



CODE OF ETHICS AND CONDUCT

Implementation Date:

Last Update: December 2023



This document outlines the set of rules and general principles of corporate governance and professional conduct applicable to all personnel, collaborators, advisers, and both natural and legal persons performing functions of representation, administration, management, or control at S.A.T. Eurosol. It also applies to all permanent and temporary contracted staff, who must commit to embracing and integrating its implementation, working towards its full consolidation within the company culture.

Furthermore, the company requires all suppliers and any natural or legal persons with a relationship with S.A.T. Eurosol to act in accordance with the general principles outlined below.

Our Code of Ethics and Conduct has been developed with the primary objective of generating trust within S.A.T. Eurosol's business activities, fostering a responsible working environment that goes beyond legal requirements for all members of our organisation.

Integrity, honesty, fair treatment, and full compliance with all applicable laws have always guided the company's business practices. This Code of Ethics and Conduct aims to provide a reference framework against which any activity can be measured. Employees should seek advice if they have any doubts about how to act in a given situation, as the ultimate responsibility of each employee is to "do the right thing"—a responsibility that cannot be delegated.

Individuals associated with S.A.T. Eurosol must accept their personal responsibility for complying with the Compliance Manual and this Code. To this end, they should take the necessary time to read and understand them to be aware of the consequences of non-compliance. Additionally, they must be guided by the following basic principles:

- Avoid any conduct that could damage or endanger the Company or its reputation, performing their respective duties with honesty, care, diligence, professionalism, and integrity.
- Prioritise the interests of the Company over personal or other types of interests.
- Understand and acknowledge that non-compliance with regulations cannot be considered an option within the Company's risk framework.
- Report any act of waste, fraud, abuse, or corruption to the administrative body.

IN GENERAL

1. S.A.T. Eurosol and its employees are governed by the law. Compliance with all applicable laws and regulations must never be compromised. Additionally, employees must adhere to internal rules and regulations, as applicable in a given situation. These internal rules are specific to the Company and may exceed legal requirements.



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2. A conflict of interest arises when an employee's personal interests or those of a third party compete with the Company's interests. In such situations, it may be difficult for the employee to act fully in the best interests of S.A.T. Eurosol. Employees should avoid conflicts of interest whenever possible. If a conflict of interest arises or if an employee faces a situation that could lead to one, they must notify the Compliance Officer and the compliance body. As a general rule, behaviours that compromise the independence of S.A.T. Eurosol or its clients in decision-making must not be accepted.

3. All individuals within the Company are essential to its success, and the Company promotes their personal development while balancing business objectives with the needs and expectations of employees.

A priority for the Company is the implementation of preventive controls, committing to provide the necessary means to eliminate or reduce risks that may materialise within its operations.

4. Confidential information is that which is not publicly known and includes trade secrets, business plans, marketing strategies, services, databases, designs, records, and financial information. The Company's ongoing success depends on the use and protection of such confidential information, which must not be disclosed. This obligation continues even after the termination of any employment or other relationship with the Company.

5. Information provided to clients, suppliers, public administrations, etc., must be truthful, complete, up-to-date, and accurately reflect the Company's situation. This principle is especially crucial concerning financial information.

6. Employees of S.A.T. Eurosol must not be influenced by the receipt of favours. They may only accept and offer reasonable meals and symbolic gifts appropriate to the circumstances, avoiding those that could create the impression of undue influence. No employee shall offer or accept gifts of money, loans, bribes, or financial advantages of any value.

7. Employees must report any inappropriate, unlawful, or criminal practices or actions to the compliance body. The Company guarantees the confidentiality of the whistleblower in all cases. Reports will be investigated appropriately and in accordance with the Criminal Risk Prevention Plan. Retaliation against whistleblowers acting in good faith is expressly prohibited. If a report is made in bad faith, disciplinary and/or legal actions will be taken against the whistleblower.



8. All employees of S.A.T. Eurosol have access to a communication channel to confidentially report any conduct or activity contrary to the Code of Conduct or the law. The communication channel is as follows: canaldecomunicacion@eurosol.es

9. Transparency and honesty must be values adopted by all Company employees. Any behaviour suspected of violating these principles must be reported to the compliance body via the aforementioned communication channel.

10. S.A.T. Eurosol will always compete in compliance with all applicable regulations on competition, antitrust, and fair trade. Policies and prices will be determined independently and will never be agreed upon formally or informally with competitors.

