

# Prevention of Bribery, Fraud and Anti-Corruption Policy

Open Sistemas de la información S.L.

**Date of entry into force: 22/02/2021**

OpenSistemas is committed to maintaining the highest standards of ethics and integrity in all of our operations at all of our national and international locations.

## Aim

Through our Code of Conduct we set out measures against bribery, fraud and corruption. The purpose of this policy is to further strengthen these measures and to reaffirm our commitment to prevent corruption and bribery in all its forms.

## Basic Principles

- **Integrity and Ethics:** We do not tolerate corruption or bribery in any of our operations. We act ethically and transparently in all our business activities.
- **Law Enforcement:** We comply with all applicable anti-corruption laws and regulations in the countries where we operate.
- **No to bribery:** We do not offer or accept bribes or improper payments under any circumstances. This includes payments to public officials, employees of private companies or other parties.
- **Accurate records:** We keep accurate and complete records of all our financial transactions and business activities.

## Prohibited Conduct

It is prohibited:

- Offering, promising or giving bribes to any person or entity.
- Soliciting or receiving bribes from any person or entity.

- Engage in corrupt practices, such as influence peddling or nepotism.
- Use intermediaries or third parties to conceal illegal activities.
- Training and Awareness Raising
- We provide training and awareness to all our employees and partners on the importance of preventing corruption and bribery. Everyone must be aware of and comply with this policy.

### **Reporting Violations**

We encourage the reporting of any violations or concerns related to this policy. Reports can be made confidentially and without fear of retaliation. Any interested party may report any such concerns by emailing [legal@opensistemas.com](mailto:legal@opensistemas.com).

### **Sanctions**

Any violation of this policy will be treated seriously and may result in disciplinary action, including termination of employment or termination of business relationships. In addition, serious violations may result in legal action.

This policy applies to all of our group companies located in the country or abroad. It is the responsibility of every employee and partner to comply with it and to promote an ethical and corruption-free business environment.