

Code of conduct

January, 2026

Empty ARCHITECTURE
MUSEUMS
EXHIBITIONS

www.empty.es

MESSAGE FROM OUR CEO:

At Empty, we understand that integrity, responsibility, and ethical commitment are fundamental pillars for building a solid and trustworthy organization. In today's complex, globalized, and demanding environment, acting responsibly is not just an option—it is a necessity to ensure the sustainability and legitimacy of our activity.

This Code of Conduct reflects our commitment to a management model based on respect for the law, human rights, diversity, the environment, and good governance. It is also a practical tool to help everyone at Empty identify the principles and behaviors that should guide our decisions, both inside and outside the organization.

"Doing things right" has always been our motto, and this Code reinforces that shared purpose: to act with rigor, consistency, and the conviction that excellence can only be achieved through integrity. From management, we assume leadership in promoting an ethical and compliant culture, providing the necessary resources for this document to be known, understood, and implemented.

Each professional plays a fundamental role in its implementation. Acting responsibly and setting an example is the first step in making Empty an even stronger, more respected company aligned with its values.

We count on your commitment and involvement to continue building, together, an organization that is ethical, innovative, and dedicated to cultural and social development.

Nicolás Mínguez Pardo

CEO of Empty

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1. INTRODUCTION

This Code of Conduct aims to establish the principles, values, and standards that must guide the professional behavior of all individuals connected to Empty. It constitutes a common framework to ensure integrity, regulatory compliance, and corporate responsibility in all our actions.

This document is part of Empty's compliance management system. It is aligned with principles found in international standardization norms, applying to all levels of the organization and in all jurisdictions where Empty operates.

The content of this Code is mandatory and reflects Empty's commitment to a strong, transparent, and continuously improving ethical culture.

2. PURPOSE AND VALUES

2.1 Empty's Purpose

Empty aims to become a leading cultural and technical organization focused on the design, development, and execution of unique museographic and architectural projects, guided by excellence, sustainability, legality, and ethical commitment.

Our work is grounded in generating long-term value for society, our clients, and all stakeholders, integrating principles of legal compliance, respect for human rights, social responsibility, and environmental protection into our daily activities.

This Code is inspired by that purpose and outlines the principles that must guide the conduct of everyone at Empty—both professionally and in their internal and external relationships.

2.2 Empty's Values

Empty draws its corporate culture from universal ethical principles that promote integrity, sustainability and respect for people. In this regard, it aligns with the fundamental principles and core values promoted by the United Nations Global Compact, such as respect for human rights, fair labour conditions, environmental protection and the fight against corruption.

Our values are the foundation of our decision-making and the basis of our corporate identity. These principles guide our actions and ensure ethical consistency across all our projects.

- Integrity and Professional Ethics: Always act with honesty, transparency, and respect, maintaining exemplary behavior.
- Creativity and Innovation: Promote original ideas and solutions that combine art, technology, and sustainability.
- Sustainability and Environmental Responsibility: Incorporate environmentally responsible practices into our decisions and processes.
- Excellence and Continuous Improvement: Strive for the highest standards of quality and efficiency in all our projects.
- Well-being, Diversity and Inclusion: Promote a healthy, safe and equitable working environment in which each person is valued for their uniqueness, and to foster equal opportunities and mutual respect as the foundation of our organizational culture.
- Cultural and Social Commitment: Actively contribute to the preservation of cultural heritage and to social development in the communities where we operate.

3. SCOPE OF APPLICATION

This Code of Conduct is mandatory for all individuals who are part of Empty, regardless of their hierarchical level, contractual nature, role, or geographic location. This explicitly includes:

- Executive staff
- Employees under permanent, temporary, or internship contracts
- Freelancers or independent contractors providing services to Empty
- Personnel assigned or seconded to international projects
- Any person acting in the name of, representing, or on behalf of the company

In addition, Empty will actively promote the extension of the principles in this Code to third parties with whom it maintains contractual or professional relationships, such as suppliers, subcontractors, strategic partners, and collaborating entities. This adherence may be formalized through contractual clauses, compliance statements, or specific agreements.

