



Code of Conduct

Open Sistemas de Información e Internet, S.L.



open
sistemas

Index

1. Introduction	3
2. Scope of application	3
3. Business Principles and Principles of Ethical Conduct	4
3.1. Basic Principles of Behaviour	4
3.2. Principles of Ethics and Compliance	5
4. Behavioural Guidelines	6
5. Compliance Data Protection	14
5.1. General principles relating to the protection of personal data	15
5.2. Appointment of Security Officer	15
6. Acceptance of and compliance with the Code	17
7. Validity	18



1. Introduction

The Code of Conduct aims to establish the values that should guide the behaviour of the entire company OpenSistemas, becoming our guide to proper conduct, along with the rules and established working procedures, to ensure the right thing to do and that in its logical consequence no crime occurs in the company.

The Code is a guide for all employees of GRUPO EMPRESARIAL INTERNACIONAL OPENSISTEMAS of which OPENSISTEMAS DE INFORMACIÓN E INTERNET, S.L. is a part, in their professional performance in relation to their work, the resources used and the business environment in which it is developed. It offers guidelines that clarify the basic principles of all management and interpersonal relationships with colleagues, collaborators, bosses, suppliers, customers, shareholders and in general any person with a direct or indirect interest in the activity carried out by the company. Our actions are based on respect for our corporate values, where all of us who work in the company will act in accordance with principles of behaviour that respect business ethics and professionalism, with the aim of being a benchmark in these terms and being recognised as such.

2. Scope of application

This Code is addressed to all employees of OPENSISTEMAS DE INFORMACIÓN E INTERNET, S.L., regardless of the type of contract that determines their employment relationship, the position they hold or the place where they work. This code will be communicated to all OpenSistemas Group staff as part of the Onboarding process.



3. Business Principles and Principles of Ethical Conduct

Our values represent our identity as a collective. We are different because the people who work in the organisation make this company a unique and differentiating project. We are fast, we know how to listen, we seek innovation, we are helpful and we work as a team in a rigorous and transparent way.

3.1. Basic Principles of Behaviour

OpenSistemas is a company committed to sustainability, social welfare, economic growth and environmental balance in which we always strive to minimise the impact of our actions on the environment, in this line we involve all employees of the company in environmental awareness. We manage the purchase of products and services trying to minimise their impact on the environment, always with the Net Zero objective, we apply policies that guarantee all employees the ability to be flexible and reconcile their work with their personal life.

The Company assumes as basic behavioural guidelines, among others, those certified in the UNE-EN ISO 14001:2015, ISO 9001:2015 and in the adherence to the United Nations Global Compact.

OpenSistemas aims that all persons and entities to which this Code of Conduct applies comply with the following principles in their relations with stakeholders:

- Comply with and abide by applicable national and international laws.
- Respect human rights and public freedoms, contribute to the preservation of the natural environment and collaborate with the development and welfare of communities.



- Promote honesty, fairness, truthfulness, compliance with commitments, free competition and transparency.
- To provide good working conditions, respecting labour rights.
- Contribute to social and economic development in the countries where it operates through innovation, technological development, efficient and responsible use of resources, maintaining responsible behaviour and integrity.
- Contribute actively and from a position of leadership to environmental balance and the promotion of a low-carbon economy.

3.2.Principles of Ethics and Compliance

Know and comply with the rules

OpenSistemas people must know and comply with this Code of Conduct, as well as with the other internal and external rules that support and develop it. In particular, they must be sufficiently familiar with the external rules as well as the most relevant policies, processes and controls according to their activity in the Company. In case of doubt, they may request the necessary information through their line manager, the Code of Conduct Committee or the appropriate bodies.

Assisting in compliance

OpenSistemas people must comply with the Company's requirements in terms of ethics and compliance. This includes, among other things, completing the declarations of compliance with the conduct set out in the code or the training requirements by the established dates and collaborating in the correct execution of the processes and controls that the company may implement in this area.

Preserving the traceability of decisions

OpenSistemas people must ensure the traceability of decisions in order to be able to provide reasonable evidence when required that they comply with the Company's policies, processes and controls.



Consult doubts and report irregularities

OpenSistemas employees must inform the Company immediately of any potential irregularities or breaches of the Code of which they may become aware. To do this, they can do so directly by informing their superior or indirectly through the digital mailbox provided for this purpose. This consultation and notification procedure allows the employee to receive a rapid response in order to minimise the consequences of possible incidents or breaches and prevent them from recurring.

