

INDET GROUP

ETHICAL CODE

(hereinafter, the "Regulations")

I. INTRODUCTION

Since the beginning of the activity of the INDET GROUP group of companies (hereinafter, the "Company"), special emphasis has been placed on the pursuit of excellence, respect for the Company's employees and collaborators and the prevention of any type of illicit conduct or behavior contrary to the philosophy, principles and ethical code of the Company have been essential elements of its activity.

By virtue of these essential elements, and in order to guarantee their future protection, management has decided to approve this Regulation, which will be mandatory for employees in accordance with what is defined therein.

Specifically, the Regulation establishes a general regulation on all aspects related to employees and their activity based on the principles of non-discrimination, equal opportunities in decisions on hiring and promotion, protection of worker safety and prevention of any harassing or degrading situation for employees.

The Company's management will establish all necessary means to guarantee the correct application of this Regulation and ensure that it is duly known by employees and inspires their conduct.

II. GENERAL FEATURES

Article 1.- Legal regime

The INDET GROUP company, established under current legislation, will be governed by its statutes, as well as by these Regulations and by all those rules and collective agreements that are applicable to it.

Article 2.- Purpose of the Regulation

This Regulation is integrated as one of the basic rules for the operation of the Company and its relationship with its employees, regulating essential aspects such as the structure of the Company or the obligations and rights of its employees and their responsibility. In any case, this Regulation will respect the provisions of labor legislation and, where applicable, the applicable collective agreement.

Finally, this Regulation will apply to the employees mentioned in Article 4 below.

Article 3.- Territorial scope of application

This Regulation will apply throughout the territory in which the Company carries out its activity in accordance with its Statutes and the agreements adopted within its administrative body.

Article 4.- Subjective scope of application

These Regulations will apply to all Company personnel, regardless of their level or position, seniority or type of contract.

From now on, all personnel to whom this Regulation applies will be called "Employees".

Article 5.- Duration of application

The Regulation will come into force on the following date: January 1, 2020 and will have an indefinite duration from that date.

Article 6.- Modification of the Regulations

The Company's management may review, modify, exclude or add new conditions or obligations to these Regulations at any time, provided that these modifications respect the provisions of labor legislation and the applicable agreement where applicable, and are made in writing.

These changes must be duly communicated to the Employees in writing according to the Company's usual communication channels with them.

Article 7.- Interpretation of the Regulations

The interpretation of the Regulation will be carried out in accordance with the principles that inspire it and in accordance with its guidelines and the literal of its articles. The provisions herein will apply to the Employees who are bound in accordance with the provisions of article 4 unless different conditions are agreed in writing between the Company and the Employees who so wish.

Article 8.- Single Agreement

This Regulation replaces and replaces all other regulations or agreements, written or verbal, on the matters included in this Regulation.

In this way, the previous agreements on these points cease to be valid and effective from the date of entry into force included in Article 5.

Article 9.- Partial nullity

The possible declaration, whether by a judicial or administrative body, of the illegality, invalidity, nullity or unenforceability of any of the articles of this Regulation, or a part of them, will not entail the illegality, invalidity or unenforceability of the others. articles or the remaining parts thereof, which will remain valid in all that is applicable, all provided that the articles or part thereof declared illegal, void, invalid or unenforceable are not essential.

Article 10.- Applicable law and competent jurisdiction

This Regulation will be governed and interpreted in accordance with Spanish legislation and, in particular, according to the provisions of the Workers' Statute and all related labor regulations, as well as what is indicated in the possible applicable collective agreement.

The Parties submit for the resolution of any disputes or claims arising from the interpretation or execution of the Regulations, including all those obligations derived from or related to the Regulations, to the jurisdiction of the Courts and Tribunals competent in accordance with law.

III. BUSINESS ORGANIZATION

Article 11.- Hierarchical structure of the Company

In order to guarantee the correct management and organization of the Company and allow its correct functioning, the following organizational structure is established:

I. The direction of the company

The address will correspond to the sole administrator of the Company.

From now on, the person or body in charge of the management of the Company will be known as the "Management".

II. The departments or areas of the Company

The departments will be determined by team leaders from different areas and/or functions with their teams.

From now on, each of the managers or team leaders who direct each area will be referred to as "Manager" or "Managers".

IV. GENERAL PRINCIPLES

Article 12.- Equality in hiring

The Company is committed to guaranteeing equal access to employment for all Employees or all potential candidates, carrying out a human resources policy based on the principles of equality, non-discrimination and respect for the dignity of Employees.

This policy applies to both current Company Employees and future candidates or job applicants, and there is no room for any type of discrimination in their selection and hiring, whether for reasons of gender, race, religion, disability, marital status, age, ideology, pregnancy status, identity or place of residence, among others.

This principle will inspire the entire human resources policy, as well as the Company's activities in relation to the hiring of personnel, including the reception of resumes; carrying out the screening or selection of candidates; job interviews; the preparation and analysis of tests to evaluate attitudes and knowledge; the setting of salaries and benefits; and the establishment of the particular conditions to which the employment contract will be subject.

In this way, the selection process for new employees will be carried out following objective criteria of merit, experience, knowledge and capacity according to the characteristics and needs of each position offered. All candidates will have the same opportunities and the final hiring will be made according to the Employee's aptitude and adaptation to the position. Working conditions will in turn be established without any type of discrimination and there will be no discriminatory differences between Employees and future incorporations.

Finally, the Employees undertake to facilitate the incorporation and integration of new employees into the workforce, facilitating their training and adaptation as much as possible, and respecting in all cases the principle of equal access and non-discrimination mentioned above.

