



## **CODE OF CONDUCT**

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## **1. MESSAGE FROM THE CHIEF EXECUTIVE OFFICER AND THE COMPLIANCE OFFICER**

### **Behaving responsibly empowers our business**

Atlantica is building a sustainable and successful business for our customers, colleagues, partners and investors. This success must be delivered in the right way, doing the right things.

To earn and maintain the trust of all our stakeholders, we need to work to a consistently high set of ethical standards in all aspects of our work. Accordingly, we are committed to promoting ethical business practices and complying with all laws and regulations wherever we operate. We are also committed to treating our colleagues, customers, partners and investors fairly.

We expect everyone to familiarize themselves with this Code of Conduct (the "Code"), not just as a set of rules but also as a tool to facilitate dialogue with colleagues and managers to support us in doing the right thing every day. This Code offers guidance in our daily business to make it easier for us to decide how to act in tricky situations.

All of us have the responsibility to be familiar with and adhere to the rules and standards in this Code at all times.

Finally, everyone should feel secure in seeking advice or raising concerns. If you are ever concerned that this Code is not being followed or have any questions or concerns it is vital that you speak up. In accordance with this Code, all information we receive regarding questionable activity or potential violations will be kept confidential to the extent permitted by law and we do not tolerate retaliation of any kind against any person who makes a report in good faith.



## **2. ABOUT THIS CODE**

Our Code of Conduct embodies the high standards of integrity we are committed to upholding in all aspects of our business. It is designed to assist everyone in Atlantica in aligning our actions and decisions with our core values and compliance requirements.

The Code is intended to help us recognize ethics and compliance issues before they arise and to deal with issues that do arise appropriately. It is not intended to be a compendium of policies or an exhaustive list of legal and compliance requirements.

With Atlantica doing business in several countries, our Code cannot cover all the different laws, applicable regulations and other legal requirements. It is important for you to be familiar with any relevant local laws and regulations where you work. Observing the law and the legal system in every country where we do business is a fundamental principle. First and foremost, we must comply with legal requirements. Where there is a difference between a legal requirement and our Code, always apply the most stringent standard. Violations of the law must be avoided under all circumstances.

Above all, please, remember that our Code is only a starting point. It cannot address every situation and is no substitute for using good judgement and doing the right thing.

You should also check to see if any more detailed Atlantica Policy applies in addition to this Code.

In this document words or phrases such as "Atlantica" and "Company" are used typically to mean the Atlantica Sustainable Infrastructure Plc. and its group companies.

### **Expectation for Compliance**

The Code applies to all directors, officers and employees of Atlantica Sustainable Infrastructure plc and each of its subsidiaries, wholly owned entities, and in joint ventures ("JVs"). In situations where Atlantica does not have overall control of JVs, we will do everything we reasonably can to make sure JVs and partners follow similar principles. We are all expected to know, understand and abide by the Code.

We also seek to work with third parties who abide by principles that are similar to those set out in this Code.

If you have any questions about your obligations under this Code or about Atlantica's policies or legal obligations, you should seek guidance from your line manager or the Compliance Committee at [compliance@atlantica.com](mailto:compliance@atlantica.com).



All directors, officers and employees must formally acknowledge that they understand their obligations under and have complied with the Code.

## **Management, Responsibility and Supervision**

The culture of integrity and compliance starts at the top of the Company. This Code has been approved by and is monitored by Atlantica's Board of Directors.

All managers bear responsibility for all employees entrusted to them. In particular, the following duties apply to managers:

1. Being a role model for ethical leadership: all managers must emphasize the importance of ethical conduct and compliance;
2. Supporting ethics and compliance activities: we must all work together to comply with applicable laws and Atlantica policies;
3. Making sure all team members understand the principles, values and the requirements of our Code and local legal requirements, and have the resources to adhere to them;
4. Holding team members accountable to behave ethically, follow our Code and comply with any other applicable Atlantica policies and legal requirements;
5. Enforcing our Code consistently;
6. Making sure appropriate compliance controls are implemented in your organization; and
7. Encouraging your team members to ask questions and raise any ethical concerns by: (i) encouraging them to speak up; (ii) dealing with concerns when they are raised; and (iii) making sure that no one who speaks up in good faith experiences retaliation in any form.

## **Commitment to Integrity**

We must comply with all laws and regulations that are applicable to Atlantica and to ourselves individually. This Code sets out ethical standards that, in some instances, go above and beyond the law.