All individuals subject to this Code must be aware of, respect, and apply its content. Each person is responsible for acting according to their principles and consulting the compliance body in case of doubt.

Non-compliance with the Code may result in corrective or disciplinary measures, without prejudice to any legal or contractual actions that may be taken.

4. GOVERNANCE AND RESPONSIBILITIES

Empty's compliance system is based on a clear governance structure adapted to its organizational reality, with defined responsibilities that ensure effective implementation, oversight, and continuous improvement of this Code of Conduct.

4.1. Governing Body

The governing body of Empty holds the highest level of responsibility for compliance. It formally approves this Code of Conduct, promotes its implementation, and ensures the availability of adequate resources for its effective application. It also champions ethical leadership as a cross-cutting value within the organization.

4.2. Top Management

Senior Management actively collaborates in integrating the Code into the organization's daily operations. It plays a key role in fostering an ethical culture and coordinating initiatives to prevent risks and promote alignment between principles and management.

4.3. Compliance Body

The compliance body coordinates Empty's compliance system, operating with technical independence and direct access to the governing body. Its responsibilities include:

- Interpreting and advising on the content of the Code
- Assessing compliance risks and proposing preventive or corrective measures
- Promoting training, awareness, and regular review of the Code
- Driving continuous improvement of the compliance system

4.4. Employee Responsibilities

All individuals at Empty—regardless of their position, function, or contract type—are required to understand, apply, and uphold the principles in this Code of Conduct.

Those in technical, administrative, or support roles are expected to actively contribute to building a culture of compliance by acting with integrity, responsibility, and ethical judgment, and by cooperating with the compliance body as needed.

5. IDENTIFICATION OF COMPLIANCE RISKS

At Empty, a preventive approach to compliance is adopted, based on the continuous identification, assessment, and management of risks that could compromise regulatory compliance, the integrity of operations, or the organization's reputation.

Managing these risks is a shared responsibility throughout the organization and follows these principles:

- Evaluate risks arising from activities, the regulatory environment, and relationships with third parties
- Prioritize risks based on potential impact and likelihood
- Design and implement appropriate controls, preventive and corrective measures
- Periodically review risks and related controls, especially in contexts of organizational change, international expansion, or regulatory updates

The most relevant compliance risks are detailed and systematized in the Criminal Risk Prevention Model, a document that is part of Empty's criminal compliance system. It outlines the methodology for identification, assessment, and management, and includes the current risk map.

This Code of Conduct acknowledges this process as essential for building an ethical culture, preventing illegal acts, and strengthening stakeholder trust in Empty's integrity.

6. GENERAL PRINCIPLES OF CONDUCT

This section sets out the ethical principles and behavioral guidelines that must govern the actions of everyone linked to Empty, in any context, regardless of their role, location, or contractual relationship.

These principles form the shared framework that ensures coherence, integrity, and accountability in our decisions and interactions.

6.1. Compliance with the Law

All professional conduct must strictly adhere to applicable legislation—both national and international—as well as internal regulations, contracts, collective agreements, and commitments assumed by Empty.

6.2. Personal and Professional Integrity

Members of Empty must act with honesty, impartiality, transparency, and loyalty, avoiding any conduct that could be perceived as fraudulent, misleading, abusive, or contrary to the organization's general interests.

6.3. Responsibility

Each individual is accountable for their decisions and the resulting consequences. They must act with diligence, sound judgment, and follow the principles of the Code—even in situations not explicitly covered.

6.4. Confidentiality and Information Protection

All non-public information accessed during the performance of duties must be kept confidential. Personal data must be handled securely and responsibly in compliance with current regulations.

6.5. Prevention of Conflicts of Interest

Professional decisions should be made objectively and free from personal, family, or financial conflicts. Any potential conflict of interest must be transparently disclosed.

6.6. Respect and Dignified Treatment

Empty rejects all forms of discrimination, harassment, or disrespect. We promote an inclusive and equal-opportunity culture based on personal dignity, diversity, and professional collaboration.

6.7. Sustainability and Social Commitment

All decisions must consider the social, cultural, and environmental impact of our activities. Empty is committed to heritage protection, resource efficiency, and contributing positively to the communities where we operate.

