



Statement of Corporate Social Responsibility



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Introduction



Yours sincerely,

Alejandro Daniel O'Davoren

Deputy Managing Director

A handwritten signature in black ink, appearing to be 'A. O'Davoren'.

We live in a liquid, constantly evolving world. The challenges facing society are complex and appropriate responses to them require collaboration between governments, organisations and individuals. Seidor, as an international technology consultancy firm, assumes the responsibility to carry out its activity based on social commitment and the desire for progress for all regions of the world.

As an influential player in the business world, Seidor carries out its activity considering aspects that are essential to life, such as climate change, human rights, people's wellbeing, equal opportunities and a scrupulous respect for transparency measures and good business practice.

This document sets out our commitment as an organisation to align ourselves with the United Nations Global Pact. We work to identify, measure and implement actions that are beneficial to our environment, both on an environmental level as in the field of human relations.

Technology is now a core value in providing welfare and progress to the world. It will be even more so in the future. Our mission is to bring it to every organisation by placing people at the centre and promoting technological development that will enable harmonious growth with the planet. Achieving this, moreover, by rooting ourselves with the local framework, in a collaborative way and contributing to generate an ecosystem of growth.

The challenges of the future call for socially and environmentally conscious organisations, in line with a reality that envisages a new future for humanity. Organisations and people in leadership positions can be drivers of this change. At Seidor, we are committed to being part of it.

Our Commitment

For years, at Seidor we have been setting Corporate Social Responsibility goals to ensure a future for people and the planet in general. Acquiring this social responsibility, Seidor went one step further in 2014, adhering to the United Nations Global Pact.

The United Nations Global Pact presents a strong commitment to the 10 principles that should govern business actions around the world to achieve the ultimate goals of the United Nations, under the name of the Sustainable Development Goals (SDG).

The 10 Principles of the United Nations Global Pact fall into 4 main areas and are as follows:

Human Rights

1. Businesses should support and respect the protection of internationally recognised human rights within their sphere of influence.
2. Businesses should make sure that their companies are not complicit in the violation of human rights.

Work

3. Businesses should support the freedom of association and the effective recognition of the right to collective negotiation.
4. Businesses should support the elimination of all forms of forced or coercion work.
5. Businesses should support the eradication of child labour.
6. Businesses should support the abolition of employment and occupation discrimination practices.

Environment

7. Businesses should maintain a preventive approach to benefit the environment.
8. Businesses should encourage initiatives that promote greater environmental responsibility.
9. Businesses should encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

Seidor demonstrates its strong year-on-year commitment to these principles through the tools and actions described below.

Human Rights

We are committed to preserving and promoting the protection of fundamental human rights, internationally recognised. We have a Code of Business Conduct (hereinafter COBC) which serves as a framework of commitment in respect for the human rights of the company. It aims to determine the values, principles and standards that should govern the behavior and actions of each of Seidor's employees, as well as the members of the administrative bodies of the companies that comprise it. The Code is also applicable to the company's main stakeholders: customers, suppliers and various stakeholders.

On the other hand, we recognise that the principle of equal treatment and equal opportunities for the recipients of the COBC is a guiding principle of Human Resources policies and applies to the recruitment of employees as well as to training, career opportunities, salary levels and other aspects of the employee's employment relationship.

Areas of action

Compliance

At Seidor we have a programme that promotes and develops a culture of compliance involving managers, employees and related agents. We carry out training: "Corporate Criminal Responsibility (Compliance)" which is given to all the people who are part of Seidor.

Suppliers

With regards to the selection, approval and evaluation of suppliers, our code of conduct stipulates that only suppliers whose business practices respect human dignity and do not violate the law will be sought and selected. In our integrated management system, supplier evaluation is carried out by completing a supplier evaluation form. In our evaluation and approval of suppliers, we positively assess their adherence to the Global Pact and their commitment to sustainability.

