

## CODE OF CONDUCT OF KMS BUILDINGS S.A.

### Ethics, Integrity, Corporate Responsibility and Anti-Bribery Policy

#### 1. Purpose and Company Commitment

Our company operates with responsibility, integrity, transparency, and respect for the law, people, and the environment. A fundamental principle of our operation is the development of relationships based on trust with employees, customers, partners, suppliers, and other interested parties.

This Code of Conduct establishes the fundamental principles of professional behavior applicable to all company activities, in accordance with the requirements of the International Organization for Standardization ISO 37001 standard and the principles of corporate social responsibility.

Compliance with this Code is a prerequisite for cooperation with the company and aims to create sustainable and responsible partnerships based on trust, integrity, and continuous improvement.

#### 2. Fundamental Principles and Corporate Commitments

The company is committed to:

- Compliance with applicable laws and regulatory requirements.
- Implementing a zero-tolerance policy against any form of bribery or corruption.
- Fair, transparent, and objective business practices.
- Protection of personal data and confidential information.
- Respect for human rights and equal treatment.
- Environmentally responsible operations and reduction of environmental impacts.
- Ensuring financial integrity and transparency in transactions.

The selection of partners and suppliers is based on objective criteria such as:

- technical competence,
- quality of services,
- compliance with schedules,
- financial reliability,
- compliance with contractual and ethical requirements.

#### 3. Customer Relations

The company is committed to providing high-quality services with consistency, professionalism, and reliability.

Towards our customers, we:

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- operate with honesty and transparency,
  - protect the confidentiality of their information and data,
  - fulfil our contractual obligations and commitments,
  - provide accurate and reliable information,
  - treat all customers with respect, objectivity, and impartiality.

The company does not accept practices that could improperly influence business decisions or partnerships.

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#### 4. Ethics and Anti-Bribery

The company applies a zero-tolerance policy against:

- bribery,
- corruption,
- fraud,
- conflicts of interest,
- unfair business practices.

The following are strictly prohibited:

- the direct or indirect offering or acceptance of unlawful benefits,
- offering gifts or hospitality intended to influence decisions,
- concealment of financial transactions,
- the use of third parties for illegal payments or benefits.

Only gifts or benefits of symbolic value are permitted and exclusively in accordance with the company's internal procedures.

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#### 5. Obligations of Partners, Suppliers and Subcontractors

The company expects all partners and suppliers to:

- comply with legislation and the principles of this Code,
- prevent any form of corruption or bribery,
- ensure safe and decent working conditions,
- promote equal treatment and avoid discrimination,
- protect the environment and minimise negative environmental impacts,
- protect personal data and confidential information,
- ensure that the same principles are applied by their own subcontractors or partners.

The company reserves the right to assess, audit, or terminate cooperation in the event of violation of the above principles.

## 6. Reporting Violations

The company encourages the good-faith reporting of:

- violations of this Code,
- incidents of bribery or corruption,
- improper or unethical practices.

All reports:

- are handled confidentially and objectively,
- are appropriately investigated,
- are protected against any form of retaliation.

## 7. Compliance and Continuous Improvement

Compliance with this Code is mandatory for all employees, partners, and suppliers of the company.

Management is committed to:

- providing the necessary resources and appropriate training,
- monitoring the implementation of the Code,
- continuously strengthening the culture of ethics, transparency, and responsible business conduct.

Violation of this Code may result in disciplinary, contractual, and/or legal consequences.

The partner, supplier, or subcontractor acknowledges that they have read and understood the commitments described in this document and confirms that they will comply with all such commitments throughout the duration of their contracts with the company.

**Full-Name:**

**Position:**

**Company:**

**Signature:**

**Date:**

*Please attach any documents defining your commitments.*