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1.1. Introduction

It is a pleasure for us to present this new edition of the Applus+ Group Code of Ethics.

Our Code articulates a framework that seeks to go beyond mere compliance with the law; its spirit is guided by the integrity and professionalism of our decision-making, establishing a set of general principles that should guide our everyday behaviour wherever we operate in the world.

We all know the importance of acting with integrity and responsibility. The set of values, principles and ethical standards that are established in our Code go further than protecting the image and reputation of our Group or avoiding legal problems. The integrity allows us to maintain a sustainable environment that we all are proud to belong to and strengthens our professional activity. Our Code of Ethics will help us in decision making and is designed to guide our behaviour in our day to day.

Business growth and maintaining high standards in terms of management and compliance with regulations are mutually reinforcing elements. Building trust with the wider public is a gradual process and requires constant effort. Therefore, it is the responsibility of all of us to protect the Group’s reputation, which means acting with honesty and treating our internal and external collaborators, our customers, shareholders, partners and suppliers in a fair and honest manner.

We are sure that we have your full support and commitment to help Applus+ grow into a company of the future that is built on its core values contained within the Group’s Code of Ethics.

We want to encourage you to read this Code carefully, to become its faithful guardian and we thank you in advance for your contribution to the implementation of the Code of Ethics within the Group. With your help Applus+ will continue to merit the confidence that we all have.
1.2. Definitions

Below you will find the definitions of some of the terms used throughout the Code:

Applus+ or Group means Applus Services, S.A. and all of its subsidiaries and participated companies, including joint ventures with other business partners, which Applus+ Services, S.A., directly or indirectly, controls.

CCO refers to the Chief Compliance Officer.

Professionals are all employees and other persons rendering services to Applus+, regardless of the type of contractual relationship with Applus+. Thus, it includes employees, freelance contractors, managers, officers, directors, and business processing outsourcing contractors working for Applus+.

Third Party means, as laid down in the Global Anti-Corruption Procedure, any legal or physical person external to Applus, who is authorized to act on behalf of Applus+, such as agents and certain subcontractors and consultants.
The quality of our services and the success of our business depend on many variables, but one of them, without a doubt, is acting in a fair and honest manner every day as socially responsible individuals. We strongly believe in Corporate Social Responsibility in a context where our business operations can generate a significant positive impact on the environment and the local communities where we work.

In order to achieve this, we have to respect these core principles:

- **Integrity**: We believe in and promote acting honestly in all relations and in strict compliance with all applicable laws. Applus+ respects the dignity of every person and cares about others’ wellbeing and safety.

- **Transparency**: Mutual respect, dialogue and transparency are the foundation of our relationships. Relations with the authorities, regulatory entities, and government agencies shall be conducted following the principles of cooperation, honesty and openness.

- **Impartiality and independence**: We operate in a free, objective, and autonomous manner and avoid any type of corruption or conflict of interest that may affect our decision making.

- **Responsibility**: We ensure that our employees and partners have a safe and healthy workplace in which to carry out their activities, and one that is respectful to the environment and the communities in which we operate.

In essence, at Applus+, we aim at serving with integrity, independence and impartiality and to exceed the expectations of those who trust in our products and services in a responsible manner.
3.1. What is the purpose of the Code?

The Code of Ethics is a binding set of rules that define the expectation of behaviour and set forth the principles that should guide the conduct of Applus+ and all its Professionals in the performance of their duties and in their commercial and professional relations.

All Applus+ Professionals are required to comply with the conduct presented in this Code. The rules in the Code of Ethics represent minimum standards for ethical behaviour within Applus+ that apply to all countries, companies, and legal systems. This Code, together with its implementing regulations, highlights the firm commitment made by Applus+ to good corporate governance, transparency and social responsibility.

This Code of Ethics may not be able to provide an answer to each situation and ethical dilemma we are presented with in the workplace. This is why Applus+ makes available to all those who must comply with the Code, as well as our clients, suppliers and business partners, the Communication Channel described in Section 3.4 of this Code.

