeve as a platform to promote outside, personal business or any other type of interests or to benefit friends or family members.

## 3.2 Interacting with governments, public administrations and trade unions

- Moeve does not involve itself directly or indirectly with any kind of political activity. Any lobbying activities must be for legitimate business reasons and meet very stringent ethical standards and criteria, and we are committed to publishing contributions aimed at defending the interests of the industry.
- We comply with the laws governing commercial interactions with government officials, agencies and public administrations.
- Moeve strictly prohibits offering, giving or attempting to give gifts, courtesies, cash payments or their equivalent or any other favors to government officials or entities, politicians or people holding public or elected offices or anyone connected to any of the above persons, either directly or indirectly, that could be seen as trying to influence a business decision or obtain an improper advantage.
- We prohibit donations or any type of funding or support to any political parties, state-owned entities or trade unions.



We rely on you to...

- Understand and obey the laws governing commercial interactions with government officials or persons working for Governments in any capacity, in the countries where we operate or do business.
- Never involve or associate Moeve with any type of political or electoral activities that you may personally be engaged in.
- Take special care and precautions when dealing with any type of government officials or agents working on behalf of governments.



### 3.3 Engaging with partners, suppliers, customers and other stakeholders

- We strive to build relationships with third parties based on trust and honesty. In that sense, we should be careful about the services and capabilities we provide, never making promises that we cannot keep.
- We expect our suppliers, contractors, subcontractors, agents, dealers and any other business partners to comply with applicable laws and regulations and to act according to the highest standards of ethics, integrity and compliance as articulated in this Code and in our safety and environmental policies and to respect internationally recognized human rights, fostering long-term sustainable relationships.
- Third parties should be made to sign confidentiality agreements if they have access to confidential or proprietary information and apply the necessary security measures to protect such information.



We rely on you to...

- Choose suppliers based on merit and through a fair and competitive selection process, avoiding any kind of favoritism or conflict of interest that can compromise, or appear to compromise, this process.
- In the event of any doubt as to the criteria described above, consult the compliance regulations with the Ethics and Compliance Office.
- Promote best practices and implementation of compliance controls, facilitating integrity in interactions with third parties.
- Ensure that suppliers and contractors have their own policies that align with the principles of this Code and require their own suppliers to adhere to similar principles, thereby maintaining full integrity throughout the supply chain.
- Address customer requests without bending to pressures to act outside the law or violate our ethical rules and standards.
- Know your customers, partners and suppliers and perform the required due diligence procedures, especially when there is an ongoing relationship, in order to verify that their transactions are legal, legitimate and reputable.
- Actively listen to our customers in order to meet their needs, offer the best possible service while complying with defined processes and applicable regulations.
- Ensure that our business partners, suppliers, clients, and other stakeholders do not use Moeve's trademarks for commercial or advertising purposes without express authorization. When such authorization is granted, to ensure that the trademark is used correctly and avoid any actions that could damage our reputation.







04

Our commitments  
in the  
marketplace

## 4.1 Antitrust and fair competition

- Free and unfettered competition is one of the basic cornerstones of a market economy and its proper functioning. At Moeve, we are firmly committed to respecting antitrust and unfair competition regulation.
  - A possible violation of these rules would not only severely damage our reputation but could also have serious consequences for Moeve (very high fines, prohibition from contracting with the Administration, claims for damages in court, etc.) and for individuals (financial penalties and even possible criminal liabilities in certain countries).
- 
- We rely on you to...**
- Make sure not to discuss sensitive topics from a competition perspective at industry associations, meetings or events where competitors are in attendance and where there is a risk of exchanging commercially sensitive information. If competitively sensitive issues arise at such industry meetings or other events or even during a casual conversation, it is your obligation to leave the meeting, ensuring that your departure is well noted, or end the conversation immediately, and promptly notify the Legal Competition & Assurance Department.
  - Always seek advice and counsel from the Legal Competition & Assurance Department to avoid the inclusion of provisions that may violate competition laws in contracts with customers or suppliers. Pay attention to exclusivity clauses, clauses that involve fixing the resale price, territorial limitations, restrictions on passive sales or online sales by our distributors, among others.
  - Avoid restrictive agreements<sup>1</sup> with third parties, whether they are competitors, customers, suppliers, or distributors (among others).

