



CODE OF ETHICS AND CONDUCT

ONDATA INTERNATIONAL, S.L.

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1. PURPOSE OF THE CODE

The Code of Ethics, hereinafter also referred to as the "Code", reflects the commitment of ONDATA INTERNATIONAL, S.L. to the principles of ethics in all areas of activity, establishing a set of principles and guidelines of conduct aimed at guaranteeing the ethical and responsible behaviour of all the Company's professionals in the performance of their activities. All those who provide their professional services at ONDATA INTERNATIONAL, S.L. must know, comply with and enforce this Code of Ethics and collaborate with others in doing so.

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2. Scope of application

This Code applies to all customers, suppliers and third parties who have business relationships with ONDATA INTERNATIONAL, S.L. anywhere in the world. Of course, it applies to all the company's staff, including its subsidiaries, collaborators and commercial agents in Spain and abroad.

3. Adherence to the code

In general, the adherence to the code will occur in the case of the company's professionals at the time of their incorporation by accepting the clause included in the contract.

In the case of service providers who are to be subject to this code, adhesion to it will be made prior to the start of the service. Such adhesion may be made by signing the service provision contract where it is included as part of the clause or as a separate document to the main contract.

For those professionals and workers whose relationship with ONDATA INTERNATIONAL, S.L. was already established before this code came into force, the company's Administration Department will be responsible for obtaining the acceptance of the code by all professionals, workers, managers and members of the Board of Directors.



4. Adequacy and interpretation of the code

The Code of Ethics is a document that attempts to set out and cover the most common guidelines for action that may raise behavioural questions for the professionals and workers who apply them.

However, it is possible that this Code does not cover each and every one of the situations that may occur within the company. For this reason, in order to interpret and adapt these guidelines to the day-to-day business activity, the Criminal Compliance area, with the Compliance Officer at the head, who created the document, is available to all professionals and workers, to collaborate in establishing criteria for guiding the conduct of people linked to their compliance, and in any case, to resolve any doubts that may arise in the course of their professional activity.

5. Responsibility of the professionals at Ondata International S.L.

The professionals, workers and other third parties linked to this Code of Ethics have the obligation to



- **Communicate** through the complaints channel any breach of this code.



- **Provide** the necessary information to be able to carry out any investigations that may be carried out.



- **Communicate** to the Compliance Officer the existence of any criminal legal proceedings in which they figure as accused, defendant or convicted, extending this duty of communication to the files.

6. General principles of ethics

6.1. Impartiality

ONDATA INTERNATIONAL, S.L. avoids any type of discrimination on the basis of age, sex, sexuality, state of health, nationality, political opinions and religious beliefs of its partners, in its relations with the parties involved, such as personnel management or work organisation, selection and management of suppliers and partners, where appropriate, the presentation of offers to customers, etc.

6.2. Honesty

Within the scope of their professional activity, professionals, workers and other third parties linked to this Code of Ethics must diligently respect the laws in force, the Code of Ethics and any other internal procedure that may be applicable and which has been formally communicated to them beforehand. The pursuit of the interests of ONDATA INTERNATIONAL, S.L. can never be supported by dishonest conduct.

6.3. Integrity of the professional/collaborator

ONDATA INTERNATIONAL, S.L. is committed to ensuring the health and safety of its employees, collaborators, contractors, visitors and customers, and to providing a safe workplace with working conditions that respect individual dignity. The company does not admit, in the work environment, any episodes of intimidation or harassment, nor requests or threats aimed at inducing people to act against the law or the Code of Ethics. The adoption of behaviour that tends to harm personal convictions or preferences is not tolerated. In this area, it should be pointed out that the company has the corresponding Occupational Risk Prevention Plan, and is assisted by external consultants specialised in the subject.

6.4. Equity of authority

In hierarchical relations, it is committed to acting correctly, fairly and avoiding any kind of abuse.

6.5. Fair competition

The Company undertakes to impose and preserve the principle of fair competition, avoiding the abuse of positions of power, in the relationship with its third parties and professionals.

6.6. Prevention of criminal activities

All persons concerned should be aware that, as a result of the current legislative framework in criminal matters, any legal person may be convicted of offences committed by its managers and employees where some form of benefit to the legal person in question has been derived from the offence. ONDATA INTERNATIONAL, S.L. denies any benefit obtained illegally or as a result of non-compliance with any of the ethical standards and commitments contained in this Code. Consequently, the persons subject to this Code must comply with the established rules and procedures with extreme rigour. In fact, the company has a programme for the prevention of criminal risks that is available to its personnel, including training and auditing activities in this area. As mentioned above, the company has appointed a Compliance Officer, whose functions are to advise, coordinate training and guarantee compliance with the plan, including the management of complaints presented in this area through the established complaints channel.



7. Code of Conduct

7.1. Policy on gifts, presents and favours

No gift or present, favour, influence or privilege of any kind is accepted that could be interpreted as exceeding normal commercial or courtesy practices or, in any way, intended to receive favourable treatment in the performance of any activity that could be linked to ONDATA INTERNATIONAL, S.L. In particular, with regard to economic transactions or public or private contracts.