3.2. Who has to comply with the Code?

All Applus+ Professionals have the duty to know and comply with the Code, regardless of their rank, location or the Group Company to which they provide services. Each and every Professional of Applus+ must expressly undertake to comply with the Code. For this reason, Applus+ provides them with access to the Code and specific training on this.
Respect for and compliance with the Code, as well as commitment to Applus+ values have to be considered in each case of granting a promotion within Applus+. No breach of the Code is justified. No Applus+ Professional may justify conduct that contravenes the provisions of the Code of Ethics in reliance on an instruction from a superior or knowledge of the conduct by said superior. In such cases, the Applus+ Professional must report it via the Communication Channel.

The success of the Code depends on the commitment of everybody but the obligation to strictly comply with the provisions of the Code is especially important for directors and managers.

Applus+ requires that all directors and executives:

- Select and promote their employees and collaborators according to, among other relevant criteria, their integrity, qualification and their work performance.
- Seek guidance from the CCO in case of doubts on the application or interpretation of the Code, and
- Report any actual or suspected breach of the Code.

The recruiting and selection procedure for directors and managers considers their merits, capacity and commitment with the Code’s values. The degree of fulfilment of the obligations listed above is taken into account both in their performance evaluation and promotion decisions, as well as in the determination of their remuneration.

- Raise awareness and promote strict compliance with the Code,
- Take adequate measures to supervise that those under their authority comply with the Code,
We expect our clients, business partners and suppliers to be professional and honest, and embrace our core principles. In order to achieve this aim, Applus+ is committed to fostering among them practices that are in line with our Code of Ethics. Pursuant to the Global Anti-Corruption Procedure, Third Parties shall undertake to comply with our Code.

3.3. Corporate Social Responsibility Committee (CSR Committee) and Chief Compliance Officer (CCO)

Applus+ Board of Directors has entrusted the CSR Committee to promote the implementation of the Corporate Social Responsibility Policy of the Group and in particular the management of corporate governance matters, corporate social responsibility, ethics and transparency.

The CCO, under the direction and supervision of the CSR Committee, must take the necessary actions to promote the Code of Ethics and monitor compliance with it by all Applus+ Professionals.

Thus, the CCO is in charge of:

- Disseminating the content of the Code, designing and conducting necessary compliance training.
- Promoting and coordinating the application of the Code of Ethics by the various companies of the Group.
- Enhancing and promoting the approval of internal policies and procedures as required for effective implementation of our values.
- Receiving and interpreting questions and complaints related to the Code.
- Investigating any breach of the Code and participate in the proposal of the corresponding disciplinary measures.
- Carrying out the necessary risk assessments to assess the need to update the Code.
• Supervising the correct implementation of the Code, without prejudice to the duties of Internal Audit.
• Monitoring compliance with the Code, with the assistance of the Internal Audit department if required.

Each year the CCO will prepare and submit to Board’s approval an annual report on all actions carried out in compliance with the above listed obligations to evaluate the level of Compliance with the Code of Ethics. To help the CCO in the performance of the referred tasks, Applus+ has nominated compliance liaisons at a divisional and regional level.

3.4. Applus+ Ethics & Compliance Communication Channel:

Questions
Applus+ Ethics & Compliance Communication Channel is available to all Applus+ Professionals, as well as our clients, suppliers and business partners to raise any questions or doubts regarding the interpretation and application of the Code of Ethics.

All questions are welcomed and will be handled expeditiously and in a sensitive way.

The CCO is in charge of managing the Ethics & Compliance Communication Channel and redirecting those doubts not related to the Code of Ethics to the appropriate person.

Complaints
All Applus+ Professionals, as well as Third Parties, shall report through the Ethics & Compliance Communication Channel any reasonable indications or suspicion of any act in violation of the rules set out in this Code.

In the event that the complaint bears any relationship with the CCO or the Compliance department, it may be directly reported to a superior, a Divisional or Regional Compliance Officer, the Legal Department or the Applus+ CSR Committee who shall also observe the rules laid down below.
In order to grant maximum security and protection of the person reporting the breach, Applus+ commits itself to:

- Strictly maintain the confidentiality of any complaint.
- Refrain from revealing the identity of the reporting person without their authorization, unless legally obliged.
- Prevent, investigate and act against any kind of harassment or retaliation against a reporting person.
- Comply with applicable data protection laws.