## 4.2 Intellectual/industrial property

- We comply with all intellectual and industrial property laws governing Moeve's intangible assets<sup>2</sup>, and we protect our intellectual and industrial property as well as that of others held in our custody.
  - Make proper use of any third-party information protected by confidentiality or non-disclosure agreements and only use such information for the intended purposes.
  - Protect the intellectual and industrial property of others using the appropriate safeguards and security measures based on the classification of information defined in the company's Data Protection & Privacy Policy.
- 
- We rely on you to...**
- Ensure the protection and ownership of Moeve's intangible assets in accordance with internal regulations.

<sup>1</sup> Examples include price fixing, market or customer allocation, bid rigging, exchange of strategic information or abuse of a dominant market position.

<sup>2</sup> Examples: trademarks and patents, as well as certain proprietary information, such as business and strategic plans, customer data, technology, research & development data, know-how, manufacturing processes and technologies, personnel records, third-party information subject to confidentiality obligations, etc.



## 4.3 Market manipulation

- We comply with laws that are intended to protect the integrity of the markets where securities, financial instruments, commodities, wholesale energy products or emission rights are traded and to avoid any type of market abuse or manipulation.
- The use of insider information in certain transactions may prevent full and proper market transparency and, in some cases, lead to major fines and penalties.
- Make every effort to properly use and protect inside information and never disclose it to unauthorized third parties.
- Never engage in any type of market manipulation, including the execution of false orders, orders that seek positioning on a market or the disclosure of false and/or misleading information, for your own personal gain, financial or otherwise, or for the benefit or gain of others.
- Avoid dealing in the securities, financial instruments, commodities, wholesale energy products or emission rights of a publicly-listed company where you have been privy to inside information until such information is no longer considered inside information (e.g., because it has been published).



We rely on you to...

## 4.4 International trade

- We comply with international trade control laws, laws regulating imports/exports and international sanctions laws that are consistent with the laws of the EU and the countries in which we operate, conducting thorough Third-Party Due Diligence before entering into any business dealing.
- We honor international sanctions lawfully imposed by countries or international organizations that are compatible with EU laws and for that reason, we do not operate in countries or jurisdictions, third parties or markets that are subject to such sanctions.
- Understand and comply with the trade regulations and restrictions applicable in the countries and jurisdictions where the company conducts its businesses or acquires or sells goods and services.
- Obtain the necessary licenses and authorizations before exporting products, services or technology as may be required.
- Conduct thorough KYC/Third-Party Due Diligence to be familiar with counterparties, products and countries before entering into any contractual commitments.



We rely on you to...



## 4.5 Media relations and information transparency

- All external communications on behalf of Moeve must be made by specifically designated and authorized persons and must follow the guidelines determined by the Corporate Communications Department.
- We provide accurate, complete, reliable and truthful communication, in compliance with legal and regulatory obligations and standards, and consistent with the fundamental principles of transparency and impartiality.
- We do not engage in false advertising or publicity nor do we publish information that could be misleading (for example: greenwashing) or could damage to our business reputation or that of our competitors.



We rely on you to...

- Uphold the principle of transparency in all corporate communications.
- Never share confidential information with anyone, either externally or internally, if not authorized or involved, especially with journalists.
- Never speak on behalf of Moeve to the news media. The Corporate Communications Department is exclusively in charge of handling external communications, except in the case of authorized representatives or spokespersons for the company, who must always be accompanied by a member of the Communications Department.
- Be careful and exercise discretion when using social media, forums and other internet channels, especially when identifying yourself as a Moeve employee: do not disclose non-public information on this type of media or respond to comments on Moeve made by others, but rather refer them to the Communications Department. Do not use your position in Moeve outside the company at non-authorized events or lie about or misrepresent your job position or job responsibilities on social media or at events where you are representing the company, in accordance with the company's Social Media Handbook.





# What to do in the event of suspected violation or possible misconduct

It is our responsibility as Moeve employees to voice in good faith our concerns and report any potential or actual violations of the Code or our internal policies and regulations. By doing so, we can help to identify and address illegal, unethical or inappropriate behavior and protect ourselves and the company from the harm and damage that may arise as a result.