Being exemplary in conduct

The conduct of all OpenSistemas people must protect the reputation of the Company and set an example of rigour, ethics and professionalism.

Be diligent in dealing with third parties

The Company applies a homogeneous model to ensure ethics and compliance, which aims to promote an ethical culture and where it helps us to prevent, detect and eradicate irregularities. Through an appropriate assessment in matters relating to ethics and compliance of third parties with whom OpenSistemas maintains business relationships or those who may act on its behalf.

4. Behavioural Guidelines

- **Respect for legality and ethical values.** OpenSistemas and all the people who belong to the company are committed to carry out their business and professional activities in accordance with current legislation in each of the places where they operate, observing a high ethical behaviour and adopting, where appropriate, the best national and international practices. Avoiding any conduct that, even without violating the law, may damage the reputation of OpenSistemas and negatively affect their interests.
- **Commitment to human rights.** OpenSistemas and all the people who belong to the company are committed to respecting the human rights and public freedoms recognised in the Universal Declaration of Human Rights of the United Nations. OpenSistemas will include in the welcome documentation for new recruits and, eventually, it will be communicated internally to all its employees so that they can follow this code and acquire



the commitment to perform their professional activities with respect for human rights and civil liberties.

- **Objectivity.** OpenSistemas and all its members must maintain absolute impartiality, without allowing external factors or pressures of a social, economic or political nature to distort our professional work. It is therefore essential to apply objective criteria in every task we undertake. Demonstrating this impartiality to third parties is a fundamental requirement. As OpenSistemas professionals, we have a responsibility to avoid situations that may create conflicts of interest or compromise our loyalty to the company for our own benefit, thereby undermining the integrity, independence and impartiality necessary to perform our duties. Conflicts of interest can be of a personal or professional nature. A personal conflict of interest occurs when the personal interests, investments or activities of professionals (including individuals and legal entities directly or indirectly related to them) conflict with the interests of OpenSistemas. On the other hand, a professional conflict of interest arises when providing services to one client prevents, for whatever reason, providing services to another client. Appropriate measures must be put in place to resolve such a conflict. If any conflict of interest is detected, the OpenSistemas professional involved must immediately disclose it to his or her supervisor and send a relevant report on the situation to the Talent Area. This report shall be forwarded to the Regulatory Compliance and Legal Prevention Committee. The Compliance Area or the Committee will take the necessary measures to address the conflict, considering the particular circumstances of each case. If a professional is involved in a judicial, criminal or administrative process with possible sanctions, or assumes a public position, manages other companies or acquires shares/participations in a competitor, this could impact his or her role in OpenSistemas. In addition, family members and other individuals with similar relationships, as well as entities in which the professional or their links have significant financial or operational influence, are considered to be directly or indirectly related persons. In short, at OpenSistemas and among its employees, impartiality prevails at all times. Integrity and independence are crucial to maintain the highest professional standards and to ensure the trust of all parties involved.
- **Competition and antitrust.** We engage in vigorous but also ethical competition, maintaining integrity and adhering to competition and antitrust laws. These laws promote fair and open competition around the world, benefiting customers through free



competition among suppliers, and sellers by fostering fair competition among buyers. Competition and antitrust laws prohibit illegal restraints of trade, including agreements or conduct involving competitors, customers or suppliers, even in cases where a single firm has a dominant market position. These regulations seek to preserve a healthy competitive environment and ensure that both market players and consumers benefit from a fair and level playing field.

- **Respect for people.** OpenSistemas rejects any manifestation of physical, psychological or moral harassment or abuse of authority, as well as any other conduct that may generate an intimidating or offensive environment with the rights of individuals. It also promotes working conditions that prevent harassment in all its forms, including sexual and gender-based harassment. At the same time, it ensures compliance with the provisions of the International Labour Organisation, especially in relation to minors, and does not allow any type of child labour.

Workers who are part of OpenSistemas must be treated with respect, providing a pleasant, healthy and safe working environment.

All workers have the obligation to treat their colleagues, superiors and subordinates fairly and respectfully. In the same way, relations between OpenSistemas employees and those of collaborating entities will be based on professional respect and mutual collaboration. OpenSistemas considers the integral development of the individual to be important, and therefore facilitates the necessary balance between professional and personal life.

- **Effective equality.** OpenSistemas promotes gender diversity and the professional and personal development of all its employees, ensuring equal opportunities.

