

Non-Financial Information Statement

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to which we must adapt and in which we must we must reinvent ourselves to overcome the challenges it presents us with. War in Ukraine and Russia, high inflation, the crisis of materials and, all of this wrapped in a time of climatic emergency, it highlights the The obligation of the European Commission to society and companies as the driving force, to act and to generate sustainable value for the environment and a positive impact on the environment.

From SEIDOR, as a technology consultant, we believe that, from the human side of the technology, we have the capacity to overcome these challenges and we are committed to social responsibility and sustainability in all of our operations, and the EINF is a reflection of that commitment. One more year, we renew our alignment with the Pact UN Global Compact and we base our work on the our actions in contributing to the 17 SDGs in order to work in the same direction together with our partners and stakeholders, with whom we engage that inspire and govern our decisions towards social, economic and social sustainability environmental.

In this document, we wish to set out detailed information on our policies environmental, social and governance issues (ESG), with the aim of providing a vision transparent and complete assessment of our impact in society, the environment and in the economy.

As a NET-Zero company, we at SEIDOR we believe that the fundamental pillar of our continuity is the environment and by In this respect, it is worth noting our neutrality in the impact of greenhouse gases. In addition, the generation of energy for our offices comes from sources and contribute to the recycling and circular economy of materials. electronics that we use in our activity.

Alejandro Daniel O'Davoren
Deputy Director General



Thanks to this circular economy, it allows us to also contribute to the reduction of the gap digital, facilitating access to technology to all collectives. We highlight our diversity and inclusion policy, our occupational health and safety management, our commitment to the introduction and talent development, and our commitment to with human rights.

At SEIDOR, we are committed to the protection of the environment and the implementation of sustainable practices in our operations, and we expect continue to work together for a brighter future sustainable for all.

Introduction to the State of Information Non-Financial

This Statement of Non-Financial Information, which forms part of the Management Report of the group of companies belonging to SEIDOR, S.A. (hereinafter SEIDOR), refers to the 2022 financial year. With this report, SEIDOR responds to the requirements of Law 11/2018 on non-financial information and diversity. SEIDOR, S.A. is a company domiciled in Spain, with its main operating headquarters in Barcelona (C. Pujades, 350), and its tax domicile in Vic (Barcelona).

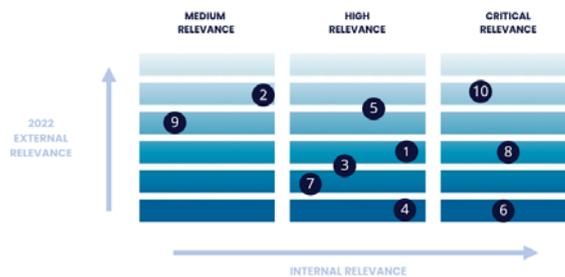
The entities included in the scope of non-financial reporting are the same as those included in the principles of consolidation of the company's financial information. This represents a total of more than 100 companies and 7,371 people.

In order to prepare the Statement of Non-Financial Information, the requirements established by Law have been followed, as well as the Global Reporting Initiative (GRI) Standards. For a better understanding, please refer to ANNEX 1 of this document, which contains a table with the relationship between the legal requirements and the GRI Standards. In accordance with the GRI Standards, the contents included in this Statement of Non-Financial Information comply with the principles of comparability, materiality, relevance and reliability, and the information included is accurate, comparable and verifiable. The Statement of Non-Financial Information is issued annually, coinciding with the close of the financial year. The Statement of Non-Financial Information for the previous year was formulated by the Governing Body on 30 June 2022. There have been no changes in reporting and no restatement of information in the previous year's Statement of Financial Information has been necessary.

In accordance with current mercantile regulations, this Statement of Non-Financial Information has been verified by Busquet Estudi Jurídic, S.L. The Independent Verification Report is attached on page 72. On 30 June 2022, Busquet Estudi Jurídic, S.L. issued an independent assurance report on the Non-Financial Information Statement for 2021.

Materiality analysis

The analysis of issues relevant to the business and stakeholders, or materiality analysis, is key to the Corporate Responsibility management process, both for reporting and for defining the strategy, initiatives and relations with stakeholders. This process has been carried out in different phases, following the GRI recommendations for identification, prioritisation and validation. To identify the material areas, the opinions of SEIDOR professionals and customers were taken into account, as well as the GRI report by sector, which highlights the most representative aspects of each sector. The results of the analysis are presented in the Materiality Matrix according to the two axes of relevance for SEIDOR's activity and for its stakeholders. It identifies 10 points with a high impact on the company's activities and with an influence on the decisions of priority stakeholders: shareholders, suppliers, customers and professionals.



- | | |
|--|-------------------------|
| 1. Compliance in the delivery of projects and services | 6. Compliance |
| 2. Investment and public sector support | 7. Talent |
| 3. Innovation and business opportunities | 8. Information security |
| 4. Financial liquidity and credit management | 9. New ways of working |
| 5. Economy | 10. Sustainability |

*These data are not comparative with the previous year due to the change in the parameters analysed.

In order to obtain the aspects reflected in the Materiality Matrix, we have started from the context analysis where we have identified and analysed:

- 18 stakeholders and contextual elements.
- 187 expectations and strategic objectives.

The following is a brief overview of the materiality of the areas under consideration in the matrix:

- 1. Delivery of projects and services:** During 2022, contract delivery through optimal delivery of projects and services has been identified as a key area for growth given the global competition in the sector as well as the shortage of talent.
- 2. Public sector investment and aid:** the aid promoted at both national and European level has been a lever for the reactivation of the economy by the entire business fabric.
- 3. Innovation and business opportunities:** in 2022, it has become even more evident the "Commoditisation of innovation. In order to stay in the market and to obtain good business opportunities, innovation must be embedded in the organisation.
- 4. Financial liquidity and credit management:** in a year of high macroeconomic volatility, particularly in terms of interest rates and inflation, the financial health of the organisation has been a key area for trading and profitability.
- 5. Economy:** The state of the global economy during 2022 has been highly affected by geopolitical conflicts, supply crises and other events that have made this one of the most relevant areas.
- 6. Compliance:** at a time when the decentralisation of organisations in the EU is As the number of employees continues to grow, proper implementation of prevention measures must be ensured to guarantee compliance.
- 7. Talent:** In 2022, the competition for talent remains high, even more evident in the technology sector and specifically in women.
- 8. Information security:** the privacy of individuals and the information of companies organisations is a key aspect in an environment full of cyber threats and ubiquitous information.

9. New ways of working: adapting to new ways of working, such as remote working, is a necessary aspect to be shared between customers and suppliers in order to achieve greater attraction and loyalty of talent, ensuring the quality of the work.
10. Sustainability: positioned as a critical factor, sustainability at both the local and global levels is The environmental, social and economic impact must be ensured in all the activities of the business fabric and, in general, of society as a whole.

Our business model

Business environment and group organisation

SEIDOR is an international technology consulting firm with a differentiated value proposition for large companies and SMEs, with a comprehensive portfolio of solutions and services: transformation and innovation consulting, implementation, development and maintenance of applications, management and provisioning of IT infrastructures and outsourcing services. With a turnover of 750 million euros in 2022 and a workforce of more than 7,000 highly qualified professionals, SEIDOR has a direct presence in 44 countries in Europe, Latin America, the United States, the Middle East, Africa and Asia, serving more than 8,500 customers.

Markets served

SEIDOR provides services in the following countries distributed by continent:

Europa

Andorra · Belgium · Spain · Ireland · Italy · Portugal · France · UK

North America

United States · Mexico

Central America

Costa Rica · El Salvador · Guatemala · Honduras · Nicaragua · Panama · Dominican Republic

South America

Argentina · Bolivia · Brazil · Chile · Colombia · Ecuador · Paraguay · Peru · Uruguay

Middle East

Israel · Kuwait · Lebanon · Oman · Qatar · Saudi Arabia · United Arab Emirates · Saudi Arabia

Africa

Egypt · Kenya · Morocco · Mauritius · South Africa · Tanzania · Zambia

Asia

China · India · Singapore · Taiwan

It also has a presence in more than 100 countries through our network of partners.

SEIDOR provides services in the vast majority of countries, offering practically comprehensive coverage of all markets. The main sectors to which it offers services are: Public Administration, Agri-Food, Food and Beverage, Banking and Insurance, Ceramics, Construction, Pharmaceutical Distribution, Education, Pharmaceuticals, Chemicals, Automotive and Aeronautics, Engineering and Machinery, Processing Products, Retail, Healthcare, Professional Services and Transport.

Given the nature of SEIDOR's business, its range of services is aimed at companies and it has a differentiated offer for Large Companies, SMEs and Public Administration.

Main brands

SEIDOR's brand strategy has been driven in 2022 based on a number of key axes, in order to further strengthen and expand the positioning of its corporate identity among its various stakeholders and to set the path for the next period.

We highlight the following points:

*In 2022, follow up on the brand strategy and strengthen the brand's link with technological humanism.

*Start of search for partnerships to position the brand with social and sustainable environments.

*Expansion of the company's value propositions in both business units and sector verticals.

*Analysis of international offering and campaigns focused on homogenising the positioning used in the different markets in which SEIDOR operates.

The key elements of the new brand strategy revolve around the following axes:

- Unique and global brand: SEIDOR.
- Values linked to: Courage, Openness, Trust.
- Exploration of brand territory to bring SEIDOR closer to people and technology, from the perspective of technological humanism.

With this strategy as a basis, SEIDOR presents itself to the market through a single global brand through which it offers its broad portfolio of services hand in hand with the main manufacturers in the market, its main partners being SAP, Microsoft, IBM, Adobe, Salesforce, Google, AWS and Cisco.

Global context and developments in the sector

Almost the entire financial year 2022 was characterised by the anticipation of an economic crisis that failed to materialise in the terms feared. Rising inflation and the response in the form of interest rate hikes by central banks added to the global uncertainty exacerbated by the war in Ukraine and the resulting supply problems. However, the most doomsday predictions did not come true - including those of the dreaded recession, which looked increasingly remote in all forecasting scenarios.

In this context, the ICT sector achieved a growth in Spain of almost 17% during 2022. (11.4% y-o-y between December 2022 and December 2021). The sector continued to be a talent attractor during the year, with a year-on-year increase in employment of 7.2 per cent in the same period, despite having gone through a short period of black expectations of employability (these were

the death throes of the pandemic) which gave way, however, to a significant recovery. Thus, from an expected growth rate of almost zero, with as many hiring as outflows, an employability indicator of more than 23 points was growth in a short period of time, and a consequent widespread feeling that the growth in staff numbers would be the norm in the sector.

These data helped paint a picture of a robust business ecosystem. ICT service technology providers in Spain, allaying to some extent the fears that pointed to the existence of a digital bubble in the country, despite the fact that the turnover for The employment rate slowed slightly due to lower prices for ICT services. 2022, finally, has been a year of positive expectations among ICT companies as a whole. Spanish counterparts (above their European counterparts), a feeling that has obviously not been able to ignore the development of strong uncertainties at the global level, marked by the persistence of armed conflict in the centre of Europe, high energy prices, and the measures taken by the European Commission to restraint, in the form of monetary policy restrictions by central banks. All of this has permanently hung over the threat of a cooling, if not cuts, in the IT investments.

Source: Centro de Predicción Económica CEPREDE, Monthly Barometer TI Monitor

Technological trends

The now overdue coronavirus crisis was an opportunity for Spanish organisations to accelerate the digital transformation of their business processes, which has been endorsed by the data: in 2022, the country was ranked number seven among the 27 EU Member States in the Digital Economy and Society Index (DESI), two places higher than in 2021, again ahead of Germany, France and Italy.

In this scenario, investment in technology by Spanish organisations in 2022 grew slightly compared to last year's data, despite the difficulties and uncertainties. The macroeconomic scenario, the war in Ukraine and the persistent shortage of semiconductors. Thus, the analysts' outlook pointed to an overall ICT investment of around 51.4 billion euros by Spanish companies, after some reductions in expectations during the year. Against the backdrop of the post pandemic recovery, the technology spending derived from the digitalisation efforts discussed at the outset has benefited from the tailwind of the Next Generation EU funds, as well as concerns about sustainability and a greater focus on the employee experience.

Despite the now almost permanent fear of an upcoming recession in the European space (and the consequent trend towards defensive contraction of technology budgets), expectations of technological investment by Spanish companies will continue on a positive path for 2023, albeit with a more demanding selection of needs, priorities and restrictions when deciding on each item. With regard to the trends that marked - and will continue to mark - the ICT investment priorities of Spanish companies in 2022, we must reiterate the powerful role that digitalisation strategies and processes have played in selecting them in practically all sectors.

Thus, the need to optimise technological service platforms and infrastructures continued to drive the adoption of cloud services (a market that in Spain grew by 28% to 2.9 billion euros during the year), particularly in light of the traditional demands of scalability and flexibility, but also those of sustainability and energy savings that are marking the decade. During the period, multi-cloud strategies continued to develop and the focus continued to be on cloud-related services. With data exploitation and support for AI technologies.

In addition to the coming of age of IoT and Edge Computing technologies - which in 2022 have contributed to real transformations in many sectors - and the promise of the expansion and consolidation of 5G technology in Spain, data analytics was one of the main focuses of interest, with 74% of companies increasing their investment in this area during the period.

Blockchain technologies - despite the crypto-winter - continued to develop as an alternative for orchestrating collaborative processes in certain sectors with a focus on transparency and traceability, while the big bets on the metaverse have not been reflected in the real needs of organisations that are still conservative in adopting disruptive digital strategies.

Cybersecurity, meanwhile, was one of the key focuses of attention for all companies in the country in 2022, regardless of size or sector. Leaving aside the critical weight of digital safeguarding technologies for areas traditionally considered strategic, it should be noted that more than 90% of Spanish organisations increased their investment in cybersecurity, a trend that is not likely to end in 2023, in a context characterised by the exponential and widespread increase in organised cyber-attacks.

The explosion of AI, fuelled by the popularisation of generative models (such as ChatGPT) that began in 2022, deserves special mention. During the year, global private investment in AI technologies was 18 times higher than in 2018, and there is a general consensus that the expectation for 2023 and beyond is going to take on dimensions that would have been difficult to imagine just a couple of years ago. In Spain, according to the ONTSI report, the adoption of AI technologies within companies remains - for the time being - modest, although slightly below the average.

Above the EU27 average. Thus, 7% of Spanish companies use AI, compared to an average of 6% in our neighbouring countries (where the greatest progress is made in Ireland, with 20% adoption). Machine learning through big data, service robots and chatbots were the AI technologies most used by Spanish organisations in 2022.

Source: *Digital Economy and Society Index (DESI)*, IDC, CloserStill Media, BARC, Palo Alto, Stanford University, ONTSI.

Strategy and objectives

SEIDOR has a position in the world, which we describe through our mission, vision, purpose, values, value proposition and strategic objectives:

1. Mission:

To boost the competitiveness and transformation of organisations based on the opportunities presented by technologies and business knowledge, always focusing on the value of the human aspect and committed to talent and social development.

2. Vision:

To be the best technology consultancy to collaborate with and work with, both nationally and internationally.

3. Purpose:

Humanising the world through technology.

4. Corporate values:

SEIDOR's corporate values are essential to achieving our vision of being our customers' trusted technology partner and fulfilling our mission. Our corporate values are grouped into 3 aspects that characterise us:

OPEN: Transparent, accessible, close, global, collaborative, self-critical.

RELIABLE: Honest, reliable, committed, loyal, self-demanding, socially responsible.

COURAGEOUS: Non-conformists, innovators, determined, transformers.

5. Value proposition:

Our value proposition is summarised in our brand promise “Humanising the world through technology”. A purpose that summarises our culture, our raison d’être and our aspirations based on three axes:

- We are activists and experts in technology, from which we contribute to the development of clients, partners, collaborators and society in general.
- We focus on the human side of any activity. We humanise the way we do business, and try to ensure that any service or solution we offer is sensitive to making the world a better place.
- We have a deep respect for people. We always bear in mind that relationships of any kind are based on a common denominator: the human side.