Complaints or concerns about suspected violations of the Code, company policies or the law can be made in good faith, anonymously or by name, in any of the following manners:

- To the Ethics and Compliance Office through the Integrity Channel ([moeve.ethicspoint.com](https://moeve.ethicspoint.com)).
- By notifying your supervisor or line manager, so that the person in charge of your area can immediately submit the information to the Integrity Channel.

Investigations into any complaints on possible violations will be undertaken in accordance with the Integrity Channel and investigations derived from the Integrity Channel procedures.

Communications must be reported without fear of retaliation. As a company, we will not tolerate or permit any form of retaliation directed against anyone who raises

a concern or complaint in good faith, or who cooperates with an investigation. In fact, any adverse action or threat of retaliation against any Moeve employee, or any bad faith communications that are intentionally false or meant to discredit others, will be treated as a serious violation of our Code.

The Integrity Channel Manager shall ensure the confidentiality of communications by preserving the informant's data, those of the persons participating in the investigation, as well as those of the persons affected.

Moeve's response to a non-compliance will be made in accordance with the formal procedures established by the company. These procedures take into account the principle of presumption of innocence and the rights to participate of workers' representatives whenever required by law. The company shall adopt the appropriate disciplinary measures for each substantiated non-compliance, in accordance with the provisions set forth in collective bargaining agreements and other applicable regulations in force.



# Glossary of terms

**Workplace bullying (or mobbing):** a type of threatening and psychologically abusive behavior that is persistent or repeated over time, targeting an individual worker or group of workers, in order to undermine their dignity, effectively creating an intimidating, hostile, degrading, humiliating or offensive environment for the worker who is the victim of such behavior.

**Sexual harassment:** any unwelcome or inappropriate sexual remarks or behavior that seek to undermine the dignity of another person and are characterized by being intimidating, humiliating or offensive.

**Money-laundering/terrorist-financing:** the former occurs when the proceeds of criminal or illegal activities are concealed or disguised through apparently legitimate business dealings (not limited to cash transactions) whereas the latter involves the collection or distribution of funds, whose sources may be legitimate or not, to support terrorist activity as defined in international law. Participating in either of these activities can damage our reputation and expose the company and its employees to very serious penalties or even prosecution.

**Inside information:** information about a company that is not generally available to the public and, if it were to become available, is likely to have a significant effect on the market price of shares or securities (for listed companies), financial instruments, commodities or emission rights, or could reasonably influence the decision of potential investors in the market.

**Public information:** information or data that is intended for the general public and that has been labeled as "Public".

**Information for internal use:** information or data that is necessary for the day-to-day running of the organisation and that is generally available and accessible to employees for the performance of their various functions.

**Confidential information:** information or data whose unauthorized disclosure, in particular outside the company, but also internally, could cause reputational, economic, profitability or opportunity damage.

**Classified information:** highly sensitive or valuable information or data that if exposed internally or externally, disclosed without authorization or destroyed would result in serious harm, significant financial loss, significant loss of customer confidence, significant loss of market share and serious damage to the company's reputation.

**Market manipulation (or attempted):** actions taken by persons using false or misleading information on supply, demand or pricing or that artificially set or attempt to set prices at levels that are unjustified by free market forces of supply and demand. Such conduct is contrary to the principles of unfettered pricing and full market transparency.

**International sanctions:** coercive measures imposed by countries and international organizations such as the United Nations, the European Union or the United States against states, entities or individuals. They are mainly aimed at changing the behavior of an actor, reducing its ability to operate or weakening its position, and publicly denouncing those actors who pose a threat to international peace and security, with the ultimate aim of strengthening international security, the defence of democracy and human rights.

**Lobbying (direct or indirect):** actions, taken directly or through associations, for the purpose of representing, through communication and information and in a transparent manner, the legitimate interests and concerns of a group, entity or governmental institution and influencing political or economic policies and decisions in favor of such interests.

**Public official:** any person whose job involves service to a public organization or international agency (i.e., anyone acting in an official capacity for a government, or any entity owned or controlled in whole or in part by a government, as well as companies under government control, regardless of whether the government in question has full ownership or majority control).

**Facilitation payments:** illegal or unofficial small payments to public officials or persons with a certifying function that are intended to secure or expedite the course of a procedure.