Personal data protection

At Seidor we take into account that the right to the protection of personal data is a fundamental right of all individuals, which translates into the power to control the use of their personal data, guaranteeing fundamental rights and public freedom. For this reason, we have mechanisms, procedures and courses of action for the processing of the personal data of all interested parties (customers, employees and other entities). We have the appropriate technical and organisational data protection measures in accordance with Organic Law 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights (hereinafter LOPDGDD), following the provisions of Regulation (EU) 2016/679, of 27 April 2016, on the protection of natural persons with regards to the processing of

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personal data and on the free movement of such data (hereinafter RGPD).

We have also updated the project for the implementation of the management system for the protection of personal data as established in the LOPDGDD and the RGPD, in which:

- A Data Protection Committee has been set up to ensure the correct operation, management and protection of the personal data processed.
- The Spanish Data Protection Agency (AEPD) has been appointed and notified a Data Protection Delegate (DPD) certified by the AEPD.
- The Register of Personal Data Processing Activities has been updated, which lists the processing carried out by Seidor as Data Controller and/or Data Processor, for the correct management of its activity.
- A procedure has been drawn up and implemented for the management of requests for data protection rights that may be exercised by data subjects.
- A procedure for the management and monitoring of personal data processing has been developed and implemented.
- A privacy risk analysis and assessment methodology has been developed and implemented to determine the level of risk associated with the processing of personal data.
- Training in data protection has been provided to all employees of the corporate group.
- All legal, contractual and video-surveillance documentation necessary for correct compliance with data protection regulations has been updated, as well as the recommendations of the AEPD (Spanish Data Protection Agency).

Solidarity initiatives

At Seidor we promote actions that aim to contribute to improving the living conditions of people, especially those at risk of social exclusion. We carry out these actions considering all the alliances that we have built in our organisation, getting involved with local and international entities to carry them out as effectively as possible.

At the international level, our actions are carried out through United VARs, a global network of leading IT consulting companies specialising in SAP solutions to which we belong, and with whose foundation we develop social activities focused on achieving the SDGs.

Our activities are intended to have an impact both locally and internationally. Some of these projects are highlighted below:

Human Rights

Collaboration with the Exit Foundation

Seidor has been collaborating for two years with the Exit Foundation, a non-profit organisation whose aim is to reduce early school drop-out among young people in situations of social vulnerability. Seidor actively participates in the annual conferences organised for young people at risk of social exclusion, so that they can find out about the professional opportunities that exist in the IT field, explaining the training environment, as well as offering experience and advice to all those who need it.

Collaboration with IMI: IT support for vulnerable families

In collaboration with the Instituto Municipal de Informàtica de Barcelona, in the framework of our regular activity with the Barcelona City Council, we store the equipment discarded in the supply, replacement and configuration of new workstations, to prepare them and donate them to different NGOs selected by IMI, which in turn send this equipment to families in situations of vulnerability.

Camboya: I support wash

In Cambodia, United VARs co-founder Detlef Mehlmann discovered a school in Cambodia that received water through a water collection and filtration system that was built thanks to a donation of around €20,000, making a big impact for the students and teachers of the school. Mehlmann passed this news on to United VARs, agreeing to support fundraising to help more schools. As part of the "I support wash" campaign, each United VARs member would contribute 0.1% of reported turnover during the second quarter. SAP also pledged to contribute €20,000 to the cause.

Tanzania: construction of orphanage building

During 2020, through United VARs, we supported a project to build an orphanage in Tanzania and improve the living conditions of children in the area. This project includes the construction of the orphanage building for 40 children, within a school with 100 pupils.

Work

At Seidor we are aware that our most valuable resource is our people, that is why we have numerous means to support and facilitate the work of the people who make up Seidor.

Our human team, both internally and with customers, suppliers and other organisations with which we collaborate, work with principles that support the elimination of any kind of discrimination in employment and occupation.

In addition, approximately 90% of Seidor's workforce is permanent, due to career development and job stability being a priority for our organisation. With our Career and Job Stability Plan, we support our staff in achieving their objectives and goals, growing together. In addition, the remuneration policy applied by Seidor is free of gender bias.

Areas of action

Collective bargaining

At Seidor we apply collective negotiation practices and ensure that there is no forced or child labour of any kind. We recognise the rights of association, unionisation and collective negotiation with full legitimacy.