Article 13.- Prohibition of discrimination and prevention of harassment

The Company is committed to actively promoting and promoting the creation of an inclusive and respectful work environment, which faithfully complies with all current legislation on the prevention of discrimination and harassment, whether for reasons of gender, race, religion, disability, marital status, age, ideology, pregnancy, identity or place of residence, or for any other reason related to the above.

By virtue of the above, Employees must provide their services in an inclusive manner, with no room for discrimination or harassment of any kind, whether with their own colleagues, with their superiors or with their dependent personnel.

For the purposes of this Regulation, harassment is understood to be any conduct or act of any Employee or Management, whether verbal, visual or physical against one or more Employees based on reasons of gender, race, religion, disability, marital status, age, pregnancy status, identity or place of residence, or any other possible related reason. This conduct must directly affect the Employee, either by creating a degrading climate or work environment, by causing a psychological or physical disorder, by forcing him to resign, or by preventing him from opting for possible promotions or improvements in his position or conditions. labor.

By way of example, and not exhaustive, situations of harassment will be considered to be inappropriate comments or jokes, the use of degrading stereotypes, threatening and/or authoritarian behavior or any non-consensual physical contact. These behaviors will be punishable whether they take place in the workplace, during social events or business trips or through telematic means, such as email, mobile phone, etc.).

Any type of discrimination or harassing behavior will give rise to the corresponding disciplinary procedure, which may lead, in serious situations, to the disciplinary dismissal of the employee in accordance with the provisions of the Workers' Statute.

Finally, Employees have the right, and the duty, to report to Management any form of discrimination that they may observe in the development of their activity. This communication must be carried out in accordance with the provisions of the Section on internal communication of the Company of these Regulations.

Article 14.- Prohibition of child labor

The work of minors under 18 years of age is completely prohibited in all of the Company's work centers.

Article 15.- Internal promotion policies

Following the provisions of Article 12 on "Equality in hiring", the promotion and advancement of Employees will be carried out in accordance with the principles of non-discrimination, training and experience.

In this way, those Employees who demonstrate adequate training, who pass the corresponding tests and who have carried out their work diligently, complying in all cases with the provisions of this Regulation, and the legislation and regulations, will be assigned to higher positions. applicable collective agreements.

Article 16.- Occupational risk prevention policies

The Company is committed to guaranteeing the safety of Employees in accordance with the provisions of Law 31/1995 on Occupational Risk Prevention and other legislation related to this matter.

In this way, Employees will be provided with all the means of security and protection necessary for the development of their activity. Specifically, the Company undertakes to comply with all occupational risk prevention measures established in labor legislation and the collective agreement applicable where applicable, providing the necessary material and training means to Employees to guarantee the correct development of their work. .

Employees, as well as future additions to the workforce, will receive the corresponding instructions regarding occupational risk prevention, and will be required to know all the risk prevention and safety policies implemented by the Company.

In addition, periodic training courses or talks will be held in order to inform about new safety measures and workplace accident prevention policies will be established adapted to the activity carried out by the Employees.

Article 17.- Promotion of the professional development of Employees

The Company will seek, within its possibilities, to promote the promotion of its Employees, providing them with the knowledge and instruction necessary to carry out their activity effectively and grow within the Company. In any case, the internal promotion and hiring policy established in these Regulations will be followed.

Article 18.- Protection of private information of Employees

The Company recognizes the importance of protecting all confidential information in relation to its Employees in strict compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, relating to the protection of natural persons. regarding the processing of personal data and the free circulation of these data (RGPD), as well as Organic Law 3/2018, on the Protection of Personal Data and guarantee of digital rights and its implementing regulations (LODPGDD), and /or those that could replace or update them in the future.

In this way, the Company undertakes to manage the Employee information files in accordance with the aforementioned regulations, and must request authorization from them in order to carry out the correct processing of their data. The Employees' data may be incorporated into their own file, automated or not, for data collection in order to correctly execute the employment relationship and, eventually, allow the administrative and/or commercial management of the data that the Company may estimate necessary.

Finally, Employees may exercise all rights of access, rectification, deletion, limitation of processing, portability or opposition that they may have in accordance with the aforementioned legislation.

Article 19.- Reconciliation of professional and family life

One of the guiding principles of the Company's human resources policy will be the active promotion of measures to reconcile the professional and family life of Employees in everything possible according to their activity.

Within the Company, the establishment of schedules that take into account the family situation of the Employees will be promoted, trying to adapt, as much as possible, the working day to their family needs.

Finally, this Regulation includes specific measures aimed at reconciling the family and work life of Employees, inspired by this principle. Furthermore, in the future we will try to develop new measures according to the needs of the Employees.

Article 20.- Compliance with immigration regulations

The Company undertakes to comply at all times with the applicable legislation on the hiring of foreign workers, both those of community and non-EU origin.

In this way, the Company expressly prohibits the hiring of employees who do not have the appropriate work permit in force, or who do not demonstrate that it has been duly granted by the competent Administration.

In those situations in which it is desired to hire personnel who do not have a work permit, the corresponding procedure must be followed to carry out the correct processing of the employee's work permit before formalizing their hiring.

Finally, any Employee may communicate to Management any possible breaches of immigration legislation that may be detected in the Company's hiring policy.

Article 21.- Integration of people with disabilities or at risk of social exclusion

The Management will establish the appropriate measures to facilitate the inclusion within the Company and the development of its activity of those people who are in a situation of physical or mental disability, as well as those who are at risk of social exclusion.

