

## GLOBAL ETHICS CODE ADDENDUM - SPAIN

### 1. INTRODUCTION AND PURPOSE

This document (“**Addendum**”), together with the Westinghouse Global Ethics Code (collectively, the “**Ethics Code**”), provides an integral, coordinated and unified set of values and principles that Westinghouse Technology Services SA, Westinghouse Electric Spain S.A. Tecnatom S.A., Tecnatom Servicios Técnicos y Consultoría, S.R.L.U. (SERTEC) and Inspectores y Consultores Ibercal, S.L.U. (the “**WEC Spain**”), and its related entities, expressly uphold<sup>1</sup>. The Ethics Code is adopted in accordance with the Article 31 bis. Organic Law 1/2015, which amends the Spanish Criminal Code (“**SCC**”), already implemented by the WEC Spain.

WEC Spain has embraced the Westinghouse Global Ethics Code not only as a WEC Spain part of the Westinghouse group, but also, because the values and principles contained therein are in line with applicable Spanish legislation which reflects best practices in terms of Compliance Program requirements.

### 2. NATURE OF THE ETHICS CODE

Compliance with all values and principles required by the Ethics Code and is considered by WEC Spain of the most importance. Such values and principles are mandatory for all the employees, contractors, and all other business partners that establish a business relationship with WEC Spain (the “**Interested Parties**”). No violations of the Ethics Code will be tolerated. The belief of acting in the interests of or to the advantage of WEC Spain does not justify the behaviors that are not in line with the Ethics Code.

### 3. THE COMPLIANCE PROGRAM EVALUATION UNDER SPANISH LAW

The 2015 amendment of the Spanish Criminal Code (“**SCC**”)<sup>2</sup> introduced a criminal liability exemption for those companies able to prove they implemented effective crime prevention and detection measures or Compliance Programs in the event that a crime is committed within the organization by their directors, representatives, employees, agents, etc.

Therefore, the WEC Spain Compliance Program Controls are executed as a part of the Westinghouse Global Compliance Program to comply with the following SCC requirements<sup>3</sup>:

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<sup>1</sup> The purchase of Tecnatom S.A., Tecnatom Servicios Técnicos y Consultoría, S.R.L.U. (SERTEC) and Inspectores y Consultores Ibercal, S.L.U. by Westinghouse Electric Spain took place on November 24, 2023. From that date, acquired entities from the Tecnatom group adopted Westinghouse's Code of Ethics, policies and procedures according to the integration plan designed and approved by management.

<sup>2</sup> Article 31 bis. Organic Law 1/2015, amendment to the Spanish Criminal Code (“**SCC**”).

<sup>3</sup> Article 31 bis.5. Organic Law 1/2015.

1. Identification of all activities in which offences might be committed (i.e., risk mapping).
2. Establishing policies, protocols and proceedings that specify how the company's decisions are adopted and executed in relation to crime prevention (i.e., Anti-Bribery policy).
3. Designing adequate financial resources management models to prevent the commission of crimes (i.e., accounting and audit controls).
4. Imposing the obligation to report to the compliance officer or supervisory body about risks and violations of the prevention model (i.e., whistleblowing channel).
5. Establishing a disciplinary regime that adequately punishes infringements of the prevention model.
6. Carrying out periodic verifications and updates of the prevention model, especially:
  - a. when relevant infringement of the compliance program occurs; and
  - b. when organizational changes or changes in the activities or control structure take place in the company.

In accordance with SCC requirements, the monitoring of the prevention Global Compliance Program had been entrusted to the Vice President and Westinghouse Chief Compliance officer with autonomous initiative and control powers. The Westinghouse Vice President and Chief Compliance Officer has a reporting line directly to the Audit Committee Chair of the Westinghouse Board of Directors.

Westinghouse Corporation has an independent Global Compliance Program, which is in place for all WEC subsidiaries and majority owned or controlled JVs (including WEC Spain legal entities), under the direction of the Vice President and Chief Compliance Officer. The Global Compliance organization consists of Ethics, Trade, Data Privacy and Data Management, and Nuclear Safeguards programs built to promote ethical decision making and prevent and detect unethical behavior.

#### **4. GLOBAL COMPLIANCE PROGRAM MONITORING AND PERIODIC CERTIFICATION**

Appropriate management of the Compliance Program is monitored by carrying out the following actions:

- Regularly checking that the Global Compliance Program components are appropriate for the purposes for which they were intended and that they operate normally.
- Ensuring that the risks addressed by the Global Compliance Program and its activities have not altered through regular evaluation.
- Confirming that the basic components at the heart of the Global Compliance Program are suitable for the needs of the organization's ethical and legal framework, with the aim of ensuring continuous improvement.

Monitoring is formally documented at least every three years, unless circumstances prevent to do it earlier, in case of organizational changes<sup>4</sup>.

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<sup>4</sup> As stated in art. 31.bis. 5.6° from SCC.

## **5. SANCTIONS**

Any violation of the Ethics Code constitutes a disciplinary offence. As a consequence, upon the occurrence of any such violation and in order to ensure the effectiveness of the Global Compliance Program and the Ethics Code implementation, WEC Spain shall take all appropriate disciplinary measures and sanctions, up to and including the termination of employment, to the extent permitted by law, as well as possible civil or criminal penalties.

Madrid, December 1<sup>st</sup>, 2023