



# Code of Ethics

Supervision and Control System of Regulatory  
Compliance of SATEC Group



## Satec Group

**Project:** Code of Ethics

**Security level:** N0 - Public

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# Change Log

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## 1\_ Introduction

The Code of Ethics is a reflection of the corporate values and principles that should guide the conduct of SATEC Group and the people that make it up. Likewise, these values and principles must be the basis of the procedures and ways of working that order relationships with client companies, shareholders, workers, supplier companies and with society in general.

With this Code, SATEC Group seeks to guarantee ethical and responsible behavior in the development of its activity, even beyond the obligatory compliance of the law. The deontological principles described here are inspired by a multitude of sources: the mission and values of SATEC Group, the best practices of companies and associations in the sector, universal declarations and conventions, etc.

The professionals of the SATEC Group must always keep in mind that each decision they make and everything they do, particularly in the development of their professional activity, can have an effect on the reputation of SATEC Group.

SATEC Group gives priority importance to compliance with this Code without exceptions to it. Therefore, the entire staff of SATEC Group must commit to respecting and ensuring that the letter and spirit of this document are respected.

The content of the Code cannot address all possible situations; however, it has an inspiring principle that should govern the actions of professionals: act with integrity and professionalism in any situation that arises.

The principles of this Code have been agreed upon by SATEC Group Corporate Social Responsibility Committee and have been approved by the Management Committee. The Regulatory Compliance Unit is the body in charge of clarifying doubts that arise and resolving complaints about non-compliance; as well as ensuring its dissemination and application in all the activities of SATEC Group.

## 2\_ Satec Group Values. Purpose, Basic Principles and Scope of Application

### 2.1. Mission and values of Satec Group

SATEC Group's Mission is to create value and generate growth through innovative Solutions and Services in the ICT field, contributing to the evolution, efficiency and productivity of our clients, promoting talent, integrity and teamwork, to be a benchmark in our industry and in our community.

The Values on which our Mission is based are:

- **Innovation**
- **Talent**
- **Integrity**
- **Teamwork**

As part of its Mission, SATEC Group promotes the Creation of Value and, therefore, its commitment to sustainable development and the consequent generation and distribution of wealth. SATEC Group aims to become a reference component in its Community and in the Industry, both in technological and economic development as well as in social development, promoting the creation of stable and quality employment in a work environment where the opportunities provided by the integrity, talent development, creativity and teamwork, rigorously assuming strict compliance with legal and tax obligations in all the countries in which it operates and applying the highest ethical level in social management and respect for People and the Environment.

### 2.2. Vision and purpose

The singular vision of SATEC Group is clear: to create value and generate growth through innovative solutions and services in the field of information and communication technologies, contributing to the evolution, efficiency and productivity of our clients.

The purpose of a company is its *raison d'être*, ours is "*to work for the world we imagine*". We work for and to build a better, more supportive and sustainable world, always looking towards the future and without setting limits, with effort we know that we can achieve everything we imagine.

### 2.3. Object of the Code of Ethics

This Code of Ethics includes SATEC Group's commitment to the principles of business ethics, institutional integrity and transparency in all its areas of action, establishing a set of principles and guidelines for conduct aimed at guaranteeing ethical, honest and responsible behavior of all the professionals of SATEC Group in the development of their activity.

Among these principles, respect, transparency, sustainability, responsibility, equity and honesty stand out in all its actions.

**This Code of Ethics is part of SATEC Group's Regulatory Compliance Supervision and Control System.**

## 2.4. General basic principles

SATEC Group has the ethical commitment to serve society by offering useful products and services, under fair conditions, promoting sustainable development, coexistence, social integration and respect for the environment, creating value in the most efficient way possible and in an sustainable in an inclusive work environment and governed by the principle of equal opportunities.

This social function must be carried out in an environment of trust between SATEC Group and its Stakeholders: customer companies, supplier companies, competition, employees and the society it serves, through transparency in relationships, the development of appropriate communication channels with these groups, the commitment to their needs and professional ethics and integrity, based on the following principles that are the foundation of this Code of Ethics:

1. **Transparency:** Seriousness and honesty in relations with all Stakeholders.
2. **Integrity:** Honesty in the development of the activity, acting in line with the greatest effort to promote the interests of SATEC Group, applying its values and capabilities.
3. **Respect:** Applying respect to people in the exercise of the profession.
4. **Commitment:** Accepting responsibility for their actions and seeking efficiency in the commitment acquired.
5. **Free Competition:** Demonstrating ethical, professional and cordial attitudes with competitors.
6. **Ability:** Possessing the necessary qualification, knowledge and experience.
7. **Value creation:** Responding to the requests of client companies with advanced solutions, through the constant contribution of value in the execution of the project or service.
8. **Confidentiality:** Maintaining professional secrecy.
9. **Quality Guarantees:** Through the application of tangible and realistic quality systems.
10. **Innovation:** Through the detection, development and implementation of new concepts, technologies, techniques and solutions that add value to the client and the sector.

It is the responsibility of the persons mentioned above, whatever the role performed within SATEC Group, to ensure that this Code of Ethics is respected and complied with.

No breach of this will be tolerated or ignored and no person who reports suspicious, illegal activities or activities contrary to it, may be penalized for this reason.

## 2.5. Area of application

This Code of Ethics contains basic information on the main values and policies of SATEC Group and has been issued to help the staff of professionals, directors and directors, as well as business partners of SATEC Group, to adopt a clear and coherent when establishing them.

