



# Code of Ethics

**Grupo SATEC Regulatory Compliance Supervision and Control System**

**Grupo Satec**

**Project:** Code of Ethics

**Security level:** Public

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# Change Log

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1.2	06/07/2022	UCN	Second version
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## 1\_ Introduction

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

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

Grupo SATEC's professionals must always keep in mind that every decision they make and everything they do, particularly in the development of their professional activity, may have effects on Grupo SATEC's reputation.

Grupo SATEC gives priority importance to compliance with this Code without exceptions to it. Therefore, all Grupo SATEC staff must commit to respecting and enforcing the letter and spirit of this document.

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

The principles of this Code have been agreed upon by Grupo SATEC's 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 Grupo SATEC activities.

## 2\_ Grupo SATEC Values. Purpose, Basic Principles and Scope of Application

### 2.1. Mission and values of Grupo SATEC

The Grupo SATEC's Mission is to create value and generate growth through innovative Solutions and Services in the field of ICT, contributing to the evolution, effectiveness 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, Grupo SATEC promotes the Creation of Value and, therefore, its commitment to sustainable development and the consequent generation and distribution of wealth. Grupo SATEC aims to become a reference component in its Community and in the Industry, both in technological, economic and social development, promoting the creation of stable and quality employment in a work environment where the opportunities provided by the integrity, the development of talent, creativity and teamwork, assuming with great rigor strict compliance with legal and fiscal 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 Grupo SATEC is clear, to create value and generate growth through innovative solutions and services in the field of information and communications technologies, contributing to the evolution, effectiveness and productivity of our clients.

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

### 2.3. Purpose of the code of ethics

This Code of Ethics includes Grupo SATEC'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 of conduct aimed at guaranteeing the ethical, upright and responsible behavior of all professionals of Grupo SATEC 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 the Regulatory Compliance Supervision and Control System of Grupo Satec.**

## 2.4. General basic principles

Grupo SATEC 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 effective way possible and in a manner sustainable in an inclusive work environment governed by the principle of equal opportunities.

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

1. **Transparency:** Seriousness and honesty in relationships with all Stakeholders.
2. **Integrity:** Honesty in the development of the activity, acting in line with the greatest effort to promote the interests of Grupo SATEC, applying its values and capabilities.
3. **I respect:** Applying respect to people in the exercise of the profession.
4. **Commitment:** Accepting responsibility for their actions and seeking efficiency in the commitment made.
5. **Free Competition:** Demonstrating ethical, professional, and cordial attitudes with competitors.
6. **Ability:** Possessing the necessary qualifications, 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 above-mentioned persons, regardless of the function performed within Grupo SATEC, to ensure respect and compliance with this Code of Ethics.

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

## 2.5. Area of application

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

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

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

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Each person at Grupo SATEC, supplier company, client company and other business partners must become familiar 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 must use daily when identifying potential risks when carrying out their work.

The Code of Ethics is not a summary of all applicable standards and guidelines. Grupo SATEC's staff must consult the Code of Conduct and other more specific internal policies for greater detail 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, subsequently proceeding to review the conflicting articles.



## 3\_ Regulatory Principles of Compliance with People of Grupo SATEC

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

Grupo SATEC assumes the commitment to carry out all its activity in accordance with current legislation, 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 Grupo SATEC will strictly comply with the legislation in force in the place where they carry out their activity, taking into account the spirit and purpose of the regulations, and will observe the provisions and standards of Grupo SATEC's Regulatory Compliance Program and the basic procedures that regulate the activity of Grupo SATEC and the society in which they provide their services. Likewise, they will fully respect the obligations and commitments assumed by Grupo SATEC in its contractual relationships with third parties, as well as the customs and good practices of the countries in which they carry out their activity.

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

If any Grupo SATEC professional observes or is aware of the contravention of any of these regulations, they must immediately inform the Regulatory Compliance Unit, through the Ethical Channel.

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

Grupo SATEC's staff will always act in accordance with the principle of good faith and the rules of correct professional practice and maintain the principles of:

- **Professionalism**, understood as diligent, responsible, efficient action focused on excellence, quality, and innovation.
- **Integrity**, understood as acting loyal, honest, in good faith, objective and aligned with the interests of Grupo Satec and its corporate principles and values.

