



Code of Ethics

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APPENDIX 1. COMMITMENT TO AND ACCEPTANCE OF THE CODE OF ETHICS

MESSAGE FROM OUR CEO

Our business fabric is currently affected by growing regulatory output and pressure.

After various difficult moments, crises of confidence in institutions and social partners, disreputable behaviour and situations far removed from the level of responsibility that should be demanded of organizations, today's society demands not only compliance with the law, but also compliance under the umbrella of principles, values and ethical standards.

A diligent attitude and profit making, in other words, ethical conduct and business growth, are not configured as elements that pull in opposite directions, but as elements that converge around a reference criteria that should guide the decisions of each and every one of us and, therefore, those of "Famytec Solutions, S.L." as an organization and as a group.

For these reasons, we have decided to adopt this Code of Ethics which includes fundamental values, guiding principles and standards of conduct that must sustain all actions, all behaviour and all decision making. We are aware that our behaviour forms the brand and image of "Famytec Solutions, S.L." (hereinafter, "the Organization") and, therefore, the axis around which the reputational judgment made by our customers, suppliers, contractors, collaborators, business partners, other third parties, the market and society in general (hereinafter, "stakeholders") will revolve.

Based on the above, we wish to express our firm commitment to ethical business behaviour and respect for the law. However, to achieve the objectives set out in our Code of Ethics, we need the collaboration and help of all of you.

For this reason, we invite you to read in detail this Code of Ethics, whose content is summarized by the motto "act correctly". This implies a constant effort from all of us to achieve a high degree of integrity, professional excellence and corporate ethics. Only in this way can successful, sustainable and long-lasting projects be built.

Fernando Saiz Del Cura

1 INTRODUCTION

This Code of Ethics establishes the fundamental values, guiding principles and regulations of conduct that must underpin the actions and behaviour of the Organisation's Administrative Body, Management and employees (hereinafter, 'professionals') as well as suppliers, contractors, collaborators, business partners and all those who work on behalf of the Organisation such as consultants, agents, intermediaries and subcontractors.

The requirements of today's business are not only focused on compliance with the laws in force in various legal systems. Stakeholders demand from organisations the attainment of high ethical standards for the proper functioning of commercial and other relationships and ties.

Therefore, mere compliance with the law is not enough; it is required that this compliance be carried out in an ethical manner based on different values, principles and rules of conduct that should guide the behaviour of each and every professional and should be a reflection of a common ethic inherent to the organisation itself.

Accordingly, the Organisation is firmly committed to a corporate culture based on solid ethical standards, by virtue of which all of us have a duty and obligation to comply with the rules set out in this "Code of Ethics".

By doing this, we will contribute to the collective success of the Organisation through the promotion of our brand in the market and the maintenance of a good reputation. The latter is an essential intangible resource for attracting and maintaining talent, customer loyalty, relationships with suppliers and contractors as well as trust and credibility with financial institutions, public administrations, commercial partners, the market and society as a whole.

Thus, all professionals must play an active part in our commitment to respect and preserve, every day and with every action, the Organisation's brand. We must always be aware of the difficulty and the great effort involved in acquiring a good reputation and of the ease with which this reputation could be negatively affected in the event of actions or decisions that are not in line with the highest ethical and behavioural standards.

Therefore, by means of this Code of Ethics, the Organisation reinforces its commitment to compliance with current legislation and to ethical behaviour that highlights the value of our way of working, our way of acting, our decision making and our way of relating to the Organisation's stakeholders.

2 PURPOSE AND OBJECTIVES

The aims and fundamental objectives of this Code of Ethics are as follows.

To establish the fundamental values, guiding principles and standards of conduct that should govern the actions and behaviour of the Organization's professionals, i.e., the ethical standards that will act as behavioural patterns that should guide our way of proceeding and our corporate culture.

To prevent any violation, infringement or non-compliance with current legislation, this Code of Ethics, the Organization's internal policies and procedures or instructions which could cause serious damage, not only from a legal or economic viewpoint, but also in terms of affecting our brand, image and reputation.

To encourage our stakeholders to behave in a manner that is consistent with and aligned with the organization's core values, guiding principles and standards of conduct, thus promoting the development and implementation of ethics and compliance programs and ensuring their adherence to our Code of Ethics.

