



# CODE OF ETHICS

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REVIEWED BY		
Compliance Committee		
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VERSION		
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## MESSAGE FROM THE DIRECTORATE-GENERAL

Our business fabric is currently affected by a growing regulatory production and by great regulatory pressure.

After several complicated moments, crises of confidence in institutions and social agents, behaviour of dubious reputation and, likewise, situations far from the level of responsibility that should be demanded of organisations, today's society demands not only compliance with the law, but compliance carried out under the umbrella of principles, values and ethical standards.

Diligent attitude and profit-making, i.e. ethical conduct and business growth, are not configured as aspects that go in opposite directions, but as elements that converge around a reference criterion that should guide the decisions of each and every one of us and, therefore, those of **GRUPO DIGGIA** as an organization and as a whole.

For all these reasons, we have decided to adopt this Code of Ethics, which includes the fundamental values, guiding principles and standards of conduct that must underpin every action, every conduct, every decision-making. We are aware that our behaviour constitutes the brand and image of **GRUPO DIGGIA** (hereinafter, "the Organisation") and, therefore, the axis around which the reputational judgement that may be carried out by our customers, suppliers, contractors, collaborators, business partners and other third parties, as well as the market and society in general (hereinafter, "stakeholders").

Based on the above, we want to express our firm commitment to ethical business behavior and respect for current legislation. However, in order 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 make a detailed reading of the Code of Ethics, whose content is summarized in the motto "act correctly", which implies a constant effort on the part of each and every one 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.

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# 1. INTRODUCTION

This Code of Ethics establishes the fundamental values, guiding principles and standards of conduct that must guide the actions and behaviour of the Organisation's professionals (from the Management and the Administrative Body, to workers, including middle management and management positions), 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 demands of today's economic traffic are not only focused on compliance with the laws in force in the various legal systems. Stakeholders demand that organizations achieve high ethical standards for the proper development of relationships and commercial and other links.

Therefore, mere compliance with the law is not enough, but it is required that this compliance be carried out in an ethical manner, namely, on the basis of different values, principles and standards of conduct that should guide the behavior of each and every one of the professionals, and that, in this way, they must be the reflection of a common ethic inherent to the organization itself.

Based on the above, the Organization expresses our firm commitment to a corporate culture based on solid ethical standards, by virtue of which each and every one of us has the duty and obligation to comply with the rules established in this "Code of Ethics".

In this way, we will contribute to the collective success of the organization, through the promotion of our brand in the market and the maintenance of a good reputation. The latter is configured as an intangible resource of an essential nature for attracting and maintaining talent, customer loyalty, the relationship with suppliers and contractors or trust and credibility in the eyes of financial institutions, Public Administrations, business partners and the market and society as a whole.

In this way, all professionals must be an active part in our commitment to respect and preserve, every day and with each action, the brand of the Organization. We must always be aware of the difficulty and great effort involved in acquiring a good reputation and, likewise, of the ease with which this reputation could be negatively affected in the event of actions or decision-making that are not aligned with the highest ethical and behavioural standards.

Therefore, through this Code of Ethics, the Organization reinforces its commitment to compliance with current legislation and to ethical behavior that involves the enhancement of our way of working, our way of acting, our decision-making and our way of relating to the *organization's* stakeholders.

## 2. PURPOSE AND OBJECTIVES

The fundamental aims and objectives of this Code of Ethics are the following:

- To establish the fundamental values, guiding principles and rules of conduct that must govern the actions and behaviour of the Organisation's professionals, that is, the ethical standards that will act as standards that must guide our way of proceeding and our corporate culture.
- To prevent any violation, infraction or non-compliance with current legislation, this Code of Ethics or the internal policies, procedures or instructions of the Organization, which could cause serious damage, not only from a legal or economic point of view, but also in terms of affecting our brand, image and reputation.
- To promote among our *stakeholders* behavioural guidelines that are consistent and aligned with the fundamental values, guiding principles and standards of conduct of the Organisation, promoting the development and implementation of ethics and compliance programmes and ensuring that they adhere to our Code of Ethics.

## 3. SCOPE OF APPLICATION

This Code of Ethics shall be mandatory and directly applicable to all professionals of the Organization, regardless of:

- Its type of contract.
- Your geographic location.
- The functions and tasks performed.
- Their hierarchical position or role held within the organization.

