



Code of conduct

Q-Energy Private Equity, SGEIC, SA
Madrid, 31 March 2021

Relevant information of this Policy/Document

Identification of the Policy	Code of Conduct
Global / national application of the Policy	Global
Section of other Policies developed by this Policy	N/A
Policy that is replaced by this Policy	N/A
Policy repealed by this Policy	N/A
Policies related to this Policy	All the Policies of Q-Energy are based on this Code of Conduct
Department affected by this Policy	All the organisation
Staff affected by this Policy	All the Employees of Q-Energy
Responsible person of the application of this Policy	All the Direction of Q-Energy
Date of approval	31 March 2021
Date of application	31 March 2021
Signatures required	N/A
Document approving this Policy	Board of Directors

1. INTRODUCTION

“Q-Energy strives to make the world better for generations to come, in order to do this, we must bring excitement, energy, and drive to the work that we do. Our success is due to the respect between, and hard work, of our employees. I encourage all our employees to take opportunities, share ideas and aim big. I am excited to welcome you and thank you for making a commitment to Q-Energy and placing your trust in our firm and people.”

Iñigo Olaguíbel, Founding Partner & Head of Q-Energy



1.1. Objective Scope of Application

This Code of Conduct (the “Code”) is applicable to the management company named Q-Energy Private Equity, SGEIC, SA, (the “Management Company”, “Q-Energy” or the “Company”) and its managed vehicles, at any time.

Q-Energy is a Management Company of closed-end vehicles (Alternative Investment Fund Managers “AIFM” as per the relevant European legislation¹) that is supervised/regulated by the National Securities Market Commission (the “CNMV” as per its Spanish acronym).

The managed vehicles of Q-Energy are the following:

	Name of the vehicle	definition for this code
	Q-Energy tenencia y gestión III, SCR, SA	("Q-Energy SCR III");
	Q-Energy III, FCR	("Q-Energy FCR III");
Q-ENERGY	Q-Energy TYG IV, SCR, SA	("Q-Energy SCR IV");
	Q-Energy IV, FCR	("Q-Energy IV, FCR")
	Tretimero Green, SCR, SA	(Tretimero IV SCR)
Q-LIVING(*)	Q-Living, FICC	("Q-Living")

(*) Q-Energy is acting as the temporary Management Company of Q-Living until Q-Living obtains the authorisation from the relevant authority to incorporate its own management company. Hereinafter jointly referred as "**Vehicles**", "**Q-Energy Vehicles**" or the "**Managed Vehicles**".

This Code is the main Policy of Q-Energy, and therefore, any other Policy or procedure approved in Q-Energy shall be based on the principles established in this Code.

1.2. Subjective Scope of Application

This Code shall be applied by all Employees of the Company (hereinafter referred to as "Employee"), in relation to the behaviour of Employees, relationships with other Employees of the Company or when there is a third party involved.

As a third party, it should be understood: investors, service providers, buyers/sellers, partners, or any similar natural or legal person(s) with whom the Company might have any business relation.

2. USE OF THIS CODE

This Section of the Code of Conduct is especially addressed to all our Employees:

A single individual's misconduct can do much to damage a company's reputation.

First and foremost, it is imperative that each Employee of Q-Energy abide by this Code and endeavour to practice and implement it.

Each Employee must accept personal responsibility to read this Code, understand what it means and apply the principles set forth in light of its intent. If more guidance is needed to do that, or if you simply have a question, feel free to speak to your supervisor or any person with a responsibility in the hierarchy of Q-Energy.

The provisions of this Code will be enforced vigorously, and all Employees shall report any knowledge of violations by other Employees to your supervisor or any person with a responsibility in the hierarchy of Q-Energy. If you see, suspect, or hear of questionable actions that may be in violation of the Code, it is vitally important to everyone that you share your knowledge and concerns through the procedures outlined below.

If you believe you have been subjected to or are aware of any violation to this Code, submit a complaint, preferably in writing, to your supervisor or any person with a responsibility in the hierarchy of Q-Energy. If these individuals are not available, or in the event you believe that one of these individuals has engaged in inappropriate behaviour in violation of this policy, or if you are not comfortable, submit a complaint to another senior manager, as soon as possible.

In this connection, please refer to section 8 of this Code, where the different means that Employees can use to submit any kind of request, information, complaint are described.

