

CODE OF ETHICS AND BUSINESS CONDUCT

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1. INTRODUCTION

CABLESCOM (the "**Company**") is committed to conducting its business and affairs with honesty, integrity and in accordance with high ethical and legal standards. This Code of Ethics and Business Conduct (the "**Code**") provides a set of ethical standards to guide each director, officer, employee and representative of the Company (referred to for the purposes of this Code as "**Employees**") in the conduct of their business and constitutes conditions of employment with the Company. It is also expected that suppliers, agents, representatives, consultants and other business partners and associates of the Company will also abide by the high ethical standards reflected in this Code.

This Code is designed to promote integrity and to deter wrongdoing. Contraventions of and deviations from those policies shall be considered to be contravention of and deviations of this Code.

2. BASIC PRINCIPLES OF THIS CODE OF ETHICS AND BUSINESS CONDUCT

The Code sets out the basic principles that should guide the behavior of Cablescom, including all of its employees and executives:

- **Respect for the Law:**

  Cablescom's business and professional activities shall be carried out in strict compliance with the laws in force in every country where it operates.

- **Ethical Integrity:**

  The business and professional activities of Cablescom and its employees shall be based on the value of integrity and are to be carried out in accordance with the principles of honesty, the avoidance of all forms of corruption, and respect for the specific circumstances and needs of all parties involved in such activities. Cablescom will encourage among its employees the recognition and appreciation of behavior in line with the principles defined in the Code of Ethics.

- **Respect of Human Rights:**

  All actions of Cablescom and its employees will strictly respect human rights and civil liberties enshrined in the Universal Declaration of Human Rights. We are committed to treating people with respect, equality and dignity without regard to race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability, or a conviction for which a pardon has been granted or a record suspended.

This Code is not a complete guide to every legal or ethical issue that may be encountered in carrying out one's duties, and all must also consider Company's other policies and procedures which may apply to each particular situation. Questions about how this Code applies to certain situations, or about whether a particular action will be in compliance with this Code, are encouraged.

3. COMPLIANCE WITH LAWS

The Company expects its Employees to comply with all applicable laws, rules and regulations, including (but by no means limited to) those regarding labour and employment practices, privacy, human rights, advertising, environment, health and safety, financial disclosure, tax, securities, insider trading, competition and trade, political contributions, government contracting, corruption of public officials, and intellectual property.

The following describes certain specific examples, but, as stated above, this list is not exhaustive.

(a) Anti-corruption laws

Cablescom requires compliance with all applicable laws that prohibit bribery, particularly the bribery of government officials, including the Spanish Penal Code, as well as other anti-corruption laws that may be applicable.

(b) Inside Trading

Employees and others who are in a "special relationship" with the Company from time to time, may become aware of corporate developments or plans which may affect the value of the Company (inside information) before these developments or plans are made public, must strictly comply with what is established in the applicable regulations.

(c) Bribery and Corrupt Practices

Employees cannot, directly or indirectly, engage in corrupt practices including making, accepting, offering, or promising to make (or conduct) a bribe, kickback or other improper payments, benefits or advantages to any person, individual, entity or organization, or otherwise facilitate any direct payment to themselves (or others).

(d) Anti-Money Laundering Laws

Employees must comply with all anti-money laundering laws, conduct business only with reputable partners and receive funds only from legitimate sources. Employees must take reasonable steps to detect and prevent unacceptable and suspicious forms of payment, and inform their superiors or make a report via the established channels regarding any suspicions or concerns.

(e) Accounting and Disclosure Practices

The Company requires full, fair, accurate, timely and understandable recording and reporting of financial information in accordance with applicable accounting requirements. No undisclosed or unrecorded amount or fund shall be established for any purpose. No false, misleading entries or improper accounting practices shall be made in the Company's books or records for any reason. No disbursement of Company funds or property shall be made without adequate supporting documentation and approvals. No transaction or payment shall be made with the intention that the transaction or payment be other than as documented.