Grupo SATEC 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 involves the development of activities that may affect professionalism and ethical principles will be incompatible with the activity of Grupo SATEC. Grupo SATEC's staff will not have agreements, nor will they accept any activity that may conflict with the legitimate interest of its client companies, or that may harm their ability to carry out their professional obligations.

In the event that any professional is involved in a judicial, criminal or administrative procedure of a sanctioning nature, which may affect them in the exercise of their functions as a Grupo SATEC professional; accept public office; holds an administrative or management position in other companies or acquires shares/participations or any interest in a competitor, 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 legal, ethically acceptable action and in the interest of the organization, they must be willing to assume responsibility for that action. performance.

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

### 3.4. Commitment to human and labor rights

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

Grupo SATEC expresses its firm commitment and connection with 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 United Nations declarations. United in matters of human rights, labor, environment, and anti-corruption. The ultimate objective of this commitment being respect for human dignity.

Likewise, Grupo SATEC expresses its total rejection of child labor and forced or compulsory labor and is committed to respecting freedom of association and collective bargaining, as well as the rights of ethnic minorities and indigenous peoples in places where develop your activity.

Grupo SATEC 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. Satec Group also outlaws and prohibits any of the following conduct:

- The imposition of working 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.
- The hiring of foreigners who lack a work permit.
- Illegal labor trafficking or fraudulent emigration.

### 3.5. Independence and equity

To carry out its activity properly, Grupo SATEC has the right and duty to preserve its independence from all types of interference and from its own or other interests.

The independence that must govern the operation of Grupo SATEC will allow it to avoid or avoid pressures, demands or complacencies that adulterate free competition, as well as the achievement of successful projects.

Grupo SATEC will be entitled, therefore, to reject the procedures that, contrary to its own professional criteria, its client, the administrations, other professionals with whom it collaborates, or any other person or entity intend to impose on it, ceasing the project being carried out. treat when you consider that you cannot act with complete independence.

### 3.6. Trust and integrity

Grupo SATEC will be obliged not to defraud the trust of its client companies and not to accept projects that could harm their interests. It will not serve, therefore, interests that conflict with those of the client company in the development of a project or service, committing not to provide its services to two parties involved in the same project, except if they do not show inconvenient.

Likewise, Grupo SATEC will have the right to refuse to carry out projects or services when it is certain that they may be misused.

### 3.7. Non-discrimination and harassment

All people who make up Grupo SATEC have the obligation to treat their colleagues, superiors and 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 intimidating environment or offensive to people's rights, are unacceptable and will not be allowed or tolerated in the work, and the people of Grupo SATEC with personnel under their charge must promote and ensure, with the means at their disposal and adopting, where appropriate, the necessary preventive measures, that such situations do not occur.

Likewise, Grupo SATEC 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 due to their membership. to him for racist, anti-Semitic, or other reasons referring to ideology, religion or beliefs, family situation, due to his belonging to an ethnic group, race or nation, his national origin, his sex, sexual orientation or 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 applicable labor regulations.

### 3.8. Equal opportunities

Grupo SATEC strongly rejects any form of discrimination in general and, especially, in employment based on 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 workers, or for any other personal, physical or social condition of its professionals.

In particular, Grupo SATEC 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 with regard to access to employment, training, the promotion of professionals and their adequate remuneration and working conditions.

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

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

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Grupo SATEC strongly rejects any type of violence, abuse of authority, harassment (whether physical or psychological) or any other type of conduct that generates an intimidating or offensive environment at work and considers it unacceptable and intolerable, without regard to who. be the victim or the harasser. 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**

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

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

### **3.10. Professional secret**

Non-public information that is the property of Grupo SATEC will, in general, be considered reserved and confidential information, and will be subject to professional and company secrecy, and its content may not be provided to third parties, unless expressly authorized by the governing body of Grupo SATEC that is competent in each case or unless required by law, court or administrative authority.

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

Grupo SATEC undertakes to respect with strict confidentiality the information that is entrusted to it, sent or of which it acquires knowledge within the framework of its activity, and may not reveal it, unless expressly authorized in writing by the Client. Grupo SATEC's staff will not use said information for personal benefit or in any other way that could be detrimental to its clients. This principle is equally enforceable to all its collaborators, even after the end of a mission or contractual relationship.