This code is applicable throughout SATEC Group, to all entities controlled by SATEC Group, and should be applied, to the extent permitted by the respective contracts, to the shareholders and entities in which SATEC Group has joint control.

When adopting this Code as their own, SATEC Group companies may include additional policy statements consistent with SATEC Group Code of Ethics, which will continue to be the reference document. Supplier companies must also take these values into account and SATEC Group will require them to implement certain Key Business Practices and adherence to the Supplier Code of Conduct.

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Each person from SATEC Group, supplier company, client company and other business partners must familiarize themselves with the content of this Code of Ethics, not only with its wording, but also with its spirit.

This code is a guide on how to act ethically and respect applicable laws in daily behavior. It is also a tool that can serve as a reference in case of questions or doubts, and that employees should use daily when identifying potential risks when carrying out their work.

The Code of Ethics is not a summary of all applicable rules and guidelines. SATEC Group's staff should consult the Code of Conduct and other more specific internal policies for more details on the procedures that must be followed.

If any applicable law or regulation conflicts with any of the principles of this Code of Ethics, said law must be complied with as a priority, proceeding after the review of the conflicting articles.

## 3\_ Regulatory Principles of Compliance with the People of Satec Group

### 3.1. Compliance with the law and the regulatory compliance system

SATEC Group assumes the commitment to carry out all its activity in accordance with the legislation in force, rejecting corruption and any illegal practice, in all its areas of action and in all the countries in which it carries out its activity.

The professionals of SATEC Group will strictly comply with the legislation in force in the place where they carry out their activity, in accordance with the spirit and purpose of the regulations, and will observe the provisions and regulations of SATEC Group Regulatory Compliance Program and the basic procedures that regulate the activity of SATEC Group and of the company in which they provide their services. Likewise, they will fully respect the obligations and commitments assumed by SATEC Group in its contractual relations with third parties, as well as the uses and good practices of the countries in which they carry out their activity.

No employee of SATEC Group shall knowingly collaborate with third parties in the violation of any law or participate in any action that compromises respect for the principle of legality.

If any SATEC Group professional observes or becomes aware of the contravention of any of these rules, he/she must immediately inform the Compliance Unit through the Ethics Channel.

### 3.2. Ethical obligations: Professional and honest conduct

SATEC Group personnel will always act by exercising their function in accordance with the principle of good faith and the rules of correct professional practice and maintaining the principles of:

- **professionalism**, understood as diligent, responsible, efficient action and focused on excellence, quality and innovation.
- **Integrity**, understood as acting loyally, honestly, in good faith, objectively and in line with the interests of SATEC Group and with its corporate principles and values.

SATEC Group will be distinguished by its skills, its credibility and the contribution of advanced solutions, responding to the highest demands for innovation and quality.

Any request that implies the development of activities that may condition professionalism and ethical principles will be incompatible with the activity of SATEC Group. SATEC Group staff will not have agreements, nor will they accept any activity that may conflict with the legitimate interest of their client companies, or that may impair their ability to perform their professional obligations.

In the event that any professional is involved in a judicial, criminal or administrative proceeding of a sanctioning nature, which may affect him in the exercise of his duties as a SATEC Group professional; accept public office; holds a management or management position in other companies or acquires shares/participations or any interest in a competitor, you must notify the Regulatory Compliance Unit, which will act in accordance with the Protocol or Procedure that may be approved for this purpose.

### 3.3. Responsibility, cooperation, diligence and professionalism

Within their functions and the tasks entrusted and instructions received, the Persons subject to the Code will act with autonomy and initiative and, based on a legal, ethically acceptable action and in the interest of the organization, they must be willing to assume responsibility for that performance.

All SATEC Group employees will act diligently and professionally, with adequate dedication to their role, with efficiency and anticipation and in accordance with the principles and values contained in this Code and must act in a spirit of collaboration, making available to the people and teams that make up SATEC Group the knowledge or resources that can facilitate the achievement of the objectives and interests of SATEC Group, working efficiently during the working day, making the most of the time and resources that SATEC Group makes available to them, and trying to provide maximum value in all processes in which they participate.

### 3.4. Commitment to human and labor rights

SATEC Group considers people as a key factor in its business activity and defends and promotes compliance with human and labor rights.

SATEC Group expresses its firm commitment and connection with the human and labor rights recognized in national and international legislation and with the principles on which the United Nations Global Compact ("UN Global Compact") is based, which derive from declarations of United Nations United on human rights, labor, the environment and anti-corruption. The ultimate goal of this commitment is respect for human dignity.

Similarly, SATEC Group expresses its total rejection of child labor and forced or compulsory labor and undertakes to respect the freedom of association and collective bargaining, as well as the rights of ethnic minorities and indigenous peoples in the places where develop your activity.

SATEC Group expresses its firm commitment and respect for the rights of its professionals, recognized in the applicable labor regulations, including the rights of association, unionization and strike. Grupo Satec also proscribes and prohibits any of the following conducts:

- The imposition of labor or social security conditions that harm, suppress or restrict the rights that professionals have recognized by legal provisions, collective agreements or individual contracts that result in each case of application.
- Hiring foreigners who do not have a work permit.
- Illegal labor trafficking or fraudulent emigration.

### 3.5. Independence and equity

In order to carry out its activity properly, SATEC Group has the right and duty to preserve its independence from all kinds of interference and its own or third-party interests.

The independence that must govern the operation of SATEC Group will allow it to evade or avoid pressures, demands or complacency that adulterate free competition, as well as the achievement of the good end of the projects.