V. RULES OF BEHAVIOR

Article 22.- Dress code

Employees must respect the following dress code:

Employees must go to their workplace always wearing the PPE elements that have been previously provided by the company, especially the production department.

Article 23.- Use of the Company's IT resources

Employees will use the Company's IT resources diligently and responsibly to carry out their activity. The computer media includes all those telematic methods that can allow correct communication between Employees, including personal computers, mobile phones or tablets, Wi-Fi connections or corporate email accounts, among others.

Specifically, the following aspects must be respected in relation to the telematic means provided by the Company:

- a. The installation of software or computer programs other than those provided on the Company's computer or tablet is prohibited, as is the use of software or computer programs without the corresponding license.
- b. Corporate email may not be used for uses that go beyond what is considered necessary for the strict development of the activities of your position. In addition, the email account must be used responsibly in accordance with the Company's guidelines, and cannot be used to defame or disqualify other colleagues or third parties, or to use offensive language.
- c. The Company will carry out the necessary control of the email accounts and computer media of the Employees. These control activities will be limited to verifying compliance with labor obligations by Employees and guaranteeing the integrity of the devices provided. In any case, the Employees will be notified in advance of the performance of these control activities.
- d. Employees may not encrypt e-mails sent from the Company's corporate account or install any encryption software or application for this purpose.

Likewise, the Company undertakes to respect the privacy of the Employees in the use of the telematic devices provided, following the provisions of the LOPDPGDD. In this way, control activities will be limited to verifying compliance with labor obligations by Employees, in accordance with what is stated previously in this Article.

Article 24.- Use of Company resources provided to Employees

Employees must take care with due diligence, just as they would with the assets they own, and in a manner appropriate to their work, all items or assets provided by the Company, such as laptops, mobile phones, tablets, company vehicle, among others.

Employees will be responsible for any damage that may be caused by conduct that goes beyond the daily use of the Company's elements or goods provided. Improper use or use outside of their daily use of these goods will give rise to the corresponding disciplinary sanction.

Article 25.- Protection of the industrial and intellectual property of the Company

Given the importance for the Company's activity of all its industrial property (patents, trademarks, etc.) and all its intellectual property (copyrights, computer programs, etc.), Employees must respect and protect this type of property. of the Company actively.

Specifically, the Company's industrial property will include, among others, patents, utility models, brands, trade names and industrial designs owned by it. On the other hand, intellectual property will include all types of artistic creations, writings, videos, computer programs, know-how or similar created or owned by the Company.

The use of this type of property by Employees will be strictly adhered to the needs of their position and the instructions of their superiors or Managers, and they will not be able to use any of this type of property for the development of activities other than those to which they correspond. .

Article 26.- Use of personal mobile phone

In order to avoid possible distractions or accidents resulting from lack of attention at work, prevent errors in their work and guarantee due collaboration between colleagues for the development of the activity, the use of the telephone or any other device is expressly prohibited. Employees' personal mobile device during their work day (not including their corresponding rest periods).

The mobile phone may be used in common areas during rest hours as long as it is done in a respectful manner with other colleagues and without disturbing the development of the activity.

The use of the personal telephone in an abusive, repetitive or reckless manner may give rise to a serious disciplinary sanction.

Article 27.- Respect in intra-business relationships

Employees undertake to carry out their activity and work diligently and respectfully with all their colleagues, with their Managers or superiors and/or their dependent personnel and with Management.

In this way, the Company will try to promote a good work environment, which encourages the development of the activity based on the principles of respect, cooperation, help, trying to avoid possible disputes that may arise within the activity and favoring their resolution. peacefully in the event that they arise.

Any discrepancy or dispute between Employees must be communicated through the internal channel established for this purpose, and the Company must give a quick and motivated response in order to resolve it and prevent it from being repeated in the future.

Article 28.- Compliance with applicable legislation and internal regulations

Employees must observe all the rules of conduct included in these Regulations, as well as the instructions of Management and the applicable legislation.

Specifically, Employees are obliged to respect and comply with the provisions of this Regulation, as well as all applicable current legislation. No breach of the aforementioned rules will be permitted, either personally or through the help or collaboration of third parties.

Likewise, Employees must inform Management or their corresponding Manager of these possible breaches within the Company as soon as they become aware of them.

The Company undertakes to provide Employees with all information on the obligations contained in these Regulations, as well as on all applicable legislation in order to ensure that they can effectively comply with all their obligations.

In the event that at a specific point the Employees are unaware of the applicable regulations, or have any doubts about their interpretation or application, they must contact their superiors, Managers or Management to report this circumstance. In these cases, the Company undertakes to provide all the corresponding information and resolve any existing doubts.

Article 29.- Carrying out other work activities

In the search for the development of their activity in the most effective way and the prevention of possible abuses in the use of the information acquired in the development of their work, Employees may carry out activities outside their working day as long as they do not cause harm. notable to the work they must carry out for the Company, and respect any exclusivity or non-competition clauses that may be included in their respective employment contracts.

Employees may, unless otherwise specifically agreed in their respective employment contract, provide advice or services in favor of natural or legal persons who are dedicated to a similar object or that may be considered the responsibility of the Company, whether in employment contract regime, even if it is a special employment relationship, or in a system of leasing services or internal advice, directly or indirectly through legal entities provided that the information obtained is not used in the development of its activity to compete unfairly with the Company.

Employees may not carry out any other economic activity, in addition to the provision of their services to the Company, whether on their own or on behalf of others, directly or indirectly through intermediary legal entities, if this activity may give rise to a possible situation of unfair competition with the Company.

