



CODE OF ETHICS AND BUSINESS CONDUCT AT ARQUIMEA





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1. What is Arquimea's Code of Ethics and Business Conduct?

- The Code of Ethics and Business Conduct is an express statement of the Values that guide the Vision and activities of ARQUIMEA, as well as of the principles and standards of conduct that must guide the behaviour of all of its employees, executives and directors.
- Consequently, it is mandatory for everyone associated with ARQUIMEA, regardless of the type of contract governing their employment relationship, the position they hold or the geographic area in which they carry out their work.
- ARQUIMEA is also committed to driving the adoption of principles and values similar to those in this Code at companies in which it participates or with which it maintains collaboration arrangements, even when it has no controlling interest, as well as with its suppliers, contractors, collaborators and other partners.
- Anyone representing the company will be personally informed of the Code when required by the nature of their relationship and they must provide a written commitment to comply. The obligation underlying that commitment will also be expressly stated in employment contracts and employees will be provided a copy when joining the Company.

2. Arquimea's DNA

A company's DNA is the common style or manner of thinking, feeling and acting by its people and constitutes its unique identity.

ARQUIMEA's DNA is based on three large identity characteristics:

THINK BIG

We put no limits on our imagination.

We imagine a future without restrictions, thinking on global terms and eliminating conformism in our style of thinking and acting. Great ideas cannot arise if we are not accustomed to taking on tremendous questions and even greater solutions. A creative and complete business requires that we maintain our sight on deserving objectives, on deep challenges that we do not avoid due to their difficulty but rather drive us to respond.

DO THE JOB

We are committed to what we do because we believe in it.

It is not sufficient to have challenging objectives. To achieve them we must dive deep and make great efforts to cause that achievement while complying with the essence of our work: researching, developing and administrating. We must therefore eliminate everything from our day-to-day work that does not contribute to attaining our vision as a company. This is the only way that our work can be performed with the quality, precision, effectiveness and care it deserves, which is an exact reflection of our attitude to commitment with everything that we do.

ENJOY LIFE

Our passion for technology is born of our passion for life and for people.

All of the above would be impossible if it did not arise from great passion for people and society. Wanting to create a better world is useless if we do not better the present, enjoying our lives every day, and our work as part of that life. Only thus will we be able to offer society the result of our ideas and our work. The results of our efforts — the new technologies we develop — must assist society in order to bring a happier life to everyone and to give back to society what we have received.

3. Arquimea's values

The identity characteristics that make up ARQUIMEA's DNA are far from being abstract or utopian concepts and they define a set of values, principles and convictions that serve as the foundation for this Code of Ethics and Business Conduct.

Integrity

ARQUIMEA is committed to carrying on its business activity with honesty, dignity, solidarity, coherence and respect while guaranteeing complete compliance with the law, policies, regulations and guidelines that are in force, as well as the company's internal policies.

Technological ecosystem

Our unflappable vocation is to be a technological ecosystem in which ARQUIMEA's companies can create a system of relationships, functions and shared services to transform their ideas into disruptive solutions that drive the progress of human beings. It is this vocation that makes us able to offer specialized services and products in multiple industrial sectors.

Well-being and growth of our society

ARQUIMEA has resolute faith in technology, not only as the driver of human development but also as the essential engine for the well-being and growth of our society. This guides our choice of projects and companies that provide true value for the progress of human beings.

Internal communication

An essential value at ARQUIMEA is internal communication and transparency among its professionals, not just as a lever for alignment and coordination with the company's strategy. For ARQUIMEA, internal communication is, above all, an attitude that allows a cohesive environment of mutual confidence, proactive behaviour and collaboration among all of its professionals to be created in such a diversified business scenario, and it promotes identification with the company's ethical, human and professional values.

Research, development and innovation

The core of ARQUIMEA's vision and values lies in its commitment to support scientific research and development that can translate into better quality of life for people. This results in a constant search for projects and ideas that use technology to advance towards the future.