It does not accept any kind of discrimination in the professional field on the grounds of age, race, colour, sex, religion, political opinion, national origin, sexual orientation, social origin or disability. The selection and promotion of employees is based on the competencies and performance of their duties, as well as on the criteria of merit and ability defined in the job requirements and the principle of diversity. OpenSistemas encourages internal promotion and mobility as a means of retaining talent in the organisation. It seeks employee stability, development and motivation.

All professionals must actively participate in the training plans that OpenSistemas makes available to them, applying themselves to their own development and committing



themselves to keeping their knowledge and skills up to date in order to promote their professional progress and contribute value to customers, OpenSistemas and society in general.

People in management or leadership positions must act as facilitators of the professional development of their employees.

- **Health and safety at work.** OpenSistemas promotes the adoption of occupational health and safety policies and adopts the preventive measures established in the legislation in force in each country. The Company provides its employees and collaborating companies with the necessary guidance and resources to carry out their activities in a safe and healthy way.

OpenSistemas promotes the application of its occupational health and safety standards and policies by the collaborating companies and suppliers with which it operates.

All OpenSistemas employees must know and comply with the rules of protection of health and safety at work and ensure the safety of themselves, other employees, customers, suppliers, partners and, in general, of all persons who may be affected by the development of their activities.

- **Use and protection of assets.** OpenSistemas provides its employees with the resources necessary for the performance of their professional activity. OpenSistemas people must use the company's resources responsibly, appropriately and with the appropriate authorisations, in the environment of their professional activity. They must also protect and preserve them from any improper use that could be detrimental to the interests of the company.

OpenSistemas employees are prohibited from transferring, concealing, assigning or transmitting any property owned by the Company with the aim of avoiding the fulfilment of responsibilities and commitments to third parties.

OpenSistemas equipment and computer systems must be used exclusively for professional purposes. However, in those cases in which these resources are exceptionally used for personal purposes, their use must be minimal, reasonable, appropriate and in accordance with the principle of good contractual faith. All Company personnel must be aware of and accept the rules established by the Company. Technology resources may not be used to:



- Issue personal opinions on behalf of the group or access forums or social networks for the same purpose, except with express consent to that effect.
- Store or distribute, or visit Internet sites with, inappropriate material that violates human rights, privacy, honour, self-image, religious freedom; or against the dignity of persons such as racism, xenophobia, advocacy of violence or terrorism, and pornographic or sexist material.
- Use, introduce, download, copy, transmit, reproduce, distribute or store any type of software, published work or invention protected by intellectual or industrial property without the corresponding licence or authorisation.
- Send or participate in mass e-mails with chain messages, jokes or inappropriate images.

- **Measures against bribery, fraud and corruption.** OpenSistemas is committed to conducting business with integrity, avoiding any form of corruption and complying with applicable anti-bribery and anti-corruption regulations. OpenSistemas is against influencing the will of people outside the Company to obtain any benefit through the use of unethical practices. Nor will it allow other persons or entities to use these practices with its employees.

OpenSistemas people must act in accordance with applicable laws and under no circumstances may they resort to or tolerate bribes from third parties to the Company, its employees or vice versa. OpenSistemas employees may not offer or accept gifts and hospitality to or from public officials or other third parties that may affect the impartiality of any party, influence a business decision, lead to misconduct of professional duty, or contravene the provisions of the Anti-Corruption Performance Standards.

OpenSistemas employees may not make contributions on behalf of the Group for political purposes contrary to the law, obtain favourable treatment using sponsorships or donations as a means to achieve it, use the relationships and business contacts of the company for their own benefit or that of a third party, or establish business relationships with third parties without complying with the minimum duties of due diligence in the knowledge of third parties.

OpenSistemas does not use misleading or false information with the aim of obtaining subsidies or any other type of aid or advantages.



This commitment extends to all subsidiaries and individuals who are part of the OpenSistemas Group.