11. Every employee is responsible for ensuring full compliance with all provisions in this Code. This responsibility is non-delegable. Any violation may result in disciplinary measures, including dismissal, and, where appropriate, the initiation of legal actions.

ON THE FINANCIAL INTEGRITY OF THE COMPANY

12. Accounting must be carried out in accordance with principles of clarity and transparency. Likewise, tax settlements must be made in compliance with current tax legislation.

13. Accounting and tax personnel must store and retain all documentation used in the relevant archive to perform their duties for the period determined by the company, which shall never be less than five years.

14. Any action that obstructs or impedes the verification and evaluation tasks carried out by the auditing company or public tax authorities during any review they may request is strictly prohibited.

ON RELATIONSHIPS WITH PUBLIC ADMINISTRATIONS

15. S.A.T. Eurosol does not currently engage in contracts with public administrations. However, should the company enter into contracts with any type of public administration in the future, the following articles of this Code of Conduct will be strictly observed. Additionally, these articles are mandatory for any interaction the company may have with a public administration (such as grant applications, tax payments, penalties, etc.).

16. Employees of S.A.T. Eurosol who interact with public administrations must be expressly designated by the company to act on its behalf. All activities carried out must comply with legislation and the Code of Conduct.

17. All agreements entered into with public administrations must be in writing, specifying all their terms.

18. All documentation and information exchanged with public administrations must be retained and contain accurate information.



19. Meetings with public administrations must be conducted in accordance with principles of correctness and transparency. Unlawful behaviour is strictly prohibited.

20. Falsifying documentation to favour or harm the company is prohibited.

21. Cash payments to public administration personnel are prohibited unless their procedures do not allow for another form of payment. In such cases, appropriate documentary support must be provided.

ON RELATIONSHIPS WITH CLIENTS

22. All relationships with clients must be guided by a commitment to honesty and professional responsibility.

23. Contracts entered into by S.A.T. Eurosol with clients must be clear, direct, and in strict compliance with applicable regulations.

24. Misleading or false advertising shall never be used.

25. Any complaint made by a client will be welcomed by the company, which is committed to addressing and resolving it to the extent possible.

ON RELATIONSHIPS WITH SUPPLIERS

26. The processes for selecting suppliers will be characterised by the pursuit of quality and competitiveness, ensuring equal opportunities. Under no circumstances will a supplier who meets the required criteria be denied the opportunity to compete for the procurement of products or services. The company will always make selections based on objective and transparent criteria.

27. The formalisation of a contract must always be based on clear and objective relationships, avoiding forms of dependency.

28. The purchase of goods or services will be carried out with complete decision-making independence, meaning any economic, family, or other ties must take into account the provisions of Article 2.

ENVIRONMENTAL PROTECTION

29. S.A.T. Eurosol is committed to complying with all relevant environmental protection laws and regulations.

30. We promote resource efficiency and the prevention of environmental pollution.

31. All members of S.A.T. Eurosol have a duty and responsibility to comply with environmental laws and respect the environment wherever they work.

S.A.T. EUROSOL PERSONNEL

32. We promote and protect the health and safety of our employees and encourage those with responsibilities in areas subject to health and safety regulations to thoroughly understand and rigorously apply them. Irresponsible behaviour that endangers the safety of colleagues, company facilities, or equipment is strictly prohibited. **Likewise, the transportation of unauthorised persons or goods is not permitted.**

33. When hiring personnel, any form of discrimination will be avoided. High ethical standards will be ensured, taking into consideration professional background, compliance with current legislation, and best practices in the relevant sector. High ethical standards are deemed absent when the prospective hire:

- a) Has unexpunged or unexpungeable criminal records for intentional offences that could render a legal entity liable.
- b) Has been sanctioned by a final administrative resolution resulting in dismissal from their previous position.

34. S.A.T. Eurosol will always respect the principle of equality between men and women, actively promoting the absence of any form of discrimination.

35. In recruitment and professional promotion processes, decisions will be based on the suitability of professional profiles for the position.

36. The company will promote a flexible work organisation that facilitates work-life balance.

37. Employees, either directly or through intermediaries, must never offer or promise personal favours to secure a business deal or other advantage from a third party, whether public or private.

38. Employees must not accept any benefits in exchange for preferential treatment and must refrain from engaging in any activity or conduct that could give rise to or suspicion of such a situation.

39. The actions described in the previous two sections may result in disciplinary sanctions and may constitute criminal offences.

40. The consumption of alcoholic beverages and/or narcotic substances during working hours is strictly prohibited by the company's management, as is the consumption of these substances if it negatively affects job performance.

