



**Inproc
Design®**

Instalación de procesos y diseño integral

**Code of Conduct
&
Responsible Practices**

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1. PURPOSE

Inproc Design (hereinafter, "ID") has promoted since its beginnings, as one of its priorities, a behavior of integrity with those who ID relates to in the exercise of its activity. The principles that guide ID's operation are part of its corporate culture.

The purpose of this Code of Conduct (hereinafter also referred to as the "Code") is to summarize and set down in writing these principles, in order to guide the actions of ID and all its Professionals in the performance of their activities, offering basic guidelines to ensure that their actions are always in accordance with them.

In turn, the code establishes the performance criteria that must be observed by ID in the performance of its professional responsibilities.

To this end, the code:

- Facilitates the knowledge and application of ID's corporate culture, firmly based on compliance with human and social rights and on the effective integration in ID of the entire group of employees, with respect for their diversity.
- It establishes the principle of due diligence for the prevention, detection and eradication of irregular conduct, whatever its nature, including, among others, the analysis of risks, the definition of responsibilities, the training of employees and, where appropriate, of third parties directly related to ID, and the formalization of procedures, in particular, for the notification and immediate elimination of irregular conduct.

2. PROFESSIONAL DILIGENCE

ID considers that professional diligence is the set of activities aimed at reducing the possibility of ethical misconduct in ID and

considers that the following is necessary to prevent it:

- Identify the risks to which ID may be exposed.
- Establish a series of guidelines for ID professionals.
- Establish a protocol to supervise the implementation of this Code, as well as the respect for the commitments and acquired practices it contains.
- To make known to all ID Professionals what is expected of them in terms of ethics.
- To foresee, locate and eradicate, if necessary, practices that may be inappropriate.
- In order to ensure the implementation and effectiveness of these commitments, ID will adapt all its internal regulations to the contents and objectives included and developed in this Code.

3. SCOPE OF APPLICATION

The Code is applicable and binding to all ID personnel, regardless of their position and function.

The application of the Code, in whole or in part, may be extended to any natural and/or legal person related to ID, when it is convenient for the fulfillment of its purpose and it is possible due to the nature of the relationship.

ID may contractually require the commitment of its compliance to any other third party with whom it maintains commercial or business relationships when, by the nature of such relationship, its activities may affect its image and reputation.

The code shall be personally notified to all ID employees and to any collaborator, when so required by the nature of their relationship, who shall assume in writing the commitment to comply with it. Likewise, the obligation to comply with the Code will be expressly included in the employment contracts of the employees, to whom a copy will be delivered upon their incorporation to ID.

4. GENERAL PRINCIPLES

The corporate culture, values, ethics and integrity of ID Professionals are the basic pillars that govern its activities, mainly focused on the development of engineering, design, management and equipment manufacturing activities.

Within these areas, always within the scope of their professional performance in accordance with ID's core values, ID's mission is to pursue leadership and promote, through the responsible exercise of the aforementioned activities, its sustainable growth and to contribute to social and economic development.

To this end, ID requires its employees and collaborators to always act within the scope of their professional performance in accordance with ID's core values: Integrity, professionalism and respect for current legislation and Human Rights.

This Code of Conduct is defined as an ethical commitment that includes basic principles and standards for the proper development of relations between ID and its main collaborators wherever they carry out their business activities.

The Code is based on the following principles:

- All ID's operations will be developed under an ethical and responsible prism and strict respect for Human Rights.
- Compliance with the legislation in force in each country is a necessary requirement of this Code.
- The behavior of ID employees and collaborators shall comply with the spirit and the letter of this Code of Conduct and Responsible Practices commonly and internationally accepted.
- All persons, natural and legal, who have any direct or indirect employment, economic, social and/or industrial relationship with ID, shall be treated fairly and with dignity. All natural and legal persons who directly or indirectly maintain any labor, economic, social and/or industrial relationship with ID shall be treated fairly and with dignity.
- All ID's activities shall be carried out in the most environmentally friendly manner, favoring the conservation of biodiversity and the sustainable management of natural resources.

