

CORPORATE CODE OF ETHICS OF SURINFO CADIZ S.L.

It has been, is, and will remain our full commitment to ethics and integrity among the people who make up SURINFO CADIZ S.L. that defines and identifies us as one of the most serious and competitive companies in our sector.

Fernando Garcia Sanchez, CEO.

BASIC PRINCIPLES THAT MUST GUIDE THE CONDUCT OF SURINFO CADIZ S.L. EMPLOYEES AND MANAGERS

Corporate Code of Ethics.

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1. PURPOSE AND SCOPE OF APPLICATION

The purpose of this Corporate Code of Ethics is to establish the basic principles that must govern the conduct of managers and employees in the context of their activities related to Surinfo Cadiz S.L.

If laws, practices, or internal procedures applicable to individuals and legal entities subject to this Code are stricter than its provisions, those stricter rules shall prevail.

2. RESPONSIBILITIES OF EMPLOYEES AND MANAGERS

2.1. Employee responsibilities

All employees must adhere to the principles and requirements contained in this Code and ensure that others do the same.

Employees must properly understand the policies, procedures, and other requirements applicable to the performance of their duties, and must seek help from their manager or legal counsel when necessary.

All employees who become aware of, or have a well-founded suspicion of, a breach of this Code must notify management or report it through the mechanisms established for submitting suggestions and complaints.

Surinfo Cadiz S.L. will adopt the necessary measures to prevent negative consequences arising from reports made by employees in good faith and under this Code.

2.2. Additional responsibilities of managers

Management must ensure that employees know and respect the conduct described in this Code.

Management must also ensure that all monitoring procedures established to guarantee compliance with this Code, policies, and procedures operate correctly.

2.3. Violations of the Code

Failure to comply with this Code may constitute a labor offense and may be subject to the appropriate sanctions, regardless of any other liabilities that may have been incurred.

3. BASIC PRINCIPLES OF CONDUCT

The business and professional conduct of persons subject to this Code must comply with the following basic principles:

3.1. Respect for the law

The activities of Surinfo Cadiz S.L. shall be carried out in strict compliance with applicable legislation.

3.2. Ethical integrity

The business and professional activities of Surinfo Cadiz S.L. and its employees shall be based on the values of integrity, honesty, avoidance of all forms of corruption, and respect for the particular circumstances and needs of all parties involved.

Our company will promote among its employees the recognition and appreciation of conduct consistent with the principles established in this Code.

3.3. Respect for human rights

All actions by Surinfo Cadiz S.L. and its employees shall show scrupulous respect for the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights.

4. RELATIONS WITH AND AMONG EMPLOYEES

The relationship between Surinfo Cadiz S.L. and its employees, and among employees themselves, shall be based on compliance with the following commitments:

4.1. Respectful treatment and prohibition of discrimination

Surinfo Cadiz S.L. assumes responsibility for maintaining a work environment free from discrimination and from any conduct involving personal harassment. Every worker must be treated fairly and respectfully by superiors, subordinates, and colleagues. Any abusive, hostile, or offensive conduct, whether verbal or physical, will not be tolerated.

4.2. Abolition of child labor

Surinfo Cadiz S.L. does not permit child labor and will not use child labor or incorporate into its business activity any product or service derived from it. It will ensure compliance with the provisions of the International Labour Organization (ILO) regarding the work of minors.

4.3. Equal opportunities

All employees shall enjoy equal opportunities for professional development regardless of age, sex, marital status, race, nationality, or beliefs. Our company undertakes to establish an effective equal opportunity policy so that employees develop their professional activity based on merit. Promotion decisions shall always be based on objective circumstances and assessments.

Employees shall respect the equal opportunity policy within their professional environment and support the personal and professional learning of their colleagues.

4.4. Occupational health and safety

Surinfo Cadiz S.L. shall provide its employees with a safe and stable environment and shall keep prevention measures up to date. All employees are responsible for strict compliance with health and safety rules in order to protect themselves and other employees or third parties.

Employees must also make responsible use of the equipment assigned to them when carrying out risky activities, share knowledge with colleagues and subordinates, and promote compliance with risk prevention practices.

4.5. Respect for privacy and confidentiality of employee information

Surinfo Cadiz S.L. undertakes to request and use only those employee data that are necessary for the effective management of its business or whose recording is required by applicable regulations. It shall take all necessary measures to preserve the confidentiality of personal data in its possession and to ensure that any transmission of such data, when necessary for business reasons, complies with current legislation.