**How to access it**

Communications to the Ethics & Compliance Communication Channel may be sent by completing an electronic form that is available in Applus+ global intranet as well as in the section of Applus+ website (http://www.applus.com/en/aboutUs/ethicsAndCompliance/communication-channel).

### 3.5. Processing of complaints, investigation and disciplinary procedure for any breach of the Code

According to the Applus+ Whistleblowing Procedure, the CCO is in charge of managing the Communication Channel and, therefore, shall process any complaint reported through this channel. Thus, the CCO will direct and coordinate any investigation and all Applus+ Professionals shall follow the CCO’s instructions in that regard.

The Code and its related policies are not just a set of “best practices” or recommendations. Compliance with them is mandatory. Therefore, any breach will result in the imposition of disciplinary measures up to and including, as the case may be, termination of the professional relationship, in accordance with applicable laws.
3.6. Communication and training

To guarantee access to the content of this Code by Professionals and Third Parties, Applus+ provides them with a copy at the time of starting the employment or commercial relationship with them. Professionals and Third Parties shall at that moment expressly commit to observe the Code.

The CCO is responsible for promoting the dissemination of the content of the Code of Ethics among Applus+ professionals, clients, suppliers and business partners. In order to promote the dissemination among the Professionals of the Group, the CCO must develop, and keep up-to-date, a training and internal communications plan to increase dissemination of the Code among Professionals of the Group.

It is a binding obligation for all Professionals to attend the regular training on the Code and, if applicable, the regulations that develop it.

3.7. Review of the Code

The Code of Ethics shall be revised and updated periodically, in accordance with the annual report of the CCO. The CSR Commission, Internal Audit department, and the CCO shall be able to make proposals to improve the Code of Ethics. Any revision of the Code of Ethics shall require the authorisation of the CSR Committee and the Board of Directors.
The rules of conduct that derive from Applus+ core principles are listed in this section of the Code.

4.1. Respecting dignity at the workplace
Applus+ commitment to the values in this Code would not be credible if they were not reflected in an employment relationship based on respecting the dignity of every employee. The employment relationship shall be free from any abuse of authority or any conduct that might seriously offend others.

Applus+ operates in various cultures, with different customs that we have to learn about and respect, acting in a respectful manner and according to the different social norms.

Our Anti-Discrimination Policy is focused on the prevention of any type of discrimination in hiring decisions, professional promotions, workplace organization or disciplinary actions.

4.2. Preventing health and safety risks and respecting employees’ rights
A healthy work environment and respecting the dignity of employees also includes respecting employees’ rights. Our Group will respect the international standards promoted by the International Labour Organization wherever it operates.

Applus+ has the duty of care and protects the health, safety and welfare of our Professionals and all Professionals have the right to challenge and the authority to stop the work whenever they have concerns about safety. In turn, all Professionals have the obligation to know and comply with the Group’s Health and Safety policies and procedures, and ensure their own safety as well as the safety of all people who might be affected by their activities.

Applus+ recognizes that all persons within our organization have the right to freely affiliate with trade unions.

4.3. Data protection and privacy

Managing any business today requires the protection of personal data in the context of a vast array of day-to-day business operations which rely on different data processing activities. Based on these considerations, Applus+ will always strive to protect individuals and their corresponding fundamental rights as a result of any type of processing of their personal data by our company.

Although laws related to data protection vary in the different countries where we operate, all the professionals must respect these basic rules:

- With the exception of Human Resources, Legal department and the CCO, no officer or employee may access any Professional’s file other than their own unless said access is required to carry out their duties or they are expressly authorized.

- Personal data may only be collected and filed to the extent necessary in order to achieve a legitimate business purpose, and such information may only be used for the purpose for which it is collected.
The personal data of any Applus+ Professional may be accessed during an investigation when there are reasonable grounds to suspect that said Professional has breached the Code, in accordance with applicable laws.