These principles apply to all individuals connected to Empty. Adhering to them ensures both legality and internal consistency, while helping to build a strong, respected, and shared ethical culture.

7. GENERAL RULES OF INTERNAL CONDUCT

The following internal conduct rules define the basic behavioral obligations within Empty's organizational environment. They ensure a respectful and safe working atmosphere that aligns with the company's values of legality, ethics, and responsibility.

7.1. Work Environment and Professional Relationships

Professional behavior must be based on mutual respect, courtesy, collaboration, and trust among all members of Empty.

Physical or verbal violence, moral or sexual harassment, bullying, abuse of authority, or degrading or intimidating behavior will not be tolerated.

Those in coordination or leadership roles must set an example, ensure fair and healthy work relationships, and detect any signs of inappropriate behavior early.

7.2. Equal Opportunities and Non-Discrimination

Empty promotes an inclusive and diverse culture. All decisions related to recruitment, hiring, promotion, training, compensation, or termination must be based solely on merit, competence, performance, and organizational needs.

Any verbal, non-verbal or written conduct that has the effect of undermining dignity or creating an exclusionary or hostile environment shall be considered a serious breach of this Code. The deliberate exclusion of opportunities based on personal factors unrelated to professional performance will also be deemed discriminatory.

7.3. Responsible Use of Resources

Assets and resources provided by Empty—whether physical, digital, or financial—must be used efficiently, securely, and exclusively for professional purposes related to authorized activity.

Misuse, abuse, or personal use of equipment, infrastructure, materials, corporate accounts, privileged information, or Empty's brand identity is not permitted. This includes vehicles, devices, software licenses, corporate email, and network access.

Any suspected fraudulent or negligent use must be reported to the designated authority.

7.4. Occupational Health and Safety

Protecting health and safety at work is a top priority for Empty. Everyone must comply with current occupational risk prevention regulations, as well as with internal protocols established for each project, office, or facility.

The proper use of personal protective equipment (PPE), participation in mandatory safety training sessions, and active cooperation in identifying risks and potentially dangerous situations are all mandatory.

Any breach of safety measures will be considered a violation, especially if it puts others' physical integrity at risk.

7.5. Information Protection and Confidentiality

All information accessed in the course of professional activities—whether technical, strategic, financial, or related to third parties—must be protected from unauthorized access, leaks, tampering, or loss.

It is prohibited to share confidential information without authorization, even after the employment or professional relationship with Empty ends. The duty of confidentiality applies to all formats: documents, plans, emails, recordings, images, and internal communications.

The handling of personal data must always comply with applicable data protection regulations and be guided by the principles of minimization, purpose, and legitimacy.

7.6. Personal Conflicts of Interest

Decisions must be made solely in Empty's legitimate interest, free from personal, family, financial, or any other unrelated influence.

A conflict of interest is considered any situation where personal interests may, or appear to, interfere with the organization's interests. This includes, for example, having relatives employed or contracted, influencing decisions involving linked companies, or benefiting from internal information.

7.7. Cooperation with Control Mechanisms

Everyone associated with Empty must actively cooperate with monitoring, control, and internal or external audit processes by providing accurate, timely, and complete information when requested.

Obstructing, intentionally delaying, or tampering with documentation or information requested by control bodies, external advisors, or auditors is strictly prohibited. Responsible cooperation is essential for an effective compliance system.

7.8. Protection of Intellectual and Industrial Property

All Empty personnel are required to protect and respect the organization's intellectual and industrial property rights, as well as those of third parties involved in any professional relationship.

Protected assets include, among others: technical documents, designs, blueprints, creative content, exhibition works, photographs, software, images, videos, trademarks, trade names, presentations, methodologies, and any other item created, commissioned, or used within Empty's professional activities.

It is forbidden to:

- Reproduce, modify, use, disclose, or register protected content without the express authorization of the competent person or body.
- Use third-party materials without verifying ownership or valid licenses.
- Register in one's own name any assets developed professionally for Empty or as part of assignments from the organization.