In particular, any form of gift to persons with public responsibility or Spanish or foreign public officials, auditors, directors or personnel of third party public or private companies, and their subsidiaries, collaborators or their relatives and friends that could influence the independence of judgment or induce them to guarantee any type of favour is prohibited.

For the same purposes, contracts with other companies include the corresponding anti-corruption clauses that prevent these activities.

In the opposite sense, it is totally forbidden for the personnel of ONDATA INTERNATIONAL, S.L. to accept any gift or present, favour or privilege that goes beyond normal commercial or courtesy practices and which may influence their actions, responsibilities, professional independence or judgement.

All company personnel have been informed that they may not give or receive any gift as a member of staff or on behalf of ONDATA INTERNATIONAL, S.L.

The company's Criminal Risk Manual includes these prohibitions in order to prevent the commission of the following types of criminal offences, which may be charged to legal entities:

- Ⓐ DISCOVERY AND DISCLOSURE OF COMPANY SECRETS
- Ⓑ BUSINESS CORRUPTION
- Ⓒ BRIBERY
- Ⓓ INFLUENCE TRAFFICKING
- Ⓔ ALTERATION OF PRICES IN BIDDINGS AND PUBLIC AUCTIONS

7.2. Processing of information

The information handled by the staff of ONDATA INTERNATIONAL, S.L. may affect both internal information (on its partners, directors, managers or employees, company know-how, information on the company itself) and information that the client or other third parties provide to the company as part of their business or contractual relationship.

7.2.1. Personal Information

ONDATA INTERNATIONAL, S.L. undertakes to guarantee that all the personal data in its possession, as the party responsible for the file or the party responsible for processing it, by virtue of the regulations in force on data protection (RGPD and LOPDGDD), are processed, stored and safeguarded in accordance with the guidelines of the said regulations, and that the principles of quality, information and consent with regard to the data handled are complied with, and are used exclusively for the purpose that justifies or protects their processing. To this end, the company has implemented a Personal Data Protection Plan and has appointed a Personal Data Protection Delegate. In addition, the company has an external legal consultancy service responsible for issues relating to public or private contracts, as well as business confidentiality and protection of industrial secrets.

7.2.2. Duty of secrecy

In general, the Professionals subject to the Code must keep professional secrecy regarding any data or information that is not public and that they become aware of as a result of the exercise of their professional activity, whether it comes from or refers to clients, other employees or managers or any other third party. This obligation will remain in place even when the contractual relationship has ended. As a guarantee, all ONDATA INTERNATIONAL, S.L. personnel have been properly trained and have signed the corresponding confidentiality and secrecy agreements.

7.3. Relations with employees

7.3.1. Selection and recruitment

The selection of staff will be carried out in accordance with the principles of equal opportunity. The General Manager himself will carry out the selection, avoiding any discrimination on the grounds of sex, age, race or religion. No minors will be recruited. Foreign workers who are not legally resident in Spain and have the corresponding work permit will not be hired, without prejudice to compliance with the other requirements established by labor and foreigner's regulations.

7.3.2. Development of professional life

The establishment of the employment relationship shall be carried out by means of an employment contract, no illegal forms of work shall be established. In no case shall there be collaboration with the trafficking of human beings for labour or sexual exploitation. Sexual harassment and any other type of discrimination on the basis of age, sex, sexuality, race, state of health, nationality, political opinions or religious beliefs, etc. is not permitted.

7.3.3. Obligations of employees

It is expressly forbidden within the work environment any behaviour that may lead to discrimination of others.

With respect to the company's assets, professionals must comply with the following:

- The means provided by the company must be treated in such a way that they are not undermined.
- They shall protect and take care of the assets they have or have access to, which shall be used in a manner appropriate to the purpose of the professional functions for which they have been given.

7.3.4. Information systems

In relation to information systems, professionals must comply with the following:

- They must comply with the specific rules governing the use of electronic mail, Internet access or other similar means made available to them, and under no circumstances may there be inappropriate use of them.
- The creation, membership, participation or collaboration by the Subjects of the Code in social networks, forums or blogs on the Internet and the opinions or statements made therein shall be made in such a way as to make clear their personal nature. In any event, personnel should refrain from using the image, name or brands of ONDATA INTERNATIONAL, S.L. to open accounts or register on these forums and networks.
- It is forbidden to share or provide users and passwords for one's own systems or those of third parties with the aim of providing a third party with undue access. For this purpose and apart from the designated DPO, the company has an internal person responsible for assigning and deleting users within the system, providing the corresponding access keys and passwords.

7.4. Relations with suppliers

The company will establish purchasing procedures to ensure compliance with these principles. Likewise, in the contracting process the procedure will be established to ensure the adherence of suppliers to this code or, if appropriate, the presentation of the code itself for evaluation by the company.