Article 30.- Treatment of confidential information

Employees assume that all documentation, projects, files or information of any nature exchanged, provided, or created within the Company or entities and organizations with which it collaborates, that they may acquire or have access to during the course of your employment relationship is confidential information that is the exclusive property of the Company.

Therefore, employees undertake, both during and after the end of the employment relationship, indefinitely:

- a)** to safeguard, not reveal and not communicate to any person or entity, all or part of this information, acting with the greatest possible diligence;
- b)** not to exploit, on their own behalf or on behalf of a third party, directly or indirectly, all or part of this information; and,
- c)** not to make or keep copies of the information, in any format or medium, for purposes other than those required to carry out their work.

Upon termination of the employment relationship, Employees will deliver to Management and/or their Manager(s) all documents and materials that contain confidential information.

Finally, the Company's reputation and continued success require that the secrecy of confidential information be maintained and safeguarded at all times. Therefore, Employees will be responsible for all damages and losses that may arise for the Company as a result of intentional or negligent breach of their obligation of confidentiality.

Article 31.- Compliance with data protection regulations

All Employees are obliged to strictly comply with the provisions of European Regulation 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data (RGPD), as well as Organic Law 3/2018, on the Protection of Personal Data and guarantee of digital rights (LOPDPGDD) and its implementing regulations, and/or those that could replace or update them in the future.

In this way, Employees undertake not to communicate personal data known in the course of their activity to third parties. If it were necessary to make some type of communication of personal data, they always undertake, and in advance, to request the express, informed, and unequivocal consent of the person who is the owner of said personal data. indicating the specific purpose for which the communication of your data will be carried out.

Article 32.- Care of materials, vehicles and tools

Employees will treat the materials and tools provided by the Company diligently and appropriate to the characteristics of their work.

In the event that certain means, vehicles or tools require special qualifications for their use (e.g. mechanical bulls, lifting cranes, driving licenses, etc.), they will only be handled by Employees who have the corresponding qualification. In the event that no Employee has the corresponding qualifying title, the Company will try to facilitate the training to obtain the necessary permits.

Any inappropriate use, that does not follow the instructions provided or that is carried out without having the corresponding qualifying title will give rise to a sanction in accordance with the provisions of the Workers' Statute.

VI. PREVENTION OF CORRUPTION AND FRAUD

Article 34.- Situations of conflict of interest

Employees are obliged to express any potential situation of conflict of interest during the development of their activity. A conflict of interest will be understood as those situations in which the Employee competes in the same sector as that of the Company or those cases in which he or she may use confidential information or knowledge acquired in the development of his or her activity to compete with the Company, among others. others.

In this way, Employees will not be able to carry out any activity or transaction that could potentially undermine the interests of the Company, unless expressly authorized by Management.

In the event that any Employee detects a potential conflict situation, it must be communicated to his immediate superior, Manager(s) or Management as soon as he becomes aware of it.

Article 35.- Hiring of family members

The Company will try to guarantee respect for the hiring principles based on equality in access, experience and training established in these Regulations. In order to guarantee these principles and prevent possible situations of abuse of power or conflict of interest, the hiring of people with close affinity to the Employees and/or Manager(s) is prohibited, which includes family members, friends or people with those who may have romantic relationships, if they do not have the express consent of the Management.

In accordance with these Regulations, fathers, mothers, children, brothers, nephews, cousins, grandparents, grandchildren, great-grandchildren, brothers-in-law, sons-in-law, mother-in-law and any other similar relative will be considered family members of an employee.

On the other hand, people with affinity will be considered all those with whom there is a friendship, couples, boyfriends, or any other relationship that has been maintained for a period of time.

Employees undertake to notify their hierarchical superior of any new incorporation of a family member or a person with affinity, whether as a work force or freelancer, or as a supplier or collaborator of the Company.

In this situation, the Company may take the measures it deems necessary, including requesting the termination of the contract signed with the employee's family member or person with an affinity or even rejecting his or her candidacy.

Article 36.- Acceptance of gifts

In order to guarantee the correct functioning of the Company, and compliance with all criminal legislation on economic crimes, Employees may not accept any type of gift, advantage or gift from third parties who may have interests in the Company such as be, among others, suppliers, clients or collaborators of the Company (hereinafter, "Related Persons") who try, directly or indirectly, to influence them in the development of their work or in their decision-making process related to the Company.

Gifts or advantages will include all types of concessions, donations, hidden commissions, aid and trips, among others.

Article 37.- Making gifts by Employees

Employees may not make any type of gift or gratuity in favor of related Persons that has the purpose of purchasing their will or receiving an advantage from them and that goes beyond what is considered appropriate or common in the sector. .

On the other hand, gifts or advantages directed to public personnel or officials will be totally prohibited, regardless of whether or not their direct objective is to obtain greater advantages or facilities from the administration.

In the event that any Employee becomes aware of these practices, they will have the right, and the duty, to immediately inform Management in order to help eradicate this type of conduct.

Article 38.- Treatment of clients

Following the image and principles of the Company, Employees are obliged to treat all clients with total education, respect and seriousness. Employees will provide clients with all the information requested, except information protected because it is confidential and information regulated by data protection legislation.

In any case, all information sent to clients about products and services must be true and accurate, and the provision of false information to clients in communications and promotional activities carried out by Employees is expressly prohibited.

On the other hand, following the legislation on data protection and the provisions of this Regulation, Employees will treat clients' personal data confidentially.

Finally, Employees must follow the provisions of this Section regarding the prevention of corruption and fraud in all related activities they carry out with clients.