Supervisors or senior persons must report any and all conduct of which they are made aware, which violates, or may violate, the policies outlined in this Code to the correct upper-level manager, as appropriate.

Your complaint should be specific and should include the names of the individuals involved and the names of any witnesses. The Company will promptly undertake an effective, thorough, and objective investigation and resolve the situation. If the Company determines that a violation of this policy has occurred, effective remedial action will be taken to commensurate with the severity of the offense, up to and including termination. Appropriate action will also be taken to deter any future violation of that subject. Violations of the Code may lead to sanctions, including suspension, dismissal and, in some cases, civil and/or criminal liability.

There will be no retaliation against any Employee who brings a complaint in good faith or who honestly assists in investigating such a complaint, even if the investigation produces insufficient evidence that there has been a violation, or if the charges cannot be proven.

Inevitably, you will face questions and situations that may not be clearly covered by this Code or that escape easy guidance. Therefore, there will be times when you are unsure about how the Code should be applied: **WHEN IN DOUBT, ASK BEFORE YOU ACT**. Your supervisor and our management team will be open to your questions and concerns.

3. CORE PRINCIPLES OF Q-ENERGY

Q-Energy's culture is based upon the below core principles that all Employees must act in accordance with and embody.

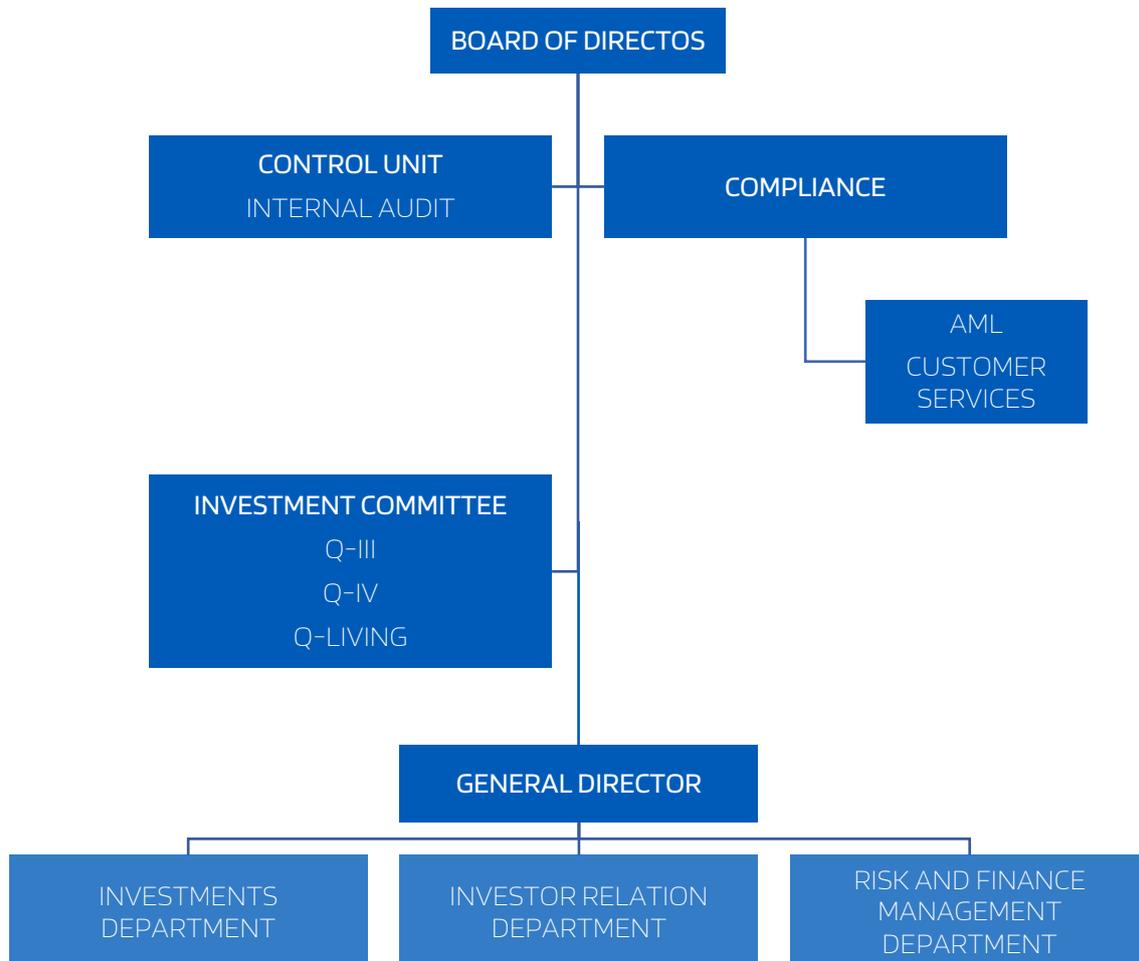
If all employees follow these principles, then our working environment will dramatically improve.