3 SCOPE OF APPLICATION

This code of ethics shall be binding and directly applicable to all the Organization's professionals regardless of:

Type of contract.

Geographical location.

Functions and tasks performed.

Hierarchical position or role held within the organization.

Moreover, this code of ethics shall apply to suppliers, contractors, collaborators, business partners and all those who work on behalf of the organization such as consultants, agents, intermediaries and subcontractors.

For this reason, it is mandatory that all professionals sign the adherence document annually and whenever there is a modification or update to the code of ethics.

4 FUNDAMENTAL VALUES

4.1 Integrity

The Organization's professionals must carry out their activities acting with honesty and integrity in their dealings with stakeholders, especially with clients, co-workers and other professionals.

Under no circumstances will conduct be tolerated that, in an attempt to achieve interests or benefits for the Organization, involves dishonest actions or implies a conflict with the organization's code of values.

4.2 Commitment to quality and professionalism

The provision of quality services not only implies technical rigor in the activities of professionals, but also a constant commitment to responsibility, dedication, loyalty and the pursuit of excellence.

This demand for quality requires that all members of the Organization receive sufficient training in their respective areas of responsibility so that the client always obtains a valid and effective response in accordance with their needs.

Likewise, all professionals must diligently comply with the tasks assigned or entrusted to them, trying to provide maximum value and always acting in a spirit of collaboration.

4.3 Confidentiality

All documentation and information which the Organization's professionals have knowledge of, whether verbal, written, from clients, other third parties or relating to internal know-how shall be treated with absolute confidentiality and exclusively for the purposes of the Organization's activities. This duty extends to all matters of which the professionals have knowledge in their areas of activity.

4.4 Respect for the integrity of persons and human rights

The behaviour of the Organization's professionals, both with colleagues and stakeholders, must be based on the principles of dignity and respect and an awareness that they represent the Organization's public image.

Similarly, the Organization shall carry out its actions and conduct its activities with absolute respect for the Universal Declaration of Human Rights.

5 GUIDING PRINCIPLES

5.1 Lawful acts and the principle of legality

The Organization is committed to carrying out its activities in accordance with current legislation in all geographical regions and fields in which it operates.

Consequently, professionals must reject any illegal practice, making the maximum effort and commitment to comply with laws, rules and regulations, with special relevance to those related to fraud, bribery and corruption.

5.2 Non-discrimination and Equal Opportunities

The organization promotes the creation of a work environment where all professionals are treated with fairness, respect and dignity, guaranteeing sexual freedom and paying special attention to the promotion of fair treatment and equal opportunities.

Therefore, the Organization will not tolerate any discrimination based on birth, race, sex, sexual orientation, religion, opinion or any other personal or social condition or circumstance.

5.3 Zero tolerance against harassment

The Organization expresses its absolute rejection of any behaviour or attitude that could violate the dignity of individuals or that, directly or indirectly, could constitute harassment in any of its multiple forms.

In furtherance of the above, the Organization has adopted a harassment prevention protocol.

6. RULES OF CONDUCT

6.1 Prevention of corruption and bribery

Our mission is to maintain a level of complete transparency and integrity in our relationships with our stakeholders.

Certain actions carried out incorrectly could give rise to practices of bribery or corruption based on the risk that they may be used to influence another party, modifying their will with the intention of obtaining from them an unjustified consideration or benefit.

The Organization is committed to zero tolerance of bribery and corruption. Thus, one of its essential objectives is to actively combat any corrupt practice that may be incurred which not only implies a violation, infringement or non-compliance with the rules of our legal system, but also a lack of alignment with the ethical standards voluntarily assumed.

At a global level, states strive to ensure that effective, proportionate and dissuasive sanctions are imposed on organizations responsible for acts of corruption.

For this reason, the implementation of preventive measures in this area will help to avoid practices that could constitute acts of bribery and corruption and, consequently, even lead to the perpetration of certain criminal offences which could pose a serious risk to the organization's image and reputation.

With regards to the types and forms of bribery, reference should be made to the following:

- Active bribery. Promising, offering or delivering to a person, directly or indirectly, a gift, reward or advantage of any kind (monetary or otherwise) in order to obtain in return an unjustified benefit or compensation as consideration for a previous, current or future action of that person.
- Passive bribery. Receiving, requesting, admitting or accepting from a person, directly or indirectly, a gift, payment or advantage of any kind (monetary or otherwise) as consideration for a previous, current or future action that provides the other party with an unjustified benefit or compensation.