(f) Fraud

The Company has zero tolerance for all forms of fraud including fraudulent financial reporting, misappropriation of assets and corruption. Employees are required to report any suspected fraudulent activities in accordance with this Code. The Company protects all employees who report such activities.

(g) Fair Competition

Cablescom prohibits any actions that involve illegal practices of unfair competition and is committed to ensuring compliance with any antitrust laws applicable in the countries in which it operates.

The Company seeks to outperform its competition fairly and honestly. The Company seeks competitive advantages through superior performance, not through unethical or illegal business practices. Information about other companies and organizations, including competitors, must be gathered using appropriate methods. The Company must guard against price-fixing or arranged market segmentation and monopolistic behaviour that aims to reduce competition. Illegal practices such as trespassing, burglary, misrepresentation, wiretapping and stealing are prohibited.

Each Employee should endeavour to respect the rights of, and deal fairly with, the Company's customers, suppliers, competitors and other Employees.

(h) Use of Assets for Illegal or Unethical Purposes

The funds or assets of the Company shall never be used for any purpose that violates an applicable law or regulation. It is the Company's policy to protect its assets and promote their efficient use for legitimate business purposes. The Company's assets should not be wasted through carelessness or neglect nor appropriated for improper use. Proper discretion and restraint should always govern the personal use of the Company's assets.

(i) Presents, gifts and favours.

Cablescom prohibits bribes to officials and public employees and prohibits its employees from giving or receiving from third parties undue payments of any kind, or gifts, donations or favours that are outside market practice or which, for their value, characteristics or circumstances, may reasonably alter the development of commercial, administrative or professional relations with its companies.

In particular, any form of gift from Spanish or foreign government officials, auditors, which may influence independence of judgement or lead to any kind of favour is prohibited.

It is also prohibited to make any contribution to political parties or organizations controlled by them, other than those cases provided for by law.

This rule does not support exceptions, even in those countries where offering gifts of value to commercial partners is a custom.

4. CONFLICTS OF INTEREST

The Company's best interests must be paramount in all of its dealings with customers, suppliers, competitors, existing and potential business partners and other stakeholders and representatives. Employees should not engage in any activity, practice or act which actually conflicts, has the potential to conflict, or which could reasonably be perceived as conflicting with the interests of the Company.

A conflict of interest occurs when an Employee places or finds himself or herself in a position where his or her private interests actually conflict, have the potential to conflict, or which could reasonably be perceived as conflicting with the interests of the Company or have an adverse effect on the Employee's motivation or the proper performance of his or her job.

Employees who find themselves in a conflict situation must notify their hierarchical superior or HR Director. Conflicts between personal interests and the interests of Cablescom will always be resolved in favour of the latter.

5. SAFE WORK ENVIRONMENT AND ETHICAL RELATIONSHIPS WITH OTHERS

Employees should treat their colleagues, the Company's shareholders, customers, suppliers, competitors, the governments and the communities in which they operate fairly and respectfully, lawfully and ethically, with honesty and integrity, in a manner consistent with long-term relationships. The Company prohibits abusive or harassing conduct by Employees toward others (including other Employees), such as violence, unwelcome sexual advances, discriminatory comments based on ethnicity, religion or race, inappropriate language, or other non-business, personal comments or conduct that make others uncomfortable in their employment with the Company. The Company encourages and expects Employees to report harassment or other inappropriate conduct as soon as it occurs.

The following describes certain specific examples of how the Company and its Employees takes steps to ensure a safe work environment and enhance ethical relationships with each other and those with whom we deal. As stated above, this list is not exhaustive.

(a) Respectful Treatment and Prevention of Discrimination and Harassment in the workplace

Cablescom assumes responsibility for maintaining a working environment free of all discrimination and conduct that involves personal harassment. All workers must be treated fairly and with respect by their superiors, subordinates and colleagues. No abusive, hostile or offensive conduct, whether verbal or physical, shall be tolerated.