### **3.11. Right to privacy**

Grupo SATEC guarantees the right to intimacy and privacy of the Affected Persons in the terms provided by law, protecting their personal data and agreeing not to disclose it without the consent of the interested parties or except in cases of legal obligation or compliance with resolutions. judicial or administrative.

### **3.12. Personal data protection**

Grupo SATEC 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. Under no circumstances may the personal data of professionals be processed for purposes other than those legally or contractually provided for.

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Likewise, Grupo SATEC's professionals who, due to their activity, access personal data of other Grupo SATEC 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 provided for in the Organic Law on the Protection of Personal Data and the regulations that develop it and, at all times taking into account the internal procedures implemented within Grupo SATEC.

Likewise, the Regulatory Compliance Unit will comply with the requirements provided for in the personal data protection legislation with respect to the communications sent to them by professionals in accordance with the provisions of its Operating Regulations, the Code of Conduct and the other regulations of Grupo SATEC Regulatory Compliance Program.

### **3.13. Conflict of interests**

All Grupo SATEC's Professionals and Collaborators must maintain and guarantee impartiality in the performance of their duties, responsibilities and professional decisions, especially in the face of any situation that could entail a conflict of interest since this causes their judgment and objectivity to be affected.

A conflict of interest will be considered to exist in those situations in which the personal interest of the professional and the interest of any of Grupo SATEC's companies come into collision, directly or indirectly. There will be personal interest of the professional when the matter affects him, or a person related to him.

If a conflict of interest arises, the Professional or Collaborator affected by it, as soon as they become aware of the conflict-of-interest situation, must inform their hierarchical superior who, in turn, will forward the communication to the Regulatory Compliance Unit to study the issue and adopt 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 to them.

## 4\_ Compliance with Grupo SATEC and Members

### 4.1. Crime prevention

Grupo SATEC expresses its firm commitment to the prevention of crimes and against fraud in its relations with the organization's personnel, with members, users, client companies, supplier, and supplier companies, competing companies, Public Administrations and the market and investors.

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

### 4.2. Privileged, confidential and reserved information

**Insider information.** It is all specific information that is held due to the position and that has not been notified, published, or disclosed. Professionals may not use privileged information with the aim of obtaining a benefit for themselves or a third party.

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

It is the responsibility of Grupo SATEC and all of its professionals to put in place sufficient security means and apply the established procedures to protect reserved and confidential information recorded on physical or electronic media, against any internal or external risk of non-consensual access, manipulation or destruction, both intentional and accidental. For these purposes, the Group's professionals will maintain confidentiality about the content of their work in their relationships 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 may arise.

Any reasonable indication of leakage of reserved and confidential information and private use of it must be immediately communicated to the person with immediate hierarchical superiority and to the management responsible for the security functions and to Human Resources of Grupo SATEC, who in turn will inform the Regulatory Compliance Unit.

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

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

Grupo SATEC considers transparency in information as a basic principle that must govern its actions and guarantees that the information it communicates to its stakeholders is true and complete, adequately reflects the financial situation of the Group and is committed to ensuring 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 Grupo SATEC has assumed.

This principle of transparency and truthfulness of information will also apply to internal communication.

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Employees have the obligation to transmit the information 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 the person receiving it.

All information and knowledge generated within Grupo SATEC is its property in accordance with the terms set forth in current legislation.

## 4.4. Business opportunities

Business opportunities will be considered those investments or any operations linked to the assets of Grupo SATEC of which the professional has knowledge on the occasion of the development of his professional activity, when the investment or operation has been offered to Grupo SATEC or it has an interest in it.

The professional may not take advantage of business opportunities for his own benefit or for the benefit of a person linked to him, nor may he use the name of Grupo SATEC or invoke his status as a professional of the latter to carry out operations on his own account or for the account of people linked to him.

## 4.5. External activities of Grupo SATEC's professionals

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

However, in order to avoid carrying out activities that may compete with those of Grupo SATEC or collide with its interests, the provision of labor or professional services, on their own or on behalf of others, by Grupo SATEC's workforce to other companies or entities other than Grupo SATEC 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 applicant's hierarchical superior. 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 the due fulfillment of the responsibilities assigned to Grupo SATEC, both in effectiveness and availability.