Specifically, this Code of Ethics is applicable to all the companies in the group<sup>1</sup>:

- DIGGIA SOLUTIONS S.L.
- GAMMA SOLUTIONS S.L.
- SFERAONE SOLUTIONS & SERVICES S.L.
- WENEA MOBILE ENERGY S.L.
- SILENCE BLEU S.L.
- GAMMA SOLUTIONS HEALTH S.L.
- NORDIAN SOLUTIONS S.L.

In addition, this Code of Ethics will be applicable to suppliers, contractors, collaborators, business partners and all those who work on behalf of the organization, such as consultants, agents, intermediaries and subcontractors.

In this way, the Organization's professionals must demonstrate their commitment to comply with the fundamental values, guiding principles and standards of conduct of our Code of Ethics.

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<sup>1</sup> Group companies located in the UK are also included

Therefore, it is mandatory that all professionals sign the Accession Document annually and, in any case, every time there is a modification or update of the contents of the Code of Ethics.

## 4. CORE VALUES

### 4.1. Integrity

The Organization's professionals must carry out their activities by acting with honesty and honesty in their relationships with *stakeholders* and, especially, with customers, 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 does not only imply technical rigor in the activity of professionals, but a constant commitment to responsibility, dedication, loyalty and the search for excellence.

This quality requirement requires that all members of the Organization receive sufficient training within the scope of their respective responsibilities, so that the client obtains a valid and effective response at all times, in accordance with their needs.

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

### 4.3. Confidentiality

All documentation and information of which the Organisation's professionals are aware, whether verbal or written, whether from clients, other third parties or relating to internal *know-how*, will be treated with absolute confidentiality and exclusively for the purposes of the Organisation's activity, this duty being understood for all matters of which professionals are aware in all their areas of action.

### 4.4. Respect for the integrity of persons and human rights

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

Likewise, the Organization will carry out its actions and carry out its activities with absolute respect for the Universal Declaration of Human Rights.

## 5. GUIDING PRINCIPLES

### 5.1. Lawful action and principle of legality

The Organization undertakes to carry out its activities in accordance with the legislation in force in all geographies and in all the areas in which it operates.

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

### 5.2. Non-discrimination and equal opportunities

The Organization promotes the creation of a working environment where all professionals are treated with impartiality, 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 for harassment

The Organization expresses its absolute rejection of any behavior or attitude that could violate the dignity of people or that, directly or indirectly, could constitute harassment behavior or attitude, in any of its many forms.

Likewise, and in development of the above, the Organization has equipped itself with a Harassment Prevention Protocol.

## 6. RULES OF CONDUCT

### 6.1. Prevention of corruption and bribery

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

Certain actions carried out incorrectly could give rise to corrupt or bribery practices, based on the risk that, through these, they are intended to influence the other party, modifying their will with the intention of obtaining from them an unjustified consideration or benefit.

That is why the Organization is committed to zero tolerance for bribery and corruption.

Thus, one of the Organization's unavoidable objectives is to actively combat any corrupt practice that may be incurred, which supposes not only a violation, infraction or non-compliance with the norms of our legal system, but also a lack of alignment with the ethical standards voluntarily assumed.

At the global level, States ensure that effective, proportionate and dissuasive sanctions are imposed on organizations responsible for acts of corruption.

Therefore, the implementation of preventive measures in this area will prevent ways of proceeding that could constitute acts of corruption and bribery and that, therefore, could even lead to the commission of certain criminal offences, which can pose a serious risk to the image and reputation of the Organization.

With respect to the modalities and typologies of bribery, we must refer to the following:

- Active bribery. Promising, offering or delivering to a person, directly or indirectly, a gift, remuneration or advantage of any kind (monetary or otherwise), in order to obtain in exchange an unjustified consideration or benefit, as consideration for a previous, simultaneous or future action of said person.
- Passive bribery. Receiving, requesting, accepting or accepting from a person, directly or indirectly, a gift, remuneration or advantage of any kind (monetary or otherwise), as consideration for a previous, simultaneous or future action that brings the other party an unjustified consideration or benefit.

In our legal system, the term "bribery" (both active bribery and passive bribery) does not constitute in itself a type of crime, but the conduct it entails is present in various criminal modalities included in our Criminal Code, such as bribery, influence peddling, corruption between individuals, etc.