OpenSistemas in its main objective of aligning the company to legal compliance at national and international level, is responsible for regulating internal operations to conform to the standards and codes designed to ensure such compliance. Therefore, the different stages are established:

- Prevention
 - Identify and assess risks
 - Design and implement protocols and procedures
 - Raise awareness throughout the organisation
- Detection and reporting
 - Monitoring and control of compliance with the prevention model
 - Reporting to the Board of Directors
 - Measuring performance
- Resolution
 - Establish recommendations and measures to guarantee the resolution of incidents, the correction of detected deficiencies and avoid their repetition.
 - Adopt sanctions for cases of non-compliance, according to the established disciplinary system.
 - Modify the model, after discovering failures in its operation or due to changes in the company. And ensure its adaptation to new regulatory and business requirements.
- **Prevention of money laundering.** OpenSistemas applies the utmost rigour to prevent and avoid money laundering from criminal or illicit activities, and has internal control policies and procedures for its prevention, detection and, where appropriate, eradication. All OpenSistemas people must comply with the applicable legal provisions and pay special attention to those cases in which there are indications of lack of integrity of persons or entities with which business relationships are maintained, such as, among others, payments that are unusual given the nature of the transaction, payments made or by third parties not mentioned with the contract, payments to persons or entities resident in tax havens or bank accounts opened in offices located in tax havens, payments to entities in

which it is not possible to identify the partners or ultimate beneficiaries, extraordinary payments not provided for in the contracts.

Except in exceptional cases, with express authorisation and traceable documentary support, OpenSistemas does not allow cash payments.

- **Information and knowledge processing.** OpenSistemas understands that information and knowledge are essential and essential assets for business management, and must therefore be subject to special protection.

Company employees must transmit all the information they have to communicate, both internally and externally, truthfully and completely, and under no circumstances will they knowingly provide incorrect or inaccurate information that could mislead the recipient.

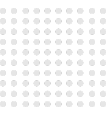
All employees who enter any type of information in the OpenSistemas computer systems must ensure that it is rigorous and reliable. They must also maintain the strictest confidentiality regarding any confidential information to which they have access as a result of their professional activity and must refrain from using it improperly for their own benefit or for the benefit of third parties. All OpenSistemas employees accept and sign, at the time of hiring, the policies established by the company regarding confidentiality.

In case of any doubt about the nature of the information, employees must consider it as confidential until they are told otherwise. The duty of confidentiality shall subsist even when the employment relationship has ended.

All information and knowledge generated within the company is the property of OpenSistemas in the terms referred to in current legislation.

With regard to information about the market and competitors, employees of the company must not use information that has been obtained inappropriately or that is confidential without the express authorisation of its legitimate owners.

OpenSistemas complies with current legislation on data protection, protecting personal data entrusted by its customers, employees, candidates in selection processes or other



persons. It also undertakes to request and use only those data that are necessary for the effective management of its business.

Persons who, in the course of their professional activities, have access to information on other employees shall respect and promote the confidentiality of this information and shall use it responsibly and professionally.

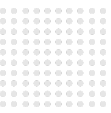
- **Customer relations.** OpenSistemas assumes, leads and promotes the commitment to the quality of its products and services, and acts under the best national and internationally recognised practices.

All the people belonging to the company must take care of customer relations, acting with integrity and aiming to achieve the highest levels of quality and excellence in the provision of services, seeking the development of long-term relationships based on trust and mutual respect.

- **Relations with suppliers, contractors, partners and collaborators.** OpenSistemas considers its contractors, suppliers, partners and collaborating companies essential to the achievement of its objectives of growth and improvement of service quality, and seeks to establish relationships with them based on trust, mutual benefit and respect for free competition.

OpenSistemas, analyses the desirability of dealing with any third party, taking into account issues of ethics and integrity of those individuals or legal entities with which they will enter into business relationships in order to avoid that the operations carried out with our company are used for money laundering or other illegal practices. OpenSistemas when establishing business relationships with third parties, all OpenSistemas people must comply with the minimum due diligence duties in the knowledge of third parties with regard also to their ethics and compliance models.

- Our professionals will pay special attention to those cases where there may be indications of lack of integrity of individuals or companies with which OpenSistemas maintains relationships.



- OpenSistemas is committed to actively work to transfer its commitment to ethical principles to third parties with whom it collaborates.
- **Respeto al medio ambiente.** OpenSistemas' environmental strategy is structured around the commitment against climate change, the promotion of energy saving, the rationalisation of water use and management, the responsible use of resources, the effective management of waste, the prevention of pollution and the protection of the natural environment and biodiversity. All this in response to a requirement demanded and assumed as a commitment by the management.

In accordance with this strategy, OpenSistemas and all its employees must be aware of and accept this strategy and strive to minimise the environmental impact of their activities and the use of the facilities, equipment and means of work made available to them. They must also contribute to the achievement of the Company's environmental objectives.

