

# CODE OF CONDUCT

|                     |                         |                  |
|---------------------|-------------------------|------------------|
| PREPARED BY:        | REVIEWED BY:            | APPROVED BY:     |
| External consultant | Chief Executive Officer | Management Board |

| Description of amendments | Revision Edition | Date          |
|---------------------------|------------------|---------------|
| N/A                       | 1st edition      | March, 2020   |
| Template adaptation       | 2nd edition      | January, 2022 |
| Template format review    | 3 rd edition     | April, 2023   |

## CÓDIGO DE CONDUCTA

|  |    |
|--|----|
| 1. Object  | 3  |
| 2. Scope of application                              |    |
| 3. Guiding principles                                |    |
| 4. Behavior guidelines                               | 4  |
| 5. Respeto a las personas                            | 5  |
| 6. Professional development and equal opportunities  | 5  |
| 7. Cooperation and dedication                        | 5  |
| 8. Safety and health at work                         | 6  |
| 9. Use and protection of assets                      | 6  |
| 10. Corruption and bribery                           | 6  |
| 11. Irregular payments and money laundering          | 7  |
| 12. Corporate image and reputation                   | 7  |
| 13. Loyalty to the company and conflicts of interest | 8  |
| 14. Processing of information and knowledge          | 8  |
| 15. Relationships with collaborators and suppliers   | 9  |
| 16. Acceptance and compliance with the code          | 9  |
| 17. Validity   | 10 |

.

## 1. Object

The ODILO TID Code of Conduct aims to establish the guidelines of conduct that must govern the ethical behavior of all its directors, employees, associates and members of the Board of Directors in their daily performance and in the relationships and interactions that the entity maintains.

In addition to the people mentioned above, we have and also by suppliers, external collaborators, public and private institutions, and civil society in general to the extent that they relate to the entity.

This Code of Conduct complements ODILO TID's Safety Policy and provides an action guide to ensure proper professional performance behavior for all of the above-mentioned individuals.

On the other hand, it reflects the principle of due diligence applied by ODILO TID for the prevention, detection and eradication of irregularities arising from criminal offences.

This due diligence requires ODILO TID to design and implement control models that periodically analyse risks, ensure knowledge of the organisation's standards, define responsibilities and establish procedures that allow confidential reporting and irregularities, investigation and adoption of measures.

Finally, ODILO TID understands that the procedures it has in place allow it to respond to the above objectives.

## 2. Scope of application

ODILO TID's code of conduct is addressed to all staff temporarily or indefinitely linked to the entity, regardless of their position relative to their job. The guidelines provided for in this code are mandatory.

These guidelines establish clear principles of action that guide the behavior of staff during the performance of the professional activity.

On the other hand, ODILO TID will promote and incentivise among its suppliers, internal and external collaborators, temporary or permanent, the adoption of behavior guidelines with those defined in this code.

The Board of Directors undertakes to put all means in order to disseminate the security policy, as well as this code of conduct and to enforce these guidelines.

## 3. Guiding principles

The guiding principles that govern this code of conduct are based on integrity and responsibility in the professional performance of employees.

Integrity is understood as ethical, honest and bona fide performance. Professional responsibility is understood as proactive, efficient and focused on excellence, quality and the will of the service.

Odilo TID expects that all the people to whom this code is addressed, will behave according to these two principles mentioned.

#### **4. Behavior guidelines**

The code of conduct determines specific guidelines for action based on these contents:

- Respect for legality, human rights and ethics
- Respect for people
- Professional development and equal opportunities
- Safety and health at work
- Use and protection of assets
- Corruption and bribery
- Irregular payments and money laundering
- Corporate image and reputation
- Loyalty to the entity
- Processing of information and knowledge
- Relationships with collaborating companies and suppliers

Odilo TID assumes the commitment to act at all times in accordance with current legislation with full respect for human rights and public freedoms. In addition, the activities and operations of ODILO TID are carried out in accordance with its security policy.

All persons within the scope of this Code must act with honesty and integrity in all their contacts or transactions with the authorities and officials of the different governments and administrations, ensuring that all the information and certifications they submit, as well as the statements they make, are true.

All employees and collaborators of ODILO TID must know the legislation that affects their work, requesting, where appropriate, the precise information through their superior or the corresponding instances.

No employee or collaborator will consciously take part, alone or with third parties, in the violation of any law, or in any action that compromises respect for the principle of legality.