In our legal system, the term “bribery” (both active bribery and passive bribery) does not constitute in itself a criminal offence, but the conduct it entails is present in various criminal offences included in our Criminal Code, such as subornation, influence peddling and corruption among private individuals.

In this regard, certain peculiarities or defining features that characterize bribe-taking behaviour should be considered:

- Although bribery is traditionally associated with public officials or authorities, it also occurs between private individuals.
- The beneficiary of the bribe can be an individual or a legal entity.
- Gifts, rewards or advantages from bribery can be monetary or other such as presents, meals, entertainment, travel, donations and sponsorships.
- The actual giving or delivery of a gift or consideration is not necessary for bribery to exist. A simple promise, offer or acceptance is sufficient.

- In the specific case of passive bribery, it should be borne in mind that such bribery will also exist even if the beneficiary of the bribe is a person other than the person who receives, solicits, admits or accepts, either directly or indirectly, the gift or consideration.
- In the case of bribery of a public official, the bribe may be given to a national or foreign public official.

In furtherance of the above, the Organisation has adopted an Anti-Corruption Policy.

6.2 Managing conflicts of interest

A conflict-of-interest arises when a professional's private interests (external business, financial, family, political or personal) may interfere with the interests of the organisation.

That is to say, a conflict-of-interest occurs when the interest that should govern the actions of a professional is displaced, altered or influenced by personal interest, giving rise to the possibility that the person's conduct, performance of duties, assumption of responsibilities and decision-making may deviate from the criteria of objectivity and impartiality.

Therefore, the interest that should govern the performance of the Organisation's professionals, i.e. the interest of the Organisation itself, should never be counterbalanced or compromised by personal interest.

Professionals must perform their functions and duties with absolute responsibility, dedication, loyalty and the pursuit of excellence, as indicated in Section 4, above, 'Fundamental Values' and, specifically, in developing 'Commitment to quality and professionalism' (4.2).

In furtherance of the above, the organisation has a Conflicts of Interest Management Policy.

6.3 Selection and recruitment of professionals

The recruitment of professionals shall be carried out in accordance with a criteria of impartiality, objectivity and professional merit, evaluating skills, competencies, talent, experience and professional training.

The principle of equality shall be respected at all times, without any discrimination on the grounds of birth, race, gender, sexual orientation, religion, opinion or any other personal or social condition or circumstance.

This will also prevent bribery through the recruitment of persons close to members of the Organisation, as well as potential conflicts of interest.

In furtherance of the above, the organisation has adopted a Recruitment and Selection Policy.

6.4 Integrity of financial reporting and compliance with tax and fiscal regulations

The Organisation is firmly committed to complying with generally accepted accounting principles as well as applicable tax and fiscal regulations.

Moreover, all daily transactions shall be recorded in the accounts and supporting documentation kept in the corresponding file for a time formally established by the Organisation and, in all cases, for the legally established periods of time.

The Organization shall under no circumstances obstruct the verification and evaluation work that may be carried out by the auditing bodies.

6.5 Commercial transactions and invoicing

Business transactions are driven by the principles of clarity and transparency in such a way that the Organisation's professionals must ensure that no action may be interpreted as misleading third parties.

In this respect, it is strictly forbidden to negotiate contracts on behalf of the Organisation without the corresponding authorisations, or to dispose of assets without sufficient powers of attorney.

6.6 Relations with suppliers and contractors

The selection, approval and evaluation of suppliers and contractors shall be carried out with the aim of trying to always guarantee an appropriate quality-price ratio based on objective criteria such as characteristics, cost, price evolution, after-sales service, economic situation, terms and forms of payment, quality, environmental management, occupational risk prevention, reputation and compliance.

In regard to this, the above section (6.2) regarding managing conflicts of interest will be directly applicable so that the selection, approval and evaluation of suppliers and contractors must have the interests of the Organisation at its core and, in order to consolidate a praxis driven by the criteria of objectivity and impartiality, must not conflict with the personal interests of the professionals under any circumstances.

In furtherance of the above, the organisation has adopted a Supplier Policy.