Article 39.- Relations with suppliers

Employees will maintain an appropriate, respectful and lawful relationship with all of the Company's suppliers.

The hiring and management of suppliers by the Employees will be carried out in a transparent manner, according to the interests and needs of the Company, avoiding any possible situation of conflict of interest or personal benefit in relation to their hiring or management. .

Knowledge by any Employee of an advantage received by his colleagues or superiors from current or potential suppliers must be reported as soon as possible to the Manager and/or Management.

Article 40.- Market practices

The Company is committed to competing in the market fairly, complying with all regulations on unfair competition and free competition currently in force at both the national and European level. In this way, any type of misleading conduct that could undermine free competition or the issuance by Employees of any malicious or false information about the Company's competitors will not be admitted.

At this point, this type of fraudulent behavior is also prohibited in relation to any other market operator other than competitors or with possible public regulators.

Article 41.- Compliance with accounting and tax regulations

Employees will carefully respect all accounting, tax and Social Security regulations applicable in each of the operations and transactions they carry out. Thus, clients must be invoiced in accordance with the provisions of current legislation and all expenses must be justified by the corresponding invoice or contract. These supporting documents must be sent to the personnel in charge of keeping and managing the Company's accounts as soon as they are available.

On the other hand, Employees are expressly prohibited from carrying out any activity or transaction that has the objective of violating the applicable tax or Social Security regulations or evading the payment of any fee, levy or tax, whether of a state nature, regional or municipal, to which the Company is obliged to pay.

In relation to the above, the Company undertakes to respect at all times the applicable tax and Social Security legislation, maintaining the accounting books clearly and in accordance with the applicable accounting and tax principles and obligations. The persons responsible for the preparation of these documents must guarantee the reliable collection of data and the correct preparation of all financial statements.

Article 42.- Compliance with environmental regulations

The Employees undertake to comply with all environmental regulations, pollution prevention and environmental protection applicable to the Company's activity, as well as all instructions or conduct guides of the Company in relation to the handling of materials, recycling and pollution prevention.

Article 43.- Compliance with the Regulations and instructions of the Company

Employees are obliged to comply with all the provisions of these Regulations, as well as all instructions they receive from Management or their Manager(s).

In this way, the work procedure must be adjusted to what is established by the superiors in charge or Managers, as well as the guidelines, work guides or manuals prepared by the Company. In the event that any doubt arises about said guidelines or instructions, the Employee must contact his/her Manager(s) or, if this is not possible, with Management, in order to resolve all possible doubts.

The Company undertakes to provide the courses and training necessary to guarantee the correct development of the work of the Employees and their adaptation to new work procedures or new technical tools acquired by the Company. The Employee will in turn be obliged to attend all these courses or training sessions, as well as to pay all attention and interest to guarantee correct knowledge of it.

Finally, Employees must allow and facilitate all audit tasks that Management can carry out in order to analyze the current situation of the Company, establish the rate of compliance with the Regulation and evaluate the possibility of implementing new improvements that can be implemented. consider necessary.

Article 44.- Responsibility of Managers

All Employees who have other employees or workers under their direction, including all Managers, must faithfully respect the provisions of this Regulation and be an example of its application for their dependent employees.

In general, Managers will act in a respectful and inclusive manner, with full respect for the principles of non-discrimination and equality, and the other principles included in these Regulations, always ensuring the well-being of the Employees and the interest of the Company.

Furthermore, they will provide all their support to the Employees in everything they need for the correct provision of their services, resolving their doubts diligently and motivating them appropriately.

Regarding the performance of the activity, the Managers will provide their Employees with all the necessary information so that they can carry out their work effectively and with complete safety, as well as clearly know all their obligations.

On the other hand, they will control that their dependent employees respect at all times the provisions of this Regulation, as well as the other corresponding instructions or guides for action or behavior. In the event that any serious or repeated breach of the Regulation is detected, this situation must be reported immediately to the body or person in charge of supervising it or to the Management.

VII. EMPLOYEE SAFETY AND HEALTH

Article 45.- Consumption of narcotic and psychotropic substances

The consumption of any narcotic or psychotropic substance during working hours or going to work under the influence of the consumption of this type of substance is prohibited.

For the purposes of this Regulation, alcohol, cannabis, methamphetamines, cocaine, opiates, and any other similar substance that alters the physical and mental conditions of the Employee will be considered narcotic or psychotropic substances.

The Company may carry out the appropriate analyzes periodically to detect the consumption of this type of substance.

The consumption of this type of substance may be considered a serious offense, following in any case the provisions of the applicable collective agreement, which may lead to disciplinary dismissal of the employee in the event that the habitual consumption of this type of substance affects the development of their activity.

Article 46.- Security measures

Given the importance of security and protection measures for the physical and mental integrity of the Employees, and in compliance with the provisions of Law 31/1995 on the Prevention of Occupational Risks and the remaining legislation applicable in this matter, the Employees are obliged to use all means of protection and act in accordance with the safety instructions provided by the Company throughout their working day.

Failure to comply with these measures will lead to the initiation of a disciplinary procedure in accordance with the provisions of the corresponding section of this Regulation.

Article 47.- Control of medical leaves

Employees who are on medical leave due to illness must request the corresponding sick leave report from their corresponding doctor. This withdrawal report will be sent to the Company's management in the shortest period of time possible.

The sick leave report must include the Employee's medical situation as well as the possible estimated duration of the Employee's recovery.

On the other hand, in cases of work accidents, Employees must go to their corresponding mutual insurance company so that their clinical situation can be correctly evaluated.