7.5. Relations with customers

ONDATA INTERNATIONAL, S.L. undertakes not to arbitrarily discriminate against its customers. When contracting with clients, it will be guided by the principles of market price, transparency, non-discrimination, objectivity, impartiality, respect, integrity and competition. Likewise, the company has adopted measures to prevent criminal risks that avoid fraud, swindles, the use or falsification of means of payment and misleading advertising.

7.6. Environment

ONDATA INTERNATIONAL, S.L. promotes respect and care for the environment. The following conduct is expressly prohibited:

- Carrying out any activity that has an impact on the environment that contravenes applicable legislation in this area.
- Managing waste in a way that contravenes applicable legislation or internal regulations.

7.7. Intellectual and industrial property

7.7.1. Intellectual and industrial property All company personnel shall respect intellectual and industrial property in relation to courses, projects, programmes and computer systems; equipment, manuals and videos; knowledge, processes, technology, know-how (patents, utility models, industrial secrets) and, in general, other works and jobs (industrial or intellectual) developed or created in the company, whether as a result of their professional activity or that of third parties, with the utmost respect for the intellectual and industrial property of both the company itself and third party companies, collaborators and suppliers. Therefore, its use will be carried out in the exercise of the professional activity in the same, and all the material on which it is supported will be returned when required.

7.7.2. Rights of third parties

Professionals will also respect the intellectual and industrial property rights held by third parties outside the company. In particular, Professionals shall not incorporate, use or employ in the company any type of physical or electronic information or documentation belonging to another company that has been obtained as a result of the performance of a previous position or without due consent or express authorization.

For the purposes contemplated in points 7.7.1. and 7.7.2., the company has implemented measures and controls in order to prevent the commission of offences attributable to legal persons in the field of industrial and intellectual property.

7.8. Relations with Public Administrations and Administration of Justice.

The Board of Directors, managers and, in short, all the personnel of ONDATA INTERNATIONAL, S.L., undertake to ensure that the company complies with each and every one of its tax and Social Security obligations, having adopted the necessary measures to prevent any administrative or even criminal offence. To this end, its criminal risk prevention plan provides for controls and measures to prevent and avoid the commission of the following crimes that may be attributable to legal entities:

- A** FRAUDULENT INVOICING.
- B** RAISING OF ASSETS.
- C** PUNISHABLE INSOLVENCY.
- D** CRIMES AGAINST PUBLIC FINANCES.
- E** CRIMES AGAINST SOCIAL SECURITY.
- F** CAPITAL LAUNDERING AND TERRORISM FINANCING.

8. Channel for complaints

ONDATA INTERNATIONAL, S.L. provides access to the Whistleblower Channel. This channel of communication will be accessible to all company personnel, as well as to suppliers, customers and third parties who wish to report a breach of this code, especially when it may involve criminal liability, or when they wish to consult any doubts of interpretation, or propose improvements or modifications to it.

The channel for communication and complaints will be established through the e-mail address canal.etico@ondata.es. The information received through this channel will be treated as confidential. The recipient's obligation to preserve the identity of the communicator and the safeguarding of the information affecting all persons involved in the communication process and in the eventual investigation process is guaranteed in accordance with the regulations in force. Nevertheless, and in general, unless an exception is justified by the designated Compliance Officer, the complainant will be informed of the resolution finally adopted.

The hierarchical superiors who have been informed by their dependents of breaches or violations of this rule must notify the designated Compliance Officer immediately and prior to any other action.



9. Internal Disciplinary Regime

Non-compliance with the principles and values of the Code of Ethics may give rise to employment sanctions, in application of the provisions of the applicable collective agreement Convenio de Oficinas y Despachos, without prejudice to any administrative or criminal sanctions that may result. The disciplinary regime will be applied by the Board of Directors, at the proposal of the Compliance Officer, who will instruct the corresponding procedure, and in application of the sanctions foreseen in the applicable collective agreement Convenio de Oficinas y Despachos and the current labour regulations.

Likewise, the Board of Directors will decide to inform the corresponding authority if the event has criminal significance and will involve the bodies it considers relevant in order to execute the sanctions imposed.

Similarly, in the event that the supplier or collaborator of ONDATA INTERNATIONAL, S.L. is not complying with the aforementioned principles and values, this may lead to the application of contractual or other measures in accordance with the terms of the applicable regulations.

This Code of Ethics is not intended to establish a regime of infringements and penalties in addition to or different from that already established in labour legislation. The purpose of the Code is to include a series of principles and behaviours that must govern the activity of the company's personnel so that their observance contributes to mitigating the risk of committing crimes and infringements in the Company.

As stated above, failure to comply with the Code may result in labour sanctions, without prejudice to any administrative or criminal sanctions that may also be applicable.

The following conduct may be sanctioned in accordance with labour regulations:

1. Failure to report a breach of this Code when it is known.
2. Making false reports with the aim of harming a third party.
3. Carrying out any discriminatory, harassing or retaliatory behaviour against a person who has made a complaint.



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