## **No exception or compromise**

No one has authority to order or approve any act or omission that is contrary to this Code or against the law. This Code and its standards will never be compromised for any reason.

## Duty to report a breach

If you become aware of any questionable activity or potential violation of this Code, you must report it using the appropriate channels described in the Code.

Disciplinary action will be taken for conduct that breaches the Code or is illegal, including up to termination of employment (where permitted by law) for particularly serious breaches.

## **3. PERSONAL & BUSINESS INTEGRITY**

### **Conflicts of Interest**

Conflicts of interest can have a significant negative impact on the reputation and effectiveness of Atlantica, its business and its people. It is the duty of all of us to make business decisions in the best interests of Atlantica.

You must avoid situations that may result in an actual or perceived conflict of interest. Where there is a conflict, or a potential for one to arise, it must be declared and managed effectively.

A conflict of interest occurs when a private business or personal interest of an individual interferes, or appears to interfere, with the interests of Atlantica in any way. Some examples of how conflicts of interest may arise include:

- ▶ Having a job, performing services, serving as a director or consultant or holding a financial interest with an existing or potential competitor, customer or supplier of Atlantica. A conflict may also arise if your close relative satisfies any of these circumstances.

"Close relatives" mean spouses, partners, children, step-children, step-parents, parents, siblings, nephews, nieces, aunts, uncles, grandparents and grandchildren (including where the relationship arises by marriage).

- ▶ Having a second job, performing services or serving as a director or consultant with any other company if this detracts from your ability to devote appropriate time and attention to your Atlantica responsibilities.
- ▶ Recruiting or managing a relative or partner as an employee of Atlantica.
- ▶ Using Atlantica's resources for political activities.

The main considerations regarding conflicts of interest are:

- ▶ **Acting in Atlantica's best interests:** you must avoid any situations where private business or personal interests may, or may appear to, conflict with the interests of Atlantica.
- ▶ **Disclosing conflicts of interest:** you must promptly inform your manager or the Compliance Committee of any situation that is or may be seen as an actual or potential conflict so that steps can be taken to appropriately address the potential conflict. In particular:
  - You must disclose if you have any *close relatives* or partners working in Atlantica, working or performing services at any competitor, supplier or customer of Atlantica or any other company with which the Atlantica has significant relationships. In addition, in the course of your work, you should not have the ability to hire, supervise, affect terms and conditions of employment, or influence the management of close relatives or partners, or any business involvement with close relatives or partners (or with any business in which your relatives work or hold a material financial interest).
  - You must disclose material financial interests in a competitor, supplier, customer or other business with which Atlantica has significant dealings.

Material financial interest means any financial interest that may, or may appear to, influence your judgment. It does not include small investments (representing in any case less than 0.1% of the capital) in traded securities nor publicly traded mutual funds, index funds and similar pooled investments where you have no say in what investments are included.
- You must not hold material financial interests in any supplier, customer or other external company if you have any involvement in the Atlantica's dealings with that company or supervise anyone who does.
- You must not hold material financial interests in a direct competitor of Atlantica, or any business conducting activities against Atlantica's interests.
- You must not accept a board position or work for or on behalf of a potential competitor, supplier, client or partner of Atlantica, without prior written approval of your line manager or the Compliance Committee. You must not use information obtained from your employment, or take advantage of a corporate opportunity, for your personal gain or benefit (or for those close to you), without first disclosing your intention to do so, and obtaining written approval.
- ▶ **Related Party Transactions:** The Board of Directors shall periodically review all related party transactions. There are specific rules applicable to the disclosure of interests and voting by directors in respect of transactions in which directors or



executive officers may have an interest. For further information, please refer to the Company's:

- Articles of Association; and
- Policy on Transactions with Related Parties.

## Bribery & Corruption

Atlantica does not tolerate and does not engage in bribery or corruption in any form, whether in the private or public sector.

Most countries in which Atlantica operates have laws that prohibit bribery (especially, in relation to conducting business with government entities and public officials) in order to support global efforts to fight corruption. All directors, officers and employees should understand and abide by such laws and regulations.