Article 48.- Emergency plans

In order to guarantee the greatest safety to Employees in the event of potential emergency situations, the Company undertakes to establish action and evacuation plans depending on the situation, in cooperation with the emergency services of the area where the centers are located. job.

These plans, and their subsequent modifications, will be duly communicated and instructed through the preparation of courses or training sessions for the Employees, who will in turn have the obligation to know them and to act in accordance with them in emergency situations.

Likewise, the Company may establish, when it deems appropriate, possible drills to guarantee the correct implementation of the emergency plan in the Company.

VIII. ACTIVITY CONTROL

Article 49.- Video surveillance

Following the current regulation established in the LOPDPGDD, the Company will expressly, clearly and concisely inform the Employees, and their legal representatives, about the existence of surveillance video cameras in the work centers or in the Company's vehicles.

In any case, this prior duty of information will not be necessary when an Employee is recorded committing an illegal act and the recording device is in a sufficiently visible place with a sign informing about the Employee's right to exercise their access rights. rectification, deletion and limitation of filmed information.

The video surveillance devices will only be used for security measures and to verify the correct performance of the work and they will be located in the places where the service is provided, avoiding locations that could violate the privacy of the Employees, such as, as For example, locker rooms, break rooms, kitchens, among others.

Finally, devices for sound recording may be installed whenever, given the circumstances of the activity, or the facilities where the activity is provided, it is necessary to establish these devices in order to control the activity of the Employees. In any case, as has been mentioned in reference to video cameras, the installation of this type of device must be duly notified to the Employees, as well as their corresponding representatives.

Article 50.- Geolocation systems

The Company may use, if it deems appropriate, geolocation systems in its vehicles or mobile devices for the sole purpose of ensuring and verifying the correct performance of work activity by the Employees.

In any case, the Company will duly inform the Employees in advance, expressly, clearly and concisely, about the installation of these geolocation devices and their operation.

Article 51.- Control of compliance with security measures

The Company may establish the necessary measures to verify and guarantee correct compliance with the security measures established by the Company. These surveillance and control tasks will be carried out in order to guarantee the integrity and safety of the Employees.

In the case of establishing video surveillance or geolocation systems, the provisions established on these points in this Section must be followed.

Article 52.- Report of non-compliance with security measures

In the event that any Employee detects a failure or non-compliance with the necessary security measures established in this Regulation, as well as in the legislation on the protection of occupational risks or the provisions of the collective agreement applicable in their case, they will have the right and the duty to communicate this situation to your Manager(s) or Management diligently following the provisions of the corresponding Section on internal communication.

IX. REMUNERATION POLICY

Article 53.- Remuneration

The determination of the amount corresponding to the remuneration of the Employees will be carried out in a fair and equitable manner, taking into account the position and level of each Employee, their responsibilities and training, their functions and the characteristics of the position, avoiding any type of discrimination, whether based on gender, race, religion, disability, marital status, age, ideology, pregnancy status, identity or place of residence, or based on any other similar factor or trait.

In any case, the Company undertakes to comply with the provisions on the remuneration of Employees in labor legislation, and above all, in the applicable collective agreement.

Article 54.- Payment of salaries

Payment of salaries to Employees will be carried out as follows:

Unless the company cannot for technical reasons, the payroll will be paid at the latest on the last day of the month, trying to advance it as much as possible.

In the event that the payment day falls on a weekend or a national, regional or local holiday, payment will be made on the immediately following business day.

Article 55.- Salary increases

Employees may receive, periodically or not, increases in their base salaries, supplements or incentives by free decision of the Company. In any case, carrying out a specific salary increase will not imply that it must be repeated periodically.

Finally, the Company will respect the salary increases agreed upon in the collective agreement applicable to it.

Article 56.- Per diems and travel expenses

The Company will establish compensation for the displacement of Employees outside their usual workplace in accordance with the provisions of the legislation and the applicable collective agreement. These expenses will include the costs of maintenance, stay and transportation necessary to carry out the activity.

Article 57.- Bonuses or economic incentives

Regardless of the supplements and extraordinary payments that correspond to the Employees according to their employment contract, as well as their current labor legislation and the applicable collective agreement, the Company may, at its sole discretion, establish the payment of bonuses or incentives to the Employees, without being, in any case, obliged to establish a specific bonus or to establish specific bonuses on a periodic basis.

Article 58.- Other salary supplements

Employees will receive salary supplements in accordance with the provisions of current legislation, and, where applicable, according to the provisions of the collective agreement applicable to the company.

Article 59.- Payroll request

Employees will be able to access their corresponding payrolls in the following way:

They will receive by email and in a protected format to the address that they have provided at the time of contracting.

X. WORKDAY

Article 60.- The work day

Employees must provide their services within the hours agreed upon in their employment contract and respecting in all cases the rest times established in the legislation, and, where applicable, the applicable collective agreement.

Article 61.- Work calendar

The Company will establish the work calendar of the Employees in accordance with its power to direct the activity included in article 20 of the Workers' Statute, and in compliance with the legislation, and, where applicable, the applicable collective agreement.

Article 62.- Meal and rest times

In order to guarantee the cleanliness of the workplace and avoid possible distractions or accidents, the intake of food is prohibited during working hours, unless it is necessary for the Employee for health reasons.

Meals will be taken during the corresponding rest hours that will be established in the employment contract of each Employee.

Article 63.- Advantages in relation to lunch and/or dinner

The Company will provide an adequate meal and rest area for employees.

Article 64.- Punctuality of Employees

Employees must carry out their work according to the schedules established in their employment contract. Repeated non-compliance with their schedules will give rise to the corresponding sanctions in accordance with the provisions of the Workers' Statute.