Resilience, flexibility and agility

Finally, with an orientation towards business effectiveness and efficiency, ARQUIMEA takes the values of resilience, flexibility and agility as its own. This is the case first because we are aware that when a project is not successful we must close it in an ordered manner and concentrate our capacities on those with a better outlook. Secondly, this is the case because we know that time is a fundamental variable for any company in the technology sector. This means that although we cannot always be the first to take advantage of an opportunity, we can never allow ourselves to bear the cost of arriving late.

4. Professional conduct and ethics standards

The observation of general ethical values and principles are the foundation of ARQUIMEA's corporate culture and of its style of conduct for the people, entities and institutions with which we maintain relationships. Its practical application translates into compliance with the following Professional Conduct and Ethics Guidelines.

Respect for the law and ethical values

- Professionals at ARQUIMEA must always act within the limits defined by the attributions and competencies associated with their duties, without exceeding the limits of their scope of actions or decisions.
- Consequently, respect for ethical values, the law and company rules must be a constant component of the daily behaviour of all ARQUIMEA employees, particularly its executives and

directors. Behaving in accordance with the values established by ARQUIMEA will constitute a basis for the selection and evaluation of all of its employees.

- Respect for personal dignity and fundamental rights is a basic element of the conduct of all professionals at ARQUIMEA, and this commitment must be supported by complete respect for, and a guarantee of, human rights and public liberties during the performance of their professional activities.

Prevention of irregular conduct

- ARQUIMEA does not tolerate corruption, bribery, subornation and any form of extortion, as defined in its Anti-Bribery and Anti-Corruption Policy. ARQUIMEA professionals thus commit to not participating in bribery, the granting of benefits or advantages of any nature that could be understood to be intended to improperly influence the normal course of commercial, administrative or professional relationships in which ARQUIMEA participates.
- Relationships with customers, suppliers, partners, collaborators or persons or entities that have, have had or may have business relationships with ARQUIMEA must be carried out by appropriately authorized persons and remain within the limits established by this Code.
- ARQUIMEA's professionals will not request, accept or receive from any outside person or entity payments, gifts, or any favourable treatment that lies outside of legal market practices and that are, or could be understood to be, intended to influence the normal course of the commercial, administrative or professional relationships in which ARQUIMEA participates.

Avoidance of conflicts of interest

- When performing their duties, ARQUIMEA professionals will act loyally, defending the interests of the company and avoiding situations that could give rise to a conflict between personal and company interests. This is why ARQUIMEA's employees are not allowed to take actions that give rise to any present or future personal benefit or a benefit for associated persons when performing the tasks falling within the scope of their position or responsibilities.
- Executives and directors must also know and apply commercial law and this Code of Ethics and Business Conduct as it relates to conflicts of interest and the duty to act loyally within the scope of related-party transactions.

Diligence, precision and truthfulness when executing and managing contracts

- Business contracts must be concluded in accordance with the matters consciously established by the parties. ARQUIMEA thus commits to not taking advantage of possible ignorance, unawareness or incapacities of the other party.
- ARQUIMEA will completely and truthfully provide the entities with which it collaborates all information that is necessary as a result of its activity and business relationship. In particular, when formally entering into possible contracts, ARQUIMEA will pay particular attention to clearly and comprehensively specifying the behaviours expected in all foreseeable circumstances from the contracting party.

- ARQUIMEA's information will be prepared with maximum reliability in compliance with applicable legislation and company standards, and it will be diligently held in custody and maintained. As a result, all of ARQUIMEA's professionals are responsible for performing their tasks in accordance with the company's standards and procedures such that they may defend their actions at all times.

Transparency

- Transparency is a basic principle for ARQUIMEA. All of its employees must collaborate with internal and external controls, as well as with supervisors, regulators and administrative and judicial authorities, attending to their requests and requirements, and quickly and accurately providing all of the information they may require relating to ARQUIMEA's business.