Occupational risk prevention

We have a Joint Occupational Risk Prevention Service, which carries out regular audits to verify Seidor's preventive management and the health and safety conditions of the people who work at Seidor. The main mission of the service is to reduce or eliminate the risks derived from work, which is why it has a policy of training in occupational risk prevention for the entire workforce that is carried out on a regular basis. In addition, due to the global situation we are experiencing because of COVID-19, we are carrying out accessible training for the entire workforce to guarantee the wellbeing of people in areas such as:

- Anxiety management with tools available to all staff.
- Managing the fear of uncertainty and minimising its effect on our lives.
- Time and energy management.
- Communication in the couple to prevent conflicts.

Diversity

We are committed to the integration of people with disabilities in the professional environment and we ensure compliance with legal standards in terms of accessibility and disability quotas in the workforce.

Work

Our Business Policy and Code of Conduct requires that we treat people with dignity, respect, and fairness. Discriminatory treatment has no place or justification in our organisation and at Seidor we encourage the development and professional training of our employees, as well as their promotion, recognising the merits of the workers, regardless of other factors.

Gender equality

Seidor is committed to maintaining, strengthening and reinforcing our commitment to gender equality.

To this end, the company has an Equality Committee whose function is to ensure the effective application of the measures established in the Equality Plan, as well as monitoring the effectiveness of these measures after their implementation.

This Equality Plan was drawn up following a quantitative and qualitative diagnosis of the state of the organisation to ascertain the company's real situation in terms of gender equality. Its objectives are as follows:

- Consolidate an inclusive company culture.
- Understand diversity as a value.
- Ensure the presence of women's talent at all levels, as well as equal opportunities in recruitment processes.

To this end, we hold regular meetings in the Equality Commission where we plan and agree on initiatives such as:

- Providing training on Equality to the organisation's staff.
- Training in the use of inclusive language and ensuring its correct application in the company's various internal and external communication channels.
- Carry out awareness campaigns and initiatives aimed at achieving full gender equality throughout the organisation.
- To develop and ensure the correct application of the set of actions aimed at achieving the gender equality seal (SIG).
- Guarantee total transparency in the selection and internal promotion processes by defining objective criteria of knowledge, experience and skills that are applied both in job offers and in defining the selection process and career plans for the entire Seidor workforce.
- Ensure the application of the same objective criteria described in the previous section to guarantee the application of a policy of equal pay.

Work

Finally, at Seidor we have a Protocol for the Prevention of Sexual Harassment, for reasons of sex, sexual orientation and gender identity, which establishes, among other things:

- A procedure aimed at prevention, through training and information for all Seidor staff.
- To channel claims and complaints with the due guarantees through specific channels for this purpose.

Conciliation

Seidor has been a pioneering company in understanding and appreciating that, for an increasingly larger group of people, the aspects derived from the implementation of a set of measures that improve, among others, the conditions of the job, the compatibility of the performance of the functions derived from the job with personal obligations, flexible working hours or teleworking, are basic when it comes to enhancing the ability to attract talent, the loyalty of this talent and the improvement of people's general wellbeing.

In this sense, long before the appearance of COVID in Seidor, we already had an infrastructure that allowed the performance of the functions of almost all the staff through remote access to the entire Information System and other resources of the organisation. And at the same time, by promoting the tools for collaborative use, communication systems, videoconferencing, telephoning, mobile telephony and a wide range of products and technologies that we also offer to our customers so that, based on our own success story, they can replicate the experience in their respective organisations.

This has not only allowed a much smoother adaptation of all employees to the new work and social reality imposed by COVID, but has also allowed us to significantly increase the number of people who, using a pre-existing infrastructure, have joined the benefits of the flexibility of teleworking.

Following this same line of action, at Seidor we are committed to continuing to strengthen and promote work-life balance measures with the aim of maintaining a balance between the different dimensions of the lives of the people who make up the entire workforce, thus improving their well-being and health.