- Treat everyone: Employees, customers and business partners, with dignity, integrity and respect;
- Behave honestly and fairly;
- Strive for mutual respect and trust in relationships;
- Use good judgment and high ethical standards in all business dealings;
- Abide by applicable laws, rules and regulations;
- Ensure a safe and healthy work environment; and
- Promptly address any actual or potential violation of the Code.

4. GOVERNANCE PRINCIPLES

4.1. Structure of Q-Energy

The composition of Q-Energy corresponds to the following structure:



Q-Energy's operations are governed by three main bodies: (i) the Board of Directors; (ii) the Investment Committees; and (iii) the Executive Directors. All entities provide guidance on internal operations as well as ensuring our work (i.e. the investments we make) are of top quality and high moral standards.

Please see more information of each entity's role below.

4.2. The Board of Directors

The Members of the Board of Directors are persons with a strong commitment towards effective functioning of Q-Energy, with a special interest that the wellbeing and actions of Q-Energy implies being fully compliant with: (i) our internal control measures; and (ii) the legislation in force and the special regulations that bind the Company, due to its nature of "regulated/supervised" company.

Due to the nature of "regulated entity" of Q-Energy, the Members of the Board of Directors have already been assessed by the CNMV. In this regard, the CNMV has assessed the suitability, reputation and capacity of the Members of the Board of Directors; having approved the appointment of all the above-mentioned members, that have been registered in the corresponding Registry of CNMV².

Concerning the Internal Control of the Company, the Board of Directors is a fundamental key within the Internal Control Scheme of Q-Energy.

The Board of Directors shall be responsible for:

- (i) Establishing, maintaining, and supervising the policies and procedures of internal control, as well as evaluating the efficiency of such policies and procedures; and, as the case might be, it shall adopt any step to address the potential deficiencies of such policies or procedures.
- (ii) Ensuring that the main risk affecting the Management Company (AIFM) and/or the Management Funds (AIFs) have been identified and that the internal control measures have been correctly implemented.
- (iii) Ensuring the existence of sufficient human and technical means to grant the correct operation of the compliance function, the risk management function, and the internal control function.

4.3. Essential Functions of Q-Energy

As established by the legislation in force, Q-Energy has three main Functions that are of paramount importance for the correct functioning of the Company:

1. The Compliance Function;
2. The Risk Function; and the
3. Internal Control Function.

Hereinafter referred to as "Essential Functions".

These functions are granted with enough independency to perform their tasks within the Company.

The responsible persons for each of the Departments concerning the Essential Functions shall be person(s) with sufficient background, integrity, and authority to perform its tasks within enough independency within the organisation of the Company.

The Essential Functions shall be in direct contact and report periodically to the Board of Directors on the development of their work.

None of the essential functions of Q-Energy have been delegated in any third party and are performed directly by the Employees of the Company.

² PLEASE SEE:

<https://www.cnmv.es/portal/Consultas/ECR/Gestora.aspx?nif=A88409271&vista=4&fs=03/12/2020>

4.4. The Investment Committees

The Investment Committees of Q-Energy are the bodies in charge of implementing the investment policy of the different Vehicles.

The members of the Investment Committee shall perform its advisement functions with the highest standards of integrity, and will be subject to:

- I. The investment policy of the relevant Vehicle; the
- II. Information Prospectus and/or the Management Regulation of the relevant Vehicle; and
- III. Any other Policy or procedure of the Company that might be applicable.

The last responsible body of the investment decisions performed by the Managed Vehicles in Q-Energy is the Board of Directors. However, the Board of Directors delegates to the Investment

Committee, the functions, and faculties to undertake the corresponding decisions concerning the investments performed by the Managed Vehicles. The Board of Directors have established that the Investment Committee's functions and faculties shall always be subject to the forementioned policies and internal procedures; specially in what concerns investment policies and procedures that establishes the means to avoid conflicts of interests.