### U.S. Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act ("UKBA")

The FCPA and the UKBA prohibit companies and (among others) their officers, directors, employees, and agents to give, request, promise, offer, or authorize the giving anything of value (such as money, benefits in kind, or any other advantages) to a foreign official, foreign political party, officials of foreign political parties, candidates for foreign political office or officials of public international organizations for the purpose of influencing a public official in the carrying out of such official's duties. Similar laws have been, or are being, adopted by other countries. Private bribery is also illegal under U.S. laws, the UKBA, and the laws of other jurisdictions. Payments of this nature are strictly against Atlantica's policy even if the refusal to make them may cause Atlantica to lose business.

The FCPA also requires covered companies to maintain accurate books, records and accounts and to devise a system of internal accounting controls sufficient to provide reasonable assurance that, among other things, companies' books and records fairly reflect, in reasonable detail, transactions and dispositions of its assets.

We base our vendor and supplier relationships on the fundamental principles of fairness, honesty and mutual respect. We do business with third parties that have high standards of conduct. We have purchasing policies and procedures in place (e.g. Supplier Code of Conduct) that require vendors and suppliers to adhere to Atlantica's standards. We comply with all laws and regulations that prohibit bribery and corruption, and we do everything we can to try to ensure that our suppliers, contractors and JV partners do the same.

Main considerations regarding bribery and corruption:

- ▶ You must never offer, promise, give or authorize any gift, payment, entertainment, donation (even if charitable) or other benefit to any person (directly or indirectly), especially if such person is holding or may in the future hold a public office or responsibility.
- ▶ You must never offer, promise, authorize or pay money or anything of value (directly or indirectly) to any person with the intention of inducing a person to improperly perform a relevant function or activity (such as his or her work) or to reward any person for having improperly performed a relevant function or activity.
- ▶ You must never solicit, accept or receive any gift, payment, entertainment, donation or other benefit or advantage from any person (directly or indirectly) as a reward or inducement
- ▶ Remember that these rules also apply to anyone authorized to act on behalf of Atlantica. As Atlantica may be liable for the actions of third parties, it is expected to maintain controls to ensure that improper payments are not offered, promised, made, solicited or received, by third parties doing business and/or performing services for or on their behalf. These controls include:
  - "Know your supplier" procedures: Employees responsible for hiring consultants, agents or partners in joint ventures must ensure that those third parties understand and will abide by Atlantica's policies. They must also evaluate the qualifications and reputation of such third parties.
  - Drafting anti-corruption provisions into contracts with third parties;
  - Providing anti-corruption training and support to staff managing supplier relationships; and
  - Monitoring third parties on an ongoing basis.
- ▶ The provision of an internship or work experience, whether paid or unpaid, may be viewed as a benefit (and potentially an improper one) to a third party. No offer should be made of any internship or work experience, without first seeking approval from Human Resources department. Any requests you receive for internships or work experience should be passed to Human Resources department.
- ▶ Atlantica prohibits political involvement of any kind on the Company's behalf. Neither the Company, nor its directors, employees or representatives on its behalf, make political contributions (donations to politicians, political parties or political organizations) or sponsor events whose exclusive purpose is political propaganda.

## Travel, Entertainment & Gifts

In many industries and countries, gifts and entertainment are common practices used to strengthen business relationships. Travel, meals, favors, entertainment, and gifts are “things of value”, and may never be accepted, provided, promised, offered, or authorized for the purpose of improperly obtaining or retaining business or securing any improper advantage from public officials or private persons. Lavish meals, extravagant travel and entertainment or gifts of cash or cash equivalents (e.g., gift cards) are always prohibited.

Atlantica employees may only accept, or give, promise, offer, or authorize travel, gifts, favors, and entertainment if they meet all of the following conditions:

- ▶ It is not against the law in the UK, US or any other relevant country, including the country of the recipient and it is consistent with customary business practices in the country and industry;
- ▶ It is not against the policy of the other party;
- ▶ It is in connection with the promotion, demonstration, or explanation of Atlantica products or services, or in connection with the execution or performance of legitimate company business, and is given in good faith without the expectation of any benefit or reciprocal action in return;
- ▶ It is consistent with any existing business guidelines;
- ▶ It is accurately and fully documented in writing and reflected in the Company's books and records;
- ▶ Expenses incurred are reasonable and directly related to the immediate business purpose of the visit;
- ▶ It cannot be construed as a bribe, payoff, or improper influence, and was not for the purpose of corruptly obtaining or retaining business or any other improper purpose;
- ▶ It should not be extended to the same person on a repetitive basis;
- ▶ Atlantica does not have pending business that the recipient can affect;
- ▶ It does not violate Atlantica's business values or ethics in any other manner;
- ▶ Spouses and other family members are not included in the entertainment or travel;
- ▶ Benefits provided are open and transparent and, in any instance involving a public official, wherever possible, are made to an organization rather than a specific government official;