SATEC Group will be empowered, therefore, to reject the procedures that, contrary to their own professional criteria, their client, the administrations, other professionals with whom they collaborate or any other person or entity intend

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to impose on them, ceasing the project to be carried out. treat when you consider that you cannot act with total independence.

### 3.6. Trust and integrity

SATEC Group will be obliged not to disappoint the trust of its client companies and not accept projects that may harm their interests. Therefore, it will not serve interests that are in conflict with those of the client company in the development of a project or service, agreeing not to provide its services to two parties involved in the same project, except in the event that they do not show drawback.

In the same way, SATEC Group will have the right to refuse to carry out projects or services when it is certain that they could be misused.

### 3.7. No discrimination and harassment

All the people that make up SATEC Group have the obligation to treat their colleagues, their superiors and their subordinates fairly and respectfully.

Harassment, abuse, intimidation, lack of respect and consideration or any type of physical or verbal aggression or conduct that may create an environment that is intimidating or offensive to the rights of individuals, are unacceptable and will not be allowed or tolerated in the work, and the people of SATEC Group with personnel under their charge must promote and ensure, with the means at their disposal and adopting the necessary preventive measures, where appropriate, that such situations do not occur.

Similarly, SATEC Group rejects any type of conduct or behavior that, in any way, could encourage, promote or incite, directly or indirectly, hatred, hostility, discrimination or violence against a group or against a person because of their membership. to him for racist, anti-Semitic or other reasons related to ideology, religion or beliefs, family situation, because of his belonging to an ethnic group, race or nation, his national origin, his sex, orientation or sexual identity, for reasons of gender, illness or disability.

SATEC Group has implemented measures to prevent workplace, sexual harassment or harassment based on sex, and always in strict compliance with the applicable labor regulations.

### 3.8. Equal opportunities

SATEC Group energetically rejects any type of discrimination in general and, especially, in employment due to ideology, marital status, political opinions, religion or beliefs, age, belonging to an ethnic group, race or nation, sex, sexual orientation, family situation, illness or disability, for holding legal or union representation of the workers, or for any other personal, physical or social condition, of its professionals.

In particular, SATEC Group will promote the professional and personal development of all its professionals, ensuring equal opportunities through its action policies, and avoiding any scenario of direct or indirect discrimination in terms of access to employment, training, the promotion of professionals and their adequate remuneration and working conditions.

All SATEC Group Professionals and Collaborators must apply and promote in their labor relations the principles of equal opportunities, diversity, respect for people and non-discrimination based on birth, racial or ethnic origin, sex, religion, belief or opinion, age, disability, sexual orientation or identity, gender expression, disease or health condition or any other personal or social condition or circumstance.

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SATEC Group respects the personal and family life of its professionals and has defined a conciliation program that facilitates the best balance between those and their work responsibilities, promoting a work environment compatible with personal development and favoring, when possible, work in remote.

SATEC Group strongly rejects any type of violence, abuse of authority, harassment (whether physical or psychological) or any other type of behavior that creates an intimidating or offensive environment at work and considers them unacceptable and intolerable, regardless of who Be the victim or the bully. To this end, there are policies that safeguard equality and non-discrimination among the workforce and promote awareness of these rights.

### 3.9. Security and health at work

SATEC Group promotes the adoption of occupational health and safety policies, provides its professionals with the necessary means to carry out their activity with the appropriate safety and hygiene measures in order to safeguard, at all times and in any situation, their indemnity and integrity physical and moral and adopts the preventive measures established in the current legislation, providing a work environment that respects the health and dignity of the people employed and promoting the application of said preventive measures by the collaborating companies with which it operates.

All the workers of SATEC Group must know and comply with the regulations for the protection of health and safety at work and ensure their own safety, that of other workers and, in general, of all the people who could be affected by the development of their activities.

### 3.10. Professional secrecy

Non-public information that is the property of SATEC Group will, in general, be considered reserved and confidential information, and will be subject to professional and business secrecy, without its content being provided to third parties, unless expressly authorized by the body of SATEC Group that is competent in each case or except legal, judicial or administrative authority requirement.

It is the responsibility of SATEC Group and all its professionals to provide sufficient security means and apply the established procedures to protect the reserved and confidential information registered in physical or electronic support, against any internal or external risk of non-consensual access, manipulation or destruction. , both intentional and accidental.

SATEC Group undertakes to respect with strict confidentiality the information that is entrusted to it, sent to it or of which it acquires knowledge in the framework of its activity, not being able to reveal it, except with the express written authorization of the Client. SATEC Group staff will not use said information for personal benefit or in any other way that could be detrimental to its customers. This principle is equally required of all its collaborators, even after the end of a mission or contractual relationship.

### 3.11. Right to privacy

SATEC Group guarantees the right to privacy and intimacy of the Affected Persons under the terms provided by law, protecting their personal data and committing not to disclose them the law, protecting their personal data and committing not to disclose them except with the consent of the consent of the interested parties or except in cases of legal obligation or compliance with judicial or administrative resolutions.

## 3.12. Personal data protection

SATEC Group undertakes not to disclose personal data of its professionals, except with the consent of the interested parties and in cases of legal obligation or compliance with judicial or administrative resolutions. In no case may the personal data of professionals be processed for purposes other than those legally or contractually provided for.

