

# Code of Conduct

## Grupo Ingenium Tecnología S.L.



Version: MM00

## Employees Code of Conduct

### 1. Purpose

The purpose of the GRUPO INGENIUM TECNOLOGÍA S.L. Code of Conduct is to establish the values that guide the behaviour of both the Ingenium Group and the companies that are part of the group. It also aims to help consolidate business conduct that is accepted and respected by all employees and managers.

This culture aims to guide relations between employees; their actions towards customers, shareholders, suppliers and external collaborators; and relationships with public and private institutions and with society in general.

This Code of Conduct is a starting point and affects all our activities. Our actions are based on respect for the following values: honesty, integrity, transparency and security.

The Ingenium Group will encourage all its suppliers, customers and collaborating companies and institutions to adapt their conduct to patterns of action similar to those defined in this Code of Conduct.

### 2. Area of Application

This Code of Conduct is aimed at all directors, officers and employees of the various companies in the Ingenium Group.

The patterns of conduct contained in this Code affect all the companies in which the GRUPO INGENIUM TECNOLOGÍA S.L. has a shareholding, in which it has control of management, as well as other institutions and organizations linked to GRUPO INGENIUM TECNOLOGÍA S.L. by a relationship of control or which are managed by GRUPO INGENIUM TECNOLOGÍA S.L., all over the world.

GRUPO INGENIUM TECNOLOGÍA S.L. will promote the adoption of principles similar to those in this Code in the companies in which it has a shareholding, even when this is not a controlling shareholding; and among its suppliers, contractors and partners.

For the purposes of this Code, "the INGENIUM GROUP" refers to both the company GRUPO INGENIUM TECNOLOGÍA S.L., and to the entire business group headed by it.

The senior management of GRUPO INGENIUM TECNOLOGÍA S.L. will take every measure in its power to enforce the rules contained in this Code of Conduct.

### 3. Basic Principles of Behaviour

The objective of the INGENIUM GROUP is for all individuals and institutions covered by this Code of Conduct to comply with the ethical principles set out below, in all their relations with its stakeholders:

- To respect the human rights and public freedoms recognized in the United Nations Universal Declaration of Human Rights, to help preserve the natural environment and assist in the development and welfare of communities.
- To act in accordance with applicable Spanish and international laws.
- To promote honesty, fairness, truthfulness, the fulfilment of commitments, fair competition and transparency.
- To provide good working conditions, respecting labour rights.
- To innovate in order to develop new technologies that contribute to social and environmental improvements.

## 4. Standards of Conduct

### 4.1. Respect for the law and ethical values.

The INGENIUM GROUP is committed to undertaking its business and professional activities in accordance with the legislation in each country where it works, engaging in highly ethical behaviour.

All INGENIUM GROUP employees must comply with the laws in force in the countries where they work, and engage in ethical behaviour in all their actions. They must also avoid any conduct that despite not being in breach of the law, may damage the reputation of the INGENIUM GROUP or adversely affect its interests.

All employees must be aware of the laws that affect their work, and if necessary request the information required from their superior or the authorities responsible.

All employees involved in the recording, production, review or reporting of financial information must be aware of and comply with the legal requirements and internal control regulations and procedures that affect their work, in order to ensure the accuracy of the financial information that is issued.

No employee may knowingly collaborate with third parties in the violation of any law, or participate in any action which compromises respect for the principle of legality.

### 4.2. Respect for individuals.

INGENIUM GROUP employees must treat each other with respect, creating a pleasant, healthy and safe working environment.

All employees must deal fairly and respectfully with their colleagues, their superiors and their subordinates. Likewise, relationships between INGENIUM GROUP employees and those of collaborating institutions will be based on professional respect and mutual collaboration.

The INGENIUM GROUP rejects any type of physical, psychological or moral harassment or the abuse of authority, and of any other conduct that could create an environment that is intimidating or offensive to the rights of individuals.

The INGENIUM GROUP promotes and respects the right of freedom of association and collective bargaining in the workplace.

The INGENIUM GROUP believes that overall personal development is important, and as such will facilitate the necessary balance between work life and personal life.

