

SEIDOR

Code of Ethics

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1. Institutional message

Since its foundation in 1982, SEIDOR has evolved into a global technology group with more than 10,000 professionals and a presence in 45 countries, positioning itself as one of the leading international technology partners.

The entry of the Carlyle Europe Technology Associates fund as a majority shareholder in 2024 represents a new phase of growth that strengthens our financial and strategic capacity to continue our global expansion and reinforce our commitment to excellence, responsible innovation and regulatory compliance in all the markets in which we operate.

In this new, more integrated and collaborative organisation, SEIDOR reinforces its global structure with specialised cross-disciplinary business units, a Strategy and Transformation Department, and a model oriented towards sustainability, transparency and positive impact. Our purpose remains "Humanising technology": accompanying companies in their digital transformation and promoting ethical, inclusive and sustainable development, aligned with legal frameworks and international standards of good governance.

Commitment to compliance is an essential part of our corporate culture: it is the basis of the trust we build among employees, clients, shareholders and society.

In this new phase, SEIDOR has implemented an Integrated Compliance Management System, whose central axis is this Code of Ethics, together with a structured set of policies, procedures, controls and technological tools for governance, risk and compliance. This system, which will be rolled out in phases, reinforces our progress towards a stronger, more transparent and demanding culture, where ethics and integrity are part of our business strategy, our risk management and all of our operational processes.

Being global means acting with ethical consistency, social responsibility and respect for the legislation and values of each country in which we operate, within a common framework that guarantees integrity, equal opportunities and responsible behaviour in everything we do. This shared vision consolidates SEIDOR as an international technology group that grows with responsibility, sustainability and the firm aim of being a benchmark in integrity and compliance.

Josep Benito
Executive Chair



Sergi Biosca
CEO



2. Commitment

With this Code of Ethics, SEIDOR's Board transmits to all its stakeholders the message of its firm commitment to complying with the current legislation applicable in all the local and international markets in which the company operates. Likewise, it states its categorical opposition to any conduct or irregularity that in any way contravenes this Code of Ethics, its internal development regulations and the legislation in force.

This Code of Ethics is the highest corporate standard, which enshrines the general principles of integrity, respect for legality, responsibility and transparency that must guide the professional conduct of any individual or legal entity representing or acting on behalf of SEIDOR.

The Code of Ethics has been developed and is complemented by an internal regulatory framework comprising a Criminal Risk Prevention Manual and its version for international subsidiaries, corporate policies, procedures and specific protocols that specify its principles in the various areas of the organisation, such as crime prevention, business ethics, data protection, human rights, sustainability and the management of relations with third parties. These rules are part of the Integrated Compliance Management System, which ensures the homogeneous, supervised and integrated application of internal rules throughout the SEIDOR Group, in accordance with the highest international standards of corporate governance and ethics.

The active involvement and oversight of the Board and senior management are essential elements for the effective implementation of the Integrated Compliance Management System. This system is managed through the Global Compliance Committee, a corporate body independent of the business that acts with technical and objective autonomy and ensures impartiality in the supervision and application of ethical and regulatory policies. The Global Compliance Committee reports directly to the Board. Its functional independence, combined with the active involvement of the Board, is a guarantee of transparency, integrity and efficiency in corporate governance.

This new Integrated Compliance Management System ensures that strategic decisions are made with an approach based on ethics, prevention and accountability.

Senior management ensures the permanent availability of the human, technological and financial resources necessary for the maintenance of the Integrated Compliance Management System and its continuous improvement.

The Global Compliance Committee is responsible for ensuring that this Code of Ethics is updated and correctly implemented in all SEIDOR Group subsidiaries.

3. Purpose

The purpose of this Code of Ethics is to establish a global reference framework that defines and reinforces the rules of conduct that must guide the actions of all SEIDOR employees and associates, guaranteeing behaviour that is upright, responsible and in accordance with current legislation, applicable international standards and the company's corporate values.

4. Definitions

To ensure its uniform and consistent interpretation and to facilitate the understanding of all

documents that make up the Integrated Compliance Management System, the following set of definitions is established:

- **SEIDOR employees and associates:** the directors, managers, employees, representatives, suppliers and other third parties, such as agents, intermediaries or subcontracted companies, who provide services or act, in any way, for and on behalf of SEIDOR, regardless of the position they hold, their responsibilities, the legal nature of their relationship with the organisation or the type of work they carry out.