The actions currently implemented are as follows:

- Possibility of teleworking.
- Flexibility in the timetable for entering and leaving the working day.
- Flexibility in the hours of weekly or monthly dedication.

Work

- Specific training courses for all staff on the change in the work paradigm induced by COVID.
 - Enabling channels for personal queries related to the social, work and personal environment of the affected person.
- Enabling a corporate app to provide an informative channel, as well as tools for booking meeting spaces or work at Seidor's physical facilities.
- Personal facilities:
 - Two or four days for reasons of illness or death of family members.
 - One day for moving house.
 - For the time required for prenatal examinations and childbirth preparation techniques that must be carried out during the working day.
 - Accumulation of the breastfeeding period by 15 calendar days to be taken once after the period of sick leave.

Environment

Our commitment to the environment is reflected in the habitual practices of the people who make up the company. We establish preventive measures that favour respect for the ecosystem and we encourage initiatives that promote greater respect for the environment. We guarantee excellence in our services by always offering the development and dissemination of environmentally friendly technologies, as a lever for growth for all our customers and for Seidor.

We continually establish objectives and goals in environmental matters, such as the control of our Carbon Footprint. It should be noted that we scrupulously comply with environmental legislation and we guarantee the availability of all the necessary resources to improve our Environmental Management System.

All measures have been discussed within our organisation and are being carried out subject to the relevant planning. Training and awareness-raising content has been created and provided to employees.

Areas of action

Environmental policy

At Seidor we have an Environmental Policy based on principles that contemplate how to perform our services and work in a way that respects the environment, preventing pollution and minimising the environmental impact that may arise from our work.

We train our employees in environmental practices through our Guide of Good Environmental Practices, which we complete and improve periodically, including, for example, advice and training in efficient driving, as we are aware that when it comes to the environment, everything adds up.

It is also worth mentioning our ISO 14001 Environmental Management System Certifications, as with the implementation of an Environmental Management System we ensure that environmental aspects are promoted by preventing pollution and negative environmental impact derived from the performance of work activities.

We carry out annual Environmental Audits, where we evaluate our Environmental Management System, thus detecting errors and improvements. We must also add the Internal Audits that are carried out periodically, which provide information on the Environmental Management System, revealing the necessary data to know if all the actions are being carried out correctly in order to comply with current legislation and the environmental objectives established.

Environment

Waste Management

In our offices we carry out an adequate Waste Management, we have containers for the separation of the different types of waste that can be generated within the office (organic, paper, cardboard, glass, batteries, etc.). Our authorised waste managers are responsible for collecting and treating this type of waste.

We have an Integrated Management System, we have an adequate system of environmental management standards and procedures, in accordance with the legislation in force in each case, which allows us to identify and minimise the different environmental risks, especially when it comes to: waste disposal, consumption of natural resources, handling of hazardous materials and prevention of spills and leaks.

Environmental impact

Seidor has identified those activities that may influence the environmental impact of its activity, and has implemented initiatives to reduce this environmental impact:

- Office maintenance and energy consumption: Environmental management.
- Carrying out an energy audit and an associated savings plan.
- Calculation of the carbon footprint, its registration and the associated reduction plan.
- Production of material to raise awareness of good environmental practices aimed at employees.
- Vehicle fleet and staff transport:
 - Carrying out an energy audit and associated savings plan.
 - Production of awareness-raising material on efficient driving, the use of public transport and the use of tools for remote meetings to avoid unnecessary travel.
 - Facilitating teleworking and flexible working hours, reducing commuting to offices.
- Management of waste produced in the operation of the activities and services (mainly electronic equipment):
 - Policy for the reuse of IT equipment.
 - Contracting authorised waste management companies.
 - Consumption of raw materials (mainly paper): Installation of smart network printers that avoid printing copies that are not subsequently removed; exclusive use of recycled paper; and the promotion of paperless offices.
- The calculation of Greenhouse Gas (GHG) emissions methodologically based on

Environment

the ISO 14064-1: 2012 standard, which we have subsequently certified and registered in the Registry of carbon footprint, offsetting and CO2 absorption projects of the Ministry for Ecological Transition and the Demographic Challenge.