Likewise, SATEC Group professionals who, due to their activity, access personal data of other Group professionals, administrators or partners, clients or suppliers, are obliged to maintain the confidentiality of this data and may only use it, in accordance with the prevented in the Organic Law for the Protection of Personal Data and the regulations that develop it and, attending at all times to the internal procedures implemented within SATEC Group.

Similarly, the Regulatory Compliance Unit will comply with the requirements set forth in the personal data protection legislation regarding communications sent to them by professionals in accordance with the provisions of its Operating Regulations, the Code of Conduct and the other regulations of SATEC Group Regulatory Compliance Program.

## 3.13. Conflict of interests

All SATEC Group Professionals and Collaborators must maintain and guarantee impartiality in the performance of their functions, responsibilities and professional decisions, especially in the face of any situation that could entail a conflict of interest, since this affects their criteria and objectivity.

It will be considered that there is a conflict of interest in those situations in which the personal interest of the professional and the interest of any of SATEC Group companies collide directly or indirectly. The personal interest of the professional will exist when the matter affects him or her, or a person related to him or her.

In the event of a conflict of interest, the Professional or Collaborator affected by it, as soon as they become aware of the situation of conflict of interest, must inform their hierarchical superior who, in turn, will transfer the communication. to the Regulatory Compliance Unit for the study of the matter and the adoption of the corresponding decision, which will determine the prohibition of the activity or its authorization, accompanied, where appropriate, by limitations or conditions. The Person Subject to the Code must refrain from taking any action in this regard until the decision has been communicated.

## 4\_ Compliance with Grupo Satec and Partners

### 4.1. Crime prevention

SATEC Group expresses its firm commitment to crime prevention and fraud in its relations with the organization's staff, with members, users, client companies, supplier and supplier companies, competing companies, Public Administrations and the market and investors.

As evidence of this commitment, SATEC Group has a dynamic Regulatory Compliance Program aimed at establishing effective surveillance, supervision and control measures suitable for preventing, detecting and discovering crimes that could be committed with the media or under the coverage (in name or on behalf of and for the direct or indirect benefit) of the Group.

### 4.2. Privileged, confidential and reserved information

Privileged information is any specific information that is held by reason of the position and that has not been notified, published or disclosed. Professionals may not make use of privileged information with the intention of obtaining a benefit for themselves or for a third party.

Non-public information that is the property of SATEC Group will, in general, be considered reserved and confidential information, and will be subject to professional and business secrecy and its content may not be disclosed to third parties, unless expressly authorized by the body of the Group that is competent in each case or except legal, judicial or administrative authority requirement.

It is the responsibility of SATEC Group and all its professionals to provide sufficient security means and apply the established procedures to protect the reserved and confidential information registered in physical or electronic support, against any internal or external risk of non-consensual access, manipulation or destruction, both intentional and accidental. For these purposes, the professionals of SATEC Group will keep confidentiality regarding the content of their work in their relations with third parties.

Revealing reserved and confidential information and using privileged, reserved and confidential information for private purposes contravenes the Code of Ethics, without prejudice to the legal responsibilities that could give rise.

Any reasonable indication of a leak of reserved and confidential information and of private use thereof must be reported immediately to the person with immediate hierarchical superiority and to the departments responsible for the security functions and Human Resources of SATEC Group who in turn they will notify the Regulatory Compliance Unit.

### 4.3. Treatment of information and knowledge: transparency

SATEC Group considers information and knowledge as one of the main assets of its business management.

SATEC Group considers transparency in information as a basic principle that must govern its actions and guarantees that the information it communicates to its stakeholders is truthful and complete, adequately reflects the financial situation of SATEC Group and undertakes that said information is communicated complying with the deadlines and other requirements established in the applicable regulations and in the general principles of good governance that SATEC Group has assumed.

This principle of transparency and veracity of the information will also be applied in internal communication.

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Employees have the obligation to transmit the information that they must communicate, both internally and externally, in a truthful and complete manner and, in no case, will they knowingly provide incorrect or inaccurate information that could mislead whoever receives it.

All the information and knowledge generated within the scope of SATEC Group is its property in accordance with the terms contained in current legislation.

### **4.4. Business opportunities**

Business opportunities will be considered those investments or any operations linked to the assets of SATEC Group that the professional becomes aware of during the course of his or her professional activity, when the investment or operation has been offered to SATEC Group or SATEC Group has an interest in it.

The professional may not take advantage of business opportunities for their own benefit or for the benefit of a person related to them, nor may they use the name of SATEC Group or invoke their status as its professional to carry out operations on their own behalf or on behalf of persons related to it.

### **4.5. External activities of Satec Group professionals**

SATEC Group respects the performance of social and public activities by its professionals, as long as they do not interfere with their work at SATEC Group.

However, in order to avoid carrying out activities that may enter into competition with those of SATEC Group or collide with its interests, the provision of labor or professional services, on their own behalf or by others, by SATEC Group's labor personnel for other companies or entities other than SATEC Group, as well as the performance of academic activities, must be authorized in advance and in writing by the Human Resources Department, following a report from the hierarchical superior of the applicant. The authorizations will be communicated by the aforementioned Directorate to the Regulatory Compliance Unit.

As a general principle, the performance, where appropriate, of these activities must be compatible with due compliance with the responsibilities assigned to SATEC Group, both in terms of efficiency and availability.

The association, membership or collaboration of professionals with political parties, associations, foundations or institutions with public purposes, will be carried out in such a way that, unless it is done on behalf of one of SATEC Group companies, their personal nature is clear, thus avoiding (under the responsibility of the professional) any relationship with SATEC Group. In particular, reference to belonging to SATEC Group, whether present or past, in political activities, taking into account in any case those that take place under the protection of, with the coverage of or in a manner linked to, political parties. politicians.