- ▶ To the extent possible, payment of expenses is made directly to the service provider. Cash payments or cash per diems to government officials are strictly prohibited;
- ▶ The payment of any expenses associated with layovers or side trips that do not have a direct business purpose is prohibited;
- ▶ The nominal value of any gift or entertainment is less than 90 USD; and
- ▶ It is properly approved in advance through Authorization Request 0.1 to give or receive donations, gifts, sponsorships or similar.

When offering or accepting any entertainment or gifts, do consider the following practical tips:

- ▶ Intent: is the intent only to build or maintain a business relationship or offer normal courtesy, or is it to influence the recipient's objectivity in making a specific business decision?
- ▶ Materiality: is it modest and infrequent?
- ▶ Legality: is it legal in the UK, US and the relevant country?

Any exception to these rules must be directly approved by the Compliance Committee in writing.

### Facilitation Payments

Facilitation payments are small payments to low-level government officials to expedite a routine governmental action that a company is entitled to in any event, and which the officials do not have discretion to deny. Atlantica strictly prohibits facilitation payments.

If Atlantica personnel become aware of a demand for a facilitation payment, or of an instance in which such a payment has been made, they must report such incidents according to the whistleblowing section in this Code.

### **Insider Trading**

Atlantica is committed to supporting fair and open securities markets and obeying the law on market abuse. Directors, officers and employees are therefore not permitted to deal on the basis of material non-public information or engage in any form of market abuse.

In this sense:

- ▶ You should not purchase or sell, offer to purchase or sell or otherwise trade any security of Atlantica or any derivative or other financial product linked to any such security, whether or not issued by Atlantica, while in possession of material non-public information about Atlantica.
- ▶ You should not communicate any non-public information about Atlantica to any other person (a "tip"), including close relatives and friends, or otherwise disclose such information without Atlantica's authorization.
- ▶ You should not purchase or sell any security of any other company or any derivative or other financial product linked to any such security, while in possession of material non-public information about that company. If you know of any such material non-public information, you may not communicate that information to, or tip, any other person, including family members and friends, or otherwise disclose such information without Atlantica's authorization.
- ▶ For compliance purposes, you should never trade, tip or recommend securities (or otherwise cause the purchase or sale of securities) while in possession of information that you have reason to believe is material and non-public unless you first consult with, and obtain the advance approval of, the Compliance Officer.

Bear in mind that "inside information" may be acquired as a result of an employee's position or inadvertently, and includes non-public information such as financial results, financial plans and budgets, dividend changes, significant mergers, acquisitions or disposals, major developments in litigation, major management changes, etc.

For further information related to Insider Trading, please refer to the "Policy on Insider Trading".

## **Privacy and Personal Data Protection**

Atlantica guarantees the right to privacy and personal data protection for all persons who establish relations with it or any of its subsidiaries, ensuring respect for the rights to honour and to privacy in the processing of the various categories of personal data from different sources and for various purposes based on their business activities.

In this sense, each employee shall:

- ▶ Comply, in the course of their activities, with their confidentiality and secrecy obligations regarding personal data to which they have access;
- ▶ Use personal data exclusively for the purpose to which they were collected, in the scope of their working responsibilities;

- ▶ Attend training sessions on privacy and data protection;
- ▶ Assist with the implementation of the established accountability measures and comply with all the procedures;
- ▶ Provide such information and documentation as maybe requested to support compliance in the field of privacy and personal data protection; and
- ▶ Disclose any noncompliance by contacting either their supervisor or line manager, Compliance Committee or directly at [dataprotection@atlantica.com](mailto:dataprotection@atlantica.com).

#### **4. HUMAN AND LABOR RIGHTS**

We respect the personal dignity, privacy and personal rights of every individual. We do not tolerate discrimination against anyone based on any personal characteristic (ethnic background, culture, religion, sexual identity, races, gender, etc.)

#### **Dignity & Respect in Treatment. Equality & Diversity Promotion**

We must all be treated with dignity, and with respect. Likewise, we must treat all our colleagues, and business partners, in the same way.