Protection of the reputation and image of ARQUIMEA

- All of its professionals are responsible for protecting the image and reputation of ARQUIMEA.
- Relationships between ARQUIMEA, and its employees, and the media are reserved for the area of the Company responsible for these relationships. Any call, request for information, questionnaire or similar item originating from the media must be sent to that area by the recipient employee.
- The area of the company responsible for media relationships must be informed when any employee is to contact the media so that the contact can be managed.

Supervision of the ownership and confidentiality of data and information

- ARQUIMEA will guarantee the confidentiality of the information it possesses and will abstain from seeking protected data, except in cases where there is express authorization and conformance with current legislation. Furthermore, ARQUIMEA professionals will not use protected information for purposes not associated with the performance of their own activities, such as cases of abuse of confidential information or market manipulation.
- All of the professionals that work at ARQUIMEA have the obligation to comply with company rules regarding Information Security and Data Protection, respecting the measures that the company has implemented to prevent outside parties and employees from accessing information and/or data in an unauthorized manner.

Protection of personal dignity and integrity

- ARQUIMEA assumes the commitment of creating, maintaining and protecting a working environment that respects the personal dignity and liberties of all personnel using all available means.
- Similarly, ARQUIMEA is committed to combating harassment at work and gender harassment and will not tolerate such conduct under any circumstances. Consequently, any action or conduct

of such a nature is prohibited and will be considered to be improper behaviour and a labour violation that will give rise to the penalties established by relevant legislation.

Encouragement of a fair working environment

- ARQUIMEA is committed to the creation and maintenance of a fair working environment that encourages professional and personal development.
- Fair treatment is an operating principle. ARQUIMEA thus develops programs, internal procedures and actions intended to create an enriching working environment that is free of any type of discrimination.
- ARQUIMEA does not tolerate direct or indirect discrimination due to gender, race, age, nationality, religion, sexual orientation, disability, family origin, language, political ideology, political or trade union affiliation or any other characteristic that does not objectively relate to working conditions.

Social responsibility

- ARQUIMEA encourages initiatives intended to encourage sustainable development. The company is aware that business operations and the rendering of its services could, at times, affect the environment and it therefore works to reduce the negative effects that it could cause and develops internal policies intended to improve environmental quality.
- Through its efforts and financial capacity, ARQUIMEA commits to contributing to the sustainable development of the environment in which it carries out its activity.

5. Supervision of compliance with the Code of Ethics and Business Conduct

- The body responsible for the control and supervision of compliance with the Code of Ethics and Business Conduct is the Ethics Management Committee, consisting of:
 - ARQUIMEA's Compliance Officer, as the Chair
 - Representative of the Human Resource area
 - Representative of the Legal area
- The main duties of the Ethics Management Committee are:
 - a) The review and update of the Code of Ethics and Business Conduct.
 - b) The preparation, review and update of other policies, procedures and protocols relating to ethics and compliance with the law.
 - c) The promotion of the dissemination of the Code of Ethics and Business Conduct and related policies through regular communications and training activities.

- d) Respond to doubts, questions and queries relating to the Code of Ethics and Business Conduct or in advance of any foreseeable possible commercial conflict in relationships with customers, suppliers and collaborators.
 - e) Receive, analyse and other actions that are necessary with respect to communications received regarding any non-compliance or irregularities.
 - f) Propose disciplinary measures, in accordance with applicable labour law.
 - g) Prepare annual reports regarding the degree of compliance with the Code of Ethics and Business Conduct.
 - h) Regularly inform the Management Committee and/or Board of Directors of the actions carried out, proposed improvements, implemented updates, agreed measures and any other matter that is considered to be relevant to the performance of their functions.
- The actions of the Ethics Management Committee will be guided by the following three fundamental rules:
 - a) It will hold regular meetings to carry out the required supervision and monitoring tasks relating to compliance with this Code.
 - b) The members of the Ethics Management Committee will have unrestricted access to all documentation or locations that are necessary to perform their duties.
 - c) The members of the Ethics Management Committee will be obligated to maintain maximum confidentiality of all of the information that they must use or to which they have access as a result of their duties.