In this regard, certain peculiarities or defining features that characterize bribery behaviors must be taken into account:

- Although bribery is traditionally associated with public officials or authorities, it also occurs between individuals.
- The beneficiary of the bribe can be a natural person or a legal person.
- The gift, retribution or advantage of bribery can be monetary or of another nature, such as gifts, meals, shows, trips, leisure, donations, sponsorships, etc.

- For there to be a bribe, a simple promise, offer or acceptance is sufficient, so the material concession or effective delivery of the gift or remuneration is not necessary.
- In the specific case of passive bribery, it must be taken into account that such bribery will also exist, even if the beneficiary of the bribe is a person other than the one who receives, requests, accepts or accepts, directly or indirectly, the gift or remuneration.
- In the case of bribery of a public official, it may take place before a national public official or before a foreign official.

## 6.2. Conflict of interest management

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

Thus, it is a situation of conflict of interests that occurs when the interest that should govern the actions of a professional is displaced, altered or influenced by a personal interest, giving rise to the possibility that the way in which the person proceeds, the performance of his functions, the assumption of his responsibilities and the making of his decisions, may depart from criteria of objectivity and impartiality.

Therefore, the interest that should govern the performance of the Organization's professionals, that is, the interest of the Organization itself, should never be opposed or compromised by a personal interest.

Therefore, professionals must carry out their functions and tasks with absolute responsibility, dedication, loyalty and the pursuit of excellence, as indicated above in the *"Fundamental Values"* section and, specifically, when developing the *"Commitment to quality and professionalism"*.

## 6.3. Selection and hiring of professionals

The incorporation of professionals into the Organization will be carried out in accordance with 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 grounds of birth, race, sex, sexual orientation, religion, opinion or any other personal or social condition or circumstance.

In this way, the commission of bribery modalities executed through the hiring of people close to the members of the Organization will also be avoided, as well as possible conflicts of interest.

## 6.4. Financial information integrity and tax and tax compliance

The Organization expresses its firm commitment to comply with generally accepted accounting principles and with the applicable fiscal and tax regulations.

On the other hand, all daily transactions will be recorded in the accounts, keeping the supporting documentation of the same in the corresponding file, for the time formally established by the Organization and, in any case, for the legally established deadlines.

The Organization shall not in any way obstruct the verification and evaluation work that may be carried out by the auditing entities.

## **6.5. Business transactions and invoicing**

Commercial transactions are inspired by the principles of clarity and transparency, so that the Organization's professionals must ensure that no action can be interpreted as deceiving third parties.

In this sense, it is strictly forbidden to negotiate contracts on behalf of the Organization without the corresponding authorizations, as well as to proceed with the disposal of assets without sufficient powers.

## **6.6. Relationship with suppliers and contractors**

The selection, approval and evaluation of suppliers and contractors will be carried out on the basis of objective criteria, such as characteristics, cost, price evolution, after-sales service, economic situation, forms and terms of payment, quality, environmental management, occupational risk prevention, reputation, compliance, etc., trying to guarantee at all times an adequate quality-price binomial.

Similarly, in this area, the above will be directly applicable with respect to conflicts of interest, so that the selection, approval and evaluation of suppliers and contractors must have as its fundamental axis the interests of the Organization, which must not collide in any case with the personal interests of professionals, in order to strengthen a practice inspired by criteria of objectivity and impartiality.

## **6.7. Relationship with business partners**

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

Similarly, in this area, the above will be directly applicable with respect to conflicts of interest, so that the selection of business partners must have as its fundamental axis the interests of the Organization, which must not collide in any case with the personal interests of the professionals, in order to strengthen a practice inspired by criteria of objectivity and impartiality.

## **6.8. Customer Relations**

The Organisation's objective is to provide a service of the highest quality to our clients, which does not only imply technical rigour in the activity of the professionals, but also a constant commitment to responsibility, dedication, loyalty and the search for excellence, as indicated above in the section "*Fundamental Values*" and, specifically, when developing the "*Commitment to quality and professionalism*".

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

The loyalty of our customers is an element of vital importance that requires the effort of each and every one of us, every day and in every activity.

## **6.9. Relationship with Public Bodies and Administrations**

The professionals of the Organization will articulate their relations with the Public Bodies and Administrations on the basis of the principles of loyalty, cooperation and transparency, in such a way that any proposal of unlawful action by any official or Public Administration must be rejected.