Personal data that is processed by the Company can be disclosed or made available to third parties, among others, in order to comply with legal obligations to which Applus+ is subject, where necessary for the performance of a contract or for the purposes of the legitimate interests pursued either by Applus+ or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject. Applus+ may also share personal data in its possession if required by a competent authority, or to the extent that the data subject has granted consent to such disclosure.

— Applus+ and all of its Professionals respect the right to privacy of other Professionals, clients, suppliers and business partners in all its forms.

4.4. Environmental protection

Our Company will respect all laws related to environmental protection and is committed to sustainability. Therefore we comply with Guidelines for Environmental Best Practices and applicable internal policies and procedures.
Illegal agreements with our competitors, bribing or giving unjustified benefits to public officials or employees of other companies is strictly prohibited.

If you have any questions, please contact the CCO immediately through the Communication Channel.

4.5. Market competition and consumers

At Applus+ we believe that innovation and compliance with antitrust and unfair competition laws are the bases for economic growth. Therefore the following are strictly prohibited:

- Any illegal agreement intended to share markets or to fix prices or bid-rigging in the public or private sector.
- The improper use and/or disclosure of trade secrets, confidential information or intellectual property rights (such as trademarks, copyrights, and patents) belonging to third parties.
- The making of any type of offer or advertising with information that is not truthful or that could be misleading or deceitful for clients.

4.6. Fighting against corruption in Applus+

Applus+ complies with national and international laws relating to the prevention of corruption in all countries where we are established. Thus, Applus+ Professionals and Third Parties have the duty to avoid any corrupt practice. Applus+ has implemented a Global Anti-Corruption Policy and Procedure for all countries where we operate.

This policy and procedure prohibits the following activities:

- To promise or give anything of value to public officials or other companies’ employees to obtain an unjustified treatment or benefit.
- To give anything of value to public officials or other companies’ employees beyond the specific limits set out in our policy or without observing the Global Anti-Corruption Procedure.
- To request or accept anything of value from another company to grant an unjustified benefit to said company or a third party.
Applus+ discourages its Professionals and Third Parties from giving or receiving gifts or hospitalities on behalf of Applus+. The receipt or giving of any gift or hospitality shall be in strict compliance with the Global Anti-Corruption Procedure. Anything of value might be:

- Cash or gift cards or
- Gifts
- Invitations to events or leisure activities (sporting events, hunting, etc.)
- Meals and travel expenses
- Job offers for family members or close friends
- Cancellation of a debt

In some countries or geographic areas Applus+ might implement specific Anti-Corruption Policies, which will follow the provisions of the general policy.

4.7. Social responsibility, sponsorship and donations

As a socially responsible member of society Applus+ promotes culture, science and arts through sponsorship activities and donations. Any sponsorship or donation shall have a legitimate purpose, must be formalised in writing, and be approved pursuant to the Global Anti-Corruption Procedure. Contributions to political parties or trade unions on behalf of Applus+, anywhere in the world, are strictly prohibited.
4.8. Veracity of information and record keeping

Guaranteeing the integrity, reliability and accuracy of information is everybody’s responsibility. We must ensure the accuracy and veracity of the information that we provide to our shareholders, to the markets where our shares are listed and their regulatory agencies, and to any public administration. In no case should Applus+ Professionals knowingly provide incorrect information.

Applus+ undertakes as well to provide adequate, true and objective information about the Group’s evolution to its shareholders. All of Applus+ financial transactions must be clearly and accurately documented and recorded.

4.9. Confidential and non-public information

All Professionals of the Group must treat as strictly confidential all reserved information to which they have access as a result of their professional activity in Applus+. Due to our activity we have access to suppliers and clients’ sensitive information that we must protect and treat confidentially. This includes the obligation not to disclose this information without the consent of the owner of the information or make an improper use of it.

Any reasonable indication of a leak of confidential information or the personal use of such information must be reported by those with knowledge thereof through the Communication Channel.
Confidential information includes:
Commercial or trade secrets of Applus+ or third parties, such as pricing policies, research projects, customer database, accounting or financial information, know-how, plans for marketing or business development or any materials marked “confidential”.