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

SATEC Group makes available to its employees the necessary resources for the performance of their professional activity, as well as the necessary means to protect and safeguard them. Said resources must be used solely for professional purposes of SATEC Group and must not be used for personal or extra-professional use and/or for the performance of activities that are not directly related to the interest of SATEC Group.

Employees shall protect and take care of the resources they have at their disposal or to which they have access, using them only as necessary for the proper performance of their duties, in a responsible, efficient and appropriate manner for their professional activity. Employees shall protect the resources that SATEC Group makes available to them for the performance of their professional work (network, internet, mail, systems, applications, etc.), as well

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as those of third parties related to SATEC Group, such as customers and suppliers, and shall protect them from any damage and/or illegal or inappropriate use, deterioration or alteration.

## 4.7. Image and corporate reputation

SATEC Group considers its corporate image and reputation as one of its most valuable assets to preserve the trust of its shareholders, employees, customers, suppliers, authorities, and society in general.

All SATEC Group professionals have the obligation to take the utmost care to preserve the Group's image and reputation in all their professional activities.

## 4.8. Intellectual property and information security

All SATEC Group personnel will respect and protect the intellectual property and the right of use that corresponds to SATEC Group in relation to courses, projects, programs and computer systems; equipment, manuals and videos; knowledge, processes, technology, know-how and, in general, the works and works developed or created in SATEC Group, either as a consequence of its professional activity or that of third parties. Therefore, their use will be made in the exercise of professional activity in the same and all the material on which they are supported will be returned when required.

The employees of SATEC Group will also respect the intellectual and industrial property rights held by third parties outside SATEC Group. In particular, the use of any content protected by intellectual or industrial property rights belonging to third parties will require obtaining their prior authorization or license.

It is the obligation and responsibility of each one of SATEC Group's Professionals and Collaborators to protect and respect the information they handle in all those places where it is stored, processed or transmitted, in order to guarantee its confidentiality, integrity and availability. The Information Security Policy establishes the fundamental principles to achieve these objectives, which in turn are developed within the regulatory framework for Information Security management, compliance with which is strictly necessary.

The installation or execution of programs or files with the purpose of suppressing or violating data protection or information security systems, as well as those that violate data protection laws, is prohibited.

Unless there is an agreement to the contrary, SATEC Group will be the owner of the rights of use and exploitation of any results of the work of its professionals within the framework of their activity.

## 4.9. Payments, accounting and financial information

The economic-financial information of SATEC Group will faithfully reflect its economic, financial and patrimonial reality, in accordance with generally accepted accounting principles.

For these purposes, no Professional or SATEC Group Collaborator will distort or hide the information in the records and accounting or financial reports of SATEC Group, which will be complete, accurate and truthful. For this reason, and according to their corresponding functions and tasks, it is the responsibility of the Professionals and Collaborators to ensure that the facts related to the management of SATEC Group's operations are correctly and truthfully reflected at an accounting level. Each operation must be based on adequate documentation, which must be verifiable. The useful principles for the accounting and management activity are correctness, integrity and transparency, in full compliance with current regulations.

No SATEC Group professional may alter, copy, reproduce or in any other way falsify credit or debit cards or use means of payment for their own benefit.

## **5\_ Compliance with Client Companies, Competitors, Partners and Collaborators**

### **5.1. Independence and equity**

In order to carry out its activity properly, SATEC Group has the right and duty to preserve its independence from all kinds of interference and its own or third-party interests.

The independence that must govern the operation of SATEC Group will allow it to evade or avoid pressures, demands or complacency that adulterate free competition, as well as the achievement of the good end of the projects.

SATEC Group will be empowered, therefore, to reject the procedures that, contrary to their own professional criteria, their client, the administrations, other professionals with whom they collaborate or any other person or entity intend to impose on them, ceasing the project to be carried out. treat when you consider that you cannot act with total independence.

### **5.2. Trust and integrity**

SATEC Group will be obliged not to disappoint the trust of its client companies and not accept projects that may harm their interests.

SATEC Group will not serve, therefore, interests that are in conflict with those of the client company in the development of a project or service, committing itself not to provide its services to two parties involved in the same project, unless they do not object to it.

In the same way, SATEC Group will have the right to refuse to carry out projects or services when it is certain that they could be misused.

### **5.3. Quality and method**

SATEC Group will apply the quality procedures defined to ensure strict compliance with the commitments with its client companies, as well as the applicable legislation and regulations, configuring a work system specially designed to satisfactorily unite the services with the client's expectations and contributing to the quality image of the Sector.

SATEC Group, by signing the contract, acquires the commitment and responsibility for the successful completion of the order, and must guarantee the necessary quality reviews, as an element to ensure the satisfaction of the Client's needs and expectations.

SATEC Group undertakes to comply with the regulations and procedures of the Management System Certifications to which it is voluntarily submitted, as well as all those acquired by contractual obligation at the beginning of the assignment.

SATEC Group will carry out a comprehensive consideration of the expectations of the client-supplier relationship, ensuring that each project or service constitutes a source of information for the identification of relevant improvement opportunities.

SATEC Group will keep the technological knowledge, skills and competencies of its staff up-to-date, necessary to carry out their professional activities.