While socially accepted in certain legal systems, facilitation payments are strictly prohibited by the Organization, as they could lead to corruption and bribery.

## **6.10. Relations with governments, political parties and trade unions**

The Organization will not carry out, directly or indirectly, either in Spain or in other countries, any type 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 influence groups linked to political parties are prohibited, as well as donations in favour of trade unions, companies, organisations, associations, foundations or influence groups linked to them.

## **6.11. Media relations and public information**

The actions carried out in the scope of the different communication channels of the Organization, such as the press, radio, television, corporate website, Intranet, social and professional networks, etc., must be inspired by the principles of transparency, integrity and honesty.

In this sense, all communication actions must provide professionals and *stakeholders with* objective, clear, faithful, truthful and verifiable information, thus contributing to the strengthening of the corporate identity and image and the reputation of the Organization.

The professionals involved in the disclosure process must respect and act in a manner consistent with the aforementioned principles and requirements.

## **6.12. Cash flow management**

To the extent possible, the Organization will not, under any circumstances, make collections or payments in cash, unless this is the only alternative.

In this case, the legal limit established by current regulations of €1,000 must be respected, and the operation must be accompanied by the appropriate documentary support.

### **6.13. Use of IT tools**

The Organization's professionals may not make unauthorized use of the Organization's computer systems and documents, as well as those owned by third parties and to which they may have access by virtue of the work they perform.

Likewise, the use of computer tools and systems must be used strictly professionally, in order to protect them against internal and external threats or improper use.

### **6.14. Intellectual and industrial property**

The Organization's professionals may not download programs, tools or applications from the Internet without the express authorization of the Organization.

It is strictly forbidden to install pirated programs.

All professionals must use the Organization's own software or the one for which they have the required authorization, as the corresponding licenses have been acquired.

Likewise, any other elements that are protected by intellectual or industrial property rights and for which the Organization does not have authorization to use will not be used.

### **6.15. Use of Information from Third Parties**

In the course of our activity, the Organization's professionals have access to a large amount of confidential information. It is our duty and core value to protect such information.

Therefore, it is strictly forbidden to incorporate into the Organization any type of physical or electronic information or documentation belonging to another entity and that has been obtained without the consent of the same.

Likewise, information of third parties of which it is lawfully known by virtue of a certain relationship with them may not be revealed, disseminated or transferred.

### **6.16. Antitrust and advertising**

The Organization shall act in the markets in a fair manner, in good faith and in accordance with the principle of free competition.

Therefore, it shall avoid any act that could be classified as unfair competition and any predatory practice or conduct, of a collusive nature or that implies an abuse of a dominant position.

Likewise, it will refrain from making any type of advertising that may be considered misleading or that may mislead with respect to the particularities, peculiarities or characteristics of the services offered.

## 6.17. Protection of personal data

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

Therefore, it is strictly forbidden to communicate, disclose or disseminate personal data of professionals, customers, suppliers and other subjects, including economic data and medical or health data.

If, exceptionally, the security of personal data could be compromised, it would act quickly, efficiently and responsibly.

## 6.18. Prevention of money laundering and terrorist financing

The Organization will act with the utmost rigor to prevent any operations, transactions or activities of money laundering or terrorist financing, guaranteeing a firm commitment to comply with all national and international regulations that are applicable in this area.

Therefore, all professionals have the inexcusable duty to pay special attention to possible cases in which there are indications of lack of integrity on the part of the persons, companies, entities or organizations with which they maintain commercial or business relationships.

## 6.19. Occupational Health and Safety

The Organization recognizes that the safety and health of workers are critical to the long-term success and sustainability of the Organization.