In this sense:

- ▶ **No discrimination or harassment:** No employee should be subject to any physical, sexual, psychological, harassment, abuse, bullying or any other form of intimidation. We respect and celebrate each other's differences and value what makes each of us unique.
- ▶ **Equal opportunities:** Atlantica provides equal opportunities to all employees to create an inclusive workforce by promoting employment equality. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on national origin, ethnicity, religion, caste, age, disability, **gender**, marital status, sexual orientation, union membership, political affiliation, health, disability, pregnancy, smoking habits, or any other characteristic protected by law, is prohibited by this Code.
- ▶ **Raise concerns:** We seek to provide a climate of confidence where employees are encouraged to **raise** issues and we aim for a swift and appropriate resolution to any concerns raised. If you witness or experience any behavior that is inconsistent with this Code, you should report it according to the Whistleblowing Policy in this Code.

## Labor Standards

In January 2018, Atlantica joined the United Nations Global Compact initiative and formally adopted the UN Global Compact Ten Principles in the fields of (among others) human rights and labor rights. We are committed to applying these principles in practice.

- ▶ **Forced Labor** is strictly prohibited: work is conducted on a voluntary basis. Forced labor, whether in the form of indentured labor, bonded labor or other forms, is not **acceptable**. Mental and physical coercion, slavery and human trafficking are prohibited.
- ▶ **Appropriate ages:** Atlantica will never employ workers under the age of 15 or under the minimum age for work or mandatory schooling as specified by the local law, whichever is higher, under any circumstances.
- ▶ **Fair wages:** all employees are provided with a total remuneration package, which meets or exceeds the legal minimum standards or appropriate prevailing industry standards, whichever is higher.
- ▶ **Trade Unions:** the rights of employees to freedom of association and collective bargaining are recognized and respected. Workers shall not be intimidated or harassed in the exercise of their right to join or refrain from joining any organization.

## Occupational Health & Safety

Atlantica's commitment to health and safety, at all levels of the Company, is absolute. It is our priority to protect the integrity and health of all our employees and any person (including our subcontractors) operating on an Atlantica site. Atlantica integrates Health and Safety management at all levels in order to conduct safely and responsibly.

Atlantica and its management are committed to prioritize and actively promote Health and Safety as a tool to protect the integrity and health of our employees, subcontractors and partners involved in the activities of the Company.

Health & safety is essential not only in our assets and facilities but also in all our offices.

## Environmental Sustainability

We invest in assets that are environmentally sustainable and we manage them sustainably. We must follow policies, that analyze, evaluate and propose measures oriented at minimizing the environmental impact of our activities.

A worldwide environmental management system has been implemented to ensure observation of the law in each jurisdiction. All employees are required to contribute to these goals through their own behavior.

## **5. CORPORATE ASSETS & FINANCIAL INTEGRITY**

### **Accurate Accounting and Reporting**

Open and effective communication requires accurate and truthful reporting. This applies equally to relationships with investors, employees, customers, suppliers and any other business partners. In addition, honest, accurate and objective recording and reporting of financial and non-financial information is essential to Atlantica's reputation, to its ability to meet its legal, tax, audit and regulatory obligations, and to support business decisions.

Any failure to record transactions accurately, the falsification or creation of misleading information, or the influencing of others to do so, could constitute fraud and result in fines or penalties both for employees and/or Atlantica.

The following principles must be observed:

- ▶ Atlantica must comply with applicable laws, external accounting requirements and Atlantica's procedures for reporting financial and other business information.
- ▶ Atlantica must manage all its critical business records in line with those policies and procedures, and never alter or destroy Company records unless permitted by law.
- ▶ Financial data (e.g. books, records and accounts) must conform both to generally accepted accounting principles and to Atlantica's accounting and reporting policies and procedures.
- ▶ We must cooperate fully with Atlantica's external and internal auditors and ensure that all information which is relevant to the audit of any Atlantica company is made available to that company's external auditors.
- ▶ All transactions and contracts must be properly authorized at all levels and accurately and completely recorded.
- ▶ All contracts entered into by Atlantica companies, whether with another Atlantica company or a third party, must be evidenced in writing.

### **Anti-Money Laundering and Related Offences**

Money laundering involves possessing, or dealing with, the proceeds of crime. It includes concealing the identity of illegally obtained money, so it appears to have come from a lawful source.