The connection, 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 any of Grupo SATEC's companies, their personal nature is clear. thus avoiding (under the responsibility of the professional) any relationship with Grupo SATEC. In particular, reference to belonging to Grupo SATEC, whether present or past, in political activities is totally prohibited, taking into account in any case those that are carried out 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

Grupo SATEC makes available to its employees the necessary resources to carry out their professional activity, as well as the necessary means for their protection and safeguarding. These resources must be used only for Grupo SATEC's own professional purposes and must not be used for personal or extra-professional uses and/or for the performance of activities that are not directly related to the interest of Grupo SATEC.

Workers will protect and take care of the resources they have or to which they have access, not using them more than what is necessary for the correct performance of their functions, in a responsible, efficient, and appropriate manner to the environment of their professional activity. And this, both from the resources that Grupo SATEC makes available to you for the performance of your professional work (network, internet, email, systems, applications, etc.),

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as well as those of third parties that relate to Grupo SATEC, such as clients and suppliers, having to protect them from any damage and/or illegal or inappropriate use, deterioration, or alteration.

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

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

All Grupo SATEC professionals have the obligation to take the utmost care to preserve the image and reputation of the Group in all their professional actions.

### **4.8. Intellectual property and information security**

All Grupo SATEC staff will respect and protect the intellectual property and the right of use that corresponds to the 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 at Grupo SATEC, whether as a consequence of its professional activity or that of third parties. Therefore, their use will be carried out in the exercise of professional activity therein and all the material on which they are supported will be returned when required.

Grupo SATEC employees will also respect the intellectual and industrial property rights held by third parties outside Grupo SATEC. 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 of Grupo SATEC'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 in 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 deleting 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, Grupo SATEC will be the owner of the rights of use and exploitation of any results of the work of its professionals within the framework of its activity.

### **4.9. Payments, accounting and financial information**

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

For these purposes, no Grupo SATEC's Professional or Collaborator will distort or hide the information in the Grupo SATEC 's accounting or financial records and reports, which will be completely accurate and truthful. Therefore, 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 Grupo SATEC's operations are correctly and truthfully reflected at the accounting level. Each operation must be based on adequate documentation, which must be verifiable. The useful principles for accounting and management activity are correctness, integrity, and transparency, in full compliance with current regulations.

No Grupo SATEC professional may alter, copy, reproduce or in any other way falsify credit or debit cards or use payment methods for personal benefit.



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

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

To carry out its activity properly, Grupo SATEC has the right and duty to preserve its independence from all types of interference and from its own or other interests.

The independence that must govern the operation of Grupo SATEC will allow it to avoid or avoid pressures, demands or complacencies that adulterate free competition, as well as the achievement of successful projects.

Grupo SATEC will be entitled, therefore, to reject the procedures that, contrary to its own professional criteria, its client, the administrations, other professionals with whom it collaborates or any other person or entity intend to impose on it, ceasing the project being carried out. treat when you consider that you cannot act with complete independence.

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

Grupo SATEC will be obliged not to defraud the trust of its client companies and not to accept projects that could harm their interests.

Grupo SATEC will not serve, therefore, interests that conflict with those of the client company in the development of a project or service, committing not to provide its services to two parties involved in the same project, except if they will not show any inconvenience.

Likewise, Grupo SATEC will have the right to refuse to carry out projects or services when it is certain that they may be misused.

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

Grupo SATEC will apply the quality procedures defined to ensure strict compliance with the commitments to 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.

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

Grupo SATEC is obliged to comply with the regulations and procedures of the Management Systems Certifications to which it is voluntarily subject, as well as all those acquired by contractual obligation at the beginning of the assignment.

Grupo SATEC 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.

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

## 5.4. Research and innovation

The professional authority of Grupo SATEC is based on the training and qualification of the professionals that comprise it. Therefore, it is committed to perfecting 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 to carry out their activity, always applying the principle of equal opportunities between women and men.

Grupo SATEC will only use proven techniques whose mastery they can prove. If during the development of the project or service, particularly innovative procedures or techniques must be applied, the client will be informed of both the advantages and the risks involved.

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

## 5.5. Relationships with client companies

Grupo SATEC employees must act with integrity towards client companies, with the objectives being to achieve 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, Grupo SATEC's employees will respect the commitments made, announce any changes in agreements in good time and maintain a high commitment to honesty and professional responsibility towards client companies.

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

Grupo SATEC will ensure that its commercial offers, corporate presentations, advertising, promotional actions, and other information publicly provided by its professionals to client companies is truthful, 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 are manifested regarding the information presented.