The Organization is committed to providing a safe and healthy work environment for all workers, as well as contractors and third parties. To fulfill this commitment, the Organization establishes the following principles:

- **Health and Safety Priority:** each member of the Organization has the responsibility to prioritize safety and health in all work decisions and actions.
- **Legal Compliance:** The Organization is committed to complying with all applicable laws and regulations related to occupational safety and health at any type of location.
- **Risk identification and management:** the Organization is committed to implementing systematic processes to identify, assess and manage occupational risks, for which it actively works to eliminate or reduce hazards and provide the necessary training so that all workers are aware of the risks associated with their job functions.
- **Active participation of workers:** the Organization encourages the active participation of workers in the identification of risks, the development of policies and the implementation of preventive measures.
- **Ongoing education and upskilling:** The Organization provides ongoing education and upskilling to ensure that all workers are adequately informed about occupational safety and health best practices. This includes initial information for new additions and regular updates for existing staff.
- **Preventive action:** The Organization takes proactive measures to prevent occupational injuries and diseases. This includes implementing appropriate controls and security measures.
- **Responsibility:** the leaders and supervisors of the Organization will be responsible for promoting a culture of safety and health at work in their teams. This includes regular

communication, consistent policy enforcement, and active participation in promoting a safe work environment.

- **Transparent communication:** The Organization encourages open and transparent communication on occupational safety and health issues.
- **Continuous improvement:** the Organization is committed to the continuous improvement of all occupational health and safety standards. Policies and procedures are regularly reviewed to reflect industry best practices and technological advances.

## 6.20. Environmental protection

The Organization expresses its firm commitment to carry out its activities in a sustainable manner, minimizing negative environmental impacts and giving absolute priority to preventive actions over corrective ones.

In this regard, the Organization's approach to action will be based on the following criteria:

- Firm commitment to compliance with legislation and environmental 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 AND SENSITIZATION

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

These actions will have the purpose of training, raising awareness and sensitizing Professionals, with the aim of promoting a culture of respect for the law, the Code of Ethics and the internal regulations of the Organization at the corporate level.

Ultimately, this will have a very positive impact on the internal functioning of the Organization itself, on the correct development of processes, on the improvement of competitiveness, on the increase of transparency and, especially, on the maintenance, consolidation and strengthening of the corporate image, brand and reputation, guaranteeing the trust of the Professionals, suppliers, customers and other *stakeholders*.

In addition to the aforementioned training activities, the Organization may undertake other training, awareness-raising and sensitization actions, such as publications on the Web or Intranet, issuance of internal communications, incorporation on the notice board, etc.

## 8. DUE DILIGENCE ON NEW PROFESSIONALS

In application of this Code of Ethics, the Organization undertakes to inform new staff of its existence, its content and the obligation to comply with it.

## 9. COMMUNICATION OF DOUBTS AND NON-COMPLIANCE

The Organisation's professionals must report any violation, infraction or non-compliance with this Code of Ethics through the Ethics Channel (<https://centinela.lefebvre.es/public/concept/1783828?access=9w4nX%2fTuO7zVcbxexNFdoXjcdfWOp%2fBK%2biJVMc69kd0%3d>), which will lead to the initiation of an internal investigation file.

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

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

## 10. APPROVAL

This regulation is approved by the Board of Directors of **DIGGIA SOLUTIONS S.L.** (parent company **GRUPO DIGGIA**).

## 11. COMMUNICATION AND DISSEMINATION

Without prejudice to the above provisions for newly incorporated Professionals, this regulation will be communicated and disseminated annually to the Organisation's Professionals, through digital or physical distribution (sending by email, publication on the Intranet, issuing internal communications, incorporation on the notice board, etc.).

## 12. ENTRY INTO FORCE AND VALIDITY

This regulation enters into force and is in force from the day following its communication and dissemination to the Organisation's Professionals, in accordance with the provisions of the previous section.

## 13. CONSEQUENCES OF THE VIOLATION OF THE CODE OF ETHICS

Violation, infringement or non-compliance with the rules contained in this Code of Ethics will empower the Organization to adopt the applicable disciplinary measures against its professionals, in accordance with the internal disciplinary regime and, in any case, in accordance with the Workers' Statute, the Collective Agreement and any other provisions on labor matters that may be applicable.



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

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## 14. VERSION CONTROL

<b>VERSION</b>	<b>DATE</b>	<b>DESCRIPTION OF THE CHANGE</b>
V. 01	05/03/2024	Issuance of the document
V. 02	19/12/2024	Removal of the company GAMMA GLOVES S.L. from section "3. SCOPE OF APPLICATION"



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## ANNEX I. COMMITMENT AND ACCEPTANCE OF THE CODE OF ETHICS

In \_\_\_\_\_, \_\_\_\_\_

I, \_\_\_\_\_, with DNI \_\_\_\_\_, by signing this document DECLARE:

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

Signature:  
\_\_\_\_\_