The Investment Committee will complete its tasks within the delegation performed by the Board of Directors.

In this regard, the functions of the Investment Committee shall be the approval, revocation, extension, reduction, modification, and any change required, if any, of those projects that are included within the Investment Policy.

In this way, the Investment Committee will receive investments proposals that have been identified by the Investment Departments and must analyse and evaluate that they are in line with the investment strategy (as stated previously: aligned with the Investment Policy; the relevant Information Prospectus and/or the Management Regulations; and the applicable regulations) of the Vehicles.

Finally, with regard to the management of conflicts of interest, any of the Members of the Investment Committee will abstain from participating in the deliberation and voting of those decisions in which they could be affected by a conflict of interest; their vote will not be counted for the purpose of calculating the majority required for the adoption of said decision.

Likewise, the Investment Committee will be in charge of searching for investments and/or divestment opportunities and will analyse the investment and/or divestment opportunities in which it could invest and will carry out the management of the Vehicle's assets.

4.5. Internal & External Communications

Q-Energy encourages all its Employees to maintain the highest standards of professionalism, respect confidentiality, clarity and integrity when communicating with a third party of the organisation, amongst departments and between all the Employees of Q-Energy.

In addition to the above, Q-Energy reserves the right to oversee internal and external communications of all its Employees. All Employees must receive permission, or at least must inform (in writing, if possible) to their supervisor or other appropriate party when sending the following communications:

- Emails to the entire company;
- Communication with a competing party;
- Communications to our investors or partners;
- Communications to the media - including articles and news stories; and
- Participating in public debates, conferences, roundtables, and presentations, when they participate in their capacity of Q-Energy's Employees.

In any case, all the Employees shall be conscious that the email provided by Q-Energy and any other means of communication, including the computer, phone, and any other device, are exclusively provided to the Employees to its job performance.

The information concerning Q-Energy that has been created within the working framework of Q-Energy by its Employees is the crux of the value of Q-Energy, and therefore all the Employees shall treat it with the highest standards of integrity and confidentiality; especially in what concerns third parties out of the organisation.

In this regard, Q-Energy has implemented internal procedures to ensure that any Non-Disclosure- Agreement by which Q-Energy is bound is fully respected by all its Employees. Additionally, Q-Energy establishes and encourages its Employees to do their best to grant and enforce any right of Q-Energy derived from such agreements.

5. LEGAL COMPLIANCE AND HONESTY, INTEGRITY AND ETHICAL DECISIONS

5.1. Corruption and Bribery

Q-Energy has a zero-tolerance policy towards any form of corruption or bribery by any of its Employees. Therefore, Q-Energy abides by and is fully compliant with the Spanish and European legislations that prohibit any kind of bribery or corruption within the commercial framework.

Q-Energy defines bribes or improper payments, as a payment made to a government, public servant of any kind, or to a private individual or entity to gain a business advantage. These types of payments are strictly prohibited both domestically and internationally, and wherever the Company may operate in the future.

All Employees must understand that any kind of payment received or made to a public administration, public servant, private individual or company in order to obtain unfair business advantages and out of a professional-service-agreement or the payment of a fee or equivalent, is strictly forbidden.

In addition, to avoid direct or indirect bribery, Q-Energy implements a company gifting and receiving procedure as per the below guidelines:

- It is prohibited to give, receive, offer, or approve an excessive gift or favour, monetary payment, or improper entertainment to get business, as this may be viewed as a bribe;
- Employees shall avoid receiving entertainment or gifts from actual or potential suppliers or other persons with a business relationship with the Company (except when customary in the country), and any such benefits should be disclosed to and approved by the appropriate party;
- Regardless of customer gift receiving policies, never offer a gift if it will create an appearance of impropriety;
- Travel sponsored by interested parties is subject to prior approval by the corresponding manager.

In any case, any Employee should revert to its direct supervisor or to the Compliance Department in the event they have doubts or have information concerning cases that might be similar to the ones described above.

Q-Energy also recognizes the importance of conducting due diligence on third parties, to ensure that all associations and external work are compliant with the relevant laws and company policy on corruption and bribery.

Importantly, corruption and bribery are classified as a criminal offence and all such violations must be reported immediately to your supervisor or senior member of staff.