41. Failure to comply with any of the obligations set out in this section will be considered insubordination or disobedience at work and, in accordance with the applicable Collective Agreement, will constitute a very serious offence, resulting in dismissal in all cases.



ON THE MANAGEMENT OF CASH TRANSACTIONS

42. It is prohibited to engage in behaviours that could compromise the prevention of money laundering and the financing of terrorism.

43. Receiving cash payments is not permitted, except for small amounts.

44. Making cash payments is not allowed, except where no other form of payment is accepted, in which case the payment must be adequately documented.

45. To ensure transaction transparency, the location of the counterparty and the financial institution used must be identified.

ON COMMERCIAL OPERATIONS

46. Employees of S.A.T. Eurosol are subject to principles of transparency and clarity, ensuring that none of their actions can be interpreted by third parties as deceitful.

47. All commercial operations will be conducted with maximum transparency, avoiding any preferential treatment.

48. Negotiating on behalf of S.A.T. Eurosol is prohibited without prior authorisation.

49. In the event of a manifest error in client data, the client themselves must rectify the information in accordance with established procedures.

50. Acts or behaviours that involve double invoicing or fraudulent billing are strictly prohibited.

51. Acting on behalf of clients without their prior simple mandate is not permitted.

ON THE DISSEMINATION AND USE OF INFORMATION

52. All company members must maintain absolute confidentiality regarding the information available to them in the course of their work, whether proprietary or from third-party companies.

53. The dissemination of false or misleading information is prohibited.

54. No employee may use privileged information obtained through their activity within the company.

55. Compliance with all regulations concerning the handling of information within the professional development framework is mandatory.

56. Incorporating any information or physical or electronic document belonging to another company into S.A.T. Eurosol without the company's prior consent is prohibited.



57. The dissemination and/or transfer of information from other companies obtained with their consent is prohibited.

58. Using the company's network, computers, or other resources to access unauthorised information is prohibited.

59. The image and reputation of S.A.T. Eurosol are fundamental elements. Therefore, it is expressly forbidden to publish derogatory content about the company on information-sharing platforms or to disseminate defamatory comments about colleagues, competitors, or collaborators on any social network, forum, blog, or similar platform.

ON THE PROCESSING OF PERSONAL DATA

60. Any employee of S.A.T. Eurosol who has access to personal data must strictly adhere to established rules and procedures as well as applicable legislation.

61. The transfer or dissemination of personal data without the consent of the data subject is prohibited, except in cases provided for by applicable legislation.

62. All authorisations for the use of personal data must pertain to specific data requests for a defined period, and all access to personal data must be recorded.

63. All employees handling personal data must undergo training on compliance with data protection regulations.

ON INDUSTRIAL AND INTELLECTUAL PROPERTY

64. Downloading or installing programmes from the internet that violate industrial and/or intellectual property rights is prohibited.

65. Using images, texts, drawings, or any other material protected by industrial and/or intellectual property rights for profit is not permitted.

66. Employees of S.A.T. Eurosol may only use software authorised and provided by the company under acquired licences.

ON THE RESPONSIBILITY OF THE CODE OF CONDUCT

67. The Company's Management is responsible for:

- a. Updating this Code of Conduct and the Criminal Risk Prevention Manual.
- b. Publishing and making this Code available to all persons subject to it.
- c. Promoting necessary training activities among employees to raise awareness of the active criminal risk prevention policies implemented by the company.
- d. Ensuring compliance with the Code of Conduct.



ON THE DISCIPLINARY SYSTEM

68. Any violation of this Code of Conduct or the Criminal Risk Prevention Plan will constitute an infraction, initiating the corresponding disciplinary proceedings in accordance with Article 58 of the Workers' Statute and the applicable Collective Agreement.

69. Any behaviour that contributes to preventing or hindering the detection of criminal actions or behaviours that could constitute criminal offences will constitute an infraction, initiating the corresponding disciplinary proceedings in accordance with Article 58 of the Workers' Statute and the applicable Collective Agreement.

70. Failure to fulfil the specific duty to inform the compliance body of behaviours or actions that could constitute crimes, criminal offences, or breaches of the Criminal Risk Prevention Plan or the Code of Conduct will constitute an infraction, initiating the corresponding disciplinary proceedings in accordance with Article 58 of the Workers' Statute and the applicable Collective Agreement.

70. The procedure for imposing the corresponding sanction will be governed by the provisions of the Workers' Statute and the applicable Collective Agreement.