6. Internal Information System

Arquimea's Internal Information System ("IIS") is mainly composed of the Arquimea IIS Development Policy, the Internal Information Channel enabled for the reception of communications, the IIS Manager and the procedure to be followed for the processing of the aforementioned communications, called "Procedure for the management and processing of information received in the Internal Information System".

The main objective of the establishment of Arquimea's IIS is to protect people who, in a work or professional context, detect serious or very serious criminal or administrative infringements and report them through the mechanisms regulated for this purpose, as well as to strengthen and promote the culture of information as a mechanism to prevent and detect irregular conduct, all in accordance with the provisions of Law 2/2023, of 20 February, regulating the protection of people who report regulatory infringements and the fight against corruption.

7. Whistleblower Channel

Open communication of situations and concerns by ARQUIMEA professionals without fear of negative consequences is vital for the proper implementation of the Code of Ethics and Conduct. ARQUIMEA urges its professionals to comply with the obligation to report any breach of the Guidelines of Conduct and Professional Ethics of this Code, being a commitment of all to cooperate in internal investigations that are initiated for breach of the same.

To this end, ARQUIMEA has an Internal Arquimea Information Channel ("Whistleblower Channel") on its website, which is a tool open to all to ensure compliance with the following purposes:

- a) To identify potential breaches or infringements of the Guidelines for Professional Conduct and Ethics and the regulations that develop them.
- b) To prevent potential weaknesses in ARQUIMEA's professional practices, in order to strengthen the company's culture of compliance.

The Whistleblower Channel is perfectly integrated into the Group's IIS and is the preferred channel for reporting irregular conduct as a result of an action or omission in a work or professional context.

Reports of sexual or gender-based harassment made by Arquimea employees in accordance with the Group's Equality Plan shall be included in the aforementioned Internal Reporting Channel (and, therefore, in Arquimea's IMS). Consequently, employees may also submit a report of sexual or gender-based harassment directly through the Whistleblower Channel, as may any other informant as provided for in the aforementioned second section of this Policy.

Arquimea's Whistleblower Channel allows:

- a. To make written or verbal communications, or both, under the conditions set out in the Whistleblower Protection Act.
- b. Include in the communication information such as the address or e-mail address for the purpose of receiving notifications.
- c. Submit and process anonymous communications.
- d. Inform the informant in a clear and accessible manner about updates on the investigation and external information channels with the competent authorities and institutions.

In the event that, as a result of information received through the Whistleblower Channel, there is a possible breach by an employee of the Guidelines for Professional Conduct and Ethics, an investigation will be carried out which may lead to internal disciplinary sanctions, without prejudice to any possible labour, civil or criminal liability that the employee may incur.

It is strictly forbidden to take any action that may constitute a reprisal against any ARQUIMEA professional for the mere fact of having made a complaint of non-compliance with the Guidelines for Professional Conduct and Ethics through the Whistleblower Channel.

Where the internal investigation determines that a report is false and has been made in bad faith, appropriate disciplinary action may be taken.

Reports, complaints or communications that are not related to the Guidelines for Professional Conduct and Ethics contained in this Code are outside the scope of the functions of the Whistleblower Channel and, consequently, will be deemed to have been misused. In other words, the Whistleblower Channel may never be used as a means for the expression of labour complaints or as a suggestion box.

All the whistleblower support and protection measures set out in Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption, and set out in the Arquimea Group's Internal Information System Policy, shall be applicable.

8. Validity of the Code of Ethics and Business Conduct

The Code of Ethics and Business Conduct will enter into force on the date on which it is published and communicated on the ARQUIMEA website and will remain in force until repealed. It will be regularly revised and updated by the Ethics Management Committee, which will take into account any suggestions and proposals made by employees.



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