5.2. Antitrust

Q-Energy performs its business within a competitive market and is fully conscious and aware of how important the competition between different actors in a market is.

Hence, no Employee or person associated with Q-Energy can have an unlawful discussion or agreement with any competitor with respect to pricing, terms and conditions, sales territories, decisions to bid or not to bid on a project, business plans and strategies, or any other commercial subject without prior clearance by the Board of Directors or any of its Members. Employees should actively avoid contact with competitors that appear improper and report internally to its supervisor and/or the legal department of any suspicious conduct.

Q-Energy and its Employees must watch out for exclusive arrangements, bundling of goods and services, choice restriction, technology licensing, selective price discounting, distribution arrangements or Company Employees sitting on other company boards.

Within the efforts to avoid any anti-competitive behaviour by Q-Energy's Employees, the Legal and the Compliance Departments can assist (previously to the establishment of any kind of business relation) in any discussion with third parties to ascertain whether the terms of such conversations are fully compliant with anti-trust regulations.

Additionally, as per the special business of Q-Energy, as a management company of private equity vehicles, within the context of the purchase/M&A or any other corporate operation in which Q-Energy (through the Managed Vehicles) is involved, Q-Energy seeks the advice of competition law experts, in order to comply with the relevant jurisdiction that might be applicable.

Q-Energy competes honestly and fairly obtaining information that is publicly available. Employees must comply with all laws and regulations of European and Spanish competition law to avoid anti-trust accusations.

5.3. Anti-Money Laundering

Q-Energy, as a financial institution, is subject to anti-money laundering (hereinafter "AML") European and Spanish legislations and regulations.

As a "Subject Entity" to AML regulations, Q-Energy is obliged to implement strong internal control procedures on AML. Such internal control shall be applied and respected by all the Employees of Q- Energy.

In addition, Q-Energy is fully conscious on how important it is to maintain the financial market where it performs its activities; and therefore, it is committed to incorporate and apply strong standards on AML procedure, which not only comply but go beyond the legislation applicable. The Manual on AML and further procedures of Q-Energy reflects the aforementioned information.

Even though all Employees are in charge of the correct application of the internal control measures, there are two bodies who are specially in charge of AML matters internally:

- (i) The OCI (Órgano de Control Interno), which is a collegiate body with direct connection to the Board of Directors. The OCI is in charge of dealing with special investors of Q-Energy and reviewing periodically the procedures and policies on AML.
- (ii) The Compliance Department supports the OCI. It applies daily AML procedures and controls and helps other departments on the interpretation of the internal policies and procedures.

5.4. Relationship with Suppliers and Services Providers

Q-Energy's suppliers must comply with all laws, regulations, and associated Q-Energy policies. Suppliers must protect the Company's intellectual property and information, ensured by Q-Energy through a confidentiality agreement. Suppliers must also protect individual's personal data regulations.

Q-Energy must choose suppliers in an open, fair, and competitive bidding process. All purchasing decisions must be made solely upon consideration of Q-Energy's best interests and must be fully transparent. Caution should be used in selecting a supplier owned or managed by a relative or close friend. No party shall take part in any sourcing decisions in connection with third parties, if that party, or any relative of that party, has a financial interest in, or works for, the relevant third party.

5.5. Conflicts of Interests

Q-Energy shall safeguard the interests of the companies and funds managed and those of their respective investors as though their own, ensuring that all are treated equally. The Company shall have the appropriate means to carry out its activity and have in place suitable controls, ensuring that it has all the information necessary on the companies and Managed Vehicles and on their respective investors, always keeping them appropriately up to date.

Hence, in order to treat conflicts of interest, Q-Energy, has established in its internal policies; namely in the Internal Control Manual, the procedures and means that the company has to follow to treat such Conflicts of Interests. In addition, the Information Prospectus and Management Regulations of the Management Vehicles includes measures to avoid conflicts of interests within the decisions- taking bodies.

Lastly, the Code establishes the measures to be undertaken by the employees to avoid and sort out any conflict that might arise.

5.6. Market Abuse

According to the applicable legislation to Q-Energy, the Employees, Directors or Members of the Board of Directors who have information on securities, instruments or affected assets, that is considered as inside information, shall strictly comply with the corresponding provisions of the applicable legislation when performing their activities at Q-Energy, as well as those contained in the Internal Control Manual of Q-Energy.