6. Strategic objectives:

During the 2022 financial year, SEIDOR has brought its position closer to the targets set in previous years:

1. Turnover: Maintain double-digit annual growth based on the development of the national and international market, both organically and inorganically, achieving a turnover of 750 million euros, which represents an increase of 22% compared to 2021). This achievement brings SEIDOR closer to the strategic objective of achieving a turnover of 1 billion euros by 2025.
2. Integration of new service lines: Work continued on the integration of new service lines into the company’s single portfolio, expanding the contribution of value in each of the areas.
3. Access to new markets: expansion of SEIDOR’s activity around the world, thus enabling it to generate greater internal synergies with customers, as well as to be in contact with the world’s innovation hubs.
4. Large Account and Public Sector: intensive market intelligence work has been carried out to increase the technology market position for the large account and the public sector.
5. Intellectual property and proprietary products: we have formalised the creation of a business unit 100% focused on the detection of needs, feasibility analysis and development and monitoring of business plans for the development and marketing of proprietary solutions that allow our customers to cover needs that the market cannot currently cover.
6. Talent management: Managing talent throughout its entire cycle, as it is our main asset and we face an environment with a shortage of technological talent. Incorporation of specific expertise and capabilities thanks to the incorporation of differential talent that has allowed us to increase our value proposition. This growth has been organic, on the one hand, by incorporating and training talent continuously thanks to the good work of our HR teams, the SEIDOR academies that train young people in the main technological practices linked to our partners, and the attraction of benchmark talent that is increasingly attracted by the opportunities presented by our organisation. In addition, we have increased our collaboration with organisations whose objective is to incorporate young and female talent into the technological world. The growth is completed through the acquisition and integration of companies.
7. Commitment to sustainability: SEIDOR focuses on people and the value of human beings. We conduct our business ethically, with responsibility and commitment to social development and the environment.

SEIDOR is a company that has earned its prestige and credibility thanks to the proximity and professionalism with which we approach other people and organisations. It is based on the

value of its team, its spirit as an organisation, its courage, and the highly esteemed SEIDOR culture, from which to articulate the growth and future prospects of the company.

Innovation

Both in the value proposition and in the diversification objective, innovation plays a fundamental role. Always with a focus on providing cutting-edge technological solutions to our customers, while also helping them to develop innovation in their own businesses. In 2022 SEIDOR has consolidated the innovation initiatives undertaken in 2021 and promoted new ones, which will lay the foundation for the coming years:

- SEIDOR Products as a new line of business. We are committed to the development of intellectual property, of our own products that can be marketed and have a life of their own, providing an innovative response to the challenges of the market.
- Reference portal as a new tool to collect and unify the company's global business intelligence. It offers direct access to all types of information on the company's references, boosting the productivity and efficiency of the business teams in their commercial actions.
- Promoters of Next Generation funds and digitalising agents within the Digital Kit programme for SMEs, offering a unique and comprehensive proposal to our smaller clients.
- Opening alliances to boost our commitment to the development of talent and economic activity. Our alliances with the three main business schools in the country, IESE, ESADE and San Telmo are the main examples.
- We are increasing our innovation efforts in areas we consider strategic for the sustainable transformation of the economy and society as a whole, such as agri-food, health and industry.

Risks and opportunities

SEIDOR identifies the risks and opportunities that need to be addressed in order to ensure that the Integrated Management System, hereinafter IMS, can achieve its intended results, enhance desirable effects, prevent or reduce undesirable effects and achieve improvement.

The methodology applied at SEIDOR to carry out the risk and opportunity analysis consists of determining the stakeholders and the context of the MIS, describing the Strengths, Weaknesses, Opportunities, Threats and Opportunities (SWOT) for each of the areas covered by the MIS, determining the priority of these actions according to the impact and the strategic plan, proposing actions to reduce the undesirable effects and enhance the desirable ones, carrying out the timely follow-up of the actions proposed and verifying the effectiveness of these actions.

Main Risks

The main risks that may have affected the development of SEIDOR's strategy are:

- **Financial risks:** financial solvency and access risk, credit risk, liquidity risk and market risk.

During the year 2022, we have continued to carry out an exhaustive monitoring of our debt ratio and our financial liquidity levels and we put in place actions to facilitate our customers to regularise their outstanding payments and guarantee SEIDOR's financial health, managing to maintain our established financial ratios at optimal levels:

- Debt renegotiation processes and payment conditions, both with customers and with our suppliers.
- Creation of a financing team, in which we reach agreements with different financial companies in order to be able to offer the most advantageous conditions to our clients.
- **Economic risks:** risk of economic downturn, declining sales, tax increases, new costs, loss of customer base and reduced business opportunities. During the year 2022, we have maintained and improved the marketing and action plan.

We have been able to increase our sales levels and increase our customer base, with a considerable increase in sales in the public sector:

- Strengthen social media presence.
- Campaign of free Webinars to customers and potential customers on technological solutions to existing new conditions and improvement of business processes.
- Provision of free support services to our customers.
- Creation of a specialised Public Sector team.
- Creation of a financing team, in which we reach agreements with different financial companies with the aim of being able to offer the most advantageous conditions to our clients in order to meet their digital transformation project needs.
- **Compliance risks:** arising from regulatory changes, interpretation of legislation and regulation. This includes tax, personal data protection, environmental and human resource management risks.

At SEIDOR we have established processes for monitoring legislative changes led by our legal, human resources and occupational risk prevention, quality and personal data protection departments, together with the Compliance Committee and the Personal Data Protection Committee, and we have collaborations with prestigious legal firms. Thanks to the work carried out, we have not received any complaints for non-compliance with legislation and regulations, nor non-conformities in this respect in the audits received.

- **HR risks:** Loyalty of talent and difficulty in recruiting new highly qualified staff. During the year 2022, the scarce existence and high demand for qualified technical personnel in the IT sector has continued to be noted, as well as the need to quickly adapt to the new circumstances and continuous legislative changes in this area. At SEIDOR, with a high percentage of our team working remotely, we have managed to increase our workforce thanks to the implementation and/or continuity of initiatives such as:
 - Small training actions aimed at improving the quality of the working environment for our employees.
 - Activities and social benefits to improve the working environment and make SEIDOR an attractive place to work.
 - Implementation of a flexible and agile 100% on-line system for our selection processes.
 - Implementation of a corporate APP with tools to help our employees and keep them informed about company news. This application provides our employees with special offers in different shops.
 - New employee welcome process for teleworkers.
 - Collaborations with Universities.
 - SEIDOR Academy initiative where we train future technicians and consultants on a paid basis in various technologies such as cybersecurity, cloud, IoT, AI and Mobility or Customer Experience and ERP.

- **Cybersecurity risks:** caused by attacks or failures in infrastructures, communication networks, workstation equipment and applications that may affect security (physical and logical), as well as the integrity, availability or confidentiality of the operational and financial information or the information of our customers managed by SEIDOR systems and/or services.

During 2022, we have not experienced any cybersecurity incidents that have had a serious impact on our systems and services, even though the level of risk has increased due to the expansion of teleworking, thanks to:

- Continuous monitoring by the Corporate Cybersecurity Committee.
- The process of monitoring and early action carried out by our Office of Corporate Cybersecurity.
- The information security management system implemented in our company.
- The implementation of preventive measures in view of the fact that our employees are teleworking.
- The implementation of awareness-raising and training campaigns on good practices in cybersecurity.

Main Opportunities

The current situation has led to the need for companies and public administrations to contract IT services, implementing technologies to improve their management, new technologies to improve their business processes and the continuity of teleworking in all those activities that allow it.

The main opportunities that have favoured SEIDOR's strategy and the achievement of its objectives are:

- Increasing demand for cybersecurity services: due to the processes of digital transformation and the incorporation of new technologies in companies, has companies' dependence on technology and exposure to the Internet has increased. cyberthreats that have led to an increase in the demand for cyber security services cybersecurity professionals.
- Continuity of teleworking: this new need has led to an increase in demand for hardware and software equipment to facilitate teleworking.
- Increased public supply of digital transformation projects and services and ICT services.
- Increasing supply and demand for cloud services and Software as a Services (SaaS).
- Increasing need for companies to implement e-business solutions and improve the management of their administration, production and commercial processes.

Risk management

SEIDOR is a global company that may have various risk factors, which vary depending on the country in which it operates and the nature of the sectors in which it operates. In this sense, the company seeks to identify these risks and assess them, which allows it to implement the appropriate management measures sufficiently in advance to mitigate the probability of these risks occurring and/or reduce their potential impact on the business objectives.

Risk management comprises the following phases:

- Identification of internal and external risks affecting SEIDOR's objectives and strategy.
- Risk assessment identifying possible causes, consequences and impacts.
- Prioritisation of identified risks.

- Risk management by the relevant managers for the purposes of develop actions to mitigate risk and risk tolerance.
- Monitoring of identified risks on an ongoing basis to assess their evolution.

At SEIDOR we manage risks according to their nature and we carry out different analyses, among which we can highlight the following:

- Context Analysis: we identify and address the circumstances that may represent weaknesses, threats, strengths or opportunities (SWOT), which may affect the different elements of context, stakeholders and strategic objectives, related to the exercise of our activity.
- Business Impact Analysis (BIA): identification of the services, activities carried out by the company, the information it processes, the systems and resources that support them, and the subsequent assessment of the dependence on them for the normal development of its business and the services it provides to its customers.
- Personal data protection impact assessment: we identify and assess the impact of the processing of personal data on the rights and freedoms of individuals.
- Analysis of risks and vulnerabilities of the systems: we identify and treat those risks related to information security and how they affect the availability, confidentiality, integrity, authenticity and traceability of the information processed.

Context analysis

One of the most effective tools for risk and opportunity management of the business activity is the Analysis of the context of our organisation, in which we identify, assess and manage the weaknesses, threats, strengths and opportunities (SWOT) of our environment, which affect the different stakeholders with whom we interact in the exercise of our activity, their expectations and the achievement of SEIDOR's strategic objectives, according to the process established in our Integrated Management System (IMS):

1. Identification of the context elements and stakeholders and their level of influence for SEIDOR's business.
2. Identification of stakeholder expectations and SEIDOR's interest in the stakeholder.
3. Identification of negative (weaknesses and threats) and positive (strengths and opportunities) cases and possible consequences that may impact on the fulfilment or satisfaction of these expectations.
4. Assessment of the impact that each of the risks could have on our business, which has informed our Business Impact Report and the estimation of the likelihood of their materialisation.
5. Risk assessment (impact (0-4) + probability (0-4)) according to our corporate risk management and assessment procedure (risk 0-8).
6. Analysis of the cause of the case.
7. Proposed risk mitigation, containment and recovery actions and their prioritisation according to the assessed risk.
8. Monitoring and verification of the implementation of actions.
9. Assessment of the effectiveness of actions and calculation of their residual risk.

Context analysis 2022

In the 2022 context analysis, we have identified and analysed:

- 18 stakeholders and contextual elements.
- 187 expectations and strategic objectives.

Average initial and residual risk of threats and weaknesses by risk type 2022:

Threats and Weaknesses < 5			
Type of Risk	Average Risk	Average Residual Risk	% change
Fulfilment of objectives	4,75	0,31	93,42%
Weaknesses	4,75	0,31	93,42%
Financial/economic	7,00	1,42	79,67%
Threats	7,00	1,42	79,67%
Resource management and HR	5,67	-	100,00%
Threats	7,00	-	100,00%
Weaknesses	5,00	-	100,00%
Image and market position	4,67	0,56	88,10%
Threats	4,25	1,00	76,47%
Weaknesses	5,00	0,20	96,00%
Legal/regulatory non-compliance	4,67	-	100,00%
Weaknesses	4,67	-	100,00%
Provision of services / breach of contract	4,67	1,06	77,32%
Weaknesses	4,67	1,06	77,32%
Information security	6,50	0,35	94,62%
Threats	7,00	0,70	90,00%
Weaknesses	6,00	-	100,00%
Sustainability	3,00	0,25	91,67%
Weaknesses	3,00	0,25	91,67%
Grand total	4,92	0,51	89,65%

Average initial and residual risk of threats and weaknesses by risk type 2021:

Threats and Weaknesses < 5			
Type of Risk	Average Risk	Average Residual Risk	% change
Fulfillment of objectives	5,00	1,25	75,00%
Weaknesses	5,00	1,25	75,00%
Financial/economic	6,75	1,46	78,33%
Threats	6,75	1,46	78,33%
Resource management and HR	6,00	1,74	71,00%
Threats	6,00	0,48	92,00%
Weaknesses	6,00	3,00	50,00%
Image and market position	4,80	0,25	94,79%
Threats	5,00	0,38	92,50%
Weaknesses	4,67	0,17	96,43%
Legal/regulatory non-compliance	4,67	-	100,00%
Weaknesses	4,67	-	100,00%
Provision of services / breach of contract	4,71	0,36	92,42%
Threats	5,00	-	100,00%
Weaknesses	4,67	0,42	91,07%
Information security	7,00	4,69	33,00%
Threats	7,00	4,69	33,00%
Sustainability	3,00	-	100,00%
Weaknesses	3,00	-	100,00%
Grand total	4,97	0,65	86,95%

Average initial and residual risk of strengths and opportunities by risk type 2022:

Strengths and Opportunities >= 5			
Type of Risk	Average Risk	Average Residual Risk	% change
Commercial and Marketing	6,56	5,85	-10,76%
Strengths	6,00	6,00	0,00%
Opportunities	6,71	5,81	-13,51%
Resource management and HR	6,00	6,00	0,00%
Strengths	6,00	6,00	0,00%
Government	6,67	6,00	-10,00%
Strengths	6,67	6,00	-10,00%
Image and market position	7,00	7,00	0,00%
Strengths	7,00	7,00	0,00%
Sustainability	6,00	6,00	0,00%
Strengths	6,00	6,00	0,00%
Grand total	6,61	6,15	-7,02%

Average initial and residual risk of strengths and opportunities by risk type 2021:

Strengths and Opportunities >= 5			
Type of Risk	Average Risk	Average Residual Risk	% change
Commercial and Marketing	6,56	6,28	-4,24%
Strengths	6,00	6,00	0,00%
Opportunities	6,71	6,36	-5,32%
Resource management and HR	6,00	6,00	0,00%
Strengths	6,00	6,00	0,00%
Government	7,50	6,50	-13,33%
Strengths	7,50	6,50	-13,33%
Image and market position	7,00	6,77	-3,33%
Strengths	7,00	6,77	-3,33%
Sustainability	6,00	6,00	0,00%
Strengths	6,00	6,00	0,00%
Grand total	6,69	6,36	-4,86%

Maximum residual risk obtained during 2022, by GIS process:

Threats and Weaknesses Max. Residual Risk		Strengths and Opportunities Max. Residual Risk	
GIS processes	Grand total	GIS processes	Grand total
Audit and Monitoring	2,50	Communication	7,00
Communication	-	Environmental Operational Control	6,00
Environmental Operational Control	0,75	Direction and management	7,00
Demand Management	4,00	Demand Management	7,00
Risk and Opportunity Management	1,75	Supplier Management	7,00
Human Resources Management	-	Risk and Opportunity Management	8,00
Presentation of Services and Projects	2,50	Human Resources Management	6,00
Corporate Social Responsibility	-	Customer satisfaction	6,00
Information security	0,70	Grand total	8,00
Max. Residual Risk	4,00		

Maximum residual risk obtained during 2021, by GIS process:

Threats and Weaknesses	
GIS processes	<5 Max. Residual Risk
Audit and Monitoring	2,50
Communication	-
Environmental Operational Control	-
Demand Management	3,15
Risk and Opportunity Management	2,70
Human Resources Management	3,00
Presentation of Services and Projects	-
Corporate Social Responsibility	-
Information security	4,69
Grand total	4,69

Threats and Weaknesses	
GIS processes	>=5 Max. Residual Risk
Communication	6,30
Environmental Operational Control	6,00
Direction and management	7,00
Demand Management	7,00
Supplier Management	7,00
Risk and Opportunity Management	8,00
Human Resources Management	6,00
Customer satisfaction	6,00
Grand total	8,00

Regulatory structure and procedures

Good governance is vital for an organisation to be successful. To this end, it is essential to have defined and implemented policies that set out the strategic lines to be followed, and processes that regulate and describe the tasks to be carried out in order to achieve the proposed objectives. In SEIDOR, a regulatory structure based on four levels is established:

- Higher or strategic level, where the Corporate Policies are set out:
 - SEIDOR company code
 - Sustainability Manifesto
 - Security Policy
 - Internal policy on the use of information systems
- Medium or tactical level, where the Corporate Rules are set out. These regulate the functioning of the organisation based on the reference framework established at the strategic level.

3. Technical level, where technical guides, internal manuals and manufacturers' manuals can be found.

Information, training and awareness-raising activities are carried out for SEIDOR staff, with the aim of ensuring the true integration of the requirements established by legal and corporate regulations in all processes. Good governance is vital for an organisation to be successful. To this end, it is essential to have defined and implemented policies that set out the strategic lines to be followed, and processes that regulate and describe the tasks to be carried out in order to achieve the proposed objectives.