## 5.4. Research and innovation

The professional authority of SATEC Group is based on the training and qualification of the professionals that comprise it. For this reason, it undertakes to improve its knowledge through the professional development of its staff and to guarantee, through investment in training, that its professionals are always at the forefront of the methodologies, procedures and techniques necessary for the performance of their activity, always applying the principle of equal opportunities between women and men.

SATEC Group will only use proven techniques and whose mastery they can accredit. In the event that during the development of the project or service, especially innovative procedures or techniques must be applied, the client will be informed of both the advantages and the risks that this entails.

At SATEC Group, in line with our corporate purpose of "Working for the world we imagine" we seek innovative ways to achieve positive and sustainable change in the communities in which we operate.

## 5.5. Relationships with client companies

The employees of SATEC Group must act with integrity with client companies, having as objectives the achievement of the highest levels of quality, excellence in service provision and the long-term development of relationships that generate value for all interested parties and that are based on trust, transparency, good faith, a spirit of collaboration and mutual respect. To achieve this, the employees of SATEC Group will respect the commitments acquired, will announce any change in the agreements well in advance and will maintain a high commitment to honesty and professional responsibility towards client companies.

SATEC Group will always provide all the necessary information and makes the mechanisms available to its client companies to give a satisfactory response to their suggestions or complaints through the appropriate channels created for this purpose.

SATEC Group will ensure that its commercial offers, corporate presentations, advertising, promotional actions and other information publicly provided by its professionals to client companies is true, clear, useful, precise and honest and tends to create relationships based on mutual trust. In this sense, it is prohibited to carry out any type of institutional, corporate, advertising or promotional communication activity in which untrue or non-transparent allegations are made or uncertain characteristics of the information presented are manifested.

## 5.6. Relationships with partners

SATEC Group will establish with its partners in common businesses, a collaborative relationship based on trust, transparency in information and the sharing of knowledge, experiences and capabilities, to achieve common objectives and mutual benefit. Commitment that is extensible to all the professionals of SATEC Group, who will apply the same ethical principles, respect, a healthy environment and teamwork.

## 5.7. Relationships with external providers

SATEC Group aims to promote relationships based on trust, transparency in information and the sharing of knowledge, experiences and skills with its suppliers, contractors and collaborators.

SATEC Group professionals who participate in the selection processes of suppliers, contractors and external collaborators and who decide the economic conditions of operations with suppliers have the obligation to act impartially and objectively, avoiding any kind of interference or influence from suppliers or third parties. that can alter them.

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SATEC Group professionals may not receive any kind of remuneration in cash or in kind from customers or suppliers of the Satec Group or, in general, accept any kind of remuneration from others for services derived from the professional's own activity within SATEC Group.

The prices and information presented by suppliers, contractors and collaborators in a selection process will be treated confidentially and will not be disclosed to third parties except with the consent of the interested parties and except in cases of legal obligation, or compliance with judicial or administrative resolutions.

## **5.8. Advertising and content creation in the media**

SATEC Group carries out dignified, loyal and truthful advertising of its professional services, maintaining absolute respect for the dignity of people, the current legislation that is applicable to it, as well as that related to the defense of competition and unfair competition.

For this reason, the dissemination, on behalf of SATEC Group, of untrue information or the making of statements or the display of images that could be illegal, indecent, inadequate, inappropriate, offensive, discriminatory, humiliating or defamatory, that violate the duty of confidentiality or professional secrecy or that may affect in any way the prestige and reputation of SATEC Group, its professionals, its interest groups or third parties in general.

The creation, membership, participation or collaboration by SATEC Group personnel in social networks, forums or blogs on the Internet and the opinions or statements made in them, will be made in such a way that their personal nature is clear. In any case, SATEC Group personnel must refrain from using the image, name or brands of SATEC Group to open accounts, register in these forums or networks or participate in them.

## **5.9. Corruption and bribery**

SATEC Group will work against corruption in all its forms, including extortion and bribery and, in accordance with the provisions of its "Anti-Corruption Policy", requires that all its professionals act with honesty, integrity and impartiality in their relationships both within the organization and its external relations.

SATEC Group declares itself against influencing the will of people outside the Group to obtain any benefit through the use of unethical practices. Nor will you allow other people or entities to use those practices with your staff.

The entire staff of SATEC Group must act in accordance with the laws that are applicable and, in no case, may they resort to or tolerate bribes from third parties towards SATEC Group, its professionals or vice versa.

## **5.10. Business courtesy: gifts and gifts**

SATEC Group professionals may not, under any circumstances, offer, deliver or accept gifts or gifts in the development of their professional activity, except when they are of irrelevant or symbolic economic value and respond to signs of courtesy or usual commercial attention, or are It deals with invitations that are considered ordinary or customary according to social customs because they are within sensible and reasonable limits.

SATEC Group professionals may not give or accept hospitality that influences, may influence or may be interpreted as influencing decision-making, and must apply at all times the guidelines contained in the SATEC Group "Gifts and Hospitality Policy" and in the Code of Conduct.

When there are doubts about what is acceptable, the offer must be declined or, where appropriate, consulted beforehand with the immediate hierarchical superior, who may refer a query to the Regulatory Compliance Unit, which will indicate its criteria by means of a written communication, the which will be binding and irrevocable.

## 5.11. Public procurement

In the case of participation in processes for obtaining licenses, grant management or tenders with Public Administrations, SATEC Group's staff undertakes to comply with applicable legislation, abide by the bid specifications, provide and keep the documentation up to date. certifying the ability to contract and solvency, act with transparency, clarity and good faith when formulating the proposals and comply with the obligations imposed by law and contractually in the event of being awarded in the contracting procedures.