Article 65.- Overtime and/or complementary hours

Unless otherwise agreed in the employment contract, Employees may work overtime or complementary hours according to the needs of the Company, respecting in all cases the requirements and limits established in current legislation, and the applicable collective agreement.

Employees will be paid for all overtime or complementary hours they perform in accordance with the provisions of current legislation, and in the applicable collective agreement where applicable.

Article 66.- Record of the work day

The Company undertakes to comply with the current regulation on the control of the working day, making the corresponding time control sheet available to Employees.

Employees must complete these time control sheets, truthfully indicating the start and end times of their work day, as well as the corresponding breaks.

Article 67.- Geographic and functional mobility of Employees

Employees must have the necessary flexibility to carry out their work outside the workplace in situations where it may be necessary for the Company.

On the other hand, some of the functions or tasks of the Employees may be modified or altered in cases where it is necessary due to operational, procedural or organizational aspects of the Company. In any case, it will be your hierarchical superior or Manager who justifies this specific change of functions, respecting labor legislation, and, where appropriate, the provisions of the applicable collective agreement.

Article 68.- Vacation enjoyment period

Vacations must be enjoyed in compliance with current labor legislation and the applicable collective agreement, as well as in accordance with the following instructions:

Employees must adjust their vacations taking into account the existing workload at any given time.

Article 69.- Vacation request

The request for the vacation period by Employees must be made in the following way:

Employees must request their vacations from the department director who must approve them.

Failure to comply with the above instructions may mean that the enjoyment of the vacation is not fully adapted to the dates interested by the Employee.

Article 70.- Remote work and teleworking

In order to facilitate the reconciliation of the work and family life of the Employees, the Company will promote, whenever technologically and economically possible, and the Employees voluntarily wish to do so, the performance of their work through telematic means.

On the other hand, following the provisions of article 38.8 of the Workers' Statute, Employees may request, as part of their right to reconcile family and work life, the provision of all or part of their services electronically. . In these cases, the Company will respond to the request and will try to facilitate as much as possible the provision of these services electronically within its possibilities and as far as its activity allows.

Employees subject to this type of work will provide their services with the same rights and obligations as other Employees. In addition, they will be provided with the necessary training so that they can provide their services through telematic means provided in an appropriate manner.

The Company may maintain control over the activity carried out by the Employees as long as the requirements mentioned in the previous articles are observed and the privacy of the Employees is respected.

Finally, the Company is committed to promoting the right of Employees to digital disconnection in order to guarantee the reconciliation of their work and family life. In this way, Employees must only be connected and active during their work day to the telematic means provided. Employees cannot be forced to remain connected outside of said hours or once the objectives set by the Company have been achieved.

Article 71.- Maternity leave and breastfeeding leave

One of the inspiring principles of the Company's relationship with its Employees is to facilitate and encourage the compatibility of the professional life and family life of the Employees. In this way, the Company undertakes to comply with the provisions of the Workers' Statute and other applicable regulations or collective agreements in order to facilitate the corresponding sick leave periods necessary for the Employees and the enjoyment of the breastfeeding permits that are thus provided. request.

Article 72.- Requests for leave of absence

The Company will attend to all requests for leave (whether voluntary leaves, to care for family members, etc.) that are sent to it by the Employees, resolving in accordance with the provisions of the

applicable legislation, as well as the provisions of the collective agreement if applicable.

In the event that the Management denies a leave of absence at a given time, provided that the applicable legislation or collective agreement allows it, said denial will be duly justified based on objective reasons on the part of the Company.

Article 73.- Adaptation of the working day

The Company undertakes to negotiate with Employees who request possible changes or adaptations to their working hours based on their personal needs. Requesting this change would involve reducing your work hours within the Company's capabilities.

The Company will respond in writing to the Employee's request where the possible acceptance or rejection of the Employee's request will be justified, and where appropriate an alternative change to the one requested by the Employee may be proposed based on a series of objective reasons for the activity or of organization of the Company.

XII. INTERNAL AND EXTERNAL COMMUNICATION

Article 74.- Communication of situations of discrimination and harassment

As mentioned above, Employees have the right and, in turn, the duty to report any type of discrimination or harassment situation against themselves, against any colleague or against any superior or dependent personnel, that they may know or witness. No Employee will be exempt from this obligation.

In any case, the existence of this channel does not prevent the communication of these situations from being carried out through any other type of means previously established or customary for the representatives of the Employees.

Given the importance for the Company of preventing all these possible situations of harassment and discrimination, they will be communicated immediately. The Management undertakes to initiate the corresponding internal investigation in order to establish the facts and apply the corresponding sanction where appropriate.

In any case, if the Employee or Employees who report a situation of discrimination or harassment consider that the Company has not acted in a completely diligent manner, they may take the legal actions they deem appropriate in order to eliminate this situation and prevent it from recurring. to reproduce in the future.

Article 75.- Communication of other breaches of the Regulation

Likewise, Employees have the right, and in turn, the duty to report any possible breach of the provisions of this Regulation that they are aware of.

In any case, the existence of this channel does not prevent the communication of these situations from being carried out through any other type of means previously established or customary for the representatives of the Employees.

The communication will be made as soon as there is evidence of the situation of non-compliance and it will not prevent the Employee from adopting the judicial measures or communication to the representatives of the Employees that he deems necessary.

Article 76.- Communication of any other circumstance

In the event that Employees wish to communicate any aspect related to their work or any personal circumstance (such as the impossibility of going to work due to illness, the request for a personal day, etc.) that may affect their activity, they may Address directly to your immediate superior or Manager(s) in writing.