Employees who, in the performance of their professional activity, have access to information about other employees shall respect and promote the confidentiality of that information and shall use it responsibly and professionally.

4.6. Promotion of personal and professional balance

Surinfo Cadiz S.L. values the benefits for employees and for the company of a balance between professional and personal responsibilities and will promote measures aimed at reconciling these two areas, within applicable legal limitations.

5. COMPLIANCE WITH APPLICABLE LAWS

5.1. Relations with public authorities

Surinfo Cadiz S.L. undertakes to maintain open and honest communication with its government partners. Employees who interact with public authorities on behalf of our company must ensure that all communications, whether direct or through intermediaries, are accurate and comply with all applicable laws and regulations, including those relating to lobbying and anti-corruption.

5.2. Anti-corruption laws

Surinfo Cadiz S.L. requires compliance with all applicable laws prohibiting bribery, especially bribery of public officials, including those set out in the Spanish Criminal Code.

5.3. Anti-money laundering laws

Employees must comply with all anti-money laundering laws, maintain business only with reputable partners, and avoid any transaction that may be connected with money laundering or unlawful activities.

5.4. Fair competition

Surinfo Cadiz S.L. prohibits any conduct involving illegal practices of unfair competition and undertakes to ensure compliance with competition laws applicable in the countries where it carries out its activities.

5.5. Accuracy of books and records

Surinfo Cadiz S.L. has accounting practices in place that help ensure the accuracy of its books and records.

6. COMMITMENTS TO THIRD PARTIES AND THE MARKET

6.1. Quality

Surinfo Cadiz S.L. establishes the pursuit of quality in its products and services as a guiding principle of its business activity. It will provide its employees with the necessary resources for the development of the most appropriate quality management systems at all times, seeking the highest satisfaction of customer expectations and striving to anticipate their needs.

6.2. Confidentiality regarding third-party information

Surinfo Cadiz S.L. guarantees respect for the confidentiality and privacy of third-party data in its possession and undertakes to preserve the confidentiality of such data, without prejudice to any legal, administrative, or judicial provisions requiring disclosure to entities or persons or making them public. It also guarantees the right of affected third parties to consult and request modification or correction of data when necessary. Employees shall maintain the confidentiality of such data in their professional activity and refrain from any inappropriate use of this information.

6.3. Transparency, value creation and corporate governance

Surinfo Cadiz S.L. and its employees shall base their relationships with customers, suppliers, competitors, and other market agents on the principles of integrity, professionalism, and transparency.

Accordingly, the company adopts as a guiding principle of its business conduct the transmission of truthful and complete information that accurately reflects the company, its business activities, and its business strategies. Communication shall always be carried out in accordance with applicable rules and deadlines.

6.4. Protection of company assets

Surinfo Cadiz S.L. and its employees shall always seek, within their scope of action and obligations, the greatest protection of all assets and rights that make up the company's property, preserving their integrity and avoiding misuse.

6.5. Conflicts of interest

Employees must avoid situations that may give rise to a conflict between their personal interests and those of the company itself, and must refrain from intervening or influencing decision-making when, directly or indirectly, they or a third party linked to them by a significant economic, personal, or professional relationship has a personal interest.

Employees who find themselves in a conflict-of-interest situation are obliged to report it to their hierarchical superior. Conflicts between personal interests and business interests shall always be resolved in favor of the latter.

7. COMMITMENTS TO THE COMMUNITY

7.1. Environment

Surinfo Cadiz S.L. shall seek the greatest possible respect for the environment in which it carries out its activities and shall minimize any negative effects these activities may cause. It will provide its employees with the most appropriate resources for this purpose. It will also contribute to the conservation of natural resources and of spaces of ecological, scenic, scientific, or cultural interest. To this end, it will establish best practices and promote knowledge and use of them among its employees. Our company undertakes strict compliance with applicable environmental legislation.

7.2. Social commitment

Surinfo Cadiz S.L. undertakes to act in a socially responsible manner, in compliance with the law, and in particular assumes responsibility for respecting the cultural diversity, customs, and principles in force among the people and communities affected by its activities.

Knowing what is right and not doing it shows a lack of courage.
Confucius