- Reduction of electricity consumption:
 - Change of luminaires to LED.
 - Awareness campaigns on the efficient use of lighting and air conditioning.
 - Contracting electricity supply to companies whose generation is low-emission or green generation.
 - Encourage the use of low-emission leasing vehicles.
 - Reducing the distance travelled with own vehicles, favouring teleworking.
- Contracting an energy company to supply electricity with a commitment to 100% from renewable sources in most of the offices.

Collaborations

We collaborate with the Seur Foundation “tapones para una buena vida” (caps for a good life) which helps children with serious health problems. By collecting caps, we help children in need and at the same time we collaborate in minimising the emission of CO2 gases.

Anti-corruption

We work against corruption in all its forms. At Seidor we prohibit the use of any form of illicit payment, with the aim of obtaining any advantage in relations with its stakeholders, understanding that the concept of “advantage” includes favourable treatment or the guarantee of obtaining benefits due.

If bribes are promised, offered or solicited, Seidor employees must inform their direct superior and the management through the whistle-blowing channel.

We refrain from exerting any kind of illegal pressure on politicians; we do not finance political parties, their representatives or candidates, either in Spain or abroad: nor do we sponsor any event whose sole purpose is political propaganda.

If critical situations are detected in this area and, in accordance with current legislation, they must be submitted to Seidor’s governing body for prior review.

At Seidor we do not authorise the making, offering, or accepting of payments or benefits of any amount for the purpose of expediting services owed by its interlocutors.

Seidor employees who receive gifts or favours that are not authorised in the cases specified must inform the company’s Criminal Compliance body, which will assess whether they are relevant.

Areas of action

Training and awareness

During 2019, Seidor has continued to raise awareness of the SGCP among its professionals through presentations, a communication plan and online platform training.

During 2019, Seidor’s offices in Spain have carried out a mandatory training plan on criminal mandatory criminal compliance training through an online platform to which all the company’s professionals have access. Training has been given to practically the entire workforce, with a very satisfactory 94% pass rate. This training was extended during 2020 to new subsidiaries incorporated into the group.

Money laundering

At Seidor, we are committed to not engaging in practices that could be considered irregular in our relations with customers and suppliers.

In compliance with this commitment, internal procedures have been developed to establish controls to mitigate the risk of money laundering, especially in relation to cash

Anti-corruption

payments and international transfers.

Cybersecurity

To guarantee transparency and regulatory compliance, as well as the non-alteration of the company's information, we have established an internal cybersecurity centre to ensure the integrity of the company's information and digital security.

At Seidor, we embrace the commitment to information security and, for this reason, we have an Information Management System certified in accordance with the ISO 27001 standard, as well as compliance with the ENS (National Security Scheme) as a guarantee measure.

Our Future

Carbon footprint calculation

In 2018, for the first time, Seidor calculated its carbon footprint in Spain. We plan to reduce emissions by 15% by 2020 with the following actions:

- Reducing electricity consumption.
- Low-emission supply.
- Low-emission leasing vehicles.
- Reducing the distance travelled in vehicles through transport alternatives.

Energy commitment

At Seidor we have a system of environmental management standards and procedures that enable us to identify and minimise environmental risks. We have identified those activities that may have an impact on the environment and the following initiatives have been implemented:

- Maintenance and energy consumption of the offices: energy audits, calculation of the carbon footprint, employee training in good environmental practices, teleworking and flexible working hours.
- Vehicle fleet and staff transport.
- Waste management and services.
- Treatment of raw materials: use of recycled paper, promotion of low paper usage, installation of smart network printers.
- Energy audit: We have a series of energy measures to reduce energy consumption such as switching to LED lighting, promoting public or shared transport, training in efficient driving, use of tools for remote meetings, hybrid vehicles, review of contracted electrical power and improving the maintenance of electrical equipment in offices.

Useful links:

Certifications:

<https://www.Seidor.es/content/Seidorweb/es/Seidor/certificaciones.html>

Business Code:

<https://www.Seidor.es/content/Seidorweb/es/Seidor/codigo-conducta.html#>



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