A failure to effectively identify money laundering and related risks (e.g. terrorist financing) can put Atlantica's integrity and reputation at risk. Directors, Officers and all employees must immediately report any suspicious about actual or potential money laundering activity through one of the whistleblowing channels set out in this Code (see 'Whistleblowing' below).

To protect our integrity and reputation:

- ▶ You must not engage in any transaction which you know, or suspect involves the proceeds of crime, or otherwise be knowingly involved directly or indirectly in money laundering activity.
- ▶ You must also ensure that Atlantica's activities do not inadvertently contravene money laundering laws.
- ▶ You must support Atlantica's procedures for:
  - Minimizing the risk of inadvertent participation in transactions involving the proceeds of crime;
  - Detecting and preventing involvement in money laundering by employees and others acting on the Company's behalf; and
  - Supporting employees in identifying situations which ought to give rise to a suspicion of money laundering.
- ▶ You must be alert to situations which ought to raise your suspicions, including:
  - Payments in non-invoice currencies;
  - Substantial payments in cash or cash equivalents;
  - Owning, purchasing, transforming or transporting any sort of stolen materials;
  - Payments to or from an account that is not the normal business relationship account; or
  - Requests for overpayments or split payments to several bank accounts.

## **Confidentiality & Information Security**

The confidentiality of Atlantica's internal confidential or proprietary information that has not been made known to the public must be maintained.

Non-public information regarding Atlantica, or its business, employees, customers and suppliers is confidential. All Directors, officers and employees are trusted with such confidential information. Confidential information can only be used for the intended business purposes of Atlantica and in accordance with legal and contractual requirements.

The following rules must be observed:

- ▶ We must not disclose any confidential information with anyone outside of Atlantica, including family and friends, or with other employees of Atlantica who do not need such information to carry out their duties.
- ▶ Access to confidential information relating to Atlantica or its business should only be provided to employees requiring it in order to carry out their work.
- ▶ We must not use confidential information relating to an Atlantica company or its business for our own financial advantage or for that of a friend or relative (see 'Conflicts of interest' and 'Insider Trading').
- ▶ In relation to the personal data of customers, employees, suppliers or any other person, Atlantica companies and employees must ensure that they comply with applicable data protection laws (including, where relevant, the EU's General Data Protection Regulation). Furthermore, access to such personal data must be limited to authorized employees who have a clear business need to access that data.
- ▶ If Atlantica performs certain operations or transactions (including, but not limited, to acquisitions, disposals, capital increases, debt issuance, refinancing, etc.) requiring a special care of disclosure of information, Atlantica has specific Confidentiality Policies that will need to be followed.
- ▶ Upon termination of your employment, you must return to the Company all physical (including electronic) copies of confidential information as well as all other material embodied in any physical or electronic form that is based on or derived from such information, without retaining any copies.
- ▶ You may not bring the confidential information of any former employer to the Company.

Nothing in this Code or in the Confidentiality Policy prohibits anyone from reporting or disclosing possible violations of laws or regulations to any governmental agency or entity where permitted by law.

We provide electronic information systems to our employees to support their achievement of business objectives. IT systems include email, computers, printers, telephones and associated operating systems. Our information systems may only be used for purposes that effectively and efficiently support Atlantica's business and goals. Casual personal use is permitted but only if it has negligible or trivial impact.

## **Protection of Assets**

There are many devices and equipment in our facilities and offices. All of them are only to be used for Company business and not for personal gain.

# Atlantica

Sustainable Infrastructure

We are all responsible for safeguarding and making appropriate use of our assets with which we are entrusted. This Code covers the protection of all assets of Atlantica, including physical assets, intellectual property assets and financial assets.

The following principles must be observed:

- ▶ You must ensure all of Atlantica's assets are not damaged, misused, misappropriated or wasted and must report their abuse or misappropriation by others.
- ▶ You must protect all funds and safeguard them against misuse, fraud and theft. Your claims for expenses, vouchers, bills and invoices must be accurate and submitted in a timely manner.
- ▶ You must never knowingly damage, misuse or misappropriate the physical assets of third parties; infringe valid patents, trademarks, copyrights or other intellectual property in violation of third parties rights; or perform unauthorized activities which adversely impact the performance of third parties systems or resources.
- ▶ You must not use Atlantica equipment or facilities for personal activities.