In SEIDOR, a regulatory structure is established based on the following:

1. A first strategic level, based on corporate values and policies.
2. A second, medium or tactical level, which includes the Corporate Rules, which regulate the functioning of the organisation based on the reference framework established at the strategic level.
3. And a technical level, where technical guides, internal manuals and manufacturers' manuals can be found.

Information, training and awareness-raising activities are carried out for SEIDOR staff, with the aim of ensuring the true integration of the requirements established by legal and corporate regulations in all processes.

Principles, rules and procedures

SEIDOR's risk management is covered by the following regulatory structure:

- SEIDOR Corporate Code.
- Sustainability Manifesto.
- Criminal Compliance Programme.
- Good Information Security Practices.
- Corporate Policy on the use of Information Systems.
- Corporate Information Security Policy.
- Integrated Management System Manual.
- Management of information security incidents.
- Registration and deregistration of staff.
- Lower or operational level, where corporate procedures (general and operational) are collected. They describe and detail the execution of a process or task.
- Zero Tolerance to Corruption Plan.
- Information Security and Service Management System (ISMS) certified to ISO 20000-1, ISO 27001.
- National Security Scheme (ENS).
- Occupational Risk Prevention Programme.
- Password policy.
- Travel policy.
- Workplace bullying protocol.
- Equality plans.

All these corporate policies and procedures are available on the SEIDOR intranet.

Environment

Environmental protection is one of the guiding principles of SEIDOR's business activities. Under normal circumstances, our activity does not have a very significant direct impact given our sector and business model.

Indirectly, we help our clients to manage the environmental impacts due to their respective sectors of activity and business models by defining processes, implementing management systems such as ERPs and new ICT technologies that help them, for example, to improve the control of the consumption of natural resources, raw materials, energy, etc. We also monitor the possible environmental impacts that our suppliers and collaborators may produce in the provision of their services.

Our Integrated Management System has a set of environmental management standards and procedures, in accordance with current legislation, certified in ISO 14001:2015, which allow us to identify and evaluate the environmental impact that the development of our activity may have on the environment, and thus assess the risks and opportunities related to environmental aspects, legal requirements, and other requirements. Thanks to this we can design action plans in order to prevent and mitigate any undesirable effects that may be caused by our activity both externally and internally.

SEIDOR provides all its employees and collaborators with knowledge of all the company's internal rules and procedures on environmental protection, as well as those good environmental and energy efficiency practices that affect their activity and level of responsibility.

We are committed to the appropriate use of raw materials from the time they are obtained until the end of their useful life. In this way, SEIDOR has implemented initiatives to reduce environmental impacts, managing the waste produced in the operation of activities and services (mainly electronic equipment), implementing a policy of reusing computer equipment and donating it to NGOs, contracting authorised waste management companies, using selective collection points or clean points, the installation of intelligent network printers that avoid printing copies that are not subsequently removed, the exclusive use of recycled paper and the promotion of the paperless office and recycling, through the use of bins in the offices dedicated to waste batteries, organic waste, paper and cardboard, plastic waste and caps, which are donated to the fight against rare diseases in children.

Environmental management system

As proof of SEIDOR's commitment to the environment, in 2014 SEIDOR designed and implemented an environmental management system certified according to the ISO 14001 reference standard, integrated with the quality management system, with the aim of guaranteeing control and minimising the environmental impact produced in the exercise of our activity, as well as significant environmental aspects, energy efficiency and the correct management of waste and, of course, compliance with current environmental legislation at a territorial and state level. As well as the necessary awareness and training in these aspects of all our employees team of professionals.

Taking another step forward in our commitment to the environment, since 2017 we have been calculating the impact of greenhouse gases, carrying out the calculation and associated reduction plan of the carbon footprint of our activity in the companies SEIDOR, S.A. and SEIDOR SOLUTIONS, S.L.U., which in 2019 we have extended to the rest of the companies and offices

of GRUPO SEIDOR in Spain, certifying it in ISO 14064:2019 and declaring it to the MINISTRY FOR ECOLOGICAL TRANSITION AND DEMOGRAPHIC CHALLENGE. The first energy efficiency audit was carried out in 2018, in compliance with RD 56/2016 transposing Directive 2012/27/EU concerning energy audits and in accordance with the UNE-EN 16247 standard on information generated in 2017.

The last energy efficiency audit took place in 2022 and was carried out on the basis of data from the last four years. These audits cover the period of four years, with the next one in 2026.

In the last energy efficiency audit, positive results were obtained.

See The analyses of consumption in each of the offices included in the scope of the audit show a higher consumption of electricity in the Barcelona facilities compared to the Madrid and Santander facilities, a higher percentage of air conditioning in the latter, due to the presence of generating equipment that consumes more electricity and, due to a greater number of office equipment in Barcelona, a lower percentage of this equipment.

Various energy efficiency improvement measures were proposed:

- Replacement of the fluorescent luminaire with LEDs, which will mean a power saving of more than 100%.
- The installation of stand-by control strips to cut off the power supply when the equipment is in this state.
- The installation of presence detectors which, together with daylight sensors, will reduce energy consumption by switching off lighting that remains on for longer than necessary and when there is adequate daylight.
- Periodic reviews of the reactive energy values and, if they are not optimal, the installation of capacitor banks.
- The implementation of an ISO 50001 Energy Management System.
- The implementation of economisers in operating systems.

Environmental Management System Processes

The Environmental Management System is mainly composed of:

Environmental Policies:

SEIDOR includes its commitment to the environment in its business policy and code of conduct, in its public manifesto of Corporate Social Responsibility, in which the environment appears as one of the main points, and in its Progress Report, as an adherence to the principles of the United Nations Global Compact, and the Sustainable Development Goals (SDGs).

By expressly committing ourselves to identify aspects or interactions environmental aspects and impacts arising from the performance of our activities, products and services, and to know and assess all associated environmental aspects and impacts, both positive and negative, in order to prevent and minimise the effects that these may have on the environment.

Identification and Management of Environmental Aspects:

SEIDOR evaluates and prioritises the most significant environmental aspects, which allows for the appropriate setting of objectives and targets, and to have an environmental management programme capable of taking specific action on these aspects during the life cycle of the environmental management system.

According to the process defined in SEIDOR's environmental management system for the identification of environmental aspects, we have identified and evaluated those activities that

may influence the environmental impact of our activity. These activities have been classified according to the conditions in which they are carried out or produced, into:

- Normal operating conditions are those that are customary in the course of business necessary for the provision of our services to customers and the normal management of our business.
- Abnormal operating conditions are those which, although necessary for the performance of our activity, are not usually carried out, such as the closure of an office or the opening of a new work centre, the change of a historical or strategic supplier, the extraordinary and unscheduled shutdown of systems, etc.
- Emergency situations and accidents, such as traffic accidents, spills or leaks, fires, flooding of facilities, etc.

In addition, we classify environmental aspects into:

- Direct environmental aspects are caused as a consequence of the execution of an activity of our company, which may interact with the environment.
- Indirect environmental aspects are produced by the environmental behaviour of third parties that interact with our company, such as contractors and subcontractors, suppliers, customers, etc.

Environmental Operational Control:

SEIDOR establishes a series of controls of its processes with the aim of complying with the commitments and requirements in terms of environmental management and contributing to sustainable development within the different stages of the life cycle, from the design to the provision of its products and services to its customers, including the supply chain, in each of its processes. For this reason, SEIDOR has identified the following environmental aspects as control points and measures to reduce the environmental impact they produce:

- Maintenance and electricity consumption in offices:
 - Retailers that distribute 100% renewable energy to supply power to their offices.
 - Planning of energy audits.
 - Course on good environmental practices, which includes a section on energy efficiency during the working day.
 - Carbon Footprint calculation: Scope 2 (Electricity and consumption).
 - Monitoring of the established environmental indicator of energy consumption.
- Vehicle fleet and travel:
 - Hiring vehicles in the form of leasing with good energy efficiency and guaranteeing their correct maintenance in the official facilities of the brands.
 - Ease of teleworking, to reduce the number of trips to offices.
 - Good environmental practice course, which contains a section on dedicated to efficient driving.
 - Carbon Footprint calculation: Scope 2 (Fossil fuel consumption).
 - Monitoring of established environmental indicators of CO2 emissions into the atmosphere.
- Waste produced:
 - Management of waste produced during activities, by contracting waste management companies.

- Re-use policy for IT equipment.
- Good environmental practices course, which includes a section on efficient waste management.

In the year 2022, 12,459 kg of waste will be managed in Spain, divided into:

- Paper and cardboard: 3,987 Kg
- Batteries: 6 Kg
- WEEE: 7.819 Kg
- R-PCs: 645 Kg
- Cartridges/Toner: 2 Kg

These data do not correspond to the group as a whole; they have been calculated for the main work centres, which are Barcelona, Vic, Madrid and Vitoria.

- Consumption of raw materials (mainly paper):
 - Consumption of recycled paper.
 - Use of smart network printers that print at the time of collection, avoiding printing that is not subsequently removed.
 - Monitoring of the established environmental indicator for paper consumption.

Environmental management system audits

The following environmental management audits have been carried out for the period 2022:

- Internal Audit: included in the internal audit of the integrated management system in which the environmental records were reviewed, the results of the established indicators were analysed, no non-conformities were found and improvement actions were proposed in the organisation's processes.
- External Audit: carried out by auditors from OCA Global, on the integrated environmental and quality management system certified in ISO 9001 and ISO 14001, in October 2022, obtaining a positive result, with the following detail in relation to the Environmental Management System:
 - Non-conformities: no Deviations were detected.
 - Comments: None detected.
 - Opportunities for Improvement: None detected.
 - Strengths to be highlighted:
 - Management leadership.
 - Willingness, availability and participation of staff during the audit.
 - Reinforcement of the management system department.
 - United Nations Global Compact. COP Progress Report.
 - Control of the management system of the new headquarters included (DEUSTO SEIDOR company in Vitoria).
 - Carbon footprint and reduction and offset plan.
 - Traceability and control of all services reviewed during the audit.

Carbon footprint calculation

In 2018 SEIDOR carried out for the first time the exercise of estimating CO₂ emissions from the activities of the companies SEIDOR S.A. and SEIDOR SOLUTIONS, S.L.U. with the information collected corresponding to the activity carried out in 2017. Based on the calculation, an emissions reduction plan was designed with a 3-year objective to progressively reduce CO₂ emissions by 15% with respect to the base year and thus minimise the environmental impact of the company's activities.

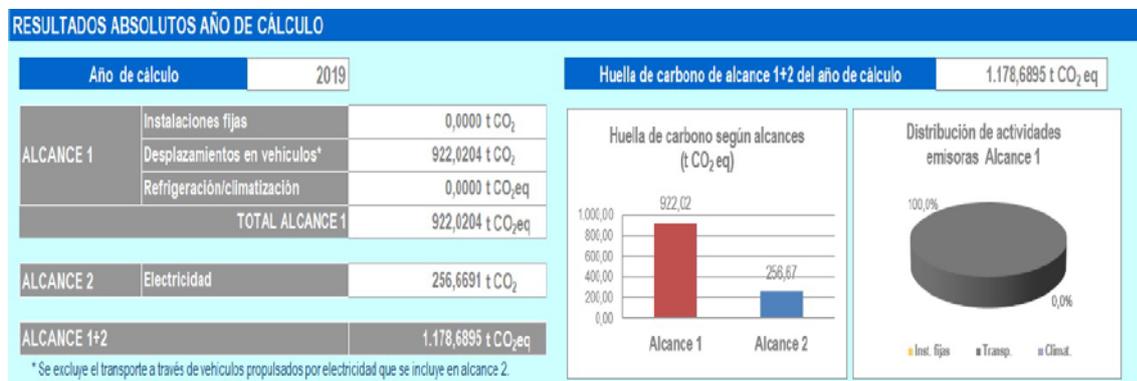
The calculation of greenhouse gas (GHG) emissions is methodologically based on the ISO 14064-1: 2012 standard, which we have subsequently certified and registered in the Registry of carbon footprint, compensation and CO₂ absorption projects of the Ministry for Ecological Transition and the Demographic Challenge.

During 2020 and early 2021, all the necessary actions and efforts were made to extend the calculation of the Carbon Footprint, extending it to the entire company at national level for the activity carried out in 2019 and 2020. In this way, the Carbon Footprint Calculation reports were obtained, which include the values for 2019 and 2020 respectively for all the offices of the SEIDOR GROUP companies in Spain.

Measurements made

SEIDOR GROUP SPAIN

- 2019: Third calculation of the carbon footprint with an estimated total of 1,178.69 tCO₂eq and a ratio per employee (workforce of 2,617 people) of 460.43 kg CO₂eq:

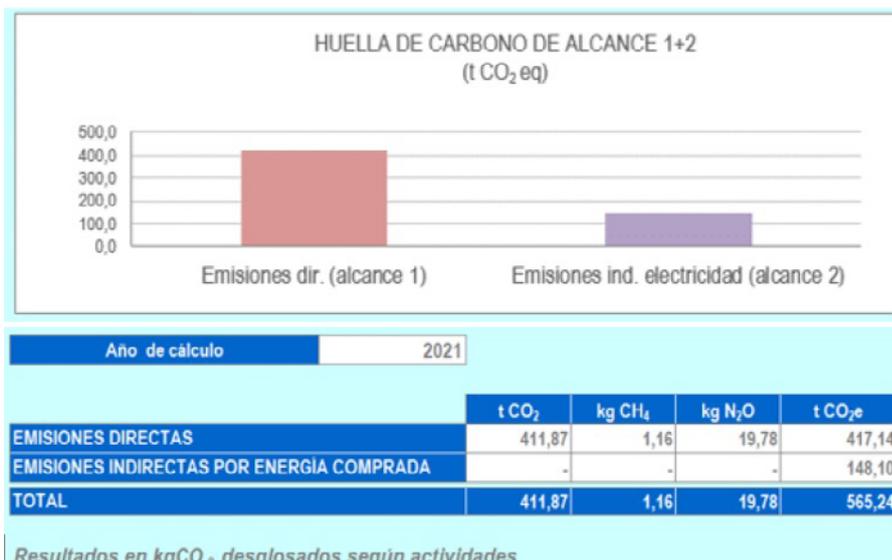


- 2020: Fourth calculation of the carbon footprint with an estimated total of 632.00 tCO₂eq and a ratio per employee (workforce 2,170 people) of 299.00 kg CO₂eq:

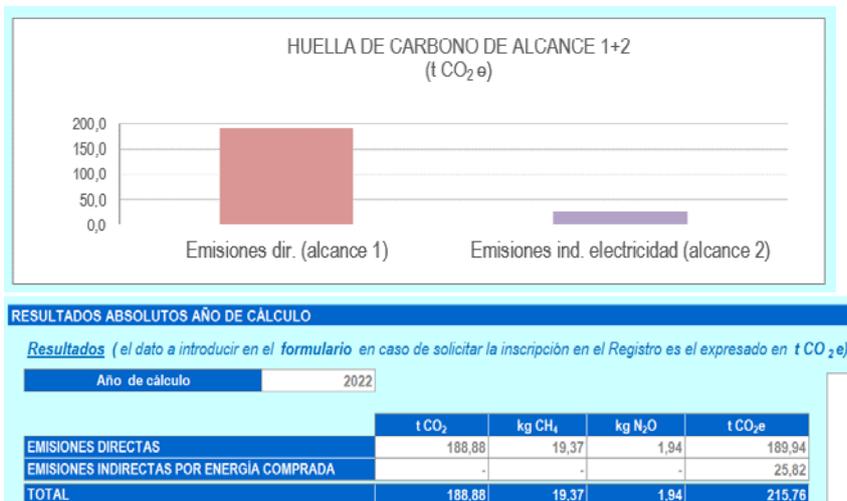


- 2021: Fifth calculation of the carbon footprint with an estimated total of 565.24 tCO₂eq and a

ratio per employee (workforce of 2,681) of 207.00 kgCO₂eq:



- 2022: Sixth calculation of the carbon footprint with an estimated total of 215.76 tCO₂eq and a ratio per employee (workforce 3,177) of 67.91 KgCO₂eq:



Plan to reduce CO₂ emissions

The first CO₂ emission reduction plan that was proposed was for the period emissions between 2017–2020, with a target of achieving an effective reduction of 15%. This came to a successful conclusion last year with a carbon footprint reduction of more than 70% compared to 2017, the base year for the plan.