For its part, ODILO TID will provide the necessary means for its employees and collaborators to know, at all times, the external and internal regulations relevant to the functions they perform, and will establish the necessary internal control models that ensure compliance with legality and ethical values.

## **5. Respect for people**

ODILO TID employees should be treated with respect for friendly relationships and a pleasant, healthy and safe working environment. They have an obligation to treat in a fair and respectful manner their companions, their superiors and their subordinates.

Odilo TID rejects any manifestation of physical, psychological, moral or abuse of authority, as well as any other conduct that may generate an intimidating or offensive environment with people's rights.

## **6. Professional development and equal opportunities**

Odilo TID promotes the professional and personal development of all its employees, ensuring equal opportunities through its policies of action. It does not accept any type of discrimination in the workplace or profession based on age, race, color, sex, religion, political opinion, national descent, social origin or disability.

Odilo TID is committed to the implementation of the public policies established to promote greater equality of opportunity and for the promotion of a corporate culture based on merit. Specifically, it implements an equality plan developed on a voluntary basis for the benefit of its workers.

## **7. Cooperation and dedication**

Odilo TID promotes an environment of cooperation and teamwork for a better use of all capacities and resources.

All persons falling within the scope of the Code should act in a spirit of collaboration, making available to the other organizational units the knowledge or resources that may facilitate the achievement of their objectives and interests.

Employees must work efficiently during the working day, make profitable the time and resources that the company puts at their disposal, and in addition, provide maximum value in all the processes in which they participate.

## 8. Safety and health at work

Odilo TID promotes the adoption of occupational safety and health policies and adopts the preventive measures established in the legislation in force in this area. It also promotes and incentivises the application of its occupational safety and health standards and policies by the collaborating companies and suppliers with which it operates.

Odilo TID considers that safety is an individual responsibility and a condition of employment, which is why it will not allow risky behaviour that could cause serious damage to people or facilities.

In order to avoid these risky behaviours, there are a number of red lines that should not be crossed, by any of the persons falling within the scope of this code, which are as follows:

- Conceal work accidents or serious incidents, or induce third parties to do so, occurring during the execution of activities on behalf of the Association and that affect both its own personnel, as well as suppliers or collaborators.
- Falsify security records.
- Order breaches of safety regulations.

## 9. Use and protection of assets

Odilo TID makes available to its employees the necessary resources for the performance of their professional activity, and undertakes to provide the means for the protection and protection of them.

All employees must use the company's resources responsibly, efficiently and appropriately in the environment of their professional activity. They must also protect and preserve them from any inappropriate use from which they may be detrimental to the interests of the association.

The Company does not allow the use of the equipment it makes available to its employees to use programs or software applications whose use is illegal, that may damage their image or reputation or to access, download or distribute illegal or offensive content.

## 10. Corruption and bribery

Corruption and bribery appear when employees make use of unethical practices and improperly, to obtain some benefit for themselves, for the entity for which they work or for a third party. Corruption and bribery are one of the categories of fraud.

Odilo TID declares contrary to influencing the will of people outside it to obtain any benefit through the use of unethical practices. Nor will it allow other persons or entities to use such practices with their employees or collaborators. Persons falling within the scope of this Code may not accept, directly or indirectly, gifts or compensation of any kind which have the purpose of improperly influencing their commercial, professional or administrative relations with both public and private entities.

Likewise, payments, gifts or compensation of any kind that are not considered typical of the normal course of business should not be made, directly or indirectly, in order to try to influence improperly their commercial, professional or administrative relations, both with public and private entities.

Those third parties that ODILO TID may resort to for the development of their professional activity must assume, in their relations with private and public entities, commitments that respond to the same principles similar to those set out in this Code.

## **11. Irregular payments and money laundering**

Odilo TID establishes policies to prevent and prevent in the course of its operations the making of irregular payments or money laundering arising from illicit or criminal activities.

The aforementioned policies establish specific controls on those economic transactions, both collections and payments, of an unusual nature or amount made in cash or with bearer checks, as well as on all those payments made to entities with bank accounts opened in tax havens, identifying in all cases the ownership of them.

The employees and collaborators of ODILO TID and the members of its board of directors will remain alert to cases in which there may be indications of lack of integrity of the persons or entities with which the Association maintains relationships.

## **12. Corporate image and reputation**

Odilo TID believes that one of the basic elements that contribute to its corporate image and reputation is the establishment of responsible citizenship relationships in those communities in which it operates.