In its relations with suppliers, contractors and collaborators, OpenSistemas shall transmit these principles and demand compliance with the environmental procedures and requirements applicable in each case.

5. Compliance Protection

Data

OpenSistemas takes a commitment to develop its activity in which it puts the utmost respect for the privacy of its employees, customers, suppliers or any other third party. We express our commitment to respect personal data and the current legislation on data protection, REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.



Through the Code of Conduct, which is accessible to every employee of the company, we encourage and ensure that they are aware of their rights and duties arising from this statement.

5.1. General principles relating to the protection of personal data

In achieving and complying with the general principles relating to the protection of personal data included in this code of conduct, OpenSistemas will act, with respect to personal data, according to the following principles:

- They must be processed lawfully, fairly and transparently.
- They must be collected for specified purposes and limited to the purpose for which they were collected.
- They must be accurate and kept up to date at all times.
- The integrity and confidentiality of the data being stored must be guaranteed.
- They must be stored only for the time necessary for the purposes of processing; after this time, they must be deleted or blocked.
- In order to comply with these principles, a person in charge will be appointed who will comply with all the principles set out above, and this compliance extends to the entire company and the people who make up the OpenSistemas Group.

5.2. Appointment of Security Officer

OpenSistemas in its efforts to comply with and preserve the fundamental principles and obligations to this end designates a Security Manager Treatment, which includes the following functions:



- Review that the data being processed are adequate, relevant and not excessive in relation to the scope and specific, explicit and legitimate purposes for which they have been obtained.
- Review that the personal data being processed are not used for purposes incompatible with those for which the data were collected.
- Check that the personal data are accurate and updated so that they truthfully reflect the current situation of the data subject.
- To order that personal data be cancelled when they are no longer necessary or relevant.
- when they are no longer necessary or relevant for the purpose for which they were collected or recorded or when they prove to be inaccurate, in whole or in part, or incomplete, and to review the correct execution of this obligation.
- Check that, except in those cases in which the Law exempts this obligation, the prior, free and informed consent of the owner of the data is obtained for the transfer of their data.
- Check that, except in those cases in which the Law exempts this obligation, the prior, free and informed consent of the data subject is obtained for the processing of his or her data.
- Verify compliance with the duty to provide information.
- Detects cases of data processors and verifies the signing of data processor contracts.
- Attend requests for the exercise of data subjects' rights.
- Implement (and, where appropriate, review and/or modify) the procedure for attending to data subjects in the exercise of their rights.
- Check whether international transfers take place and whether there is the necessary security or legal basis necessary for such transfers to take place.



6. Acceptance of and compliance with the Code

OpenSistemas shall communicate and disseminate the contents of this Code of Conduct to all its employees, suppliers, contractors and collaborators. All employees who join or become part of OpenSistemas must accept the Values and Principles and the standards of conduct set out in this Code of Conduct.

OpenSistemas expects from all its directors, officers and employees a high level of commitment to comply with its Code of Conduct.

Non-compliance with any of the principles contained in the Code will be analysed in accordance with internal procedures, current agreements and legal regulations. When a breach is identified, the Human Resources Department, or the management responsible for the company's human resources function, will determine the application of disciplinary measures in accordance with the system of misconduct and penalties set out in the company's collective bargaining agreement.

No one, regardless of level or position, is authorised to ask an employee to contravene the provisions of this Code. No employee may justify improper conduct on the grounds of superior direction or ignorance of this Code.

Employees must report any breach or violation of the conduct set out in this document to their line manager. Despite the existence of the figure of the hierarchical superior, it is recommended that the ethics channel be used as the main means of communicating irregularities and making enquiries about this code of conduct.

The ethics channel shall be permanently available and accessible to all OpenSistemas employees. Notifications and queries shall preferably be made by name to facilitate their resolution and shall be studied and treated confidentially.



7. Validity

The Code of Conduct comes into force on the day of its publication to all employees and will remain in force until repealed.

It will be reviewed and updated periodically and, where necessary, policies, processes and controls will be reviewed, updated or implemented. In doing so, suggestions and proposals made by employees and OpenSistemas' commitments on ethics and compliance will be taken into account.

The Board of Directors is committed to ensuring the effectiveness of the company's ethics and compliance model and to update its contents as often as necessary to ensure that it is in line with the most important ethics and compliance issues for the company.