## 5.6. Relations with partners

Grupo SATEC 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 extendable to all Grupo SATEC professionals, who will apply the same ethical principles, respect, healthy environment, and teamwork.

## 5.7. Relationships with external suppliers

Grupo SATEC aims to foster relationships with its suppliers, contractors and collaborators based on trust, transparency in information and the sharing of knowledge, experiences and capabilities.

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

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Grupo SATEC professionals may not receive any type of remuneration in cash or in kind from clients or suppliers of Grupo SATEC nor, in general, accept any type of external remuneration for services derived from the professional's own activity within Grupo SATEC.

The prices and information presented by suppliers, contractors and collaborators in a selection process will be treated confidentially and will not be revealed 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

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

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

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

## 5.9. Corruption and bribery

Grupo SATEC 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 as well as in its external relations.

Grupo SATEC declares itself opposed to influencing the will of people outside the Group to obtain any benefit using unethical practices. Nor will it allow other people or entities to use these practices with their staff.

All Grupo SATEC's staff must act in accordance with the applicable laws 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

Grupo SATEC professionals may not, under any circumstances, offer, deliver or accept gifts or presents 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 These are invitations that are considered ordinary or customary in accordance with social customs because they are within sensible and reasonable limits.

Grupo SATEC's professionals may not give or accept hospitality that influences, could influence or could be interpreted as influencing decision-making, and must apply at all times the guidelines set out in Grupo SATEC's "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 first with the immediate superior, who may refer a query to the Regulatory Compliance Unit, which will indicate its criteria through a written communication, the which will have an imperative and irrevocable character.

## 5.11. Public procurement

In the case of participation in processes of obtaining licenses, management of subsidies or tenders with Public Administrations, Grupo SATEC's staff undertakes to comply with the applicable legislation, abide by the tender specifications, provide and keep the documentation up to date. accreditation of the capacity to contract and solvency, act with transparency, clarity and good faith when formulating proposals and comply with the obligations imposed legally and contractually in the event of being awarded 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 Grupo SATEC, which is guaranteed through the approval of the appropriate environmental policy and the implementation of an environmental management system based on ISO 14001 regulations.

Grupo SATEC's professionals must, within the scope of their duties, know and assume this 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, which favors the recycling of materials and promotes energy and water savings.

### **6.2. Relations with Public Administrations and officials**

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

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

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

No Grupo SATEC professional must, directly or indirectly, offer, promise, grant or authorize the delivery of money, gifts, favors, contributions or contributions to any official to obtain a benefit, concession, subsidy or advantage in favor of Satec Group. . In particular, they will abstain from or suspend any relationship in the event of any indication of corruption that may determine preferential treatment, or that may give rise to influence, favored treatment, or that is linked to any extortion or bribery.

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

Grupo SATEC expresses its complete independence from political parties and union organizations. Their eventual participation in business associations at a territorial or sectoral level will always be considered in terms of the best defense of the legitimate interests of the company and of the territory or sector.

Grupo SATEC 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.

Nor may Grupo SATEC's professionals, under any circumstances, make contributions of any nature at Grupo SATEC's expense, 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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Grupo SATEC, in the exercise of constitutionally recognized rights, will not prevent or make it difficult for its personnel to join union parties or organizations and will respect the exercise of freedom of association. Union-type activities within Grupo SATEC will be carried out in accordance with the applicable rules and collective agreements.

## **6.4. Relationships with competing companies**

Grupo SATEC is committed to competing in the markets fairly, 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 antitrust regulations, restricts effective and real competition in a sensible manner, collusive agreements, fixing or altering prices that would result from free competition in the market, market sharing or the exchange of sensitive information between competitors. The regulations that, where applicable, are applicable regarding dominant positions, concentrations, or public aid, will always be respected.

When it is necessary to transfer or continue projects or services started 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 available, respecting the provisions of the articles referring to Professional Secrecy and Intellectual Property, and collaborate as necessary to guarantee the continuity of the customer service, and Grupo SATEC must always maintain the most absolute respect for the previous company.

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

## **6.5. Money laundering and terrorist financing**

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

Likewise, Grupo SATEC undertakes to comply with all 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**

Grupo SATEC, 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 Grupo SATEC.