Article 77.- Participation in conferences and congresses

In respect of the right to personal and family privacy, Employees may participate in those conferences and congresses to which they are invited as speakers without the need to obtain prior authorization from the Company.

In any case, the reporting Employee must respect his obligations in reference to the disclosure of confidential information of the Company and data protection included in this Regulation as well as in his corresponding employment contract.

Article 78.- Contact with the media

Likewise, Employees may maintain dialogue or contact with journalists or external communicators without the need to obtain prior authorization from Management.

In the event that information related to the Company is shared with these professionals, the Employees must respect their obligations of confidentiality and data protection, and in all cases follow the corresponding communication guidelines established where appropriate by the competent personnel for this within of the Company or Management, as well as what is indicated in this Regulation.

Article 79.- Corporate image and reputation

The corporate image and reputation is one of the Company's greatest assets, the result of its years of activity and the correct provision of its service. Therefore, it is of vital importance for the Company to protect this image and prevent any conduct by Employees that could damage or harm said reputation.

In this way, Employees must act in the most appropriate manner in the development of their activity and, above all, in their relationship with clients, suppliers and any other collaborator of the Company.

Article 80.- Communication policy

The Company wishes to guarantee the establishment of an effective external communication policy that guarantees and protects the integrity of its image and reputation. .

External communication will be understood as any information directed to the media, clients or social networks of the Company, including all promotion and advertising campaigns.

All contact received by any Employee from any journalist or media outlet to discuss matters directly related to the Company and its activity must be sent to this body immediately.

Article 81.- Use of social networks

The Company is part of various platforms in order to maintain effective communication with its clients, and to effectively communicate and promote the activity carried out. For information purposes, the Company has the following social profiles:

Linkedin, Instagram and Twitter

In any case, along with these profiles, new corporate profiles may be created in the future (hereinafter, the "Platforms").

In this way, the Employees undertake to respect the prestige and image of the Company on these Platforms, committing to make appropriate use of the Company's social networks, and not to defame, insult or disclose confidential information through social media profiles. the Employees on said platforms.

Regarding the Company's corporate profiles, the Employees undertake to interact with other users and clients in a cordial, polite and professional manner, without at any time resorting to insult or disqualification, and providing adequate information to the customer needs. In all cases, the guidelines of the people in charge of managing these profiles will be followed.

On the other hand, the confidentiality of the data that clients may share with Employees through these Platforms will be respected at all times, in accordance with the provisions of this Regulation, in their employment contract, in any signed confidentiality agreements. , and in current data protection legislation.

In addition, the use of the Platforms for the publication of any type of dishonest or offensive video with Employees or third parties is prohibited, giving rise to the corresponding sanctions where appropriate.

Finally, Employees may have personal profiles on social networks without the need to obtain prior authorization from the Company. In any case, Employees must comply with all standards for the protection of confidentiality and data protection standards for all information that is revealed in relation to the Company.

XIII. COMPLIANCE WITH THE REGULATIONS AND DISCIPLINARY REGIME

Article 82.- Supervisory body

In order to guarantee that the measures included in this Regulation will be duly followed and applied by all Employees as well as by Management, it is agreed that their control will be carried out by: Manager (Hereinafter, the "Supervisor") .

The functions of the Supervisor will be limited to the control and management of the correct functioning of the Regulation, as well as the receipt of suggestions from Employees regarding possible incidents or aspects that should be regulated therein, the preparation of periodic reports on the application of the Regulation. Regulation or the preparation of proposals or recommendations for modification or expansion of the content of the Regulation. In any case, the decision on its modification or inclusion of new aspects in the Regulation will correspond solely to the Management.

Finally, this body may act at the request of any Employee who suffers or detects any breach of any of the rights or rules set forth in this Regulation, as well as on its own initiative if it deems it necessary.

Article 83.- Sanctions for non-compliance with the Regulations

Failure to comply with the obligations set out in this Regulation will give rise to the establishment of a sanction that will depend on the seriousness of the non-compliance and its possible consequences.

The seriousness of the non-compliance will be evaluated by the Supervisor and/or Management, truthfully describing the facts, the evidence that justifies the facts, the precepts of the Regulations that were not fulfilled and the possible consequences thereof.

In any case, this possible sanction will comply with the provisions of this Regulation, and above all, with the provisions of the Workers' Statute, and, where appropriate, with the provisions of the applicable collective agreement.

Article 84.- Content of complaints of non-compliance

Any complaint sent to the Supervisor for study must contain the following information:

- name of the person or persons filing the complaint;
- description of the facts or possible situation that gives rise to a breach of the Regulation;
- and, data of the possible non-compliant person.

The presentation of any complaint without the aforementioned information will not be valid and will be sent again to the complainant so that within a maximum period of 15 calendar days they can resubmit the complaint, complying with all the previous requirements.

Article 85.- Sanctioning procedure

The sanctions for non-compliance with any of the aspects provided in this Regulation will be established by the Supervisor or Management following their operating rules set out in the previous Section.

The Supervisor or Management will conduct the corresponding investigation of the reported events, so that the necessary testimonies and evidence can be collected. After collecting data, the Supervisor will hear the parties and finally, with all the information collected and the testimonies, the Supervisor will make the decision in accordance with what is established in the previous Section.

In any case, this procedure will guarantee the participation of the potential defaulter and the possible decision adopted must be duly founded and proven, following in all cases the provisions of the legislation and the collective agreement applicable in your case.