#### **4.3. Effective equality.**

The INGENIUM GROUP promotes gender diversity and the professional and personal development of all its employees, ensuring equality of opportunities through its action policies and adopting merit and performance evaluation as the objective basis for professional advancement.

It does not accept discrimination of any type in the professional sphere, on the grounds of age, race, colour, sex, religion, political opinion, national origin, sexual orientation, social origin or disability. It also ensures compliance with the regulations of the International Labour Organisation, especially regarding minors, and does not accept child labour of any kind.

The recruitment and promotion of employees is based on their skills and the performance of their duties, as well as the criteria of merit and ability defined in the job specifications.

The INGENIUM GROUP encourages internal promotion and mobility as a means to retain talent within the organization. It seeks stability among its employees, as well as their development and motivation.

All employees must actively participate in the training plans offered by the INGENIUM GROUP, engaging in their own development and committing themselves to updating the necessary knowledge and skills in order to facilitate their professional advancement and provide value for clients, INGENIUM GROUP shareholders and society in general.

Individuals holding managerial or executive positions must facilitate their collaborators' professional development.

Respect for real equality of opportunity between women and men must be promoted, and any scenario of direct or indirect discrimination must be avoided.

#### **4.4. Cooperation and dedication.**

The INGENIUM GROUP fosters an environment of cooperation and teamwork to make a better use of all skills and resources.

All employees must act in a spirit of cooperation and responsibility, making knowledge or resources that may facilitate the achievement of the company's objectives and interests available to other organizational units and people within the INGENIUM GROUP.

Employees must work efficiently during the working day, making profitable use of the time and resources that the company places at their disposal.

The INGENIUM GROUP encourages a sense of belonging and pride among its employees. In order to achieve appropriate levels of communication in all respects, the INGENIUM GROUP places channels of communication that encourage and nurture a sense of belonging at the disposal of its employees.

#### **4.5. Health and safety at work.**

The INGENIUM GROUP promotes the adoption of policies for health and safety in the workplace and adopts the preventive measures stipulated in the applicable legislation in each country, providing a working environment that is respectful of its employees' health and dignity.

The INGENIUM GROUP also encourages the collaborating companies and suppliers with which it works to apply its rules and policies on health and safety in the workplace.

All INGENIUM GROUP employees must be aware of and follow the rules for protection of health and safety at work and ensure their own safety, as well as that of other employees, customers, suppliers, collaborators and in general, everyone who might be affected by its activities.

#### **4.6. Use and protection of assets.**

The INGENIUM GROUP offers its employees the resources necessary for undertaking their professional activities.

All employees must use company resources responsibly and appropriately during their professional activities. They must also protect and preserve them from any inappropriate use that could be prejudicial to the interests of the company.

#### **4.7. Corporate image and reputation.**

The INGENIUM GROUP believes that one of the basic elements that enhances its image and reputation is the establishment of relations of responsible citizenship in the communities in which it works.

While engaged in their work, all employees must consider the interests of local communities.

The INGENIUM GROUP believes that its corporate image and reputation is one of its most valuable assets for maintaining the confidence of its customers, employees, suppliers, authorities and society in general.

Employees must also ensure respect for and the correct and appropriate use of the corporate image and reputation by employees of contractor and collaborating companies.

Employees must be particularly careful in any public speech, and must have the necessary authorization to make comments to the media, to participate in professional conferences or seminars, and any other in events that may be disseminated publicly, if they appear as employees of the INGENIUM GROUP.

#### **4.8. Loyalty to the company and conflicts of interest.**

The INGENIUM GROUP believes that its relationship with its employees must be based on loyalty born of common interests. It respects its employees' participation in other financial or business activities, provided these are legal and do not involve unfair competition or clash with their responsibilities as employees of the INGENIUM GROUP.

In situations where there may be any doubt, the employee must notify the company through his/her superior, and avoid making a decision that might lead to suspicions that he/she has acted against the interests of the company.

#### **4.9. Measures against bribery and corruption.**

The INGENIUM GROUP declares itself opposed to influencing the desires of people outside the company to obtain a profit using unethical practices. It will also not allow other people or institutions to use these practices with its employees.