6.7 Relations with business partners

The Organisation will develop a relationship with its partners or business partners in which integrity, transparency and mutual trust will be paramount at all times. This will be achieved through the sharing of knowledge and experiences that facilitate the generation of positive synergies and result in a reciprocal benefit for the parties involved.

Moreover, in this area, the aforementioned provisions on conflicts of interest will be directly applicable so that the selection of business partners must have the interests of the organisation at its core and, in order to consolidate a praxis driven by a criterion of objectivity and impartiality, must not under any circumstances conflict with the personal interests of the professionals.

6.8 Client Relations

The aim of the Organisation is to provide the highest quality service to our clients, which not only

implies technical rigour in the work of our professionals, but also a constant commitment to responsibility, dedication, loyalty and the pursuit of excellence, as indicated above in Section 4 'Fundamental Values' and, more specifically, in 4.2 'Commitment to Quality and Professionalism'.

Therefore, the actions of our professionals in this area will be directly aimed at maintaining and strengthening our reputation with our clients, who are one of our most important assets and whose disaffection could have very negative consequences for the organisation.

Client loyalty is a vitally important element that requires the effort of each and every one of us, every day and in every activity.

6.9 Relations with public bodies and administrations

The Organisation's professionals shall base their relationships with public bodies and administrations on the principles of loyalty, cooperation and transparency in such a way that any proposal of unlawful action on the part of any public official or administration shall be rejected.

Although socially accepted in certain legal systems, the Organisation strictly prohibits facilitation payments, since they lead to corruption and bribery.

6.10 Relations with governments, political parties and trade unions

The Organisation will not carry out, directly or indirectly, either in Spain or in other countries, any kind of financing of political parties, federations, coalitions or groups of voters.

Similarly, direct or indirect donations in favour of political representatives and candidates, companies, organisations, associations, foundations or groups of influence linked to political parties and trade unions are also prohibited.

6.11 Relations with the media and public information

The functioning of the Organisation's different communication channels such as press, radio, television, corporate website, intranet, social and professional networks must be driven by the principles of transparency, integrity and honesty.

In this sense, all communicative action must provide professionals and stakeholders with objective, clear, accurate, truthful and verifiable information, thus contributing to the strengthening of the Organisation's corporate identity and image and reputation.

Professionals involved in the outreach process should respect and act in a manner consistent with the above principles and requirements.

6.12 Cash flow management

The Organisation will not, under any circumstances, charge or pay in cash unless it is the only alternative.

In this case, the legal limit of €1,000 established by the regulations in force must be respected and the transaction must be accompanied by the appropriate supporting documentation.

6.13 Use of IT tools

The Organisation's professionals cannot make unauthorised use of the Organisation's computer systems and documents, nor those owned by third parties to which they may have access by virtue of the work they carry out.

Furthermore, the use of IT tools and systems must be strictly professional to protect themselves against internal and external threats or misuse.

6.14 Intellectual and industrial property

The Organisation's professionals may not download software, tools or applications from the Internet without the express authorisation of the organisation.

It is strictly forbidden to install pirated software.

All professionals must use the Organisation's own software or that for which they have the necessary authorisation, having acquired the corresponding licences.

Likewise, any other elements that are protected by intellectual or industrial property rights for which the organisation does not have authorisation will not be used.

6.15 Use of third-party information

In the course of our business, the Organisation's professionals have access to a great deal of confidential information. It is our duty and fundamental value to protect such information.

Therefore, it is strictly forbidden to incorporate into the Organisation any physical or electronic information or documentation belonging to another entity and obtained without its consent.

Likewise, the Organisation shall not disclose, disseminate or transfer third party information of which it has lawful knowledge by virtue of a specific relationship with them.

6.16 Antitrust and advertising

The Organisation shall act fairly and in good faith in the markets in accordance with the principle of free competition.

It shall therefore avoid any act that could be qualified as unfair competition and any predatory or collusive practice or conduct involving the abuse of a dominant position.

Similarly, it shall refrain from carrying out any type of advertising that may be considered misleading regarding the particularities, peculiarities or characteristics of the services offered.

6.17 Protection of personal data

The Organisation will fully respect the personal and family privacy of all its professionals, guaranteeing compliance with all the security measures established in the regulations on personal data protection.

It is therefore strictly forbidden to communicate, disclose or disseminate the personal data, including financial, medical or health data, of its professionals, customers, suppliers and other subjects.