## **6. ETHICS MAILBOXES**

Atlantica requires its employees, officers and directors to report any known or suspected criminal activity or policy breach involving Atlantica or its employees, officers or directors. If anyone becomes aware of any suspicious activity or behavior, including, but not limited to, concerns regarding questionable accounting or auditing matters, potential corruption or fraud, or any other matter related with the Criminal Risk Prevention Program, it must be promptly reported.

If you have any concern, question or complaint, speak to your manager in the first instance. In most cases, they will be in the best position to address your concerns. However, if you are not comfortable with this or if you are not satisfied with your manager's response, you are encouraged to use the whistleblowing channels described below.

With regards to financial control, the Audit Committee of the Board of Directors of Atlantica has established procedures for:

- (a) The receipt, retention and treatment of complaints regarding accounting, internal controls or auditing matters; and
- (b) The submission by employees of Atlantica, on a confidential and anonymous basis, of good faith concerns regarding questionable accounting or auditing matters.

## Channels of Communication

Atlantica has made available several channels for the reporting of any conduct that is in actual or potential breach of this Code or any other Atlantica policy, as set out below:

1. **Line Manager:** report your concerns to your line manager, who will determine if the matter should be escalated.
2. **Compliance Committee:** If you do not feel comfortable with discussing the matter with your line manager, you may report your concern directly to any member of the Compliance Committee or you may use the Compliance Committee's email address: [compliance@atlantica.com](mailto:compliance@atlantica.com)

Should a member of this Compliance Committee be potentially implicated in the matter that has been reported, that individual must be recused from that matter.

3. **Whistleblower Channel:** you may also use the Company's whistleblower channel, details of which are set out below:
  - Website: in the Corporate Governance section of the website, you will find a form you can complete at:  
<http://www.atlantica.com/web/en/company-overview/corporate-governance/whistleblower-channel/>
  - Email: you may send an email including as much relevant information as possible to the following email address:  
[whistleblowerchannel@atlantica.com](mailto:whistleblowerchannel@atlantica.com)

Information submitted by using any of the channels above will be received by:

- ▶ Chairman of the Audit Committee
- ▶ Compliance Officer & General Counsel
- ▶ Head of Internal Audit

### Confidentiality and Anonymity:

Violations or suspected violations of any law, the Code or any other Atlantica policy, or concerns regarding accounting, internal controls over financial reporting, or auditing matters may be submitted on a confidential basis by the complainant or may be submitted anonymously.

All information received through the whistleblowing channel will be fully and objectively investigated, regardless of whether or not it has been received anonymously.

Nevertheless, we encourage you to provide your contact details and as much information as possible in order to facilitate the investigation. The Company will keep the matter under investigation (including your identity and all documentation) confidential to the extent permitted by law.

Good faith and no reprisals:

Atlantica does not tolerate retaliation of any against any employee who makes a report in good faith. Any individual found to have retaliated against someone who has raised a concern in good faith will face disciplinary action, which could include dismissal. However, any allegations that prove to be maliciously or knowingly false will be viewed as a serious disciplinary offence.

## **7. BREACH OF THE CODE**

The objective of this protocol is to ensure that the organization develops a system for prompt, competent and confidential review and resolution of allegations involving a potential breach of this Code.

### **Managing Suspected Misconduct**

The process for determining whether a breach of the Code has occurred must be carried out promptly and confidentially, taking into account the presumption of innocence. This process consists of the following phases:

1. Receipt and registration of an allegation: The Compliance Committee will evaluate the information received in order to determine the appropriate course of action to resolve it, considering credibility of the allegation, type of incident, subject and seriousness or severity of the allegation.
2. Investigation: The Compliance Committee will be responsible for overseeing the investigation process (in case of a breach by senior management or a member of the Compliance Committee, it should be overseen by the Board or the Audit Committee). The committee will determine the composition of the investigation team, will appoint an investigation leader and will analyze if external advisors are needed. Investigations may involve interviews, evidence collection, computer forensic examinations, etc.
3. Conclusion and reporting: The investigation team will draft a preliminary report that will be submitted to the Compliance Committee, who may make comments or

suggestions to it. The Compliance Committee will share the main conclusions with the audit committee if appropriate.

4. Corrective action: The Compliance Committee will determine the corrective actions to be taken, which may include disciplinary actions, changes to systems and controls and recovery of losses.

*This policy was initially approved by the Board of Directors in December 2016 and was last amended in December 2020*