INGENIUM GROUP employees must act according to the applicable laws and may not under any circumstances resort to or tolerate bribes from third parties to the Company, its employees or vice versa.

INGENIUM GROUP employees may not receive, offer or give, directly or indirectly, any payment in cash, in kind or any other benefits to any person at the service of any public or private institution, political party or candidate for public office, with the intention of unlawfully obtaining or retaining business or other advantages.

Gifts, invitations to functions and events, and attention to public officials will take place within general standards of austerity, which under no circumstances may be interpreted as being anything other than what they are: a display of attention to the person(s) who have been invited.

#### **4.10. Treatment of information and knowledge.**

The INGENIUM GROUP considers information and knowledge to be one of its prime and essential assets for business management, and as such they must be given special protection.

Employees must pass on all the information they have to convey, both internally and externally, truthfully and completely, and must never knowingly provide incorrect or inaccurate information that may mislead the recipient.

All employees that input any type of information in INGENIUM GROUP computer systems must ensure that it is accurate and reliable.

All employees must maintain the strictest confidentiality as regards information reserved to those accessing it when engaging in their professional activities, and refrain from using it improperly for their own benefit or for that of third parties.

If in doubt about the nature of the information, employees should consider it to be confidential unless they are informed otherwise.

All information and knowledge generated within the company belongs to the INGENIUM GROUP under the terms stipulated in the applicable legislation.

The INGENIUM GROUP complies with the applicable legislation on data protection, protecting the personal data entrusted by its customers, employees, candidates in selection processes and others. It also undertakes to request and use only the data that are necessary for the effective management of its business.

Employees who due to their work have access to information about other employees must respect and promote the confidentiality of this information and make responsible and professional use of it.

The INGENIUM GROUP computer equipment and systems must be used for exclusively professional purposes. However, in cases in which these resources are used for personal purposes under exceptional circumstances, this use should be minimal, reasonable, appropriate and in accordance with the principle of good faith.

The Information and Communications Technology resources that the INGENIUM GROUP places at the disposal of its employees and managers may not be used to issue personal opinions on behalf of the group, or to access forums or social networks for the same purpose, unless specific authorization to that effect has been granted.

INGENIUM GROUP computer equipment and systems may not be used for:

- The storage, distribution, or visits to websites containing inappropriate material that violates human rights to privacy, honour, self-image or religious freedom; or which violates individual dignity such as racism, xenophobia, support of violence or terrorism, and material containing pornography or support for sexism.
- The use, entry, downloading, copying, conveying, reproduction, distribution or storage of any type of software, published works or protected by intellectual or industrial property rights without the appropriate license or authorization.
- Conducting or participating in mass electronic mailings containing chain letters, jokes or inappropriate images.

#### **4.11. Client relations.**

The INGENIUM GROUP accepts, leads and encourages a commitment to quality. The INGENIUM GROUP works according to the best recognized and standardized national and international practices, and all its employees must aim to achieve the highest levels of quality and excellence in the provision of services, seeking long-term relationships based on mutual trust and respect.

#### **4.12. Relations with suppliers, contractors and collaborators.**

The INGENIUM GROUP considers its contractors, suppliers and collaborating companies to be essential in the achievement of its objectives for growth and improved quality of service, and seeks to establish relationships with them based on trust, mutual benefit and respect for free competition.

The INGENIUM GROUP checks the professional standing of the individuals and legal entities with which it establishes significant commercial relations in order to avoid money laundering in any transactions carried out with our company.

Our employees must pay particular attention to cases in which there may be signs of a lack of integrity by individuals or companies with which the Group has a relationship, and must immediately notify their superior of this.

### **5. Acceptance and compliance with the Code**

The INGENIUM GROUP will notify and circulate the contents of this Code of Conduct among all its employees, its suppliers, contractors and collaborators. All employees who join or become part of the INGENIUM GROUP must accept the Values and Principles and the standards of action set out herein.

The INGENIUM GROUP expects a high level of commitment to compliance with its Code of Conduct from all its managers, directors, and employees, and their compliance with this Code may be evaluated.

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 an order from a superior or ignorance of this Code.

Employees must inform their hierarchical superior of any breach or violation of the conduct referred to in this document.