## 6\_ Compliance with the Community and Society

### 6.1. Respect for the environment

The preservation of the environment is one of the basic principles of action of SATEC Group, which is guaranteed through the approval of the appropriate environmental policy and the implementation of an environmental management system based on the ISO 14001 standard.

The professionals of SATEC Group must, within the scope of their functions, be aware of and assume said policy and act at all times in accordance with the criteria of respect and sustainability that it inspires, adopt habits and behaviors related to good environmental practices and contribute positively and effectively to achieve the established objectives, striving to minimize the environmental impact derived from its activities and the use of the facilities, equipment and means of work made available to it, through efficient management and use of these that minimizes the generation of waste and eliminating those produced responsibly, favoring the recycling of materials and promoting energy and water savings.

### 6.2. Relations with Public Administrations and officials

Relations with the authorities, regulatory bodies and Public Administrations will always be considered under the principles of legality, integrity, collaboration, cooperation and transparency.

All SATEC Group employees will act with honesty and integrity in their contacts with the authorities and public employees, ensuring that all the information, as well as the statements made, are true and complete. Especially in compliance with administrative and judicial resolutions that are executive in nature and that affect SATEC Group, unless their execution is legally suspended.

No SATEC Group employee will knowingly collaborate with third parties in violation of any law, nor will they participate in actions that compromise respect for the principle of legality.

No SATEC Group professional should, directly or indirectly, offer, promise, grant or authorize the delivery of money, gifts, favours, contributions or contributions to any official to obtain a benefit, concession, subsidy or advantage in favor of SATEC Group. They will refrain or suspend any relationship at any indication of corruption that may determine preferential treatment, or that may give rise to influence, favorable treatment, or that is linked to any extortion or bribery.

### 6.3. Political parties and business and union organizations

SATEC Group declares its complete independence from political parties and trade union organizations. Their eventual participation in business associations of a territorial or sectoral scope will always be considered in terms of the best defense of the legitimate corporate interests and of the territory or sector.

SATEC Group will not finance, directly or indirectly, either in Spain or abroad, political parties or their representatives or candidates, nor will they participate in any type of structure or organization whose purpose is the financing of political parties, federations, coalitions or groups of voters.

The professionals of SATEC Group may not, under any circumstances, make contributions of any nature, charged to SATEC Group, not even in the form of a donation, loan or advance, to political parties (including federations, coalitions or groups of voters).

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SATEC Group, in exercise of constitutionally recognized rights, will not prevent or make it difficult for its personnel to join parties or trade union organizations and will respect the exercise of trade union freedom. Union-type activities within SATEC Group will be carried out in accordance with the applicable standards and collective agreements.

### **6.4. Relations with competing companies**

SATEC Group undertakes to compete fairly in the markets, complying with the rules and principles of free competition in all the markets in which it operates, competing on equal terms and avoiding any distortion that prevents effective competition in the markets.

Therefore, any conduct that, contrary to competition law, restricts effective and real competition in a sensitive manner, collusive agreements, fixing or changing prices that may result from free competition in the market, market sharing or the exchange of sensitive information between competitors. The regulations that, where appropriate, are applicable in terms of dominant position, concentrations or public aid will always be respected.

When it is necessary to transfer or continue projects or services initiated or carried out to date to another company in the sector, the process must be carried out with rigor, diligence and objectivity. Said company must be provided with all the information that is available, respecting the provisions of the articles referring to Professional Secrecy and Intellectual Property, and collaborate in what is necessary to guarantee the continuity of customer service, and SATEC Group must always maintain the absolute respect for the previous company.

Communications between companies in the sector must also be considered confidential or reserved.

### **6.5. Money laundering and financing of terrorism**

SATEC Group expresses its firm commitment not to carry out practices that may be considered irregular in the development of its relationships with customers, suppliers, suppliers, competitors or authorities, including those related to money laundering from illegal or criminal activities, in accordance with the provisions of corporate policies in the field of Prevention of Money Laundering and Financing of Terrorism that are mandatory for all SATEC Group professionals.

Likewise, SATEC Group undertakes to comply with all the regulations and provisions, both national and international, in force in the field of the fight against money laundering and financing of terrorism that are applicable to it.

### **6.6. Social content performances and donations**

SATEC Group, in its commitment to the progress and well-being of the communities with which it is related, contributes to their development through donations and collaborations in projects of social and cultural content that are channeled through agreements and allocation of resources with representative institutions of the society.

In accordance with the principles of transparency and integrity, donations made must have the necessary internal authorizations; they must have a legitimate purpose and be granted to entities of recognized prestige and moral solvency; in no case may they be anonymous; they must be formalized in writing and, when they are in cash, they must be made by any means of payment that allows the recipient of the funds to be identified and must be faithfully reflected in the records and accounting books of SATEC Group.

## 7\_ Regulatory Compliance Program

SATEC Group has a Regulatory Compliance Program aimed at establishing effective surveillance, supervision and control measures suitable for preventing, detecting and discovering crimes that could be committed with the media or under coverage (in the name or on behalf of and for the benefit of direct or indirect) of SATEC Group.

In this way, SATEC Group expresses its firm commitment to the prevention of its corporate criminal risks and, in particular, to not carrying out practices that may be considered irregular in the development of its relations with its Stakeholders, including those related to money laundering, of capital and the financing of terrorism.