As a sign of the will and commitment of the SEIDOR Group’s General Management to the environment, we have designed a new plan covering the period 2020–2025. For this new reduction plan, we have used data from 2019 as the base year. This is due to the fact that during 2020 the SEIDOR Group’s activity was affected by the abnormal conditions caused by the appearance of the COVID-19 virus, which triggered a global pandemic and, consequently, the declaration of a State of Alarm at National level, establishing the confinement of the population and preventing mobility. Between provinces.

Therefore, a target of 10% reduction of GHG emissions and carbon footprint has been set.

Analysis of results

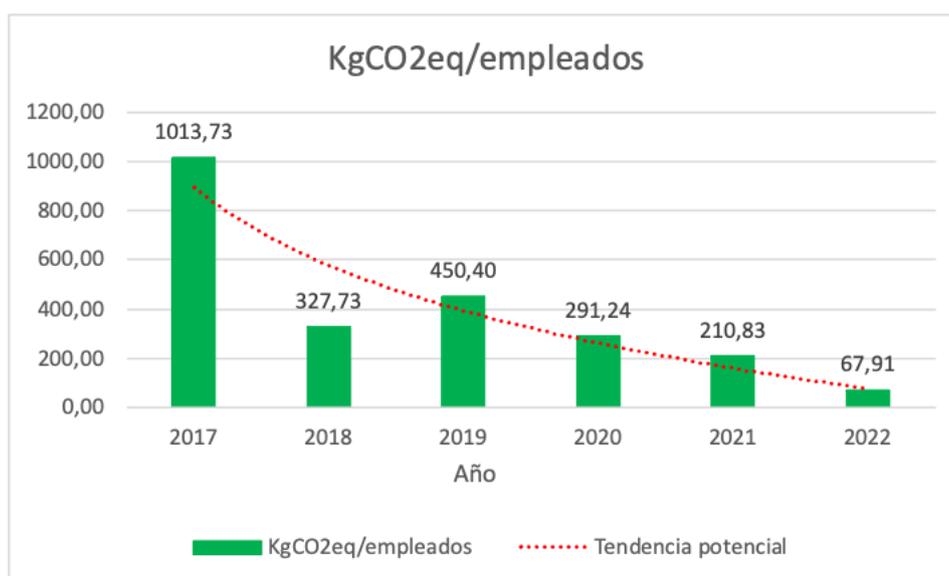
As we have explained above, since 2017 a series of circumstances have occurred, produced both by the strategic decisions of the group of companies and those of third parties, which have had a significant influence on the results of the calculation of Greenhouse Gas (GHG) emissions, which we explain below:

1. 2017 (First measurement): the general management of the SEIDOR group of companies decided to start a process of measuring the CO₂ footprint of our activity, choosing the companies of the SEIDOR, S.A. and SEIDOR SOLUTIONS, S.L.U. group.
2. 2018 (second measurement): the structure of the group of companies and the companies are reorganised in 2018, which has a direct impact on the basis for calculating the CO₂ footprint:
 - SEIDOR, S.A.: drastically decreases the number of its employees, bringing together exclusively to employees belonging to the group's structural services categories. These are employees who do not travel on a regular basis, so the number of kilometres travelled is considerably reduced.
 - SEIDOR SOLUTIONS, S.L.U.: merges with the company MICROSISTEMAS S.A., considerably increasing the number of employees, the employee profiles are technical and administration staff of information and commercial systems, people who on the one hand need to travel for the execution of their work, but it begins to implement a policy of remote work by connecting to customer systems instead of travelling.
3. 2019 (Third measurement): at the suggestion of the auditors and with the aim of collecting a value closer to the reality of our group of companies, it was decided to calculate the CO₂ footprint of all the companies and work centres in Spain, measuring the emissions of more than 2,700 employees and 27 offices, including the electricity consumption of the Santander work centre where the Group's corporate Data Centre is located, which represents approximately 40% of the total Kw/h consumed in all the Group's work centres. 700 employees and 27 offices, including the electricity consumption of the Santander work centre where the group's corporate Data Centre is located, which represents approximately 40% of the total Kw/h consumed in all of the Group's work centres, under the umbrella of the parent company SEIDOR, S.A., including all employees in Spain of the SEIDOR Group companies.
4. 2020 (Fourth measurement): this is the last measurement of the target period 2017-2020. This year is mainly marked by the COVID 19 pandemic, states of alert, confinements and restrictions and recommendations to limit mobility and gathering of people, which have led to a considerable decrease in travel and electricity consumptions due to teleworking, which may influence the analysis of the period and the achievement of targets.
5. 2021 (Fifth measurement): this is the first measurement of the period 2020-2025. Throughout this year the population has been conditioned, as in 2020, by the pandemic situation caused by COVID-19. Due to this, teleworking has been formalised, which has reduced electricity consumption and, to a certain extent, staff travel.
6. 2022 (Sixth measurement): This year saw a change of supplier in terms of energy as we have started to collaborate with a company that has a much lower impact on the environment.

The evolution of CO₂ consumption for the period between 2021 and 2022 at global group level in Spain is as follows:

Year	employees	tCO2eq	tCO2eq/employees	KgCO2eq/employees	% variation of previous worker
2021	2681	565,24	0,210831779	210,83	-28%
2022	3177	215,76	0,067913126	67,91	-68%

Graphically:



Conclusions

As can be seen in the graph above, the amount of CO2 emitted by the SEIDOR group is progressively decreasing, meeting the target conditions established in the new 2020-2025 plan thanks to the results obtained in the last calculation made for the year 2022.

The actions carried out to achieve the objectives were as follows:

- Analyse as part of Seidor's Corporate Social Responsibility policy Carbon Footprint offsetting actions.
- Design an action plan based on the following areas of action:
 - Reduction of electricity consumption.
 - Awareness-raising and training of our employees and collaborators.
 - Contracting the supply of electricity to companies with low-emission or green generation certification.
 - Reduced travel by private vehicles.
 - Fleet of low-emission leasing vehicles.

Sustainable use of resources

Water consumption

Due to the group's activity, water consumption is an environmental variable on which SEIDOR has little impact, so it is not considered relevant to include data on this section.

Energy consumption

During 2022, the measures established in relation to energy consumption have been continued.

The energy consumption of all SEIDOR companies nationwide has been recorded on a monthly basis to calculate annual consumption. The results obtained were as follows:

Consumo kWh	2018	2019	2020	2021	2022
Totales	1.742.226,00	2.187.725,94	1.597.458,20	1.305.358,00	1.277.222,01
Por trabajador	794,45	765,21	492,91	486,9	402,2
% Variación año anterior por trabajador	-	-3,68%	-35,59%	-1%	-17,4%

As can be seen, the annual consumption in all SEIDOR offices is reduced every year, demonstrating that the measures adopted by the organisation are being effective. A large decrease is also observed between 2019 and 2020, mainly due to the pandemic caused by the SarsCOV-19 virus (COVID-19) and between 2021 and 2022, due to greater awareness on the part of SEIDOR staff of the importance of caring for the environment and the lessons learned and actions taken that have followed their course, coming from the year of the pandemic, such as teleworking.

United Nations report

Since 2014, when SEIDOR joined the [United Nations Global Compact](#) and the commitment to its principles. This has helped us to develop activities and initiatives aimed at improving our way of relating and contributing value to society by developing our activity in a sustainable way.

In order to maintain our commitment, SEIDOR has prepared a new Progress Report on our activity, where we detail our policies and actions in terms of Sustainability, developed throughout the year, aligned with the principles of the United Nations Global Compact and the Sustainable Development Goals (SDGs). Our Progress Report is available for consultation at the following link: [Global Compact COP Report](#).

Commitment to the principles of the United Nations Global Compact is found in led by SEIDOR's senior management, transmitting these values to our employees, managers and employees in our day-to-day work, keeping business ethics and sustainability at the core of our business.

This progress report details our policies and actions in the area of Social Responsibility initiatives developed throughout the year in line with the Global Compact Principles and the Sustainable Development Goals.

The main points related to environmental protection covered in the Progress Report are as follows:

- Biodiversity protection.
- Calculation and offsetting of CO2 emissions.
- Climate change.
- Sustainable mobility.
- Consumption of the entity.
- Sustainable use of resources and environmentally friendly technologies.

People

Talent is one of the fundamental assets underpinning SEIDOR's business as a technology company based on knowledge, innovation and the provision of technological services.

At the end of 2021, the workforce consisted of 5,795 professionals. At the end of 2022, the workforce consisted of 7,371 professionals, a variation of 27% compared to the previous year.

SEIDOR's talent management strategy is based on the following pillars:

Cultural transformation and talent management

2022 was a year of continuity with respect to 2021 in which we continued to focus on people's well-being.

In 2022 we have been reinforcing our #BeCare programme (formerly calledS), again this year with the collaboration of Fundación Mapfre.

The webinars given by Mapfre both on-line and recorded to the whole company were:

- ✓ **"Generate impact and influence"**: 149 attendees + 220 subsequent views
- ✓ **"We say goodbye to tobacco"**: 56 people + 20 subsequent views
- ✓ **"Introduction to mindfulness"**: 149 online attendees + 7 post-views
- ✓ **"Hypopressive gymnastics"**: 72 attendees online

In addition to the #Cúdate Programme, different training programmes on SOFT SKILLS development and cultural transformation were also delivered:

- ✓ **"Learn to give feedback"**: an eminently practical programme where much emphasis was placed on the development of conversational skills so that people know how to develop others through conversations.
- ✓ **"Public speaking and storytelling"**: focused on improving communication skills for presentations/presentations in front of internal and external clients.
- ✓ **"Relationship skills in consulting"**: intended for juniors entering the Academy. It complements the technical training they acquire with the following competences which they will have to demonstrate in the life of the projects in relation to the client and the team.
- ✓ **"Leadership and team management"**: Focused on training middle management in people management.
- ✓ **"Change management"**: Focused on consulting professionals who need to know the phases of change management in any information system implementation project in order to help people adapt to it.

Attracting talent

In order to attract the best talent, SEIDOR is committed to differentiating factors such as innovation, international presence, project diversity and flexibility. Even in the exceptional situation caused by the Coronavirus pandemic, SEIDOR has had to struggle with the shortage of talent in the sector in 2022, we work with a 100% online model for our recruitment processes.

In this way, SEIDOR incorporated more than 1,200 professionals in Spain and more than 1,500 in the rest of the subsidiaries during 2022.

Número de horas de formación Global 2022		
Category Professional	Administration	25,0
	Commercial and Marketing	1.806,58
	Directors	217,00
	Technicians	101.144,38
Gender	Male	82.459,92
	Women	20.733,04

Número de horas de formación Global 2021		
Category Professional	Administration	842,15
	Commercial and Marketing	1.598,50
	Directors	418,00
	Technicians	83.976,80
Gender	Male	62.749,71
	Women	24.085,74

Número de horas de formación España 2022		
Gender	Male	18.590
	Women	4.461
Category Professional	Administration	4
	Commercial and Marketing	313
	Directors	115
	Technicians	22.619

Número de horas de formación España 2021		
Gender	Male	13.406
	Women	45.177
Category Professional	Administration	34
	Commercial and Marketing	142
	Directors	216
	Technicians	58.191

Diversity management

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. Our corporate Policy and Code of Conduct requires people to be treated 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 diversity strategy

SEIDOR is committed to maintaining, strengthening and enhancing 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 to monitor 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.
- Understanding diversity as a value.
- Ensure the presence of women's talent at all levels, as well as equal opportunities in selection processes.

To this end, the Equality Commission holds regular meetings where initiatives such as the following are planned and agreed:

- Conduct training on Equality for the organisation's staff.
- Conducting trainings on the use of inclusive language and ensuring its correct application in the company's various internal and external communication channels.
- Conduct awareness campaigns and initiatives aimed at achieving full gender equality throughout the organisation.
- To develop and ensure the correct implementation of the set of actions aimed at achieving the gender equality label (GES).
- To 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 that the same objective criteria described in the previous section are applied to ensure the implementation of an equal pay policy.

In SEIDOR we have a Protocol for the Prevention of sexual harassment, on grounds of sex, sexual orientation and gender identity, which establishes, among other things:

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

SEIDOR has set out 3 stages in the area of Equality and Diversity, which is why an implementation timetable has been drawn up.

The first stage, which began in 2019 and continued in 2020, consisted of drawing up the Equality Plans of the different companies in the SEIDOR group and implementing the measures proposed in them, for which different procedures were drawn up, such as the Prevention of sexual harassment, for reasons of sex or gender identity and the Procedure on inclusive language in SEIDOR.

From this point onwards, training sessions were held for the managers of the different areas of the company where these points to be taken into account were made known.

Published texts, such as job offers, LinkedIn posts, company newsletter, corporate manuals (Welcome), etc. were also reviewed to adapt the company to inclusive language.

The second stage began in 2021 and consists of consolidating the knowledge acquired in the previous phases and continuing with training and raising awareness of the issue of equality

among the rest of the staff. We also wanted to go a step further by participating in various external initiatives such as ApadrinaTIC, 100tifiques, an interview with FibraCat on inclusive language.

In the third stage, we want to internationalise our procedures and know-how to all SEIDOR Group companies worldwide. It should be noted that in 2022 the company's management has made a series of commitments on gender equality that will be implemented in the coming years, such as:

1. **COMMUNICATION** – We will review the use of language and images in communications, we will produce a guide for all people in the company to have a reference.
2. **SELECTION** – We will train the people involved in the selection and promotion processes in equal opportunities, we will continue to publish job offers in an equal manner, and we will adopt positive discrimination measures when there is an under-representation of women in vacant positions.
3. **TRAINING** – We will create a training and awareness-raising module on equal opportunities between women and men for all staff.
4. **PROMOTION** – We will update the qualification and experience records, which will allow us to know the potential of the staff in order to offer equal opportunities promotions. We will also adopt a new measure of positive discrimination to favour the promotion of women in positions where there is low female representation and in compliance with the requirements of the post.
5. **PROFESSIONAL CLASSIFICATION** – We are working on job evaluation. and that the internal classification is free of gender bias. We will verify that the existing job evaluation system takes into account only objective factors and that each job is associated with competencies that do not relate to stereotypes or gender-related issues.
6. **REMUNERATION** – We will maintain and update the remuneration register and provide access to it in accordance with the law.
7. **CONCILIATION** – We will draw up a document setting out the rights of reconciliation of work, personal and family life, as set out in the law and the collective agreement, as well as others offered by the company such as teleworking and flexible working hours.
8. **WORKING CONDITIONS and WORKING HEALTH** – We are convinced that flexible working hours and teleworking is a fundamental factor for people to continue to feel happy at work, which is why at SEIDOR we will continue to do so as we have done up to now.
9. We will carry out a risk assessment with a gender perspective, and pregnant women will also be informed, at the time they communicate their condition to the company, of the measures that are contemplated in the assessment of their job, inherent to their pregnancy.
10. **PREVENTION OF HARASSMENT** – We will disseminate the protocol for action in the event of sexual and gender-based harassment so that in the event of a case we all know how to act. In addition to the measures, permits and improvements proposed by the company in terms of gender-based violence.

11. GENDER-BASED VIOLENCE – We will draw up a document that includes measures, permits and improvements in the area of gender-based violence.

Reconciliation and social benefits

SEIDOR has conciliation measures to respond to different moments in the lives of professionals, including paternity/maternity. In addition to facilitating the balance between personal and professional life, the aim is to promote co-responsibility, offering the same measures to men and women with, for example, a wide range of “flexible working hours”.

SEIDOR has been a pioneering company in understanding and appreciating that for an increasingly larger group of people, the aspects derived from the generation of a set of measures that improve, among others, the conditions of the workplace, the compatibility of the performance of the functions derived from the position with personal obligations, flexible working hours or teleworking, are basic when it comes to boosting the capacity to attract talent, the loyalty of this talent as well as the improvement of people’s general wellbeing.

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 its entire workforce, thus improving their well-being and health.

The actions currently in place are as follows:

- Possibility of remote working.
- Flexible timetable for entering and leaving the working day.
- Flexibility in the hours of weekly or monthly dedication.
- Enabling channels to channel personal queries related to the social, work and personal environment of the affected person.
- Enabling a corporate app to provide a channel for information, as well as tools for the reservation of meeting space or performance of work on SEIDOR’s physical premises.
- Personal facilities:
 - Two to 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 to be carried out during the working day.
 - Accumulation of the breastfeeding period by 15 calendar days to be taken in a single period following the period of parental leave.

Social benefits

The Bankinter Partnet office has been revitalised, a banking office created exclusively for the company’s employees, offering flexibility in management, ease of access, personal attention and immediate help in banking, financial and capital matters. It offers products with special conditions and exclusive advantages for SEIDOR employees.

In addition, Bankinter Partnet distributes 50% of the profits generated by the operations and products contracted by each employee.

The Bankinter branch will help you get the mortgage.

More than 232 people have accessed this benefit in 2022, 27% more than in the previous period. Having a personal advisor in the office with whom you will have direct contact, and who will advise you on the best conditions and advantages.

Remuneration model

SEIDOR's success depends, to a significant extent, on the achievement of the following objectives of the individual professionals who form part of the company. In order to promote the achievement of these objectives and, therefore, those of each business unit and those of the company, there is a variable remuneration system that covers most of the professionals.

In Spain, the company offers a flexible remuneration plan that allows all professionals to allocate part of their remuneration through a series of goods and services such as medical insurance, transport tickets, childcare tickets and restaurant tickets.

Wage gap

The remuneration policy applied by SEIDOR has no gender bias. Fixed and variable remuneration, the two fundamental components of the company's remuneration structure, are established objectively. Fixed remuneration mainly reflects the professional's experience and responsibility in the organisation; on the other hand, variable remuneration rewards the achievement of objectives, mainly quantitative, and which are shared by professionals working in the same functional areas, irrespective of gender.

Labour relations

SEIDOR manages labour relations locally, taking into account the particularities of each market and, above all, the legislation in force in each country. In accordance with the Universal Declaration of Human Rights and the laws applicable in the countries in which it operates, the company respects its employees' right to freedom of association and collective bargaining. In Spain, 100% of employees are protected by the applicable collective bargaining agreement, mainly the state collective bargaining agreement for consulting and market and public opinion research companies, and the collective labour agreements of the metal trade sector in the different provinces where the group is based.

Well-being at work: occupational health and safety

The year 2022 has been the year of the return to normality after the pandemic and the consequences we faced that spanned the health, social, economic and employment spheres and have left an intense mark on all these areas and, in general, on society as a whole.

This stage meant a new approach to our relations, implementing in time frames that would be difficult to. We can imagine new organisational forms, models of work performance and communication with a collective and individual effort that within the SEIDOR Group we combine with the ability to adapt the structure to adapt it to changing needs, in this case the return to normality in an environment with new needs, demonstrating the flexibility required by the new context of the "new normality", covering the different work centres, both our own and those of the clients for whom we provide our services, guaranteeing the provision of services throughout this period of time.

The SEIDOR Group's main asset is its professionals and, therefore, their health and safety are fundamental objectives and basic principles of the company.

In order to achieve these objectives, the SEIDOR Group follows a strategy of integrating the tasks associated with the fulfilment of these objectives within the actual performance of the job

functions and incorporating them into the continuous improvement methodology deployed by the group, so that the tasks and responsibilities of the jobs include these aspects.

For the development of this strategy, there is a Joint Prevention Service (SPM), made up of the Seidor Group's Occupational Risk Prevention Department, which has been maintained throughout 2022 as an organisational modality for the prevention of occupational risks. This SPM is made up of the different corporations that have been integrated in this period has joined the SEIDOR Group.

The Occupational Risk Prevention Department is in charge of defining and executing the prevention policy and the prevention plan of the different companies that make up the Group, and this department generates the specific procedures in the field of prevention that must be incorporated into the associated work activities.

- Online courses, a widely used method with maximum flexibility to adapt it to the timetable of each worker.
- Online courses with instructor, which allows distance learning and establishes a direct channel between instructor and student that allows immediate resolution of doubts.
- Traditional face-to-face courses in the different work centres, especially where the training to be undertaken is more specific, either because of the nature of the tasks or the environment in which they are carried out.

In any of the modalities, the aim is that by training and informing employees of the existing risks associated with their job and the associated mitigation measures, awareness is raised and a preventive culture is fostered.

All these risks are collected, analysed and assessed in the different occupational risk assessments generated for each of the centres, including the risks to which workers are exposed and the analysis of the different risk factors that may trigger the materialisation of a risk and the associated preventive measures. If, despite this, an accident or incident occurs, based on its investigation, it may be considered necessary to review it and define the implementation of actions to minimise the likelihood of its repetition.

The operational model used by the Occupational Risk Prevention Department is based on two basic pillars:

- Technical field: Including specialities of Occupational Safety, Industrial Hygiene, Ergonomics and Applied Psychosociology, the following activities, among others, are carried out:
 - Risk Assessments, including initial data collection for new workplaces and/or workstations and periodic reviews of the assessments.
 - Specific assessments: study of psychosocial risks.
 - Planning of preventive activities.
 - Prevention plans.
 - Legal Audits.
 - Periodic inspections of the different workplaces.
 - Validation of conformity of PPE and control of its delivery and correct registration use.
- Registration and review of technical data sheets and safety data sheets for products chemicals
- Accident and incident investigation.
- Application of preventive measures derived from the previous points.
- Coordination of activities with third party companies or suppliers.

- Emergency Plans and their implementation.
- Training and information for new employees, as well as specific training and retraining.
- Occupational-medical field: Including the speciality of Occupational Medicine, carried out by external prevention services with national accreditation, and from which the following activities, among others, are carried out:
 - Conducting initial and periodic medical examinations of employees.
 - Protecting sensitive employees
 - Epidemiological studies

These two pillars are mainly covered by internal resources and are complemented in those aspects that require greater specialisation by external services to cover all needs, fundamentally health monitoring. In addition, these two pillars are reinforced by the participation of employees in the form of their trade union representatives in several of their work centres in different companies and by the presence of the Health and Safety Committees.

In this regard, it should be noted that in 2022, trade union elections were held in two companies of the group, thereby increasing employee representation for these companies.

The results obtained show that, although we are on the right track, with a slight improvement over the previous year in many of the indicators, this strategy needs to be further developed and strengthened.

Key indicators on SEIDOR employees

SEIDOR cares for its employees, promotes their talent and seeks their commitment and involvement with the Company's Corporate Responsibility.

Absentismo 2022 (en horas) en España		
Gender	Male	34.005,7
	Women	29.841,3

Accidentes de trabajo 2022 en España		
Gender	Male	4
	Women	0

Accidentes de trabajo 2021 en España		
Gender	Male	1
	Women	0

Enfermedades profesionales 2022 en España		
Gender	Male	0
	Women	0

Enfermedades profesionales 2021 en España		
Gender	Male	0
	Women	0

SEIDOR employees 2022 detail by country					
Spain	Total	3177	India	Total	73
	Male	2402		Male	45
	Women	775		Women	28
Argentina	Total	388	Italy	Total	43
	Male	237		Male	31
	Women	151		Women	12
Brazil	Total	1484	Mexico	Total	298
	Male	1131		Male	203
	Women	353		Women	95
Belgium	Total	1	Peru	Total	469
	Male	1		Male	301
	Women	0		Women	168
Chile	Total	688	Portugal	Total	29
	Male	451		Male	20
	Women	237		Women	9
Colombia	Total	183	Africa	Total	200
	Male	98		Male	116
	Women	85		Women	84
Costa Rica	Total	5	UK	Total	26
	Male	4		Male	18
	Women	1		Women	8
Ecuador	Total	38	Taiwan	Total	24
	Male	17		Male	18
	Women	21		Women	6
Uruguay	Total	24	ORE	Total	158
	Male	7		Male	113
	Women	17		Women	45
USA	Total	28	Türkiye	Total	10
	Male	17		Male	6
	Women	11		Women	4
France	Total	25			
	Male	20			
	Women	5			
Total employees 7.371					

SEIDOR employees 2021 detail by country					
Spain	Total	2503	Morocco	Total	18
	Male	1872		Male	11
	Women	631		Women	7
Argentina	Total	317	Mauricio	Total	3
	Male	195		Male	2
	Women	122		Women	1
Brazil	Total	1109	Mexico	Total	213
	Male	854		Male	145
	Women	255		Women	68
Chile	Total	547	Peru	Total	446
	Male	353		Male	199
	Women	194		Women	147
Colombia	Total	145	Portugal	Total	22
	Male	80		Male	15
	Women	65		Women	7
Costa Rica	Total	5	South Africa	Total	154
	Male	4		Male	92
	Women	1		Women	62
Ecuador	Total	32	Tanzania	Total	5
	Male	14		Male	1
	Women	18		Women	4
Emirates Arabs	Total	33	UK	Total	21
	Male	22		Male	14
	Women	11		Women	7
USA	Total	34	Uruguay	Total	17
	Male	20		Male	7
	Women	14		Women	10
Kenya	Total	36	Zambia	Total	5
	Male	21		Male	2
	Women	15		Women	3
Italy	Total	39	Taiwan	Total	15
	Male	28		Male	10
	Women	11		Women	5
ORE	Total	34	Kuwait	Total	9
	Male	26		Male	9
	Women	8		Women	0
Saudi Arabia	Total	14	Lebanon	Total	19
	Male	9		Male	12
	Women	5		Women	7
Total employees 5795					

The people in SEIDOR in 2022			
Breakdown by gender	Women	2.117	29%
	Men	5.254	71%
Breakdown by age	Under 30 years	1.686	23%
	Between 30 and 50 years	4.895	66%
	Over 50 years	790	11%
Distribution of staff by category	Administration	424	6%
	Commercial and Marketing	486	7%
	Directors	168	2%
	Technicians	6.293	85%
Distribution of the workforce by contract type	Undefined	6.874	93%
	Temporary	497	7%

The people at SEIDOR in 2021			
Breakdown by gender	Women	1.677	28,94%
	Men	4.118	71,06%
Breakdown by age	Under 30 years old	1.161	20,03%
	Between 30 and 50 years old	4.036	69,65%
	Over 50 years	598	10,53%
Employees with disabilities		56	1%
Distribution of staff by category	Administration	352	6,07%
	Commercial and Marketing	432	7,45%
	Directors	151	2,61%
	Technicians	4.860	83,87%

Employees with disabilities 2022			
Breakdown by gender	Men		45
	Women		22
Total:			67
Distribution of staff by category	Administration		19
	Commercial and Marketing		4
	Directors		1
	Technicians		43
Total:			67

Employees with disabilities 2021			
Breakdown by gender	Men		20
	Women		36
Distribution of staff by category	Administration		20
	Commercial and Marketing		4
	Directors		0
	Technicians		32

Employees by contract type 2022				
Breakdown by gender	Men	Indefinite contract	4.919	67%
		Temporal agreement	335	5%
	Women	Indefinite contract	1.950	26%
		Temporal agreement	167	2%
By age	Under 30 years	Indefinite contract	1.499	20%
		temporal agreement	187	3%
	Between 30 and 50 years	Indefinite contract	4.624	63%
		Temporal agreement	271	4%
	Over 50 years	Indefinite contract	751	10%
		Temporal agreement	39	1%
Distribution of staff by category	Administration	Indefinite contract	399	5%
		Temporal agreement	25	0%
	Commercial and Marketing	Indefinite contract	454	6%
		Temporal agreement	32	0%
	Directors	Indefinite contract	168	2%
		Temporal agreement	0	0%
	Technicians	Indefinite contract	5.853	79%
		Temporal agreement	440	6%
Employees by contract type 2021				
Breakdown by gender	Men	Indefinite contract	3.796	66%
		Temporal agreement	323	6%
	Women	Indefinite contract	1.537	27%
		Temporal agreement	139	2%
By age	Under 30 years	Indefinite contract	906	16%
		temporal agreement	250	4%
	Between 30 and 50 years	Indefinite contract	3.397	59%
		Temporal agreement	644	11%
	Over 50 years	Indefinite contract	546	9%
		Temporal agreement	52	1%
Distribution of staff by category	Administration	Indefinite contract	320	6%
		Temporal agreement	39	1%
	Commercial and Marketing	Indefinite contract	395	7%
		Temporal agreement	33	1%
	Directors	Indefinite contract	152	3%
		Temporal agreement	0	0%
	Technicians	Indefinite contract	4.466	77%
		Temporal agreement	390	7%

Empleados por tipo de jornada 2022

Breakdown by gender	Men	Full time	5.071	69%
		Reduced working day	347	5%
	Women	Full time	1.805	24%
		Reduced working day	148	2%
By age	Under 30 years	Full time	1.607	22%
		Reduced working day	79	1%
	Between 30 and 50 years	Full time	4.696	64%
		Reduced working day	199	3%
	Over 50 years	Full time	742	14%
		Reduced working day	48	1%
Distribution of staff by category	Administration	Full time	398	5%
		Reduced working day	26	0%
	Commercial and Marketing	Full time	478	6%
		Reduced working day	8	0%
	Directors	Full time	166	2%
		Reduced working day	2	0%
	Technicians	Full time	5999	81%
		Reduced working day	294	4%

Empleados por tipo de jornada 2021

Breakdown by gender	Men	Full time	3.940	68%
		Reduced working day	174	3%
	Women	Full time	1.565	27%
		Reduced working day	116	2%

Number of layoffs 2022

Gender	Male	489
	Female	186
Age	Less than 30 years	170
	Between 30 and 50 years	425
	More than 50 years	80
Professional category	Administration	33
	Commercial and Marketing	37
	Directors	13
	Technicians	592

Number of layoffs 2021

Gender	Male	531
	Female	189
Age	Less than 30 years	135
	Between 30 and 50 years	465
	More than 50 years	120

Professional category	Administration	27
	Commercial and Marketing	35
	Directors	8
	Technicians	650

Number of new hiring 2022		
Gender	Male	2.254
	Women	844
Age	Less than 30 years	1.110
	Between 30 and 50 years	1.692
	More than 50 years	296
Category Professional	Administration	136
	Commercial and Marketing	131
	Directors	9
	Technicians	2822

Number of new hiring 2021		
Gender	Male	1710
	Women	603
Age	Less than 30 years	722
	Between 30 and 50 years	1386
	More than 50 years	205
Category Professional	Administration	107
	Commercial and Marketing	135
	Directors	4
	Technicians	2067

Rotation 2022		
Gender	Male	7,2%
	Women	4,8%
Age	Less than 30 years	4,1%
	Between 30 and 50 years	7,0%
	More than 50 years	1,0%
Category Professional	Administration	0,7%
	Commercial and Marketing	2,1%
	Directors	0,5%
	Technicians	8,7%

Rotation 2021		
Gender	Male	6,2%
	Women	4,4%
Age	Less than 30 years	5,8%
	Between 30 and 50 years	5,9%
	More than 50 years	2,3%
Category Professional	Administration	2,6%
	Commercial and Marketing	3,7%
	Directors	0,3%
	Technicians	5,2%

Human rights

Commitment to the protection of human rights

SEIDOR is committed to actively ensuring compliance with Human Rights in order to preserve and promote the protection of internationally recognised fundamental human rights, and to work to prevent and manage the risks arising from their violation. We have recently published an updated Sustainability Manifesto, which sets out our commitment. This document is available on our website.

We also have a Code of Business Conduct (CCE), which serves as a framework of commitment to the company's respect for Human Rights. This aims to determine the values, principles and rules that should govern the behaviour and actions of each of SEIDOR's employees, as well as those of the members of the management bodies of the companies that make up the company. The Code is also applicable to the company's main interest groups: customers, suppliers and various stakeholders.

In addition, we recognise that the principle of equal treatment and equal opportunities for the beneficiaries of the SCC is a guiding principle of our Human Resources policies and applies to recruitment, training, career opportunities, salary levels and other aspects of the employment relationship. Externally, we are involved in the protection of human rights through our suppliers and solidarity initiatives.

Suppliers

We seek out and select, through an accreditation process, only those suppliers whose business practices respect human dignity and human rights and do not violate the law.

Solidarity initiatives

We promote actions that aim to contribute to improving the living conditions of people, especially those in vulnerable situations.

SEIDOR Code of Business Conduct

SEIDOR's CCE is the document that serves as a framework for the company's commitment to respect for Human Rights. It aims to determine the values, principles and rules that should govern the behaviour and actions of each of SEIDOR's employees, as well as those of the members of the management bodies of the companies that make up the company. The Code is also applicable to the company's main stakeholders: customers, suppliers, competitors, shareholders and other groups.

SEIDOR, in the SCC, recognises that Human Rights are fundamental and universal rights, and must be interpreted and recognised in accordance with international laws and practices, in particular the United Nations Universal Declaration of Human Rights and the principles proclaimed by the International Labour Organisation. Relations between all stakeholders to which the SCC applies must always be based on respect for the dignity and non-discrimination of individuals.

The company rejects any conduct, behaviour or action aimed at encouraging, promoting or inciting, directly or indirectly, hatred, hostility, discrimination or violence against a group, on racist or other grounds relating to ideology, religion or beliefs, family situation, membership of an ethnic group, race or nation, national origin, gender, sexual orientation or identity, illness or disability. SEIDOR strongly prohibits any kind of hostile or humiliating act against people, abuse of authority and any kind of harassment, whether physical or psychological, as well as any other conduct that may create an intimidating, offensive or hostile working environment for people. Child labour or forced labour of any kind is not tolerated.

Furthermore, the company recognises that the principle of equal treatment and equal opportunities for the recipients of the PPA is a guiding principle of the Human Resources policies and applies to the recruitment of employees as well as to training, career opportunities, salary levels and other aspects of the employees' employment relationship.

The PPA also prohibits the imposition on employees of working and safety conditions that prejudice, suppress or restrict the rights they have recognised by law, collective bargaining agreements or individual contracts. No form of illegal labour trafficking or fraudulent emigration is permitted and the legislation on foreigners and the entry and transit of foreigners shall always be respected.

Anti-bullying protocol

SEIDOR has regulated, by means of this protocol, the problem of sexual harassment in the workplace, establishing a method to be applied both to prevent, through training, responsibility and information, and to resolve claims and complaints with due guarantees.

Identity and good governance

Ethics and compliance

SEIDOR is a company of values, highly sensitive to the culture of compliance. Through its Code of Business Conduct, SEIDOR provides a reference framework and establishes the bases and principles of action and conduct for all its professions and collaborators. The Board of Directors, the Management and each and every one of SEIDOR's professionals and employees assume the responsibility and commitment to establish a solid culture of compliance. Consequently, all professionals and collaborators are required to carry out their activities applying the principles of integrity, professionalism and respect, complying with the legislation and regulations in force, SEIDOR's own Code of Business Conduct and the Code of Business Conduct.

SEIDOR, the Zero Tolerance to Corruption Plan and the policies and procedures established by the company. SEIDOR's management system is made up of a set of rules and principles aimed at complying with the applicable regulations, as well as incorporating best practices in Corporate Governance.

In 2017, the new Criminal Compliance model was implemented in the company. This model is updated annually, so in 2022 it has been reviewed and updated again. With this model, we have identified the possible risks that our business model may entail, in order to mitigate criminal risks (and assimilable administrative risks). The Criminal Compliance Management System is a model that is constantly updated and evolving. On the other hand, in 2020, SEIDOR, as an influential player in the business fabric, developed and published the Corporate Social Responsibility manifesto, which highlights the company's commitment to its stakeholders and involves influencing a reference framework aimed at guaranteeing responsible behaviour.

SEIDOR conducts its business in a way that takes into account aspects essential to life, such as human rights, the well-being of people, equal opportunities, diversity, the environment and scrupulous respect for transparency and good business practice.

Compliance and criminal risk prevention

SEIDOR's criminal risk prevention and compliance model includes the company's criminal risk organisation, prevention, management and control system (and similar administrative systems).

SEIDOR wishes to ensure that internal control mechanisms and effective crime prevention measures are in place, as well as the detection and supervision of crimes, in order to prevent the risk of the company being involved in any type of criminal or administrative proceedings as a result of not having adequate and effective control mechanisms in place.

In conclusion, and in line with the continuous improvement of the principles of good governance and, specifically, of the internal control and risk management systems, the objective of the Criminal Compliance Management System (hereinafter CCMS) is to establish the principles and the general framework of action for the control and management of criminal risks (and similar administrative risks).

Likewise, one of the objectives of the SGCP is to establish and implement improvements in the internal control mechanisms for the prevention of possible crimes, as well as for detecting and reacting to them, with SEIDOR's firm commitment to prevent and combat any crimes that may occur in the organisation, in accordance with the principle of "zero tolerance". Thus, if there is any indication that a criminal act has been committed, the corresponding investigation will be opened and, in the event that any illicit action is duly accredited, the following measures will be taken corrective and disciplinary measures, without prejudice to the regulations applicable in any other jurisdiction in which SEIDOR carries out its activities.

The fundamental principles governing the PCMS are as follows:

- Integrating and coordinating the set of actions necessary to prevent and combat the possible commission of unlawful acts by any SEIDOR professional.
- Generate an environment of transparency, integrating the different systems developed for crime prevention, maintaining the appropriate internal channels to encourage the communication of possible irregularities.
- Act, at all times, under the protection of the legislation in force and within the framework of the established by the Code of Business Conduct, in compliance with SEIDOR's internal regulations.
- Promote a preventive culture based on the principle of "zero tolerance" and responsible behaviour by all SEIDOR professionals, irrespective of their hierarchical level.
- Develop and implement adequate procedures for the control and comprehensive management of crime prevention.
- Maintain emphasis on proactive activities such as prevention and detection.
- Investigate any report of a suspected criminal or irregular act as soon as possible, guaranteeing both the confidentiality of the complainant and of all investigations carried out.
- Communicate to all SEIDOR professionals the duty to report any fact constituting a possible criminal offence or any other irregularity that is contrary to the principles proposed by the SGCP.
- Implement appropriate training programmes for SEIDOR professionals in the duties imposed by the applicable legislation at all times.

The company has defined a control structure consisting of the Board of Directors and Management as the highest decision-making bodies, and a Criminal Compliance Body in charge of ensuring the proper functioning of the programme. Likewise, in the international subsidiaries, the directors and management act as the highest supervisors of the criminal risk prevention model in the local sphere.

This criminal risk prevention system is part of SEIDOR's principles of good governance and must be connected and complemented with the preventive systems – risk management, internal control and regulatory compliance – and policies and procedures such as, among others, the Code of Business Conduct (hereinafter, CCE), the Zero Tolerance Plan for Corruption (hereinafter, PTCC), the Corporate Social Responsibility manifesto, occupational risk prevention, the equality plan, COVID 19 protection policies, the anti-harassment protocol, financial control, compliance with tax obligations, procedures for access to public administration contracts, internal policies for the protection of personal data, corporate security policies for the protection of personal data and the protection of the environment, among others.

information (cybersecurity policy) and the National Security Scheme (ENS), as well as the corporate policy on the use of information systems.

Complaints channel

Within the framework of compliance with the Criminal Compliance Programme, SEIDOR has set up a whistle-blowing channel for reporting breaches and irregularities which, depending on the seriousness of the situation, may be accompanied by a disciplinary system. No complaints were received through this channel in 2022.

In accordance with the above, SEIDOR has implemented appropriate procedures for:

- Facilitate channels of communication so that both members of the organisation and third parties can report, in good faith and on the basis of reasonable indications, circumstances that may involve the materialisation of a criminal risk for the organisation, as well as breaches or weaknesses in the CCMS.
- Ensure the confidentiality of the identity of persons using such communication channels.
- 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 such communication channels.
- Providing advice to those who have questions or concerns related through the communication channels established by the organisation.
- Ensure awareness of existing communication channels, as well as the procedures governing their operation, among the members of the organisation.
- Encourage the use of communication channels between members of the organisation.

Reporting obligations should be clearly set out in the procedures derived from the organisation's PCMS and reinforced by other means, such as training, as well as informal reinforcement by management during its day-to-day work with staff.

SEIDOR's whistleblowing channel is located on its website (www.seidor.com), where there is a form that allows users to report any type of event that could be considered a criminal offence.

Currently, and as a result of the entry into force of Law 2/2023 of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption, which implements Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of European Union (EU) law, Seidor has a project underway to implement a new whistleblowing channel which we will call the ethical channel and which, once completed, will replace the current one.

Compliance training

During 2022, SEIDOR has continued to raise awareness of the SGCP among its professionals through presentations, a communication plan and meetings, focusing on the importance of compliance.

In the second half of 2022, Compliance training was conducted on competition issues, with a special focus on the public sector and especially on the UTEs, with the aim of disseminating good practices in this area and minimising risks for the business. These trainings were given by experts in competition issues.

After each session, a multiple-choice test was sent to all participants via Moodle to assess the knowledge acquired. Most of the attendees completed and passed the test satisfactorily.

Data protection

SEIDOR, renewed its Data Protection Management System in 2018 to adapt it to the requirements set out in Organic Law 3/2018, of 5 December, on Personal Data Protection and guarantee of digital rights (hereinafter LOPDGDD), which follows the provisions of Regulation (EU) 2016/679, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter GDPR).

This adaptation has meant:

- At the organisational level:
 - The constitution of a Data Protection Committee, made up of representatives of the Management and of different areas of SEIDOR.
 - The constitution of the Data Protection Office, in charge of operations and management.
 - The appointment of a Data Protection Delegate certified by the AEPD.
- At the operational level:
 - Analysis of the processing of personal data carried out by SEIDOR, preparing the corresponding Data Protection Impact Assessment (DPA) on the rights and freedoms of individuals. Twenty-seven different personal data processing operations were identified at corporate level. In addition, the processing of data by type of service that SEIDOR provides to its customers was analysed, identifying a total of 21 different services.
 - Definition and implementation of the contract management process for contract managers. Treatment with customers, suppliers and subcontractors, as well as the control and management of records of treatment activities.
 - Definition and implementation of the process for managing requests and the exercise of data protection rights that data subjects may exercise. As at 31 December 2022, the total number of requests managed by the DPO was 44.
 - Definition of the procedure for communication and response to the control authorities competent.
 - Definition and implementation of a methodology for risk analysis and assessment privacy-related information that makes it possible to determine the level of risks associated with the processing of personal data.
 - Updating of all legal, contractual and video surveillance documentation. necessary for the correct compliance with data protection regulations.
 - Advice on data protection matters to the Directorate General, units of business, commercial and structural areas of SEIDOR (HR, PRL, administration, etc.).
 - Development of a website on the "Argos" corporate portal dedicated exclusively to the data protection, where all documents, contracts, procedures, etc. are recorded, courses, etc. that are related to this subject.

- Training and awareness-raising work: 1/ Development of infographics for managers, area and commercial managers. 2/Development and configuration of e-learning courses. And best practices and training for all staff involved in data protection, and training for all staff involved in the SEIDOR. There are three types of courses, depending on the job position held:
 1. Administration and HR.
 2. Service and project technicians.
 3. Sales and marketing staff.

As of 31 December 2022, 16 training sessions have been held, with a total of 3,855 people enrolled.

Money laundering

Through the Code of Business Conduct, the Corporate Social Responsibility Manifesto and the applicable regulations, SEIDOR expresses its commitment to comply with all the regulations and provisions, both national and international, in force in the field of anti-money laundering (and the financing of terrorism). To this end, it undertakes not to engage in practices that may be considered irregular in the development of its relations with customers and suppliers. In compliance with this commitment, the company has developed internal procedures to establish controls to mitigate the risk of money laundering, especially in relation to cash payments and international transfers.

Commitment to society

Mark Malloch-Brown, human rights and sustainable development advocate, mentioned in one of his speeches that “Business cannot thrive in societies that fail”. In the same way, we understand that societies cannot prosper if they do not have companies that share this statement and are committed.

SEIDOR’s management is aware of the expectations of all the stakeholders with whom it interacts, as well as those of society in general. For this reason, it is committed to meeting these expectations, working to offer quality and sustainable products and services, within the context of our activity.

SEIDOR reflects its commitment to the United Nations Global Compact and the ten principles that underpin it to promote:

- Sustainable development.
- Values based on universally accepted principles.
- Joining a network of companies and other interested organisations.
- Belonging to a platform for learning and exchanging experiences of these values.

To this end, SEIDOR’s management carries out policies and actions aimed at:

- Respect human rights and democratic institutions and promote them wherever possible.
- Maintain the principle of political neutrality, by not interfering politically in the communities where we carry out our activities, and as a sign, in addition, of the respect for the different opinions and sensitivities of the people involved in the company.
- To deal with public authorities and institutions in a lawful and respectful manner, neither accepting nor offering gifts or commissions, in cash or in kind.
- Collaborating with public administrations and with entities and organisations non-governmental organisations dedicated to improving levels of social care for the most disadvantaged.

In its desire to have a positive impact on the most disadvantaged societies, SEIDOR participated in different projects in 2022:

Collaboration with Fundación Exit

SEIDOR has been collaborating for the past two years with the Exit Foundation, a non-profit organisation whose aim is to reduce early school leaving among young people in situations of social vulnerability.

Collaboration with IMI

SEIDOR provides computer support to vulnerable families in collaboration with the Municipal Institute of Computer Science of Barcelona, in the framework of our regular activity with the Barcelona City Council.

Orphanage in Tanzania

SEIDOR has participated in the creation of an orphanage and a school in Tanzania. The project is part of the activities promoted by the association to positively impact society and the lives of young people around the world.

Santa María de la Armoní Project

Through United VARs CLG, SEIDOR has contributed to promoting an initiative to improve the living conditions of children at risk of exclusion. The Santa Maria de la Armoní project is located in rural areas on the outskirts of Buenos Aires, Argentina. Through this project, housing and access to drinking water will be improved for a group of between 100 and 150 children.

Donations

In 2021, the company contributed a total of 174,641.60 €* to foundations and non-profit organisations. In 2022, the company contributed a total of €293,216.94* to foundations and non-profit organisations.

*Representative data for Spain.

Report on the company

Fiscal information SEIDOR 2021 – 2022

Below is a breakdown of the information relating to corporate income tax and the result obtained in the various tax jurisdictions in which SEIDOR is present. The data for 2022 are consolidated, however, in 2020 and 2021 the adjustments to the result derived from the consolidation process of the group were not included, so the figures are not comparative.

Benefits and Taxes (Thousands of Euros)						
	2022		2021		2020	
Geographic Area/ Country	Profit/(Loss) before Corporate Tax	Corporation tax	Profit/(Loss) before Corporate Tax	Corporation tax	Profit/(Loss) before Corporate Tax	Corporation tax
Andorra	-86	9				
Saudi Arabia	25	-12	-294	0	-202	0
Argentina	850	-1.050	4.531	-1.046	3.090	-495
Belgium	1	0	1	0	52	-1

Bolivia	75	-3	169	-1	45	0
Brazil	4.909	-1.104	4.360	-1.452	3.950	-917
Chile	2.802	-460	8.053	-1.758	2.816	26
China	-230	0				
Colombia	787	-445	974	-429	544	-239
Costa Rica	-112	-61	347	-6	56	0
Dubai	709	0	1.092	0	781	0
Ecuador	7	-36	-2	-29	-187	88
USA	818	-888	2.179	-13	-1.022	0
The Savior	0	0	0	0	0	0
Egypt	0	0	-8	0	-84	0
Spain	24.983	-5.316	15.327	-2.311	12.692	-1.479
France	29	-8	-6	0	-6	0
Guatemala	0	0	0	0	-94	0
Honduras	0	0	0	0	0	0
India	159	-10				
Israel	100	0	-44	0		
Italy	39	-12	149	-39	127	-39
Lebanon	83	-5	-99	0		
Kenya	175	-61	158	-50	227	-66
Kuwait	160	0	42	0	128	0
Morocco	-350	-7	16	-8	141	-9
Mauricio	-2	0	-25	0	23	0
Mexico	-377	-1.020	-1.398	449	-1.094	589
Panama	0	0	0	0	0	0
Peru	4.588	-1.649	6.198	-1.602	4.873	-1.307
Portugal	-166	-14	37	-17	3	0
Qatar	15	-19				
United Kingdom	946	-186	517	-103	67	-22
Dominican Republic	93	-29	235	-77	12	-11
South Africa	934	-310	962	-245	346	-125
Taiwan	21	-6	33	-7	7	-2
Tanzania	143	0	106	-32	35	-37
Türkiye	-20	0				
Uruguay	1.233	-331	396	-143	125	-31
Zambia	44	25	144	-85	-133	96
Total countries	43.384	-13.010	44.148	-9.004	27.318	-3.981

Subsidies

In 2022, the company received 1,132,339.29€, 1,075,982.14€* in 2021, from subsidies that mainly correspond to grants received for the training of its employees:

	2022	2021
Employee training bonus	322.980,95	277.879,36
Subsidies for R&D activities	660.913,03	752.896,54
Employment creation	148.445,31	45.206,24
	1.132.339,29	1.075.982,14

*Representative data for Spain

Quality

During 2022, SEIDOR's Quality Department focused its efforts on the following functions and activities:

- Consolidation and maintenance of corporate management systems and certifications:
 - ISO 9001, Quality.
 - ISO 14001, Environment.
 - ISO 20000-1, IT Services.
 - ISO 27001, Information Security.
 - ISO 15504 and ISO 33001 (Maturity 3) Software Development.
 - Global Compact.
 - National Security Scheme (ENS) category ALTA
- Obtaining new certifications and scope extensions:
 - ISO 22301, Business Continuity
 - GHG PROTOCOL, Carbon Footprint
- Design of procedures, manuals and methodologies.
- Creation of e-learning content and training:
 - Service management system.
 - Information security management.
 - Environmental management and best practices.
 - Training manual for project managers.
 - GDPR for workers.
- Management of SEIDOR's Service and Support Centre tools.
- Customer satisfaction survey and Improvement Plan.