5.7. Data Protection

Q-Energy is especially concerned with the treatment of information provided by all our investors and will treat such information with the highest standards of confidentiality. Henceforth, Q-Energy obligates and encourages all its Employees to follow European and Spanish laws and regulations applicable to the protection of any data provided by investors, services providers, or third party which has shared information with Q-Energy.

In this regard, Q-Energy dedicates strong efforts to follow and be updated in the recommendations issued by the corresponding Spanish and European authorities on Data Protection. The Compliance Department is in charge of improving and enhancing internal procedures and policies in data protection.

Q-Energy will collect and maintain personal data only for legitimate business purposes. Concerning the internal treatment of the personal data, the Employees of Q-Energy will organise, treat, and classify information as to guarantee that only the employers who have to/needs to deal with this information (within the context of its work duties) have access to it.

Q-Energy and its Employees will prevent unauthorized access to privacy data and assess security controls, and when required, will immediately report any violation of policy or inadvertent release of privacy data. Employees are forbidden to share personal data of the investors, services providers, etc. with third parties without requesting previous authorisation towards its supervisors and inform the Compliance Department when transferring personal data outside the organisation.

5.8. SAC: Servicio de Atención al Cliente – Customer Service

Q-Energy values the relationship and information sharing processes with its investors. As such, Q-Energy has created a channel for its investors to allow them to submit any query or complaint that they might have.

Accordingly, Q-Energy has approved a "Customer Service Policy" and an "Internal Regulation on Customer Service" to:

- I. habilitate the aforementioned channel;
- II. to provide with enough information to its investors; and
- III. to establish the procedure on managing any information received by the investors

6. SAFEGUARDING

6.1. Cybersecurity

Every user who is provided access to Q-Energy's communications systems is responsible for using these systems professionally. Users are prohibited from using the communications systems for any unauthorized or unlawful purpose.

The communications systems are property of Q-Energy. As stated in section 4.5 hereof, they have been provided for the sole purpose of conducting company-related business as well as other business that are approved by Q-Energy. All communications and information transmitted by, received from, or stored in these systems are company records and the property of the company. Electronic communications are a means of business communication. The company requires all users to conduct themselves in a professional manner.

To protect the integrity of the Company's communications systems and the users thereof against unauthorized or improper use of these systems, Q-Energy reserves the right, to limit or restrict any individual's use, and to inspect, copy, remove, or delete any unauthorized use of upon authorization of its superior. The Company also reserves the right to periodically monitor the use of the communication systems of the Employees, and to access users' voice mail, internet access and e-mail for that purpose, or any other business-related purpose upon authorization of the Employee's supervisor; and a previous notification to the Employee.

Information stored on the communications systems is kept confidential within the company. Q-Energy has taken all reasonable steps to assure confidentiality and security.

6.2. Intellectual property

All Employees must identify and protect Q-Energy's intellectual property and respect valid patents, copyrighted materials, and other kinds of protected intellectual property. When required, consult with Q-Energy's Legal Department concerning necessary licenses or approvals to use protected intellectual property of others such as patents, trademarks or proprietary information (i.e. information that is in confidence and not publicly known or generally available).

Employees must consult with the Legal and Compliance Department before, soliciting, accepting, or using proprietary information of outsiders (for example, soliciting from a customer proprietary information of a competitor).

Employees must not share Q-Energy's intellectual property with anyone outside of the company without prior approval and consulting with Company's Legal Department.

7. SUSTAINABILITY AT Q-ENERGY

7.1. ESG & Responsible Investment

Q-Energy defines responsible investment according to the United Nations Principles on Responsible Investment (UNPRI), "as a strategy and practice to incorporate environmental, social and governance (ESG) factors in investment decisions and active ownership." Q-Energy is a member of the UNPRI since November 2020.

Q-Energy understands the importance of ESG factors and endeavours to implement them across all business lines, both internally and externally. Q-Energy incorporates ESG as part of its company ethos and does not regard it as a tick box exercise for its investments and Employees. At its core, Q-Energy focuses on investments that will actively benefit both the environment and society. The company will continue to invest into assets that support the energy transition to a low carbon economy and will continue to improve its internal mechanisms to ensure the morality and efficiency of its work, as well as the happiness of the company's Employees.

For more information on our ESG and Responsible Investment goals, please refer to/ask for a copy of our ESG Policy.