Additionally, Applus+ Professionals shall avoid personally benefitting from an opportunity about which they became aware as a result of the access in the course of their work to confidential information. The Information Security Policy specifies these obligations in more detail.

Any confidential or non-public information of listed companies, including Applus+, may not be used in order to, directly or indirectly, carry out (or recommend a third party to do so) any type of transaction in their shares, financial derivatives or any other securities. Professionals having access to any non-public information of the Group shall adhere to the obligations, limitations, and prohibitions set forth in the Internal Regulations for Conduct in the Securities Markets.

4.10. Integrity in our services

Our services must be rendered in a professional, independent and impartial manner, according to the methods, procedures, practices and policies of Applus+ and the laws of each country. Recommendations, professional opinions, data, results and generally any asserted facts must be documented in a careful manner, in compliance with internal policies.

Reports and certifications have to include objective and truthful results and findings, as well as the corresponding opinion of the relevant professionals. Applus+, in rendering its services, strictly observes and avoids any kind of legal restriction or limitation as the services that it can render, in accordance with the Global Conflict of Interest Policy and other applicable internal regulations.
4.11. Conflicts of interest

A conflict of interest arises when the personal interest of an Applus+ Professional is or can be, directly or indirectly, in contradiction with the interest of the Group. The risk to be avoided is that the personal interest that a Professional may have in a given scenario affects its decision making on behalf of Applus+, which should always pursue the best interest of the Group. Therefore, within the framework of the professional relationship with Applus+, Professionals with decision-making capacity or influence over decision-making should put the interests of the Group before their personal interests. Professionals have a duty of loyalty towards Applus+. Therefore, as a general rule, they must prevent and avoid being in a situation of conflict of interest. This entails taking the necessary measures and decisions so that the conflict of interests does not take place. However, it is not always possible to avoid a conflict of interests: There may even be occasions when the conflict of interests is inevitable to promote the interests of the Group. In those cases where it is not possible or practical to avoid a conflict of interest, the Professional must inform its superior.

Common examples of situations that present a conflict of interest are:

- Hiring family members or friends.
- Having financial interests in companies competing with Applus+, or which are clients or suppliers of the Group.
- Carrying out any paid activity related to the type of services that Applus+ may provide, in addition to work performed in Applus+.
- Rendering any other services to Applus+ clients when such service has been facilitated by the previous performance of work by Applus+ for such client or when said service prevents the Applus+ professional from performing its functions in Applus+ with the objectivity and impartiality due, unless duly authorized.
- Using our employment within Applus+ in order to secure any business or commercial opportunity for one’s own benefit.

All of the above conducts may be authorised by your superior in accordance with applicable internal policies.

The Global Policy on Conflicts of Interest sets out in more detail the rules on what constitutes a conflict of interest and how it is appropriate to act in these cases.
4.12. Use of Applus+ resources

As established in the Applus+ Policy Regarding the Use of IT and related Company Resources by Applus’ Employees, corporate email accounts are the property of the Company and therefore not appropriate for private use. Any use of the corporate email account for private purposes constitutes a waiver of privacy of its content. IT facilities (such as PCs, laptops, tablets, phones, internet access and other communication systems) that Applus+ provides for the use of its Professionals are for professional use and may only be used for personal issues when such use does not interfere with the performance of professional activities. In any case, Applus+ reserves the right to control the use of these IT facilities, including communications made in the past, always in compliance with applicable law.

Those professionals who have an Applus+ corporate email account shall always use said account in their professional communications on behalf of Applus+.

Use of external files and software puts our security at risk and might lead to important criminal and civil sanctions for Applus+. Therefore, any download or use of unauthorized software, any downloads of inappropriate content or any action that violates intellectual property rights is prohibited.

The rest of Applus+ resources may only be used for developing our activities and never for personal use. All Professionals must take proper care of resources assigned to them and must avoid damage, theft or any improper use of such resources.