4.1. Integrity

ID shall conduct itself with loyalty, honesty, integrity and impartiality, as well as promote this behavior among its Professionals, which is manifested, among others, in the following requirements:

4.1.1. Loyalty to the company.

ID Professionals shall act in the performance of their duties with loyalty and seeking the defense of ID's interests. Likewise, they shall try to avoid situations where the affected party is or appears to be in a conflict of interest.

Notwithstanding the foregoing, ID shall respect the participation of its employees in other financial or business activities, provided that the internal regulations do not provide otherwise, that such activities are legal and that they do not concur or give rise to possible conflicts of interest with their responsibilities as ID employees, in which case, the above mentioned in the previous paragraph shall be taken into consideration.

4.1.2. Respect for Legality, Human Rights and Values

ID is committed to act at all times in accordance with the laws in force, ensuring respect for human rights and internationally accepted ethical practices.

All its activities shall be carried out in accordance with the values and principles contained in the United Nations Global Compact on Corruption. In any case, the relations of ID's members with public authorities and institutions must comply with the provisions of international provisions for the prevention of corruption and bribery that have been signed by Spain (highlighting the United Nations Convention against Corruption, approved by Resolution 58/4 of the General Assembly of October 31, 2003), and in those actions with any international component, with the provisions of the U.S. Foreign Corrupt Practices Act (FCPA) and the British Anti Bribery Act.

ID rejects any type of maneuver aimed at changing the will of authorities, public officials or any other person outside ID to obtain any benefit through the use of improper practices, and actively promotes among those related to ID not to give to third parties or receive from third parties improper payments of any kind, as well as gifts or favors whenever they are outside social customs or exceed courtesy practices, or that, by their value, characteristics or circumstances, could reasonably involve an alteration in the development of commercial, administrative or professional relationships in which their companies are involved.

All ID professionals must scrupulously comply with the regulations applicable in the countries where they carry out their activity, maintaining in all their actions an adequate behavior and in accordance with the legislation in force. Likewise, they shall avoid any conduct that, even if in accordance with the applicable local regulations, may damage ID's reputation or negatively affect its interests.

In this sense, they shall also be especially careful in any public intervention, being necessary to have the due internal authorization to intervene before the media, to participate in professional conferences and seminars, as well as in any other event that could have public diffusion, as long as they appear as ID employees.

Likewise, ID Associated Persons shall pay attention to those cases in which there are indications of lack of integrity of the persons or entities with which they do business. In particular, payments made by means of bearer checks shall be examined with special caution, if there is a payment in cash and those made in currencies other than the one previously agreed upon. Likewise, special attention will be paid to all payments made to accounts that are not the usual ones in relations with a given entity and those made to persons, companies or bank accounts opened in tax havens.

In addition, the members of ID and of the companies associated with ID shall ensure that the policies, control systems and measures defined to prevent fraud are applied. For the purposes of this Code, fraud shall mean the following:

- Any action contrary to ID's standards of conduct or the regulations in force.
- Any act intended to circumvent a mandatory legal provision.
- Acting against the interests of ID in the event of a conflict.

4.1.3. Use of Assets

ID makes the resources necessary for the performance of its professional activity available to the Persons who compose it. All of them shall protect and make good use of such resources, preserving them from any loss, damage, theft or improper use that could be detrimental to the interests of ID. In this sense, and unless expressly permitted otherwise, ID resources shall be used solely and exclusively in the performance of professional duties, excluding their use for their own benefit or for the benefit of third parties outside the business purpose of ID.

In particular, the computer equipment made available to ID employees must be used in compliance with the security and access measures provided for this purpose.

4.1.4. Expenses

ID Professionals incurring expenses in connection with their activity at ID (travel, meals, hotels, communications, etc.) shall provide documentary evidence of such expenses, as well as, if applicable, the strict relationship of such expenses with the performance of their duties at ID. Likewise, they shall make use of its resources and incur expenses on behalf of the company in accordance with the principles of necessity and austerity.

4.1.5. Treatment of information and knowledge

ID considers information and its knowledge as an essential asset for the management of its business, and therefore it must be especially protected.