If, extraordinarily, the security of personal data was compromised, action would be taken swiftly, efficiently and responsibly.

6.18 Prevention of money laundering and terrorist financing

The Organisation shall act with the utmost rigour to prevent any money laundering or terrorist financing operations, transactions or activities, guaranteeing a firm commitment to comply with all applicable national and international regulations in this area.

Therefore, all its professionals have an inexcusable duty to pay special attention to possible scenarios in which there are indications of a lack of integrity on the part of persons, companies, entities or organisations with which they maintain commercial or business relations.

6.19 Environmental protection

The Organisation is firmly committed to carrying out its activities in a sustainable manner, minimising negative environmental impacts and giving absolute priority to preventive rather than corrective actions.

In this respect, the organisation's approach will be based on the following criteria:

- Firm commitment to comply with environmental legislation and regulations.
- Rational and efficient use of natural resources.
- Minimal environmental impact
- Respect for biodiversity.
- Prevention of harmful or polluting activities.
- Protection of ecosystems.
- Fight against climate change.
- Preservation of socio-cultural, historical, archaeological and architectural heritage.

7 TRAINING, AWARENESS RAISING AND SENSITISATION

The contents of this Code of Ethics will be included in the training plans carried out within the Organisation.

The aim of this training is to raise awareness and sensitize its professionals with the aim of promoting a corporate culture of respect for the law, this Code of Ethics and the Organisation's internal regulations.

Ultimately, this will have a very positive impact on the internal functioning of the Organisation itself and the correct functioning of its processes, improvements in competitiveness, increased transparency and, especially, on the maintenance, consolidation and strengthening of the corporate image, brand and reputation, guaranteeing the trust of its professionals, suppliers, clients and other stakeholders.

In addition to the aforementioned training activities, the Organisation may undertake other training, awareness and sensitization actions such as publications on the Blog, the web or the intranet, issuing internal communications and posting on the notice board.

8 DUE DILIGENCE RELATING TO NEW PROFESSIONALS

In application of this Code of Ethics, the Organisation undertakes a commitment to inform new employees of its existence, its contents and the obligation to comply with it.

9 COMMUNICATIONS OF DOUBTS AND NON-COMPLIANCE

The organisation's professionals must report through the Ethics Channel any violation, infringement or breach of this Code of Ethics. This will result in the opening of an internal investigation.

They may also raise any doubts or concerns that may occur in relation to the application or content of this Code of Ethics.

The organisation strictly prohibits any form of reprisal, discrimination or other unfair treatment against those who submit communications in good faith.

10 APPROVAL

The present regulation was approved by the governing body of the Organisation on August 02, 2023.

11 COMMUNICATION AND DISSEMINATION

Without prejudice to what has been established above for new professionals, this regulation shall be communicated and disseminated on an annual basis to the Organisation's employees by means of digital or physical distribution (for example, by e-mail, publication on the Intranet, the issuance of internal communications and posting on the notice board).

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12 ENTRY INTO FORCE AND EFFECTIVENESS

This regulation comes into force and is effective from the day following its communication and dissemination to the organisation's employees, in accordance with the provisions of the previous section.

13 CONSEQUENCES OF A BREACH OF THE CODE OF ETHICS

The violation, infringement or breach of the rules contained in this Code of Ethics shall empower the Organisation to adopt the disciplinary measures applicable to its staff, in accordance with the internal disciplinary regime and, in all cases, in accordance with the Workers' Statute, the Collective Bargaining Agreement and any other provisions on labour matters that may be applicable.

Likewise, in relation to suppliers, contractors, collaborators, business partners and other third parties, the Organisation may terminate existing relationships, covenants or agreements, commercial or otherwise.

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14 VERSION CONTROL

VERSION	DATE	DESCRIPTION OF CHANGE
V. 01	03/08/2023	Document issuance

APPENDIX I. COMMITMENT TO AND ACCEPTANCE OF THE CODE OF ETHICS

In _____, on ____ of _____ / _____

I, _____, with DNI _____, by signing this document DECLARE

- That the Organisation has delivered the Code of Ethics to me, through the following communication channel: _____.
- That I undertake to comply and act at all times in accordance with the principles, values and rules of conduct contained in this Code of Ethics, abiding by them and being aware of the responsibilities, legal consequences and applicable disciplinary regime that may arise from non-compliance.

Signed:
