

SEIDOR

# SEIDOR's Business Code



June 2022



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# Management Letter



I have the pleasure of presenting our Business Policy and Code.

This document outlines our commitment as an organisation. It provides a reference framework and establishes the principles of action and conduct for all the company's professionals and collaborators. This Code is therefore of paramount importance for all those who work at or for SEIDOR.

Our organisation is concerned about, and takes care of, people: teams, customers, partners, future professionals, society. Based on this premise, we have drawn up a Code that generally reflects the framework from which we contribute to the development of customers, partners, collaborators and the company in general, focusing on the human side of any activity. A Code that encapsulates our culture, our *raison d'être* and our purpose-driven aspirations: "Humanising the world through technology".

I encourage all our employees, managers and partners to join us in this commitment as a framework for action, focusing on the way we do business and trying to ensure that any service or solution we offer is sensitive to making the world a better place.

Yours faithfully,

**Alejandro Daniel O'Davoren**  
Deputy Managing Director

A handwritten signature in black ink, appearing to be 'A. O'Davoren', written over a horizontal line.

# Confidentiality

SEIDOR's Management leads and is committed to its Integrated Management System, to quality in the provision of its products and services to its customers, to the protection of the environment and to the security of the information it processes in its information systems.

SEIDOR is aware of the expectations of all those stakeholders with whom it interacts within the context of our activity, analyses the associated threats and opportunities and assesses the corresponding risk, and is committed to meeting these expectations, working to offer quality, safe and sustainable products and services.

## **We acknowledge that:**

Our activity has an impact on the environment by consuming natural and energy resources and generating waste.

Achieving the quality of our products and services is a strategic goal, which makes us more competitive and able to meet the requirements and needs of our customers and stakeholders.

Information is a strategic asset for SEIDOR, as a company whose main activity is the provision of Information Technology services, and therefore needs to be adequately protected. Therefore, we commit ourselves to: Identify the stakeholders and contextual elements of our activity (customers, SEIDOR's organisation, partners and shareholders, employees, candidates, partners and suppliers, public administration, social agents, society in general, etc.), seeking to satisfy their associated expectations, which underpins SEIDOR's strategic business direction and is the reference framework for establishing its objectives.

Carry out our services and activities in an environmentally friendly, resource-efficient way, managing the waste produced in such a way as to contribute effectively to sustainable development, without environmental degradation and preventing pollution

throughout the life cycle of the products, the supply chain and the services we provide.

Identify the environmental aspects or interactions arising from the performance of our activities and the products and services we develop, and know and evaluate all aspects and impacts. Associated environmental aspects, both positive and negative, in order to protect the environment, minimise and prevent pollution, greenhouse gas emissions and the consumption of natural and energy resources.

Ensure the confidentiality, integrity, availability, authenticity and traceability of own resources and information systems, as well as the assets of third parties (customers, collaborators, public administration, partners, etc.) that we manage or interact in our activity, identifying threats and opportunities, assessing the associated risk and managing the necessary protection measures.

Setting objectives and goals, aligned with SEIDOR's strategic lines, focused on the assessment of the performance of our processes, as well as on the continuous improvement of our activities and the Integrated Management System developed by this policy.

Compliance with the legislation and regulations applicable to our activity, the requirements signed that apply to us, the voluntary requirements established, contractual commitments and all the internal rules or guidelines for action to which SEIDOR submits.

Ensure ethical behaviour in all our actions by all SEIDOR staff. Maintaining fluid communication, both internally and with customers and stakeholders, including environmental protection and awareness and information security issues as a joint initiative of all SEIDOR staff. Evaluate and guarantee the technical and personnel management skills, as well as ensuring the appropriate motivation of the latter to participate in the continuous improvement of our processes.

Raise awareness and train all people involved in our company's internal or external activities of the culture, benefits and obligation of

complying with this policy, as well as in terms of information security and the procedures of the SEIDOR's Integrated Management System. Ensure the correct state of the facilities and equipment in such a way that they are in line with SEIDOR's activity, objectives and goals. Ensure the availability of the resources needed to establish, implement, maintain and improve SEIDOR's Integrated Management System. Guarantee a continuous analysis of all processes, establishing the relevant improvements in each case, based on the results obtained and the established objectives and indicators.

Ensure that the risks to which SEIDOR may be affected are identified and are in Acceptable levels and the processes for the correct management and treatment of possible deviations and exceptions.

Ensure that the services provided by SEIDOR to its customers and the activities it carries out for their provision have a growing level of security and have passed the tests necessary to guarantee an acceptable risk level.

Develop and implement all the policies and standards necessary for information security to ensure compliance with business requirements, the assignment of responsibilities and

expectations of stakeholders. Provide the necessary resources to the SEIDOR Cybersecurity Office, which will ensure the monitoring, maintenance and continuous improvement of the SEIDOR's Information Security Management System.

## “Prioritize Prevention on Correction”

These principles are backed by SEIDOR's Management, which provides the necessary means and provides its employees with sufficient resources to comply with them, and which sets them out, disseminates them and makes them public through this Integrated Management System Policy of the company.

# Introduction

Our corporate code is the core that identifies the standard of conduct that SEIDOR aims to adhere to in all its business activities and the behaviour and actions of each and every one of SEIDOR's Collaborators, Employees and Executives.

This involves the development of a series of principles and values in the business behaviour and the public commitment of SEIDOR's management.

SEIDOR, since its foundation in 1982, has worked with an extensive network of collaborators, including leading software and hardware manufacturers, system integrators and value-added distributors. Today, it is still a 100% Spanish-owned company and one of the few ERP implementers listed in the Top 50 Spanish ICT companies

## Mission

At SEIDOR we promote the competitiveness and transformation of organisations from the opportunities presented by technologies and business knowledge, always focused on the value of human beings and committed to talent and social development.

With a team of more than 6,500 professionals, we guarantee our customers the success of technological solutions in the digital transformation of their organisations, the protection of technological investments in infrastructures and systems, with a team of experts certified by the main manufacturers that offer personalised attention and stand out for their flexibility and ability to react to changing business requirements.

SEIDOR's offer in this field is backed, tested and guaranteed by a multitude of real business experiences, in companies of all sizes and sectors.

## Vision

In a market environment as demanding as the current one, solutions are needed and services that resolve the challenges posed. In that sense, it is essential to be sure that the strategy chosen will have the expected success.

The continuous pursuit of excellence in our products and services, together with encouraging the talent of our people, are strategic objectives that make us more competitive and able to meet the requirements and needs of our customers and stakeholders, underpin our company's results, bring benefits to society and contribute to the sustainability of our planet.

SEIDOR aims to continue and grow as a benchmark in ICT solutions, Innovation and Business Strategy for all our present and future customers, to provide them with unique and personalised experiences, based on permanent support, the result of a long experience and focus on the values of sustainability, service and support, guaranteeing the competitiveness of our customers. In short, to help organisations develop their full potential and become better companies for their teams, for their partners, for their customers and audiences, for the economy, for society and for the world.

# Values

Our work philosophy is based on detecting the needs of our clients through a direct relationship with them, committing ourselves to their needs and applying solutions that guarantee the proposed results and their satisfactory experience.

We understand that, in order to achieve these objectives in a market as dynamic as ours, clear and strong values are required to be at the forefront:

- **Flexibility:** We adapt to the specific needs of each customer and offer them customised solutions.
- **Commitment:** With us and our customers to maintain quality services at all times. We are fully involved in each project and we work with the commitment to create a long-term relationship based on the effectiveness and efficiency of our Work Team.
- **Client focused:** We design projects according to the customer's demands, being able to meet their needs.
- **Forward-looking approach:** We care not only about today, but also about tomorrow, guaranteeing our clients our complete involvement and continuity over time in all the projects we undertake.
- **Talent:** Our professionals and technicians have extensive knowledge in their areas of specialisation and apply it to the search for and implementation of the best solutions to the needs of our customers.
- **Experience:** Accumulated over the years we have been in the Information Technology market.
- **Innovation:** We invest in research, innovation and development, designing new products and services, which adapt to provide solutions to each company, person and moment in time.
- **Sustainability:** Carry out our services and activities in an environmentally friendly, resource-efficient way, managing the waste produced in such a way as to contribute effectively to sustainable development, without environmental degradation and preventing pollution throughout the life cycle of the products, the supply chain and the services we provide.
- **Quality:** The ongoing effort to achieve excellence in each service we carry out.
- **Ethical Behaviour:** Ensure ethical behaviour in all our actions by all SEIDOR staff.
- **Trust:** All the information we work with is treated with rigorous professional ethics.
- **Enthusiasm:** Every project is taken on with the enthusiasm and passion characteristic of the first day.
- **Transparency:** Always convey the benefits without hiding the risks in our clients' decision-making.

# United Nations Global Compact

We reflect our commitment to the United Nations Global Compact ([www.unglobalcompact.org](http://www.unglobalcompact.org)), the ten principles that underpin it and the sustainable development objectives to promote:

- Sustainable development and corporate citizenship.
- The values based on universally accepted principles.
- Joining a network of companies and other interested organisations.

## The Ten Principles of the Global Compact:

The Ten Principles of the Global Compact are based on Universal Declarations and Conventions applied in four areas: Human Rights, Environment, Labour Standards and Anti-Corruption.

### Human Rights:

Principle 1: Businesses should support and respect the protection of universally proclaimed human rights within their sphere of influence.

Principle 2: Businesses should make sure that their companies are not complicit in the violation of human rights.

### Labour standards:

Principle 3: Businesses should uphold the freedom of Association and the effective recognition of the right to collective bargaining.

Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour.

Principle 5: Businesses should support the eradication of child labour.

Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

### Environment:

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

### Anti-corruption:

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

# Scope of Application and Compliance

This Business Code shall apply to the following individuals or legal entities, as applicable and undertake to respect and follow the following rules and precepts:

## Shareholders and Owners

Configure the company as an instrument at the service of wealth creation, making its unavoidable purpose of obtaining profits compatible with sustainable social development and respect for the environment, ensuring that all its activity is carried out in an ethical and responsible manner.

Shaping the company as a medium- and long-term institution without the pursuit of short-term enrichment compromising its continuity.

Always demand ethical behaviour from the people who make up our company, including the approval of the corresponding Code of Conduct and ensuring its effective application. Seek a fair balance between capital and work so that workers receive fair compensation through their wages.

Appoint as directors and executives persons who have the appropriate qualifications and experience and who exercise their management professionally, ethically and responsibly.

Define and defend the company's mission and values in line with its Code of Conduct.

## Directors and Executives

Carry out a professional, ethical and responsible exercise of their activity. Comply with and enforce SEIDOR's Business Code and to do so, make it known and establish the appropriate mechanisms to ensure its application.

Inform owners and shareholders of the company's situation and perspectives on a timely and accurate basis.

Maintain the company's books and records accurately and honestly, so as to enable information to be obtained and decisions to be made in an informed and responsible manner. Provide the company's external and internal auditors with all the information and explanations they require to carry out their work.

Subordinate their own interests to those of the company when acting in the name and on behalf of the company and not use company assets for their own benefit except with due transparency, subject to the authorisation of the relevant corporate body and for such consideration as is appropriate in the market.

Immediately inform the management body of any fact or situation that could involve or lead to a conflict between the interests of the company and the individual interests of the director or executive, and refrain from intervening in its resolution.

Facilitate transparency and control of their remuneration so that they can be adapted to their level of responsibility and performance and the characteristics of the company. Maintain the confidentiality of background information, data and documents to which they have access by reason of their duties in the company, even after they have left the company.

Meet the payment and fulfilment of the company's debts and obligations without undue delay or unjustified default and to proceed with the collection of its claims with the diligence required by the case.

Develop and maintain a succession plan for key positions in the company, so that the continuity of the company does not depend on the permanence of any one director or executive.

Choose collaborators and subordinates according to the principles of merit and capacity, only striving for the interest of the company

## Employees and Collaborators

Know SEIDOR's Business Code and carry out tasks and competences in accordance with these principles and policies that emanate from them.

In addition, they must report responsibly any evidence of the existence of processes or actions that contravene the provisions of this Business code.

They will also protect the confidentiality of SEIDOR information that has been entrusted to them, as well as that relating to customers, shareholders, employees or suppliers.

# Doing Business Ethically and Responsibly

The business principles and values that SEIDOR is committed to at the highest level and which inspire this code in the exercise of our business activity are as follows:

## Honesty and Trust

All people in the scope of this code must be honest and trustworthy in all negotiations in which SEIDOR's interests are at stake and will comply with the commitments undertaken.

## Integrity

Under no circumstances shall persons within the scope of this Code offer or accept gifts, entertainment, perks or other inducements that may reward or influence a business decision, the value of which exceeds what may be considered reasonable and moderate in the circumstances of the matter and the country concerned. Refusal shall always be made politely, explaining that it is in accordance with SEIDOR's Code of Business Conduct.

In exceptional cases where, in accordance with a foreign country's business practices, gifts that exceed the value considered moderate or reasonable in Spain, the gift will always be accepted on behalf of the company, which will be its sole owner.

## Money laundering

SEIDOR is particularly committed to the persecution of money laundering, and shall in any case report any money laundering operation of which they are aware.

## Bribery and Corruption

In exercising a responsible attitude, we stress the need to refrain from promoting, facilitating, participating in or covering up any kind of operation in the form of bribery of authorities or public officials, by means of personal perks, even if it is to fulfil their obligations or to speed up their own work routines. These procedures can also constitute a criminal offence.

Under no circumstances should a person in the scope of this code request, accept or offer, whether directly or indirectly, rewards, bribes, gifts of any kind. This includes the misuse of money, loans, special privileges, personal favours, benefits or services.

If you have any questions about whether a transaction is allowed, please contact your supervisor or immediate supervisor.

In conducting its international business, SEIDOR will be guided by the recommendations and guidelines issued by business associations and the Organisation for Economic Co-operation and Development, as well as the premises and documents of the United Nations Global Compact.

## Compliance with the law

SEIDOR and its employees are governed by law. Compliance with all applicable laws and regulations is integrated into our value chain. SEIDOR competes in the markets in a fair and transparent way, complying with the legislation in force in each of the countries where it operates and promoting free competition for the benefit of customers.

In supplier selection processes and business relationships with our customers, consideration is given to those that comply with tax and labour legislation, with special attention to aspects that avoid child labour and adverse environmental impacts.

SEIDOR, in all its relations with public authorities and representatives of any nationality or scope, will always act respectfully and in accordance with what establishes the applicable law to promote and defend its legitimate business interests.

Persons in the scope of this code will always collaborate with the public authorities and representatives when they exercise the functions that are legally applicable to them.

## Conflicts of Interest

A conflict of interest exists when one of the recipients of the Code of Conduct has to make a decision that affects both the interests of SEIDOR and the interests of the recipient themselves, their family members or persons with whom they have an equivalent bond of affection, their close friends, or with companies, businesses or entities in which the recipient or all the aforementioned persons have interests that may be affected by the outcome of the decision.

For example, it would be a conflict of interest:

Deciding or recommending the award of a SEIDOR contract to a company in which a relative of the decision-maker worked.

Making a business decision that can directly benefit an intimate friend of the person in charge of deciding whether it is because they are one of those who earns money with the decision or because the company in which they work is the one that will obtain the benefit.

When a recipient of this code of conduct is in a situation of conflict of interest, they must inform their superiors and not make any decision on the matter in which there is a conflict. If their superiors give them the order to proceed after studying the possible conflict of interest, the recipient may then make the decision that is objectively in to SEIDOR's best interests.

When allowing a recipient of this code in a situation of conflict of interest to make the decision in which the conflict exists, their superiors shall take into account not only the integrity and objectivity of the decision-maker, but also whether the company's image of objectivity may be affected vis-à-vis third parties.

When the recipient of the code of conduct who is in a situation of conflict of interest is part of a group of people collectively in charge of making the decision (such as committees or working groups), they will notify the rest of the people in charge of making the decision when the decision is collective and will refrain from participating in any vote.

# Respect for free competition

SEIDOR is prepared to compete successfully in the current commercial world and will always do so in full compliance of all applicable laws regarding the defence of competition, antitrust and trade fairness. Therefore, employees must adhere at all times to the following standards:

- Commercial policy and prices will be established independently and will never be agreed, either formally or informally, with competitors or other unrelated parties, either directly or indirectly; Customers, territories or product markets will never be distributed between SEIDOR and its competitors, but will always be the result of fair competition; Customers and suppliers will be treated fairly.
- All employees, but particularly those engaged in marketing, sales and purchasing activities, or those who are in frequent contact with competitors, must ensure that they are familiar with applicable competition laws.
- If in doubt, the head of the Legal department must be contacted in order to receive advice and training on these laws.
- Compete fairly with other companies by cooperating to achieve a free market based on mutual respect between competitors, refraining from unfair practices.
- In particular, not attracting customers from other competitors using non-ethical methods

# Protection of SEIDOR's Resources and Assets

Set up the company as a SEIDOR instrument in its management policies:

- Ensure the correct state of the facilities and equipment in such a way that they are in line with SEIDOR's activity, objectives and goals.
- Ensure the availability of the necessary resources to establish, implement, maintain and improve the integrated quality and environmental management system.

The persons covered by this code are obliged to ensure the safekeeping and correct use of all the resources that SEIDOR places at their disposal for the development of their business activity.

By company assets we mean not only buildings, vehicles, machinery or furniture, but also plans, designs, formulas, processes, systems, technologies, master plans, business strategies, product launch plans, promotional campaigns and of course our brands, among others.

We make responsible use of the company's assets, seeking to keep them in perfect working order and usefulness, maximising their capacity and prolonging their useful life.

## Computer systems

SEIDOR has a policy for the use of information systems in order to ensure responsible use of these and the security of the information they process. They shall not be used in an abusive manner, nor for personal gain or for actions that could affect SEIDOR's reputation or image.

Employees may only access IT systems to which they are authorised and with the appropriate licences. No software that could affect the security of the systems shall be installed, used or distributed, nor shall unauthorised copies be made or actions be taken that allow the entry of malware.

Communications that may be made through the computer tools should not contain offensive or defamatory statements.

The user of any computer or communication medium owned by SEIDOR may not disclose or transmit illegal, sexist, abusive, defamatory, obscene, racist, offensive, pornographic information or any other type of offensive information or information not authorised by Law, either through photographs, texts, advertising banners or links to external websites; nor may they post, transmit, reproduce, distribute or exploit any information, pirated material or software that contains viruses or any other component harmful to the integrity of IT systems or that may infringe intellectual property rights; similarly, they will not be able to post or provide material or access to resources on hacking, cracking or any other information SEIDOR considers it likely, even potentially, to compromise the security or integrity of the IT systems, and that person is solely responsible for these actions and potential legal consequences.

# Business Policy

Persons falling within the scope of this code shall maintain the strictest professional secrecy and keep confidential all information they handle in the course of their professional work.

For these purposes, "Confidential Information" means any information that may be disclosed orally, in writing or by any other means or medium, tangible or intangible, to which they may have access during their professional activity, including, but not limited to, information related to business plans, products or services, financial forecasts, patents, trademarks, utility models and any other intellectual or industrial property rights or applications for the same (whether registered or not), computer passwords, source codes, inventions, processes, designs, whether or not they are graphic, engineering, advertising, budgets, financial forecasts, characteristic elements of the services of all types that SEIDOR offers on the market, business management techniques, related or accessory, including the hardware and software used in management, as well as any other information that SEIDOR indicates or designates as confidential.

Employees may not access, use or disclose such Confidential Information unless they have been properly authorised in writing by their immediate superior to do so. In case of doubt, and unless otherwise stated, Employees shall treat information to which they have access in the course of their professional activities as confidential.

Confidential Information: SEIDOR will ensure the protection of personal data

that are stored and exchanged during daily activities in development of their business, to the extent that this protection is a priority to reach a maximum level of quality in the development of the corporate purpose:

- All SEIDOR employees must always observe personal data protection legislation when processing personal data of customers,

suppliers, shareholders or employees. See privacy policy

<https://www.seidor.com/es-es/aviso-legal-y-politica-de-privacidad>

- SEIDOR will adopt training policies, distributing teaching material periodically to facilitate its understanding and thus avoid any non-compliance in its application.
- All Information will be protected and kept strictly confidential. Confidential Information shall only be disclosed to and used by the person for the purposes assigned to them under their employment contract or relationship with SEIDOR. In the event that the assistance of a third party is required and it is necessary to disclose the Confidential Information to such third party, the employee shall take the necessary measures to ensure that the Information is duly protected, by entering into a written and binding confidentiality agreement with all the guarantees provided by law.
- The Information shall not be used, in whole or in part, for any purpose other than that for which it is intended in the course of its work
- The person holding the Confidential Information shall not, directly or indirectly, disclose the Information to third parties other than those referred to in the previous paragraph. The Information will not be copied, reproduced or duplicated, in whole or in part, without the written authorisation of SEIDOR.
- The person holding the Confidential Information shall notify, as soon as possible, any processing or incorrect use of Confidential Information, cooperating with SEIDOR in order to protect this information.
- Privileged information: Persons within the scope of this code shall never use the information they learn as a result of their relations with SEIDOR to obtain any

personal financial advantage, nor shall they provide it to third parties so that they can obtain the same type of advantage.

## Misuse, fraud or misappropriation of assets

Employees must never engage in a fraudulent act or other dishonest conduct involving the property or assets or the financial records and accounts of SEIDOR or a third party. This may not only lead to disciplinary sanctions, but may also result in criminal charges.

# Dealing with our Customers, Suppliers and Society

One of the fundamental objectives of SEIDOR's Code of Conduct is to recognise that any activity carried out by SEIDOR has a direct impact on other people, organisations and society in general, which is why we are committed to implementing and communicating the following principles.

## In relation to Suppliers

Relate ethically and lawfully to suppliers of goods and service providers.

Seek and select only suppliers whose business practices respect human dignity, do not violate the law and do not jeopardise the company's reputation.

Select suppliers on the basis of the suitability of their products or services, as well as their price, delivery conditions and quality, not accepting or offering gifts or commissions, in cash or in kind, that may alter the rules of free competition in the production and distribution of goods and services.

## In relation to Customers

To seek excellence in our goods and services so that our customers and users obtain the satisfaction expected of them.

Quality culture, which involves having a quality management system and processes defined and implemented, which, based on the stipulation of objectives and the implementation of action plans and continuous improvement, seeks to increase the satisfaction of our customers and users.

Guarantee products and services and deal quickly and efficiently with the complaints of our customers and users, seeking their satisfaction beyond mere compliance with the regulations in force.

Not to offer gifts or fees, in cash or in kind, that may alter the rules of free competition in the marketing and distribution of goods and services.

## In relation to Society

Respect human rights and democratic institutions and promote them wherever possible.

Maintain the principle of political neutrality, not interfering politically in the communities where we carry out our activities, as a sign of respect for the different opinions and sensitivities of the people linked to the company.

Deal with public authorities and institutions in a lawful and respectful manner, neither accepting nor offering gifts or commissions, in cash or in kind.

Make contributions to political parties and public institutions only in accordance with the current legislation and, in any case, guaranteeing its transparency.

Collaborate with public administrations and non-governmental entities and organisations dedicated to improving the quality of life of the population. the social care levels of the most disadvantaged.

## In relation to the Environment

Environmental protection is one of the guiding principles of SEIDOR's business activity, which always acts in accordance with the provisions of the laws and other regulations on environmental protection, as well as the provisions of its Environmental Management System.

As part of its Integrated Management System, SEIDOR has an adequate system of management standards and procedures.

hazardous materials and preventing spills and leaks.

SEIDOR will provide recipients with knowledge of all the company's internal standards and procedures on environmental protection that affect their activity and level of responsibility.

The addressees of this code must ensure that they comply with it and report to their superiors or environmental managers all risks and breaches of these procedures of which they become aware.

# Dealing Honestly and Respectfully with People

We believe that the continued and sustainable success of our business depends to a large extent on people. Respect for people is a fundamental value at SEIDOR.

## Human Rights

SEIDOR will respect and promote Human Rights. SEIDOR recognises that human rights are fundamental and universal rights and must be interpreted and recognised in accordance with international law and practice, in particular the United Nations Universal Declaration of Human Rights and the principles proclaimed by the International Labour Organisation.

SEIDOR takes a special interest in the control and monitoring of compliance with human rights in its relationship with the company's personnel, with special attention to those linked to business activity such as the right of association (freedom of association and the right to collective bargaining), the rights to childhood and youth (removal of child exploitation and forced labour) or the right to fair and satisfactory employment conditions.

SEIDOR focuses on the prohibition of sexual exploitation and abuse, committing to the United Nations Organization. All appropriate measures are taken to prevent the exploitation and sexual abuse of someone by their employees or any other person contracted and controlled by SEIDOR to execute any service under the contract. For these purposes, any sexual activity with any person under eighteen years of age, regardless of laws relating to consent, shall be taken as sexual exploitation and abuse of such a person.

In addition, SEIDOR will refrain from and take all reasonable and appropriate measures to prohibit its employees or other persons employed and controlled by it from exchanging any money, goods, services or other things of value for sexual favours or activities, or from engaging in any sexual activity that is exploitative or degrading to any person.

## Respectful treatment

The addressees of this code shall always treat all persons with whom they come into contact, whether or not they are addressees or aware of the corporate code, with due respect. Disrespectful verbal or written actions or statements against any person or group of persons, whether present or not, shall not be permitted.

## Violence and aggressive behaviour

SEIDOR categorically prohibits the recipients of this code from any kind of violent conduct and aggressive behaviour, including aggression, the threat of physical aggression or verbal violence.

## Equality and non-discrimination

SEIDOR guarantees everyone equal and non-discriminatory treatment regardless of their race, colour, religion, sex and sexual orientation, nationality, age, degree of disability and other legally protected circumstances.

## Our Employees

SEIDOR recognises the Human Factor as the most valuable resource in our company and has as its primary objective that all SEIDOR personnel should consider themselves as an important and integrated part of our company “We want them to want to work with us”.

Therefore, our social policy, which applies to all Group companies, requires us to:

- Deal with employees with dignity, respect and fairness, taking into consideration their different cultural sensitivities.
- Not discriminate employees for reasons of race, religion, age, nationality, sex, pregnancy, or any other personal or social condition unrelated to their merit and capacity.
- SEIDOR prohibits and pursues harassment in the workplace, including sexual harassment. The recipients of this code of conduct must know and apply the company’s policies to prevention and persecution of harassment in the workplace.
- Recognise the rights of association, unionisation and collective bargaining.

Ensure safety and hygiene at work, taking as many measures as are reasonable to maximise occupational risk prevention.

Seek reconciliation of work in the company with the personal and family life of employees. Ensure the integration of people with disabilities or impairments into the workplace, eliminating all types of barriers within the company’s scope for their insertion.

Facilitate employees’ participation in the company’s social action programmes.

## Protection of Occupational Health and Safety and Physical Integrity

SEIDOR is committed to providing employees with a healthy and safe working environment, free of all recognised hazards, complying with all safety standards and practices and assuming responsibility for taking the precautions necessary to protect our colleagues and ourselves.

SEIDOR is firmly committed to informing all recipients of this code of conduct of the rules and procedures for the prevention of occupational hazards.

The recipients of the Code of Conduct should report any alleged breach of the Code of Conduct to the company through their superiors or occupational health officers.

- Our commitment to occupational safety: Take care of my health and the safety of my colleagues.
- Participate in activities related to health and safety.
- Respect and care for our facilities and equipment.

- Establish mechanisms to ensure the safety of personnel and the operation of the industry.
- Promote the company's image as a company committed to safety and the environment.
- Know, apply and observe safety measures in our work area.
- Provide information to society on the environmental performance and specific aspects of the company's safety in a transparent way.

## Drugs and alcohol at the workplace

SEIDOR is committed to providing and maintaining a safe, drug-free working environment that encourages optimum productivity and service to our customers. Abuse of alcohol or any drug or other substance, whether legal or illegal, can interfere with our ability to fulfil our professional responsibilities and obligations; it endangers our own and others' health and safety; damage the company's reputation and business; and may create a legal risk.