Likewise, it declares that the truthfulness of the information (in particular, the financial information, which shall faithfully reflect the economic, financial and equity reality of ID) shall be one of the basic principles in all its actions.

ID Professionals shall share and communicate in a transparent and truthful manner all the information that they must transmit internally or externally and in no case shall they knowingly

provide to third parties, or introduce in the computer systems, information that is incorrect, inaccurate or that, in any way, may mislead the recipient.

Likewise, all of ID's economic transactions shall be accurately and clearly reflected in the corresponding records in each case and shall be in accordance with the applicable international financial reporting standards.

Likewise, all the ID Persons and collaborators shall keep the strictest confidentiality on the information to which they have access as a consequence of the performance of their activity, maintaining the strict duty of confidentiality with respect to the information known in the course of their work and whose disclosure or publicity may affect the interests of ID.

For these purposes, reserved information shall be understood to be, by way of example and without limitation, any information of a specific nature that refers directly or indirectly to one or more marketable securities or financial instruments, or to one or more issuers of the aforementioned marketable securities or financial instruments, which has not been made public and which, if made or had been made public, could have an appreciable influence on their market price.

This obligation shall remain in force even after the termination of the professional's relationship with ID.

Consequently, any report, offer, study, product or any knowledge (understood as a conceptual result of the integration of diverse information generated within the company) obtained by the Related Persons as a result of their activity at ID shall be the property of ID and may not be communicated, provided or transmitted by any means without the prior express and written authorization of ID.

4.1.6. Intellectual and Industrial Property Protection

ID is committed to protecting its own and others' intellectual and industrial property.

ID shall take the necessary measures to protect intellectual and industrial property, ensuring that the processes and decisions in this field are traceable, in the sense of being documented, justifiable and verifiable, especially through the titles of the works, creations or distinctive signs themselves and the application of contractual clauses that guarantee the originality and peaceful use of those of third parties.

The intellectual and industrial property resulting from the work of the employees during their stay at ID, and which is related to the present and future business of ID, shall be the property of ID.

4.1.7. Respect for Free Market Competition

ID respects the principle of free competition and observes the compliance with the laws that the different jurisdictions where they carry out activities have established in this respect, in order to avoid incurring in actions that may imply a market abuse or an unlawful restriction of competition.

In this way, all persons directly or indirectly related to ID must refrain from engaging in any deceptive, fraudulent or malicious practice or conduct that leads to obtaining inappropriate advantages in the market. Specifically, all promotional information of ID shall be presented in a clear way in order not to mislead, avoiding, in this way, to distort the characteristics of the services offered by ID.

Likewise, with regard to market and competitor information, ID will reject any information that is not obtained in an ethical manner and without violating the rules that protect this type of information. Special attention must be paid to this information, and care must be taken to ensure compliance with the applicable regulations, in the event that professionals from competing companies join ID.

4.2. Professionalism

The Persons linked to ID must act in a diligent, efficient and responsible manner, striving for excellence, quality and innovation in their actions, which shall be guided by the following principles:

4.2.1. Quality and innovation

ID aims to offer its clients the highest quality in its products and services. To achieve this, ID will provide its related Persons with the necessary resources to ensure the innovation, development and continuous improvement of these products and services according to profitability criteria. To achieve this objective, ID undertakes to make available to all of them the necessary resources for the proper performance of their activity and undertakes to provide the means for their protection and safeguarding.

Likewise, the Persons related to ID shall use these means in a responsible and efficient manner, as well as collaborate in their protection and preserve them from any improper use that could be detrimental to ID.

4.2.2. Customer Orientation

ID, as well as the Persons linked to it, shall guide their behavior and actions to seek the greatest satisfaction of the customers and their expectations, trying to anticipate as far as possible the knowledge of their needs and thus strengthen their relationship with ID.

4.2.3. Relations with collaborating companies and suppliers

ID considers its suppliers and collaborating companies as an essential part for the achievement of its growth, profitability and service quality improvement objectives, seeking to establish stable relationships with them based on trust, efficiency and mutual benefit.

ID adapts the selection processes of suppliers, providers, subcontractors and external collaborators to criteria of objectivity, efficiency and impartiality and will avoid any conflict of interest or favoritism in their selection.

Persons related to ID shall avoid any type of influence from these third parties that may modify their impartiality and objectivity in the adoption of decisions. This obligation particularly affects those professionals who must make decisions on the procurement of supplies and services.

Likewise, ID undertakes to share and disseminate the content of its principles of ethical behavior in the relationship it develops with the companies with which it maintains links, of collaboration or of any kind; and it will promote and encourage collaboration with all those companies that accredit social, environmental and, in general, advanced ethical standards.

4.3. Other principles

ID, as a consequence of the commitment to act at all times in accordance with the United Nations Global Compact mentioned in point 4.1.2 of this Code, shall ensure that all actions of those related to ID scrupulously respect the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights. Consequently, ID's relationship with third parties and companies, as well as with its professionals, and in turn, their relationship with each other, shall respect the following behavioral criteria.

4.3.1. Professional development, non-discrimination and equal opportunities

ID promotes the professional and personal development of all the People linked to it, ensuring equal opportunities through its performance policies. Likewise, ID does not accept any discrimination in the work or professional environment for reasons of age, race, color, sex, religion, political opinion, nationality, social origin, disability, sexual orientation or any other circumstance susceptible to generate discrimination.

ID will maintain a rigorous and objective selection program for its professionals, taking into account only the professional, academic and personal merits of the candidates according to ID's needs and in order to promote a corporate culture based on merit. In turn, the promotion of these Professionals shall be based on their skills, on the performance of their duties and on criteria of merit and ability.

ID undertakes to promote the moral and physical integrity of its Professionals, ensuring the existence of working conditions that respect the dignity of the person. In particular, ID shall adopt the appropriate measures to prevent and, if necessary, correct any manifestation of violence, physical, sexual, psychological, moral or other harassment, abuse of authority at work and any other conduct that generates an intimidating or offensive environment for the rights of the related Persons. Likewise, in view of the importance of the balance between work and personal life, measures and actions for work-life balance will be promoted.

4.3.2. Training

ID will promote the training of people linked to ID through training programs that will promote equal opportunities and career development.

Professionals performing management tasks shall facilitate the professional development of their collaborators in order to facilitate their professional growth in ID and progressively improve their ability to add value.

4.3.3. Privacy Protection

ID shall protect the privacy and intimacy of the Persons linked to ID by adopting the standards determined according to the information available to ID, as well as the corresponding processing and storage methods, which shall in any case comply with the provisions of the regulations in force at any given time regarding the protection of personal data.

In particular, it is not allowed any kind of research on the ideas, preferences, personal tastes and, in general, the private life of the connected Persons.

4.3.4. Rejection of child, forced or compulsory labor

ID declares its total rejection of child labor and forced or compulsory labor and undertakes to respect freedom of association and collective bargaining and to recognize the rights of ethnic minorities in the countries where it operates, rejecting any form of exploitation and, in particular, child labor, ensuring compliance with the provisions of the International Labor Organization (ILO) regarding the work of minors.

4.3.5. Respect for the environment

Respect for the environment is a fundamental principle for ID, and it is committed to complying with the parameters established in the applicable environmental regulations.

Likewise, ID will promote the conservation of natural resources and areas of ecological, scenic, scientific or cultural value. Specifically, employees must inform the corresponding responsible body of the circumstances or situations that may imply an inefficient consumption of resources.

In their relations with contractors or collaborating companies, the Persons linked to ID shall transmit these principles and shall demand compliance with the environmental procedures and requirements applicable in each case, as well as those related to respect for urban planning regulations.

4.3.6. Occupational Health and Safety

ID shall provide its Affiliated Persons with a safe and stable environment, undertaking to continuously update the measures for the prevention of occupational risks and the promotion of occupational health, as well as to scrupulously comply with the applicable regulations in this area in all the places where it carries out its business activities.