Any behaviour, expression or intention which, directly or indirectly, has the effect of denigrating, either personally or professionally, any employee of the Company or any class thereof is expressly prohibited and rejected

(b) Abolition of Child Labour

Cablescom does not allow child labour. Cablescom will not use child labour or include any product or service originating from child labour in its business activity, and it shall comply with the content of the International Labour Organization (ILO) provisions related to the work of minors. Cablescom demands that this principle be strictly observed by its employees and suppliers.

(c) Equal Opportunities

All employees shall enjoy equal opportunities in the development of their professional careers irrespective of age, gender, marital status, race, nationality and beliefs. Cablescom is committed to establishing an effective equal opportunities policy to ensure that its employees may carry out their

professional activities based on the principle of merit. Decisions on promotion will be based on objective criteria and assessments. Likewise, Cablescom is committed to maintaining a policy of investing in the personal and professional education and training of its employees. Cablescom employees shall respect the equal opportunities policy in their professional lives, and will support the personal and professional training of their colleagues.

(d) Workplace Health and Safety

Cablescom will provide its employees with a safe and stable environment. It will ensure that the work-related risk prevention measures are kept permanently updated, and will strictly comply with related applicable law at all locations in which company business is carried out.

All employees must strictly comply with health and safety regulations in order to protect themselves and other employees or third parties. Likewise, employees must responsibly use equipment assigned to them, particularly when conducting high-risk activities, and they must promote compliance with risk prevention practices among their colleagues and subordinates.

(e) Respect for the Privacy and Confidentiality of Employee Data

Cablescom shall only request and use employee data required for the efficient management of its businesses or for which collection is specified by law. Likewise, Cablescom will take all necessary measures to protect the confidentiality of the personal data that it possesses and to guarantee that the confidentiality of the data, when transmitted for business reasons, complies with prevailing legislation. Employees who, in the performance of their duties, have access to information of other employees will respect and ensure the confidentiality of such information, and use it responsibly and professionally.

(g) Communications with the Media

The Company's credibility and reputation in the community are vital to its business success. The Company is committed to providing timely, consistent and credible dissemination of information, consistent with disclosure requirements under applicable securities laws and rules.

(h) Good Ambassadorship

All Employees are ambassadors of the Company in both their business and personal lives. While the Company supports the freedom of the individual to pursue life in his or her own way outside of business hours, Employees are encouraged to act in a manner which upholds their good reputation and

that of the Company. Employees shall represent the Company in a professional manner at all times. Neither the reputation nor the image of the Company shall be jeopardized at any time. The behaviour of all Employees is seen to reflect that of the Company, so all actions must reflect the policies of the Company.

6. SAFEGUARDING COMPANY INFORMATION AND ASSETS

Employees may be provided with equipment, information, credit cards and access to technology in order to effectively perform their duties. While there are other policies that govern these areas, an overarching expectation is that you will protect and safeguard all Company information and resources, and use them as the organization intended.

(a) Confidential Information

Information is a key asset of the Company. The Company's information, written or oral, belongs to the Company. Employees shall keep secret and shall neither disclose to any third party nor use for non-Company purposes any information that the Company has designated as "Confidential". This applies as well to the confidential information of any other person or entity with which the Company does business. Confidential information includes, without limitation, employee and customer personal information, sales, financial information and strategies, marketing information and strategies, research and development activities.

(b) Confidential of Third-Party Data

Cablescom respects the confidentiality and privacy of the third-party data that it possesses. Cablescom is committed to maintaining the confidentiality of third-party data, without prejudice to the legal, administrative or judicial provisions that require it to submit data to entities or persons or to make the data public. Likewise, Cablescom respects the rights of third parties to consult and modify or rectify such data when necessary. Cablescom employees shall maintain the confidentiality of third-party data in accordance with the terms indicated above in the course of their professional activity and will refrain from any inappropriate use of such information.