Therefore, alcohol, drugs or other substances in the workplace are prohibited and subject to disciplinary action by the company and, in the case of illegal drugs, legal actions.

Although SEIDOR does not prohibit the consumption of alcoholic beverages at business events, the consumption of more than one minimum amount of alcohol must be avoided.

# Application of the Business Code

## Training actions

SEIDOR will carry out the training actions required for all its employees and managers to have sufficient knowledge of this code of conduct and its contents. Training will include criteria and guidance for resolving doubts based on accumulated experience.

In addition to general training, SEIDOR will provide specialised training to those groups of its managers or employees who, due to the tasks they perform, must have a more precise and detailed knowledge of the rules of conduct applicable to their area of activity.

## Apoyo y asesoramiento

All recipients of this Code of Conduct will have the following channels available to them to raise concerns about the Code of Conduct and to seek advice and support:

- From their bosses and superiors.
- From their respective Human Resources area.
- Compliance committee:  
compliance@seidor.com

## Business verification

SEIDOR will establish an adequate monitoring and control system to verify compliance with the code of conduct without waiting for complaints or claims to be received.

In addition to the bodies responsible for the ordinary management, the internal audit managers will participate in the monitoring and control of compliance with the code of conduct and will report this directly to the Compliance Committee.

# Notification of Breaches of the Business Code: REPORTING CHANNEL

SEIDOR has been acting under a crime prevention model for years. This model, in addition to its preventive effectiveness, must enable the detection of criminal conduct. This is suggested by the fourth requirement of Article 31a(5) of the Criminal Code, when it imposes “the obligation to report possible risks and non-compliance to the body responsible for monitoring the functioning and observance of the prevention model”.

The existence of our Report Channel, to report on internal breaches or illegal activities committed within the company, is one of the key elements of the prevention models. However, so that the obligation imposed can be demanded of employees, at SEIDOR we have a specific protective regulation for whistle-blowers, which allows them to report possible infringements while facilitating confidentiality through a system that guarantees communications without the risk of suffering reprisals.

In accordance with the above, SEIDOR has implemented suitable procedures to:

- Provide a whistleblowing channel for both the organisation’s members and third parties to communicate in good faith and, based on reasonable indications, those circumstances that may result in criminal risk occurring for the organisation, as well as breaches or weaknesses of the criminal compliance management system;
- Guarantee the confidentiality of the identity of the persons making use of the Whistleblowing Channel.
- Allow communications to be carried out confidentially;
- Prohibit any form of retaliation, taking the necessary measures to protect those members of the organisation or third parties who make communications in good faith and on the basis of prima facie evidence through the Whistleblowing Channel;;
- Provide advice to those who raise doubts or concerns through the Whistleblowing Channel established by the organisation;
- Ensure that the members of the organisation are aware of the existing Whistleblowing Channel.

Whenever a recipient or person aware of SEIDOR’s code of conduct wishes to inform the company of a possible violation of the same, they may contact the Compliance Committee directly by the following means:

**[Fill in the SEIDOR Complaints Channel form.](#)**

## Independence and confidentiality

SEIDOR guarantees that anyone who submits a complaint or report directly to the Compliance Committee will keep their identity confidential, except when they have to be identified to the authorities in accordance with the provisions of the law.

SEIDOR also guarantees that the Compliance Committee will carry out the investigation of the facts reported or communicated with absolute independence from all the bodies responsible for the management of the company except for the Management Body and the Compliance Committee.

## Prohibition on reprisals

SEIDOR guarantees that no retaliation will ever be taken against anyone who in good faith brings a possible violation of its code of conduct to the company's attention, assists in its investigation or helps to resolve it.

This guarantee does not extend to those who act in bad faith with the intention of spreading false information or harming others. SEIDOR will take appropriate legal or disciplinary action against such misconduct.

## Investigation of possible breaches

SEIDOR's Compliance Committee will analyse the facts reported or communicated and may request information from other company bodies, which will always be obliged to provide it.

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  | [seidor.com](https://seidor.com)

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