Persons linked to ID, for their part, shall observe with special attention the rules relating to occupational health and safety, with the aim of preventing and minimizing occupational hazards. Likewise, when carrying out risky activities or activities that could cause damage, explosions or deflagrations, they shall make responsible use of the equipment assigned to them and shall inform their colleagues, people under their responsibility, customers, suppliers and collaborators of their knowledge in this area, promoting compliance with risk protection practices.

4.3.7. Social commitment

ID is committed to socially responsible actions, with special emphasis on respect for cultural diversity and the principles and customs of the communities where it operates.

ID's relations with authorities, regulatory bodies and administrations shall be guided by institutional respect, compliance with the law and internal rules and the principles of cooperation and transparency.

Likewise, if any, relations with associations and other social organizations shall be governed by the principle of legality, respecting in all cases the legal framework in force in the different countries of operation.

4.3.8. Neutrality

ID develops its activities without interfering or participating in the political processes of those countries where it develops its business.

Consequently, ID's relations with governments, authorities and local institutions shall be based on the principles of neutrality and legality.

ID recognizes the right of the Persons linked to it to exercise their freedom of political thought and participation in public life, provided that it does not interfere with the performance of their activity in ID, that it takes place outside working hours and outside ID premises and provided that this participation could not lead an external observer to associate ID with one or another political option.

4.3.9. Prevention of Money Laundering and Terrorist Financing

ID shall comply with national or international regulations issued to prevent money laundering and the financing of terrorism. In this sense, no business relationships shall be established with persons or entities that do not comply with the aforementioned regulations or that do not provide adequate information regarding compliance therewith.

4.3.10. Corporate Image and Reputation

ID considers its corporate image and reputation as a very valuable asset to preserve the trust of its customers, suppliers, authorities and society in general. The Persons linked to ID shall take the utmost care in preserving ID's image and reputation in all their professional actions.

5. INTERPRETATION AND MONITORING

This Code establishes principles and commitments that ID and its Professionals must respect and comply with in the exercise of their activities.

ID shall communicate and disseminate the existence and content of this Code to all Persons related to ID.

Any doubt that may arise regarding the interpretation or application of this Code shall be consulted with ID's management for clarification and correct interpretation.

No one, regardless of his or her hierarchical level or position, is authorized to request that a Person linked to ID commit an illegal act or in any way contravene the provisions of this Code. In turn, no professional may justify improper conduct on the basis of an order from a superior.

Any person having knowledge or reasonable suspicion of a breach of this Code may report the same through the mechanism established for this purpose by the company .ID will take the measures it deems appropriate to prevent or remedy any breach of this Code.

The violation or breach of this Code that constitutes a labor misconduct, will be punished in accordance with current regulations, without prejudice to other responsibilities that the offender may have incurred.

6. COMPLIANCE WITH THE CODE

In order to ensure compliance with this Code, resolve incidents or doubts about its interpretation and adopt the appropriate measures for its best compliance, ID shall be entrusted with the following functions:

- To promote the dissemination, knowledge and compliance with the Code.
- To interpret the Code and guide actions in case of doubt.
- Facilitate the resolution of conflicts related to the application of the Code.
- To establish the appropriate channels of communication so that any person may request or provide information on compliance with the Code, guaranteeing at all times the confidentiality of the complaints that are processed.
- To guarantee the truthfulness and fairness of any process initiated, as well as the rights of the persons allegedly involved in a possible non-compliance. For the purposes of this Code, process shall be understood as the set of actions related to any communication or complaint made by any ID professional, aimed at verifying the truthfulness of the facts reported and ending with a resolution that may include, where appropriate, the measures to be adopted.
- Define the cases in which the scope of application of the Code must be extended to third parties that maintain commercial or business relations with ID.

7. VALIDITY AND PUBLICITY OF THE CODE

The Code shall enter into force on July 20, 2016, as approved by ID, and shall be communicated to all persons linked to ID and shall be accessible on the ID website.

The Code will be made available to all employees, and will remain published on the ID website (www.inprocdesign.com) and will be the subject of appropriate communication, training and awareness actions for its timely understanding and implementation throughout the organization.

For any comments or complaints, the whistleblower channel is enabled as provided for in this code buzonsugereencias@inprocdesign.com.