All exploitation rights for creations developed under a professional or contractual relationship with Empty shall belong to the organization, unless otherwise agreed, in accordance with current legislation and contractual terms.

Respect for intellectual and industrial property is essential to protect Empty's reputation, business interests, and capacity for innovation.

8. GENERAL PRINCIPLES AND STANDARDS OF EXTERNAL CONDUCT

The reputation and legitimacy of Empty depend on the ethical, professional, and consistent management of its external relationships. These standards define the principles that must govern staff conduct in interactions with clients, suppliers, public entities, and other stakeholders, both nationally and internationally.

8.1. Relationships with Clients

Client relationships must be based on respect, transparency, and excellence in service. All staff must:

- Act with integrity, avoiding any form of deceit or unrealistic promises.
- Strictly comply with contractual terms and committed quality standards.
- Treat all technical, commercial, or strategic client information as confidential, even after project completion or relationship termination.
- Consider cultural and regulatory differences in international contexts, adapting communication and management with sensitivity and professionalism.

8.2. Relationships with Suppliers and External Collaborators

The selection of suppliers, subcontractors, and collaborators must be based on objective, transparent, and verifiable criteria. Under no circumstances will procurement or contracting be permitted based on personal relationships, favoritism, or improper compensation.

Third parties must commit to upholding principles equivalent to those in this Code regarding legality, human rights, sustainability, and anti-corruption. Empty may require adherence through contractual clauses or specific ethical declarations.

It is forbidden to accept, offer, or request gifts, invitations, payments, or advantages that could affect impartial decision-making, except for symbolic, courtesy gifts that do not create conflicts of interest or the appearance of impropriety.

Specific criteria on admissibility, monetary limits, authorization, and recording of gifts, invitations, and other courtesies will be regulated in Empty's Anti-Bribery and Corruption Prevention Policy.

8.3. Relationships with Public Bodies

Relations with public administrations, regulatory bodies, and national or foreign authorities must be conducted under the principles of legality, transparency, professionalism, and cooperation.

It is strictly forbidden to offer, promise, or deliver any kind of benefit, preferential treatment, or incentive to public officials—directly or indirectly—to obtain undue advantages or influence official decisions.

In procurement processes, grant applications, or administrative procedures, the utmost integrity must be maintained and all conduct that could be interpreted as irregular must be avoided.

8.4. Confidentiality and Information Protection

Information generated or shared in the context of external relationships must be treated with the highest level of confidentiality and may not be disclosed or reused without prior and explicit consent.

This commitment also applies to international information exchanges, which may be subject to differing regulations on privacy, trade secrets, or intellectual property rights. Empty will adopt additional measures when required by local legislation or international agreements.

All personnel must exercise extreme caution in professional settings, avoiding the disclosure of sensitive or strategic data without authorization.

8.5. Relationships with the Community and Other Stakeholders

Empty maintains an active and responsible stance toward the social and cultural environments in which it operates, both at its headquarters and in the countries where it carries out activities.

Respectful and transparent engagement is promoted with cultural associations, local entities, academic institutions, and other social actors, ensuring alignment with the organization's values and the positive impact of its projects.

9. COMMITMENT TO GOOD GOVERNANCE AND SUSTAINABILITY

Empty is committed to integrating sustainability and good governance into all areas of its activity, promoting a responsible and efficient organizational model focused on generating long-term value for society and its stakeholders.

9.1. Environmental Sustainability

Empty is committed to reducing its environmental impact through responsible resource use, pollution prevention, and the continuous improvement of its environmental performance.

In all its projects, Empty will promote:

- Energy efficiency and emissions reduction.
- Responsible material use and waste minimization.
- The application of circular economy principles in design and execution.
- Collaboration with suppliers who meet high environmental standards.

These actions align with the United Nations Sustainable Development Goals (SDGs), particularly those related to responsible consumption and production, climate action, and sustainable cities.

9.2. Social and Cultural Responsibility

Empty promotes the development of projects that create a positive impact in the communities where it operates, especially in contexts related to cultural heritage, social identity, and territorial cohesion.

Efforts will be made to encourage local hiring where feasible, show respect for the communities and cultures involved, and actively participate in initiatives that contribute to education, access to culture, and social inclusion.