## 7\_ Regulatory Compliance Program

Grupo SATEC has a Regulatory Compliance Program aimed at establishing effective surveillance, supervision and control measures suitable to prevent, detect and discover crimes that could be committed with the means or under cover (in the name or on behalf of and for the benefit direct or indirect) of Grupo SATEC.

In this way, Grupo SATEC 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, Grupo SATEC professionals will subject 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 usual in relationships with a specific organization or person, 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

The Regulatory Compliance Unit of Grupo Satec is a collegiate body of an internal and permanent nature, responsible for proactively ensuring the effective functioning of the Regulatory Compliance Program of Grupo SATEC, for which it has been granted broad powers, budgetary autonomy, and independence of performance.

### 7.2. Ethical channel

It is the confidential channel that Grupo SATEC makes available to its employees, suppliers, collaborators and other third parties who have a relationship with the organization so that, through it, in the event of certainty or well-founded suspicion that a crime is being committed, illicit conduct within Grupo SATEC, transfer said communication so that it can be investigated, with full guarantee of confidentiality and not being persecuted, discriminated against or suffer any other type of retaliation.

This Ethical Channel reaffirms the commitment acquired by Grupo SATEC that all illicit activity that is reported will be treated confidentially and will be rigorously investigated, adopting the measures that, in accordance with internal and external regulations, are appropriate. The Ethical 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 Grupo SATEC employees to act responsibly, in order to maintain the ethical principles and values of Grupo SATEC, and to proceed honestly in the face of possible commission. of an illegal act that could harm Grupo SATEC.

Communications can be sent in writing through the form available on our website: <https://satecgroup.ethic-channel.com/newcom>.

The Regulations for use of the Ethical 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 Grupo SATEC personnel, including directors, managers, representatives, and people who in any way hold powers of representation of Grupo SATEC, 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 called for adequate knowledge of their content. Ignorance of the rules of conduct and good practices contained in this Code will not exempt you from compliance.

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

Communications regarding possible breaches of the Code or doubts that may arise regarding its interpretation or application will be sent to the address of the Regulatory Compliance Unit through the Ethics Channel: in writing through the form available on our website: <https://satecgroup.ethic-channel.com/newcom>, or by postal mail (attention of the Compliance Unit, Avenida de Europa 34-A, 28023 Madrid) who will receive, study and resolve them, safeguarding the confidentiality of the sender.

Grupo SATEC 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 Regulatory Compliance Unit is responsible for the general interpretation and integration of this Code. Its interpretative criteria are binding for all Professionals who are part of Grupo SATEC. Therefore, any doubt that may arise among Grupo SATEC's professionals regarding the interpretation of the Code of Ethics must be raised to the Regulatory Compliance Unit.

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



## 9\_ Disciplinary regime

Grupo SATEC 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 the provisions of the Code of Ethics. At the same time, no professional can justify improper, illegal or conduct that contravenes the provisions of the Code of Ethics by relying on the order of a hierarchical superior or ignorance of the Code itself.

The Disciplinary Regime applies to all workers and management teams (including the Administrative Body of Grupo SATEC), without exception, who have the obligation to comply with the rules and procedures established by Grupo SATEC in their organization and to conduct themselves at all times in accordance with the highest standards of ethics and integrity in the performance of their duties.

Thus, when it is determined that a Grupo SATEC professional has carried out activities that contravene the law, the Code of Ethics or the rest of the provisions that at any time could make up the Grupo SATEC 's 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 failure to comply with controls established in Grupo SATEC's Regulatory Compliance Program). If the possible breaches do not have foreseeable criminal significance, they may be instructed by the person who holds 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 Grupo SATEC and will comply with the provisions of the applicable Collective Agreements and/or, failing that, with the provisions of the Statute of the Workers or specific applicable regulations, and depending on the minor, serious or very serious nature of the sanctioned offense.

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

### **10.1. Update**

The Code of Ethics will be reviewed and updated periodically, based on the annual report of the Regulatory Compliance Unit, as well as the suggestions and proposals made by Grupo SATEC's professionals by any means and especially through the Whistleblowing Channel.

Any review or update that entails a modification of this Code of Ethics will require approval by Grupo SATEC Management.

### **10.2. Acceptance**

Grupo SATEC professionals expressly accept the standards of conduct established in this Code of Ethics.

Professionals who join or become part Grupo SATEC in the future will expressly accept the principles and standards of action established in this Code of Ethics.

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

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