These certifications are available for consultation on the SEIDOR website, under Certifications.

Integrated management system

The main objective pursued in the design of the various management systems implemented at SEIDOR is to guarantee the quality of the services we provide to our customers, as a basis for demonstrating our commitment to fulfilling the agreements reached with our customers.

Our certified management systems cover the core companies and activities of the SEIDOR Group.

At SEIDOR we understand the quality of services based on the following main aspects:

- Client orientation: Changes and changes may occur during the provision of the service. we understand that speed and flexibility of action is key to maintaining customer satisfaction.
- Service availability and capacity: Providing services with the necessary plans, procedures and resources in order to ensure that the services are operational according to the client's needs and the characteristics and level of performance committed to.
- Incident resolution and forecasting: Having specialised procedures and teams that guarantee the rapid resolution of possible errors and failures that inevitably occur in the provision of services, accompanied by cause analysis and trend studies that aim to ensure that incidents do not recur or even occur for the first time.
- Continuous improvement: The measurement and monitoring of the effectiveness of processes through the The formulation of objectives and indicators, as well as the continuous monitoring of service delivery, together with the management and anticipation of potential risks and regular maintenance of the systems supporting the services, help to ensure the proper delivery of services.

Thanks to our SIG, SEIDOR has a methodology that establishes a series of standard processes, activities, tools and records, which is in turn based on the analysis of the context and the satisfaction of expectations and compliance with the requirements of the interested parties in each of the projects and services we provide, including their management methodology, which we previously agreed with the interested parties, respecting at all times the quality levels of the stipulated services.

Quality management system

In 2008, we designed and implemented a Quality Management System in two companies of the SEIDOR group, certified according to the ISO 9001 reference standard, which currently covers seven companies of the group in the following services:

- Marketing of hardware and software products.
- Design, development and implementation of customised business solutions.
- Technical support service and maintenance of computer equipment.
- Information systems project management.

IT Service Management System

In 2016, coinciding with the restructuring of our support centre and the implementation of new service desk service management tools, we designed and implemented an IT Service Management System (SGSTI) certified according to the ISO 20000-1 reference standard. Currently, the scope of SEIDOR's SGSTI covers seven companies in the group and nine areas of operations, in the following services:

IT assistance and support services: Seidor Service and Assistance Centre (CASS), Microsoft Azure Managed Services and Corporate Cybersecurity Office (OCC), Monitoring Centre, Cybersecurity Operation, Security Incident Response and Analysis Services (SEIDOR CSIRT), IT assistance and support service (Seidor Customer Service), Microsoft Azure Managed Services, Networking Service Centre (NOC), SAP Systems Managed Services and AM assistance and support service.

Every year, external audits of the management system are carried out and passed, certifying compliance with the requirements established by the reference regulations. This is a guarantee that there is continuous monitoring and correct management of the services provided by SEIDOR based on the commitments, requirements and service level agreements (SLAs) established with our customers.

Information Security Management System

SEIDOR's Information Security Management System (ISMS) is a mature and consolidated management system that has been in place for almost 10 years.

In 2011, the SEIDOR ISMS implementation project was launched, demonstrating the organisation's concern, commitment and effort to improve information security. For its design, the guidelines established by the international reference standard ISO 27001 for information security management were followed.

In 2016, the Service Management System (SGS) implementation project was launched at the SEIDOR Service and Assistance Centre (CASS), which led to a restructuring and extension of the initial scope of the SGSI to this fundamental area within the organisation.

In 2017, in order to ensure the achievement of results, the Office of the SEIDOR Cybersecurity (OCS), reporting directly to the Cybersecurity Committee, whose objective would be to lead and be the operational unit of reference and support at the level of information security in the company.

In 2018, following the entry into force of the GDPR on 25 May, SEIDOR adapted to the data protection regulations, thus incorporating its management into the ISMS and appointing a Data Protection Officer (DPO) for the group of companies.

In 2019, a strong commitment was made to the improvement and growth of the ISMS within the organisation. On the one hand, a CISO / CSO was appointed, the Cybersecurity Committee was restructured, led by the general management and the CISO with representation from areas such as IT infrastructure, Cloud and Data Protection, and the new Corporate Cybersecurity Office (OCC) was created, thus inheriting the responsibilities and functions of the SEIDOR Cybersecurity Office (OCS). On the other hand, a major expansion of scope was carried out, covering the main companies of the group, and the project was initiated to incorporate the ISMS SEIDOR, the National Security Scheme (ENS) in the systems and services that various divisions and companies of the SEIDOR group offer to Public Administration entities, achieving, in January 2020, ENS certification in the MEDIA category.

In the year 2021, work was carried out to strengthen the management system, achieving the design of ENS category ALTA.

In 2022, a risk analysis was carried out and a corporate policy was implemented to guarantee information security and the continued provision of the services it provides. At the beginning of 2022, certification in ENS category ALTA was achieved and the extension of the scope of this certification is planned for the beginning of 2023. The scope of SEIDOR's ISMS covers seven companies and nine different service centres of the group. As can be seen, SEIDOR's ISMS is in a process of continuous growth and improvement every year. SEIDOR is committed to and intends to continue this growth in the coming years.

Software Cycle Management System

In 2017 we designed and implemented a Software Life Cycle Process Management System according to the ISO 12207 reference standard, assessing its maturity, achieving and certifying level 3 in accordance with ISO 15504 and ISO 33001 standards, which guarantees quality and compliance with the requirements of our customers and stakeholders in software development and maintenance services. It currently covers five companies of the group and five different scopes.

Commitment to customers

As reflected in our Business Policy and Code, SEIDOR, with its management at the helm, is committed to the pursuit of excellence in the products and services it provides to our customers,

developing our activity in a responsible and sustainable manner, making a positive contribution to the society in which we live and which, together with the rest of the interested parties, forms the context of our company.

SEIDOR carries out its entire business strategy based on an exhaustive analysis of the context of the organisation, identifying and managing the expectations of each of its stakeholders and working to offer quality and sustainable products and services, based on our principles of professionalism, integrity, honesty and respect for the law.

We therefore commit ourselves to:

- To ensure the satisfaction of our customers and interested parties by fulfilling the agreed commitments, seeking to satisfy their requirements and expectations in the course of our activity and the return of benefits to society as a fundamental part of SEIDOR's business strategy.
- Ensuring the monitoring, maintenance and continuous improvement of policies, standards and processes that make up corporate management systems.
- To have a system for monitoring and controlling the satisfaction of our customers. And an agile and efficient procedure for managing, responding to and resolving any dissatisfaction, complaints or claims that may arise.
- To carry out our services and activities in an environmentally friendly, resource-efficient manner, 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 and services we provide.
- Comply with the legislation applicable to our activity, the requirements subscribed that apply to us, the voluntarily established requirements, the contractual commitments and all those internal rules or guidelines to which SEIDOR submits itself.
- To ensure ethical behaviour in all our actions by all our staff and by all our employees. SEIDOR's staff, demanding honesty from its employees and collaborators, transparent and impartial in the performance of their tasks, rejecting and prosecuting all forms of corruption, both direct and indirect.
- To ensure that the products and services that SEIDOR offers its customers and the activities it carries out to provide them have an increasing level of information security and have passed the necessary tests.
- Identify, manage and address all risks that may endanger the safety and security of the achievement and fulfilment of its objectives and stakeholder expectations, so that they are at acceptable levels.
- Providing our employees with all the physical and technical resources and the necessary

knowledge necessary for the performance of their responsibilities and to enable them to comply with established quality and safety parameters.

In order to guarantee services and projects with customers, SEIDOR's Quality Department carries out follow-ups and satisfaction surveys. The monitoring of services is carried out periodically to verify that they comply with the requirements established in the standards and with the provisions of the contracts formalised with the clients. Satisfaction surveys measure the degree of satisfaction of service users or customers, which will help us to identify weaknesses and opportunities for improvement. These are carried out through Microsoft Forms or through the SOLMAN tool. Complaints and claims are detected via email, from the CASS system or in the satisfaction surveys themselves. Once a complaint arrives, it is managed by opening a ticket, which is registered in the

CASS. The ticket is escalated to the Quality Department, which contacts the person associated with the service affected by the complaint and then the customer. In the event that it leads to the application of a corrective action, an action plan is generated, compliance with which is subsequently verified.

Customer and stakeholder complaint management

SEIDOR has established an out-of-court complaint management procedure for its customers and other interested parties. This procedure is integrated within the management system and its main objective is the registration, mediation, resolution of possible conflicts, continuous improvement and monitoring of the proposed corrective actions.

The complaints and claims management process basically consists of carrying out the following tasks:

- Detection of the complaint or claim.
- Creation of the register.
- Transfer of the complaint or claim.
- Reply to the person concerned.
- Recording of corrective actions.

The initiation of this procedure can take place in different ways:

- E-mail (calidad@seidor.com), to which customers and/or any other interested parties can address themselves.
- Intermediation request to the Quality department expressed by any SEIDOR person in favour of any other interested party.
- Satisfaction survey communicating the dissatisfaction of any of the following our customers.

All complaints are recorded in the corresponding management system and escalated to the Quality team, who carry out an initial internal investigation to analyse the causes of the complaints and propose corrective measures and actions. Subsequently, an action plan is agreed with the SEIDOR area affected (sales, operations, administration, etc.) and subsequently with the customer or interested party concerned; the quality department carries out the follow-up.

of the implementation of the plan, as well as a final evaluation of the effectiveness of the actions taken, and closure of the plan once it has been verified that the cause of the original complaint has been mitigated or resolved and verified with the person concerned.

In 2022, no complaints or claims have been received from customers or other users.

Monitoring and auditing process

As part of the Quality Department's monitoring tasks for the control and continuous improvement of our integrated management system and its associated processes, we carry out the following actions:

- Annual audit and monitoring plan, detailing the schedule of the different types of activities:
 - * Internal audits: these are carried out by specialists belonging to or collaborating with the SEIDOR's Quality Department in accordance with the requirements established to act as internal auditor. In these audits, procedures, records, monitoring of indicators are reviewed, compliance with objectives and systems included in the scope of the audit to be performed, The aim is to provide evidence of compliance with the requirements of the management system.

As part of the audit process, regular monitoring of processes and systems in the different projects and services provided by SEIDOR: these are carried out by technicians. The Quality department reviews and supervises the execution of the processes in the provision of services, according to the procedures, records and monitoring of the established performance indicators.

- * External audits: these are carried out annually by auditors from OCA certification companies, who review the evidence of compliance of each of the management systems with the different ISO reference standards.
- * Monitoring of processes and systems: these are carried out by the technicians of the Quality department, who review and supervise the execution of the processes in the provision of services, according to the procedures, records and monitoring of the established performance indicators.
- * Monitoring activity reports and minutes: At the end of each of the monitoring actions, the person responsible draws up a report/act showing the different actions carried out, the evidence collected, the results and conclusions.

Continuous improvement process

SEIDOR's strategy for measuring and improving service levels is based on the following strategic objectives:

- Immediate and continuous monitoring of the status of service levels and their risks non-compliance (alarms).
- Guarantee the service, with the measurement of service and response times. committed through continuous monitoring and team planning responsible.
- System for the review and continuous improvement of the conformity, use and effectiveness of the established procedures.
- Plan for innovation proposals that improve the performance of systems that support current services.
- Analysis and planned follow-up of the situation of the systems. By analysing the data obtained from the monitoring tools implemented.
- Manage the competence of service technicians through service-specific training plans.
- Structure of multidisciplinary work teams.
- Promoting knowledge management, access to service information, and the knowledge transfer between the different work teams.
- Promote flexibility of resources, by managing them in accordance with the service needs (flexibility of resources).
- Implementation of measures and processes that encourage self-service by the and thus increase the efficiency of work teams and the resolution of problems incidents.
- Proposals for technological improvements aimed at increasing the availability of services, drawing from our experience in similar services that we are other clients.
- Periodic audits, at least annually, of the Integrated Management System and service delivery.

SEIDOR designs, in agreement with its customers, a continuous improvement procedure within the service management system as proposed in our IT service management model.

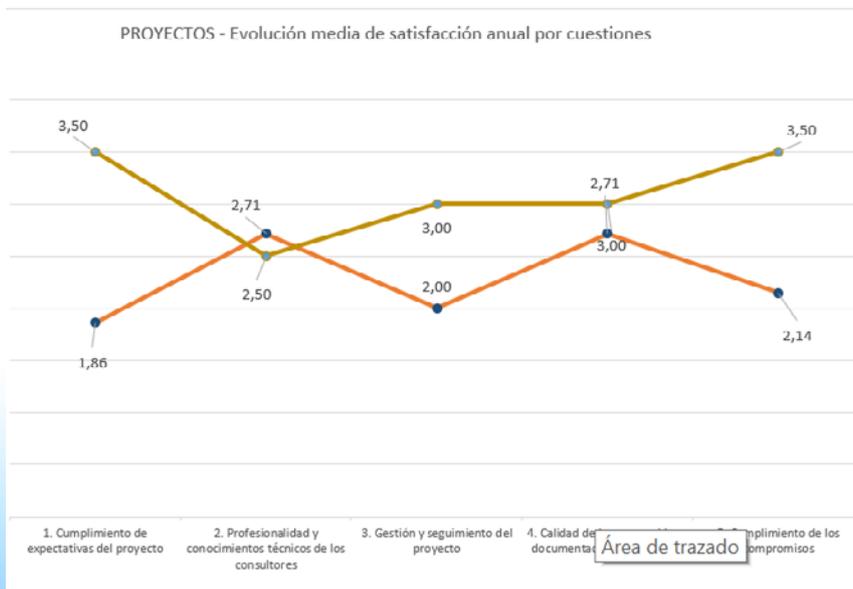
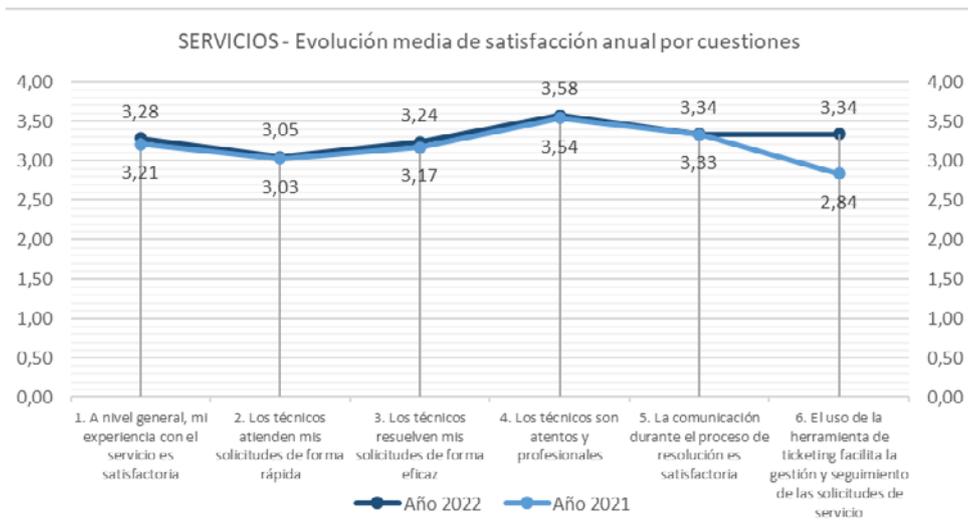
Customer satisfaction survey

In 2022, SEIDOR carried out a study of customer satisfaction through satisfaction monitoring surveys on projects and services provided by SEIDOR’s different business units.

In 2022, the following results have been obtained:

- Overall satisfaction with the Services is 3.27 out of 4.
 - 63.57% of respondents were positive about all the issues.
 - 54% of customers strongly agree
- The overall satisfaction of the Projects is 2.29 out of 4.

The following graphs have been obtained with the evolution of the surveys, for each question:



Commitment to suppliers

SEIDOR's policy in its relationship with its suppliers and partners is based on the following commitments, as described in our policy and code of business conduct:

- Deal with our suppliers of goods and services in an ethical and lawful manner.
- Seek and select only suppliers whose business practices respect human dignity, do not violate the law and do not jeopardise the company's reputation.
- Selecting suppliers on the basis of the suitability of their products or services, as well as and 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.
- Promoting activity with suppliers and trade close to the various national and international offices and delegations.