Odilo TID considers its corporate image and reputation as one of its most valuable assets to preserve the trust of its associates, employees, suppliers, authorities, and civil society in general.

All employees and members of the board of directors should take the utmost care to preserve the image and reputation of the entity in all its professional actions. Likewise, they will monitor the correct and appropriate respect and use of the corporate image and reputation by the employees of suppliers and collaborators.

### **13. Loyalty to the company and conflicts of interest**

Conflicts of interest arise in circumstances where the personal interests of employees, directly or indirectly, are contrary or conflict with the interests of your company, interfere in the correct performance of their professional duties and responsibilities or involve them in a personal capacity in any transaction or economic operation of the company.

Odilo TID believes that the relationship of the company with its employees and vice versa, should be based on the loyalty that arises from common interests. In this sense, the participation of employees in other financial or business activities is respected, provided that they are legal and do not enter into unfair concurrence or collision with their responsibilities as employees. In this line, employees must abide by the limitations on their participation in other companies, which are laid down in the legislation that applies to them.

Employees must inform their company in the event that they or their close relatives participate or will participate in the governing bodies of other companies that may conflict with their interests.

During the performance of their professional responsibilities, employees, collaborators and members of the board of directors must act with loyalty and in accordance with the defense of the interests of the same. They should also avoid situations that could lead to a conflict between their personal interests and those of the Association.

### **14. Processing of information and knowledge**

Odilo TID considers information and knowledge as one of its main and essential assets for business management, so they must be subject to special protection.

Declares the truthfulness of the information as a basic principle in all their actions, so that employees and collaborators must accurately transmit all the information they have to communicate, both internally and externally, and in no case will they knowingly provide incorrect or inaccurate information that may mislead the recipient.

All employees, collaborators and members of the board of directors must keep the strictest confidentiality regarding all the information reserved to which they access as a result of the performance of their professional activity.

Odilo TID promotes that the information and knowledge generated in it flows properly among all its employees and collaborators to facilitate the management of activities and promote the development of people. All information and knowledge is owned by the entity.



Employees, collaborators and members of the board of directors shall protect the intellectual property of the entity including, but not limited to, domain names, reproduction rights (including software reproduction rights), design rights, database extraction or know-how.

## **15. Relationships with collaborators and suppliers**

Odilo TID considers its suppliers and collaborators an indispensable part for the achievement of its objectives of growth and improvement of the quality of service, seeking to establish relationships with them based on trust and mutual benefit.

Odilo TID assumes the commitment to try to promote in its relations with internal or external third parties, practices in accordance with the guidelines of conduct included in this Code of Conduct. In addition, whenever possible, ODILO TID will seek from them their adherence to this Code so that full respect for the principles of it is considered incorporated into the content of the contractual or collaborative relationships established with them.

Likewise, ODILO TID offers its suppliers and collaborators the possibility to address confidentially, in good faith and without fear of reprisals, through the complaints channel established when they understand that the practices of any of the persons linked to the entity are not in accordance with the principles of this Code.

## **16. Acceptance and compliance with the code**

This Code of Conduct is mandatory for all employees of ODILO TID, for its associates, collaborators, members of the board of directors and for those third parties who have voluntarily assumed it in their relationships or contracts with ODILO TID.

Odilo TID will insert it for dissemination on its website and will make it known to those persons or entities with whom it relates and for which its content is relevant.

Employees must formally commit to compliance with the Code at the time they cause registration with the entity, incorporating compliance with the principles of the same in their employment contracts. Additionally, ODILO TID may periodically require the persons included in its scope to formally manifest that they know and comply with the guidelines of conduct established in the Code and carry out training sessions on the different aspects of it.

Non-compliance with this code will be analysed in accordance with internal procedures, legal regulations and conventions in force, and if applicable, the resulting penalties will be applied.

No one, regardless of level or position, is authorised to request an employee to contravene the provisions of this Code of Conduct.

Breaches of the Code of Conduct put ODILO TID's reputation at risk and could compromise its strength. For this reason, all persons within its scope are obliged to inform their hierarchical superior or through the reporting channel of any non-compliance or malpractice they may observe in the performance of their professional activities.

## **17. Validity**

The Code of Conduct enters into force on the day of its insertion on the website of the entity and will be in force as long as its modification or cancellation is not approved.

This code will be reviewed and updated as appropriate by the Board of Directors in accordance with the suggestions and proposals received through the ethical channel and the commitments made by ODILO TID in the area of social responsibility and good governance.