Likewise, dignified, fair, and safe working conditions will be promoted both within the organization and throughout its value chain, ensuring that the fundamental rights of workers are always respected.

9.3. Principles of Good Governance

Empty's management is based on the principles of legality, transparency, accountability, and institutional responsibility. Decisions must be made according to ethical, professional, and public interest criteria, avoiding opacity, favoritism, or arbitrariness.

The commitment to good governance includes:

- The existence of clear and traceable internal procedures.
- Accountability to the appropriate governing bodies.
- The fight against any form of corruption or abuse of power.
- The promotion of an ethical, participatory, and professional culture.

Adherence to these principles is essential to strengthen the trust of clients, institutions, professionals, and society at large, and is an integral part of Empty's corporate identity.

10. INTEGRITY AND PREVENTION OF UNLAWFUL CONDUCT

Empty maintains a zero-tolerance policy towards any form of corruption, bribery, fraud, collusion, or unfair practice. All individuals within the organization must act with integrity, transparency and respect for legality in all their professional relationships, both internal and external.

10.1. Prevention of Bribery and Corruption

Empty strictly prohibits any attempt to engage in, or participation in, acts of corruption, bribery, fraud or the granting or acceptance of undue advantages, reaffirming its commitment to legality and fair play in all its operations, both at national and international level.

This principle applies to all relationships, whether public or private, and is developed throughout this Code, in particular in the section on external relationships, as well as in Empty's Anti-Bribery and Corruption Prevention Policy, which establishes the control procedures and specific criteria.

All personnel are required to act with due diligence and to report any suspected conduct or conduct contrary to this principle through the Whistleblowing Channel.

10.2. Conflicts of Interest and Influence Peddling

Any situation in which personal or family interests may interfere with the impartiality of professional decisions must be avoided. It is also forbidden to use one's position at Empty to influence or improperly benefit third parties.

All actual, potential, or perceived conflicts of interest must be disclosed and assessed in terms of their scope and the appropriate measures to be taken.

10.3. Fraud and Manipulation of Information

Any action intended to falsify, alter, or manipulate data, reports, contracts, certifications, or records to obtain financial, reputational, or contractual benefits for Empty or third parties is strictly prohibited.

The truthfulness and traceability of information are critical requirements for the transparency and accountability of the organization to clients, institutions, and partners.

10.4. Protection of Free Competition

Empty is committed to acting in strict compliance with competition law, avoiding any behavior that could constitute:

- Price fixing, condition setting, or margin manipulation with competitors.
- Market, client, geographic area, or bid rigging.
- Exchange of confidential information among competitors.
- Collusive agreements or coordinated practices that restrict competition.

Any questions about these practices should be directed to the legal department before making decisions that might pose a risk.

11. WHISTLEBLOWING CHANNEL AND REPORTING OF VIOLATIONS

Empty has established a Whistleblowing Channel through which any acts or behaviors that constitute a violation of this Code of Conduct, internal policies, or applicable legal frameworks can be reported confidentially.

This channel is available for use by all individuals who maintain a professional relationship with Empty, whether labor-related, commercial, or contractual, including collaborators and third parties with legitimate ties to the organization.

11.1. Purpose of the Channel

The whistleblowing channel aims to facilitate the early detection of legal, ethical, or reputational risks, by allowing:

- The reporting of acts contrary to the Code of Conduct.
- Notification of potential legal breaches.
- Disclosure of situations that could affect the integrity of the organization.

Reports may be made anonymously or by identified individuals, with the following guarantees:

- Confidentiality of the informant's identity and the contents of the report.
- Protection against retaliation for those reporting in good faith.
- Respect for the rights of all parties involved.

11.2. Procedure and Management

The Whistleblowing Channel is managed in accordance with the Whistleblowing Channel Operating Procedure, which governs:

- The channels available for submitting reports (digital platform, email, or meetings).
- Timelines for acceptance, review, and response.
- Guarantees of independence, objectivity, and proportionality in handling reports.