To this end, SEIDOR has designed a series of procedures and activities to manage its supply chain, which seek to guarantee the quality and sustainability of our products and services.

Purchasing policy

SEIDOR ensures that the purchasing process of products and services acquired or contracted with third parties complies with the established purchasing requirements, with the performance of compliance controls and the commitments acquired by suppliers through specific clauses in the contracts signed.

SEIDOR has a purchasing and supplier evaluation procedure that describes the established system, as well as the establishment of the guidelines to be followed for the selection, approval and evaluation of suppliers.

SEIDOR's supply chain focuses on two types of suppliers. On the one hand, suppliers of infrastructures, equipment and software, with which partnership contracts are established (mainly SAP, Microsoft, IBM and Adobe), as well as their wholesalers, and, on the other hand, professional partners for the provision of services. In general, in the latter case, these are local companies in each of the countries in which the group operates. In 2022, there have been no significant changes in the organisation, in terms of the introduction of new countries or suppliers.

Approval of suppliers

SEIDOR aims to establish guidelines for the selection, approval and evaluation of suppliers of products and services. It is necessary to distinguish between various types of suppliers: strategic supplier, historical/habitual supplier, general supplier, new supplier, small supplier.

SEIDOR carries out, both at the beginning and periodically, an approval of its suppliers and providers according to their categorisation consisting of:

- Dissemination and request for acceptance of SEIDOR's corporate policy and code.
- The completion of a series of commitment questions, with the aim of guarantee:
 - The existence of codes of business conduct and legal compliance.
 - Quality management of its products and services.
 - The sustainability and environmental management of its processes.
 - Commitment to human rights and the principles of the United Nations Global Compact United Nations.

- Information security and personal data protection.
- Zero tolerance policies on corruption and money laundering.

Regular monitoring and evaluation of suppliers

The Supplier Evaluation and Monitoring process is carried out continuously by each SEIDOR Operations Department, by the Purchasing Department and by the person responsible for the Integrated Management System, in which it is verified that they are aligned with the definition of the management policies and procedures defined by SEIDOR. The evaluation of suppliers assesses the level of satisfaction of the general operations carried out each year.

During the course of activities and operations, with each supplier, as well as during internal and external audits, SEIDOR carries out the following actions:

- Management of incidents that occur during the supply or provision of services.
- Assessment of the following items relating to operations and management processes related:
 - Flexibility and ease of payment.
 - Quality and fulfilment of commitments.
 - Commercial communication.
 - Meeting deadlines.
 - Ease of access to administrative documentation.
 - Ease of communication.
 - Response time to incidents.
 - Incident resolution time.

The supplier evaluation procedure consists of approving suppliers every year, which is recorded in a register that allows the process to be controlled on a day-to-day basis. In this procedure, once the service has been contracted, it begins to be provided and with it, the service is monitored to ensure that it is provided in accordance with the terms of the agreement. The results are used to detect possible non-conformities and observations.

Extraordinary events

The year 2022 has been dominated by the geopolitical conflicts experienced mainly in Eastern Europe between Ukraine and Russia, although they have affected the whole world due to aspects such as: lack of supplies, which has caused high inflation, shortages, climate emergency, geopolitical and social conflicts, among others.

SEIDOR, in order to deal with the supply crisis and the increase in its cost, has continued to support and encourage remote working, thus facilitating savings in terms of travel costs and, in addition, has continued to cover the costs associated with teleworking for those people in the organisation who work remotely.

In turn, and as an influential player in the business world, SEIDOR has continued to carry out its activity considering essential aspects for life, such as human rights, people's welfare, equal opportunities, the environment and a scrupulous respect for transparency measures and good business practice.

SEIDOR continues to pursue its strategic objectives by focusing on people and human value, demonstrating in 2022 a great capacity to adapt to change and strength in its activities.

Summary

The main highlights of SEIDOR's Non-Financial Information Statement in 2022 are summarised below:

- Defining a new corporate strategy focused on turnover up to 1,000 million euros by 2025, integration of new service lines, access to new markets, focus on large accounts and the public sector, development of intellectual property and proprietary products, talent management and commitment to sustainability.
- Strength in the execution of the company's mission as a technology consulting firm 750 million, a team of around 8,000 professionals, and a direct presence in 44 countries in Europe, Latin America, the United States, the Middle East, Asia and Africa.
- Promotion of the brand strategy as the core of the corporate identity, linking SEIDOR with technological humanism.
- Commitment to innovation as a key element of our commitment to customers, through initiatives such as management development programmes in digital leadership and the promotion of technology centres specialising in emerging technologies such as the Internet of Things and Artificial Intelligence.
- Commitment to good corporate governance and information security on the part of both SEIDOR and our employees.
- Care for the environment:
 - During 2022, local initiatives have been developed to promote awareness of the environmental.
 - A new energy supply company has been contracted which ensures that almost all of the energy consumed comes from renewable sources, thus significantly reducing the carbon footprint.
 - Offsetting of the carbon footprint generated, thus making SEIDOR a NET-ZERO organisation.
- Focus on talent: turnover is below 7%, lower than in the previous year and much lower than the average for the sector. In addition, initiatives to increase the presence of women and enhance their role in the technology sector have continued to be carried out during 2022.

SEIDOR has prepared the report in accordance with the GRI Standards for the period from 1 January 2022 to 31 December 2022.

Annex I: Table of Contents of the Statement of Non-Financial Information

SEIDOR has prepared this report in accordance with the standards set by the Global Reporting Initiative (GRI).

Objeto de la verificación					Omission of non-mandatory content	
Scopes and Contents of Law 11/2018 of December 28	Relationship standards GRI	GRI Description	Page EINF	Section title	REASON FOR THE OMISSION	EXPLANATION NECESSARY
1. Business model Brief						
description of the group's business model						
Business environment	"GRI 2-1, 2-2, 2-3, 2-4, 2-5"	"Organizational details Entities included in sustainability reporting. Period covered by the report, frequency and point of contact Update of Information, External verification"	8	"Introduction to the Non-Financial Information Statement See contact point in the Content section"	-	-
Organization and structure	GRI 2-6	Activities, value chain and other commercial relationships	8	"Business environment and group organization Innovation"	Restricciones de confidencialidad	No se incluyen los organigramas de gobernanza por la confidencialidad
Markets in which it operates	GRI 2-6	Activities, value chain and other commercial relationships	8	"Markets served Main brands"	-	-
Objectives and strategies	"GRI 2-23, 2-24"	"Commitments and policies Incorporation of commitments and policy"	11	Strategy and objectives	-	-
Main factors and trends that may affect its future evolution	GRI 1	Basics	9, 10, 61	"Global context and evolution of the sector Technology trends Extraordinary events"	-	-
Policies						
Due diligence procedures applied for the identification, evaluation, prevention and mitigation of significant risks and impacts.	"GRI 2-23, 2-25"	"Commitments and policies Processes to remedy negative impacts"	13,15,20, 21,29	"Risk management Regulatory structure and procedures Principles, rules and procedures"	-	-
Verification and control procedures, including what measures have been adopted.						
Risks to cp, mp and lp						
Description of the main risks related to the different issues and linked to GRI 2-22, to the activity of the entity or group	"GRI 2-22, 2-25, 2-29, 3-1, 3-2, 3-3"	"Declaration on sustainable development strategy Processes to remedy negative impacts Approach to stakeholder engagement Process of determining material issues List of material topics Management of material issues"	4, 13, 15, 6, 16	"Address Letter Risks and opportunities Risk management Materiality Analysis Context analysis"	-	-
Management of said risks, explaining the procedures used to detect them and 2-29,						
Effect of the impacts that have been detected, offering a breakdown of them, in 3-3						
KPIs						

<p>Key indicators of non-financial results that are relevant to the specific business activity, and that meet the criteria of comparability, materiality, relevance and reliability.</p> <p>- In order to facilitate the comparison of information, both over time and between entities, standards of non-financial key indicators will be used especially that can be generally applied and that comply with the Commission's guidelines N/A European in this matter and the standards of the Global Reporting Initiative, and the national, European or international framework used for each matter must be mentioned in the report.</p> <p>- The key indicators of non-financial results must be applied to each of the sections of the non-financial information statement. These indicators must be useful, taking into account the specific circumstances and consistent with the parameters used in your internal risk assessment and management procedures. In any case, the information presented must be accurate, comparable and verifiable.</p>	N/A	General or specific GRI standards of the Economic, Environmental and Social dimensions that are reported in the following blocks.	4 to 61	Key indicators are identified throughout the chapters of the report.	-	-
2. Environmental issues						
Global Environment						
Detailed information on the current and foreseeable effects of the company's activities on the environment	GRI 1	Basics	22 a 25	"Environmental management system Commitment to the Environment Environmental Management System Processes Environmental management system audits"	-	-
Resources dedicated to the prevention of environmental risks.						
The application of the precautionary principle, the amount of provisions and guarantees for environmental risks.						
Pollution						
Prevention measures, recycling, reuse, other forms of recovery and waste disposal.	GRI 305-5	Reduction of GHG emissions	26	Carbon footprint calculation (CO2 emissions reduction plan)	-	-
Any form of air pollution specific to an activity, including noise and light pollution.						
Circular economy and waste prevention and management						
Prevention measures, recycling, reuse, other forms of recovery and waste disposal.	GRI 306-3	Waste generated	22	Environmental Management System Processes	-	-
Actions to combat food waste.						
Sustainable use of resources						
Water consumption and water supply in accordance with local limitations.	GRI 1	Basics	29	Sustainable use of resources	Not applicable	It is not considered a topic material for the company
Consumption of raw materials and the measures taken to improve the efficiency of their use.	GRI 1	Basics	22	Environmental Management System Processes	-	-
Energy: Consumption, direct and indirect, measures taken to improve energy efficiency, use of renewable energy	"GRI 302-1, 302-4"	"Energy consumption within the organization Reduction of energy consumption"	29	Sustainable use of resources	-	-
Climate change						

The important elements of greenhouse gas emissions generated as a result of the company's activities	*GRI 305-1, 305-2*	"Direct GHG emissions (scope 1) Indirect GHG emissions associated with energy (scope 2)"	26	Carbon footprint calculation	-	-
The measures adopted to adapt to the consequences of Climate Change.						
Reduction goals voluntarily established in the medium and long term to reduce GHG emissions and means implemented to this end.						
Protection of biodiversity						
Measures taken to preserve or restore biodiversity.	GRI 1	Basics	-	-	Not applicable	It is not considered a topic material for the company
Impacts caused by activities or operations in protected areas.						
3. Information on social and personnel issues						
Employment						
Total number and distribution of employees by sex, age, country and professional classification.	*GRI 2-7, 401-1*	"Employees Hiring new employees and staff turnover"	38	Key indicators on SEIDOR employees	-	-
Total number and distribution of employment contract types.						
Annual average of permanent, temporary and part-time contracts by sex, age and professional classification.						
Number of dismissals by sex, age and professional classification.						
Wage gap.	GRI 1	Basics	36	Wage gap	-	-
The average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment to long-term savings pension systems and any other perception disaggregated by sex						
Implementation of work disconnection measures	GRI 1	Basics	36	Occupational well-being: occupational health and safety	-	-
Work organization						
Health and safety conditions at work	GRI 2-7	Employees	38	Key indicators on SEIDOR employees	-	-
Work accidents (frequency and severity) disaggregated by sex.						
Measures aimed at facilitating the enjoyment of conciliation and promoting the co-responsible exercise of these by both parents.	GRI 2-19	Remuneration policies	35	"Conciliation and social benefits Remuneration models"	-	-
Health and security						
Health and safety conditions at work	*GRI 403-1, 403-3, 403-6, 403-9, 403-10*	"Occupational health and safety management system Health services at work Promotion of workers' health Work accident injuries Occupational ailments and diseases"	36	Occupational well-being: occupational health and safety	-	-
Work accidents (frequency and severity) disaggregated by sex.						
Occupational diseases (frequency and severity) disaggregated by sex.						
Social relationships						
Organization of social dialogue, including procedures for informing and consulting staff and negotiating with them.	GRI 2-30	Collective bargaining agreements	36	Labor Relations	-	-
Percentage of employees covered by collective agreement by country.						
Balance of collective agreements, particularly in the field of health and safety at work.						
Training						

Policies implemented in the field of training.	*GRI 404-1, 404-2, 404-5*	* Average training hours per year per employee Programs to develop employee competencies and transition assistance programs Training workers on health and safety at work*	31	*Cultural transformation and talent management Talent attraction*	-	-
Total number of training hours by professional categories.						
Accessibility						
Universal accessibility for people with disabilities.	GRI 405-1	Diversity of governing bodies and employees	38	Key indicators on SEIDOR employees	-	-
Equality						
Measures adopted to promote equal treatment and opportunities between men and women.	GRI 1	Basics	32	Gender diversity strategy	-	-
Equality plans.						
Measures adopted to promote employment.						
Protocols against sexual and gender-based harassment.	GRI 406-1	Discrimination cases and corrective actions taken	46	Anti-harassment protocol	Not applicable	No se han producido denuncias por discriminación
The integration and universal accessibility of people with disabilities.	GRI 1	Basics	32	Diversity management	-	-
Policy against all types of discrimination and, where appropriate, diversity management.			32	Gender diversity strategy	-	-
4. Information on respect for human rights						
Application of due diligence procedures in human rights matters; prevention of the risks of violation of human rights and, where appropriate, measures to mitigate, manage and repair possible abuses committed.	GRI 1	Basics	46,47,49, 45	*Ethics and compliance Compliance and prevention of criminal risks Compliance training Commitment to the protection of human rights SEIDOR Code of Business Conduct*	-	-
Complaints for cases of violation of human rights.	*GRI 2-26, 2-27*	*Mechanisms to request advice and raise concerns Compliance with laws and regulations	48,49	*Complaint channel Data Protection*	Not applicable	There have been no complaints of violation of the human rights
Promotion and compliance with the provisions of the fundamental conventions of the International Labor Organization related to respect for freedom of association and the right to collective bargaining.	GRI 1	Basics	36	Labor Relations	-	-
The elimination of discrimination in employment and occupation; the elimination of forced or compulsory labor.	GRI 1	Basics	-	-	Not applicable	There are no cases of forced or compulsory labor, nor of discrimination in the employment and occupation
The effective abolition of child labor.	GRI 1	Basics	-	-	Not applicable	There is no hiring or subcontracting of children
5. Information relating to the fight against corruption and bribery						
Measures taken to prevent corruption and bribery.	GRI 205-2	Communication and training on anti-corruption policies and procedures	50	Money laundering	-	-
Measures to combat money laundering.						
Contributions to foundations and non-profit entities.	GRI 1	Basics	51	Donations	-	-
6. Information about the company						
Company commitments to sustainable development						

Impact of society's activity on employment and local development. Impact of the society's activity on local populations and the territory.	GRI 413-1	Operations with local community participation programs, impact assessments and development	50	Commitment to society	-	-
Relationships maintained with the actors of the local communities and the modalities of dialogue with them. (Interest group participation)						
Association or sponsorship actions.						
Subcontracting and suppliers						
Inclusion of social, gender equality and environmental issues in the purchasing policy.	"GRI 308-1, 414-1"	*New suppliers that have passed selection filters according to environmental criteria New suppliers that have passed selection filters according to social criteria*	60, 61	*Commitment to suppliers Purchasing policy Supplier approval Periodic monitoring and evaluation of suppliers*	-	-
Consideration in relationships with suppliers and subcontractors of their social and environmental responsibility.						
Supervision and audit systems and their results.						
Consumers						
Measures for the health and safety of consumers.	"GRI 416-1, 416-2, 418-1"	*Assessment of the impacts of product and service categories on health and safety Cases of non-compliance relating to the impacts of product and service categories on health and safety Substantiated complaints regarding violations of the customer privacy and customer data loss*	55, 52, 53	*Commitment to customers Quality Integrated management system Quality management system IT service management system Information Security Management System Software cycle management system Integrated management system processes*	-	-
Complaint systems, complaints received and their resolution.						
Tax information						
Profits obtained by country taxes on	GRI 201-1	Direct economic value generated and distributed	51	SEIDOR tax information 2021-2022	-	-
Profits paid						
Public subsidies received	GRI 201-4	Financial assistance received from the government	52	Subsidies	-	-

SEIDOR