(c) Intellectual Property

All work, including but not limited to documents, research work, and business plans, created by employees, agents, representatives, contractors, consultants, or business partners on behalf of the Company is designated as and remains the property of the Company in perpetuity. As an Employee, you

will respect the intellectual property of others and will adhere to all laws and contracts relating to intellectual property. You will disclose all intellectual property produced, made, composed, written or designed during the course of your employment with the Company and which relates to the Company or its business and work with the Company to ensure that rights in that intellectual property are validly assigned to the Company.

(d) Electronic Use and Access

Telecommunications facilities of the Company such as telephone, cellular phones, intranet, Internet and email are Company property. Use of these facilities imposes certain responsibilities and obligations on all Employees. Usage must be ethical and honest with a view to preservation of and due respect for the Company's intellectual property, security systems, personal privacy, and freedom of others from intimidation, harassment, or unwanted annoyance.

7. COMMITMENTS WITH THE COMMUNITY

(a) Environment

The Company will seek the greatest possible respect for the environment in which it performs its activities, and will minimize the negative effects that, consequentially, may be caused. The company will provide its employees with the most appropriate resources for achieving this commitment. Likewise, Cablescom will contribute to the preservation of natural resources and sites of ecological, scenic, scientific or cultural interest. To do so, it will establish best practices and promote knowledge and use of them by its employees. Cablescom is committed to strict compliance with all applicable environmental laws.

(b) Social Commitment

The Company is committed to acting in a socially responsible way, in compliance with the laws of the countries in which it operates and, in particular, it assumes responsibility for respecting cultural diversity and the customs and principles of the people and the communities affected by its activities.

(c) Protection of land rights.

Cablescom is committed to respecting the rights of ownership, tenure, and legitimate use of land, forests, and aquatic resources of local communities, indigenous peoples, and other individuals affected by its business activities or those of its suppliers. The Company rejects all forms of illegal or illegitimate land acquisition (land grabbing) and will ensure that legitimate rights over natural resources are not violated.

8. DISSEMINATION, ACCEPTANCE AND ENFORCEMENT

The Company shall communicate and disseminate to all its employees the content of this Code, along with its rules, commitments and development procedures.

- All employees must accept the principles and rules of conduct set out herein.
- This Code is mandatory for the board members, managers and employees of Cablescom.
- Failure to comply with them shall be judged according to the regulations and applicable collective agreements. In labour relations subject to Spanish law, such failure to comply shall be considered gross disobedience, regardless of any other consequences that may ensue.
- Cablescom requires its professionals to respect and comply with the internal and external standards applicable to their professional activity. This is also required of those who, in their respective areas, have dealings with the company, its contractors, suppliers and those who collaborate with it or act on its behalf, and to its business partners.
- Cablescom team also have an obligation to honour and respect the processes and controls that the company approves in terms of ethics and compliance. They must also protect the climate of ethics and compliance at the company and regularly confirm, as required, that their conduct conforms to this Code or to any of the regulations developing it.
- Any person who has knowledge of or suspects a breach of this Code is required to make it known to a hierarchical superior or to the HR Director, or to report it through the mechanisms set up by the company for complaint procedures.
- The hierarchical superiors who have been informed of breaches or violations of this standard must, in turn, give immediate notification, prior to any further action, to the HR Director or General Manager.
- Nobody, regardless of their rank or position, is authorized to ask an employee to contravene the provisions of this Code. No employee may justify improper conduct by invoking a higher order or ignorance of this Code.

It is important that all Employees understand the expectations outlined in our Code.

New hires will be provided with the Company's Code in their offer letters, and it will form part of their orientation to the Company Managers will review the Code with their staff each year, or earlier if there are changes, to review the principles and reinforce the Company's expectations.

All staff will refresh their understanding each year by completing electronic confirmation that they have read the Code and have had an opportunity to ask questions for clarification.

Copies of this Code are made available to all persons bound by it, either directly or by posting the Code on the Company intranet site or website.

Mr. Qiang Wang

General Managing

Zaragoza, June 2025