7.2. Ecosystems & Natural Capital

Q-Energy understands the implications of operating in different ecosystems and working with natural capital. Q-Energy, as part of their ownership of its assets, works to implement all necessary environmental regulations as designated by the local area. Q-Energy will enforce all land or wildlife protection measures surrounding their assets and will take any extra precautionary measures deemed necessary.

7.3. Emissions & Pollution Management

Q-Energy measures and tracks carbon emissions and material pollution of its assets and office use. As a sustainable company, with an objective to transition to a low carbon economy, Q-Energy is acutely aware of the steps it must take to reduce its emissions and pollution.

Internally, Q-Energy enforces strict recycling guidelines around the office including the use of designated bins and the prohibition of single use plastic bottles by its Employees. Additionally, Q-Energy, over the next year, will be offsetting its offices electricity use, using renewable energy credits.

Externally, Q-Energy measures the emissions of its wind and solar assets. Q-Energy chooses to be conservative using lifecycle emission numbers, to recognize the carbon emission cost to build and dispose of such assets. Q-Energy will work toward improving the disposal of any assets and will offset any carbon omitted through using lifecycle analysis.

8. HEALTH AND SAFETY FOR Q-ENERGY'S EMPLOYEES

8.1. Workplace

Q-Energy has approved an Employees Handbook which is handed out to any new employee upon arrival. This document includes all the obligations binding Q-Energy towards its employees; and vice versa.

Every Employee is responsible for the safety of himself or herself as well as others in the workplace. To achieve our goal of maintaining a safe workplace, everyone must always be safety conscious.

Q-Energy and its Employees will comply with applicable environmental health and safety ("EHS") laws and regulations, and additional company policies. It will also develop and maintain safe working environments and a process to prevent workplace injuries and determine EHS legal and reputational risks prior to engaging in new transactions. Additionally, the Company will remove unreasonable EHS risks from company facilities, products, services, and activities.

Q-Energy will also reduce toxic and hazardous materials; prevent pollution; and conserve, recover and recycle materials, water and energy and encourage Employees to present ideas on improving EHS practices and report any EHS concerns immediately.

8.2. Diversity and Inclusion

Q-Energy strongly believes that a more diverse and inclusive workplace will foster a better company culture and more efficient work environment. Q-Energy encourages all Employees to be themselves, in whatever capacity that may be.

Q-Energy will not only take into consideration diversity and inclusion during hiring processes but will also ensure diversity and inclusivity throughout a person's employment at Q-Energy. Q-Energy will prohibit any form of harassment, bullying, exclusion and violence against any employee, no matter what their gender orientation, sex, pregnancy, sexual orientation, race/colour, religion, disability/special needs, age, political stance and/or any other characteristic protected by law. Q-Energy will ensure the acceptance of an employee by all others and will strictly punish any form of discrimination up to and including termination.

8.3. Labour Law

As mentioned, Q-Energy has an Employees Handbook for its Employees, which informs all staff of their rights and internal standards that bind Q-Energy towards its Employees.

Q-Energy also has internal policies that establish the fixed and the variable remuneration of the staff, in line with the regulatory legislation applicable to financial institutions.

9. THE "SIBILUS CHANNEL"

Q-Energy has established an internal channel to be used by any Employee of the Company, in the event that they are aware of or they are suspicious that there has been a violation on this Code of Conduct, the Employees Handbook, any internal policy approved by Q-Energy, any internal regulation or the legislation abiding Q-Energy.

Any communication received through the **SIBILUS CHANNEL** will be managed internally with the highest confidentiality, security, independency, and objectivity that these kinds of situations require.

Additionally, the **SIBILUS CHANNEL** allows any Employee to identify or inform the Company of a potential conflict of interest, market abuse or any breach of the Internal Control Manual. The means that the Employees can submit any kind of request, information, complaint, are the following:

- Q-Energy has created the following mail address: SILIBUS@QUALITASEQUITY.COM.
- The Employees can refer a letter through ordinary mail to the Q-Energy's address: Jenner Street, no3, 4th floor, CP 28010, Madrid; for the Attention of "**SIBILUS CHANNEL**".

The Employees are allowed to submit their requests/complaints/etc. in an anonymous manner.

In any event, Q-Energy's Employees are requested to use this **SIBILUS CHANNEL** with professionalism