In this sense, the professionals of SATEC Group will submit to special control and supervision any unforeseen payments made to or by third parties not mentioned in the corresponding contracts, those made in accounts that are not the usual ones in relations with a certain organization or person, the payments made to or by persons, companies, entities or to accounts opened in territories classified as tax havens and those made to organizations in which it is not possible to identify the partner, owner or ultimate beneficiary.

### 7.1. Regulatory Compliance Unit

SATEC Group Regulatory Compliance Unit is a collegiate body of an internal and permanent nature, responsible for proactively ensuring the effective operation of SATEC Group Regulatory Compliance Program, for which it is attributed broad powers, budgetary autonomy and independence from performance.

### 7.2. Ethics channel

It is the confidential channel that SATEC Group makes available to its employees, suppliers, collaborators and other third parties that have a relationship with the organization so that, through it, given the certainty or well-founded suspicion, that an illegal conduct is being committed within SATEC Group, forward said communication in order for it to be investigated, with a full guarantee of confidentiality and of not being persecuted, discriminated against or suffering any other type of retaliation.

This Ethics Channel reaffirms the commitment acquired by SATEC Group that any illegal activity that is reported will be handled confidentially and will be rigorously investigated, adopting the appropriate measures, in accordance with internal and external regulations. The Ethics Channel is, therefore, an effective tool for detecting irregularities that would go unnoticed by other controls.

This procedure for reporting illegal acts implies a commitment on the part of all SATEC Group employees to act responsibly, in order to maintain the ethical principles and values of SATEC Group, and to proceed honestly before possible commissions. of an illegal activity that could harm SATEC Group.

The Regulations for the use of the Ethics Channel will be accessible both on the intranet and on the corporate website.

## 8\_ Knowledge, compliance, interpretation and integration of the Code of Ethics

All SATEC Group personnel, including directors, managers, attorneys-in-fact and persons who in any way hold powers of representation of the Group have the obligation to know and observe the values, principles and standards of this Code and to comply with its requirements and to attend and participate in all those training actions to which they are summoned for the adequate knowledge of its content. Ignorance of the rules of conduct and good practices contained in this Code will not exempt them from compliance.

Those professionals of SATEC Group who, in the performance of their duties, manage or direct teams of people must also ensure that the professionals directly in their charge know and comply with the Code of Ethics and lead by example, being benchmarks of conduct in SATEC Group.

Communications about possible breaches of the Code or doubts that the interpretation or application of the Code may raise will be sent to the address of the Regulatory Compliance Unit through the Ethics Channel: [anticorrupcion@satec.es](mailto:anticorrupcion@satec.es), who will receive, study and resolve them, safeguarding the sender's confidentiality.

SATEC Group will not apply or allow any type of sanction or retaliation in any complaint or information made in good faith in relation to violations of this code.

The interpretation and general integration of this Code corresponds to the Regulatory Compliance Unit. Its interpretative criteria are binding for all Professionals that are part of SATEC Group. Therefore, any doubt that may arise for the professionals of SATEC Group regarding the interpretation of the Code of Ethics should be raised with the Regulatory Compliance Unit.

This Code is integrated into SATEC Group's Regulatory Compliance Program and is fully respectful of the principles of corporate organization established therein.

## 9\_ Disciplinary regime

SATEC Group will develop the necessary measures for the effective application of this Code of Ethics.

No one, regardless of their level or position, is authorized to request that a professional commit an illegal act or that contravenes what is established in the Code of Ethics. At the same time, no professional can justify improper, illegal conduct or that contravenes the provisions of the Code of Ethics, relying on the order of a superior or on ignorance of the Code itself.

The Disciplinary Regime applies to all workers and management teams (including the Administrative Body of SATEC Group), without exception, which have the obligation to comply with the rules and procedures established by SATEC Group in their organization, and to maintain behavior in accordance with the highest levels of ethics and integrity in the exercise of their duties at all times.

Thus, when it is determined that a SATEC Group professional has carried out activities that contravene the law, the Code of Ethics or the rest of the provisions that at any time could be part of the SATEC Group Regulatory Compliance Program, it will be the Regulatory Compliance Unit that will have the power to investigate and, where appropriate, sanction the possible commission of infractions related to criminal offenses (including any breach of controls established in SATEC Group Regulatory Compliance Program). If the possible non-compliance is not foreseeable to be a criminal offense, it may be investigated by the person holding the position of HR manager.

The determination of the sanction and the procedure for imposing any of the sanctions are defined in the Disciplinary Regime of SATEC Group and will be adjusted to the provisions of the applicable Collective Agreements and/or, failing that, to the provisions of the Statute of Workers or specific applicable regulations, and depending on the minor, serious or very serious nature of the offense sanctioned.

## **10\_ Update, acceptance, approval and validity**

### **10.1. Update**

The Code of Ethics will be reviewed and updated periodically, taking into account the annual report of the Regulatory Compliance Unit, as well as the suggestions and proposals made by SATEC Group's professionals by any means and especially through the Complaints Channel.

Any revision or update that implies a modification of this Code of Ethics will require the approval of the Management of SATEC Group.

### **10.2. Acceptance**

SATEC Group professionals expressly accept the rules of conduct established in this Code of Ethics.

Professionals who join or become part of SATEC Group in the future will expressly accept the principles and rules of conduct established in this Code of Ethics.

### **10.3. Approval and validity**

This update of the Code of Ethics was approved by SATEC Group Management on February 14, 2022, and has been in force for the entire SATEC Group since that day.