The channel is administered confidentially, under the supervision of the responsible person or body designated by Empty, under the provisions of Spain's Law 2/2023 on the protection of whistleblowers.

12. DISCIPLINARY REGIME

Failure to comply with the provisions contained in this Code of Conduct may lead to the adoption of disciplinary, contractual, or legal measures, depending on the seriousness of the offense and the applicable regulations.

This disciplinary regime aims to ensure internal coherence within the compliance system, strengthen the culture of integrity, and correct behaviors that violate the ethical, regulatory, or professional responsibility principles established by Empty.

12.1. Types of Violations

- Violations may include, but are not limited to:
- Breach of internal or external conduct rules.
- Violation of the general principles of the Code.
- Intentional concealment of facts relevant to the organization.
- Participation in practices of corruption, fraud, harassment, or discrimination.
- Obstruction of internal controls or audits.
- Lack of cooperation with the Whistleblowing Channel or knowingly submitting false reports.

12.2. Applicable Measures

Consequences for violations may include, as appropriate:

- Verbal or written warnings.
- Temporary suspension of duties.
- Disciplinary sanctions are imposed following the applicable collective labor agreement.
- Termination of labor or commercial contracts.
- Civil claims or criminal actions in the most serious cases.

All measures will be adopted following the principles of legality, objectivity, proportionality, and prior hearing of the affected person, guaranteeing their right to a defense.

12.3. Coordination with the Legal System

This disciplinary regime complements but does not replace the provisions established by labor, civil, or criminal law, nor those set out in collective agreements, contracts, or specific internal regulations. In case of conflict or contradiction, the provisions of applicable legislation and binding legal instruments will prevail.

13. TRAINING, AWARENESS AND CONTINUOUS IMPROVEMENT

Training in ethics, regulatory compliance, and organizational culture is a fundamental pillar of Empty's compliance system. Proper understanding and application of this Code require that all members of the organization are familiar with its principles, assume their responsibility, and act in accordance with shared values.

13.1. Training Plan

Empty will develop an annual training and awareness plan on ethics and compliance, addressed to all staff on a cross-functional basis, with special focus on:

- Newly hired personnel.
- Managers or staff with coordination responsibilities.

- Areas with higher exposure to regulatory or reputational risks.
- Teams involved in international projects or those interacting with third parties.

The plan may include in-person or virtual sessions, self-learning content, support materials, and targeted actions on specific topics (e.g., bribery, harassment, data protection, sustainability, etc.).

13.2. Participation and Monitoring

Participation in training activities will be mandatory for staff. An active, critical, and participatory attitude will be encouraged, motivating individuals to raise questions or present real case studies.

The effectiveness of training activities will be evaluated through surveys, learning assessments, or analysis of compliance indicators.

13.3. Continuous Updating and Improvement

Training content will be reviewed periodically to adapt it to legal changes, developments in the compliance system, or newly identified needs. Lessons learned from real cases or events occurring inside or outside the organization will also be incorporated.

Ethical training should not be seen as a one-off action but as a continuous process integrated into Empty's culture.

14. APPROVAL AND UPDATES

This Code of Conduct has been approved by the governing body of Empty, and its content is binding for all individuals within the organization, as well as for third parties who, under their professional relationship with the company, have agreed to its terms.

14.1. Entry into Force

This Code of Conduct was approved by the governing body of Empty on January 21, 2026, and replaces the previous Code of Good Practices approved in March 2018, which is repealed from this date onward.

From the moment it enters into force, this Code is mandatory for all Empty personnel and will be available via the corporate intranet at the following link: <https://intranet.empty.es/>, along with the policies and procedures that develop it.

14.2. Periodic Review

The Code will be reviewed at least every two years, or whenever circumstances make it necessary, such as:

- Significant regulatory changes.
- Modifications in the organizational structure or business model.
- Results from audits, investigations, or reports received through the whistleblower channel.
- Needs identified by the compliance body or the governing body.

Reviews may lead to proposed amendments, which must be validated and approved by the competent governing body.

14.3. Document Control

The current version of the Code will be identifiable by its version number and date of approval. A file will be maintained with the version history and corresponding approval records, as part of Empty's compliance system documentation.

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