**Conflict of interest:** situations that arise when a personal, professional, financial or other relationships or activities interfere, or appear to interfere, with an employee's workplace objectivity or loyalty in the performance of their work for the company.

**Bribery:** promising, offering, giving, soliciting or accepting, directly or indirectly, an undue advantage to or from a public official or a person who directs or performs a function in a private sector entity, for that person to act or refrain from acting in the performance of his or her official duties.



A man with a beard, wearing a blue baseball cap and a pink button-down shirt, stands in a forest. He is looking upwards and to the right with a thoughtful expression. His hands are in his pockets. The background is a dense forest with tall, thin trees and green foliage. A blue diagonal shape covers the bottom left corner of the image, containing the text.

**Annex**

**Ethical principles  
of Artificial  
Intelligence**



## The person at the center

- Our **commitment** to people translates into one of our values that, regardless of what we call it, will always be in our DNA as an organisation: "**We care about people**". For this reason, all of our artificial intelligence systems will **always take people into account**, as long as fundamental rights and human dignity are always respected and never harmed.
- **We are committed** to taking all necessary measures to ensure that no harm is done, that our AI systems do not have or perpetuate bias, and that diversity and equality are always taken into account. In short, we will always consider the impact of AI systems or applications on people.

## Transparency and explainability as a sign of trust

- **We are committed** to ensuring that all our AI developments and their use are transparent. Wherever possible, we must be able to explain our decisions to those affected by them and inform them when they are interacting with an AI system rather than a person, or with artificially generated content that may affect their rights or perception of reality.
- This principle is crucial for users to trust AI systems and to maintain that trust.
- Processes need to be transparent, openly communicating the capabilities and purpose of AI systems, and we need to be able to explain decisions to affected parties as much as possible.
- Black-box algorithms will only be used where justified, either in terms of accuracy or because of the low potential impact of the use case on people.

## Respect for privacy and protection of personal data

- It will always be our **priority** to protect people's privacy, and no system or use of AI will result in a failure to respect the fundamental right to the protection of personal data. Our commitment is to avoid any unwarranted intrusion into people's private lives and to always leave the power to decide how data is used with the individual. We are **passionate about our customers** and respect their rights.
- **We are committed** to ensuring privacy in the development, deployment and use of artificial intelligence. Similarly, we commit to ensuring information security in the AI systems we develop and use from third parties.
- **We are committed** to integrating cybersecurity measures into the development and use of AI systems. We commit to implementing specific controls to ensure data protection and the integrity of our AI systems, and to ensure that their use is consistent with our security standards and corporate ethics.





## Human supervision

- In order to ensure that our AI systems do not have a negative impact on people and that they comply with regulations and our ethical principles, human oversight will be a fundamental part of this control, and **we are committed** to ensuring that this oversight exists.
- This principle means that a human will be involved throughout the lifecycle of AI solutions. From their design and development to their oversight in production.
- This does not mean that we will abandon the opportunities for automation offered by AI. Human oversight does not mean that a human must review every output of an AI system, but it does mean that these systems will be monitored in a deterministic way, especially at the moment of decision.
- In the same way, ethical and legal risks are monitored from the idea of a new development or the evaluation of the purchase of a new product.

## Harm prevention

- **We are committed** to taking all necessary technical and organisational measures to ensure that AI systems do not cause harm to people.
- This includes protecting **human dignity** and **physical** and **mental integrity**.
- All AI systems and the environments in which they operate must be safe. They should also be technically robust, and it should be ensured that they cannot be used for malicious purposes.
- Preventing harm also means taking into account the natural environment and all living things.
- Vulnerable people should be given special consideration.

## Sustainability and environmental protection

- **We care about the planet** and **are committed** to taking all necessary technical and organisational measures to ensure that AI systems do not damage or harm the environment.
- We will monitor the power consumption and carbon footprint of AI solutions, depending on the systems in which they are deployed.
- The **optimal solution** in terms of consumption and carbon footprint will be sought as long as the reliability and accuracy of the systems is not compromised.
- We will also prioritise the AI solutions we develop based on their **impact on sustainability**.

## Responsibility and accountability

- Our systems will be auditable so that compliance with the law and ethical principles can be verified, and we are **committed** to ensuring the right to reparation for those affected in the event of certain problems.





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