It also covers the directors, professionals and suppliers of temporary joint ventures (UTE) or equivalent groupings in any jurisdiction in which SEIDOR operates when SEIDOR assumes their management or operational coordination.

- **Related third parties:** natural or legal persons, external to SEIDOR, who act for it or on its behalf, or who maintain a business relationship with the organisation and may create exposure to bribery risks.

This includes, without limitation, agents, intermediaries, suppliers, contractors, consultants, distributors, business partners and subcontractors.

- **Civil servant:** any person who, either individually or as a member of a national or foreign corporate or collegiate body, holds or performs, on a permanent or temporary basis, legislative, executive, administrative or judicial functions in any country or territory, or who acts for and on behalf of:
 - a public or governmental entity;
 - a state-owned or publicly owned company;
 - an international or supranational body; or
 - any level of government, domestic or foreign.

It also includes candidates for public office and anyone who, by virtue of their position, could unduly influence public sector decisions.

- **Bribery:** the direct or indirect offer, promise, giving, solicitation or acceptance of an undue or unjustified financial or other advantage, so that a person will act or refrain from acting in the exercise of their duties, and to thus obtain, retain or secure an improper business, contractual or personal advantage.
- **Undue advantage:** any material or immaterial benefit or reward that exceeds reasonable social or commercial usage and that may unduly influence, or appear to influence, a person's judgement, conduct or decision-making. Any form of compensation, favour, fee, commission, incentive, credit or remission that is not objectively justified or duly recorded is considered an undue advantage.
- **Facilitation payments:** minor, unofficial or informal payments paid to expedite or secure the performance of routine acts or administrative procedures of an ordinary nature.
- **Conflict of interest:** any situation in which a person's personal, family, professional or financial interests interfere, or could appear to interfere, with their impartiality, independence or loyalty to SEIDOR.

A conflict of interest is also considered to be any situation which, even if there is no direct personal benefit or immediate detriment to SEIDOR, may give rise to reasonable doubts about the independence, objectivity or impartiality of the employee or associate,

or adversely affect the public perception of the organisation's integrity. In these cases, the conflict must be stated in the same way through the established channels, and the affected person must refrain from intervening in related decisions or actions until the Global Compliance Committee assesses and determines the appropriate measures.

- **Gift:** any object, invitation, courtesy, benefit or benefit given or received in a business context, which may be perceived as unduly influencing a business relationship.
- **SEIDOR:** SEIDOR TopCo, S.L., and all of its direct and indirect subsidiaries.
- **Misconduct or unethical conduct:** any act or omission contrary to good faith, impartiality or the duty of trust arising from the exercise of professional duties, including exercising influence over others to have them act improperly or fail to fulfil a duty required in the performance of their responsibilities.
- **Related person or entity:** a person related to a SEIDOR employee or associate is considered to be the spouse or person in an analogous relationship of affection, and their ascendants and descendants, or any natural or legal person with whom they have a personal, professional or economic relationship that may generate a significant influence or interfere with their objectivity and impartiality. Significant influence is presumed to exist when there is a shareholding of 10% or more of the capital or voting rights, or a position in the management body or in senior management.
- **Senior management:** all managers and decision-makers who form part of SEIDOR's top hierarchical level, with powers to take strategic decisions, supervise their implementation and represent the organisation before third parties. This includes persons who are not on the Board but exercise relevant management, administrative or control duties within the corporate structure.
- **Ethics Channel:** this is a confidential, secure and accessible mechanism created so that employees and associates can report, in good faith and based on reasonable indications, any conduct contrary to the law or SEIDOR's Code of Ethics or internal policies. The channel is available via the link <https://compliance.seidor.com/#/>. Any reports received will be handled in accordance with the Ethics Channel Management Procedure (CMP-CE-PR-01), guaranteeing confidentiality, anonymity and prohibition of reprisals.
- **"Subsidiary":** any entity legally incorporated in a country other than that of the registered office of SEIDOR TOPCO, S.L., in which SEIDOR directly or indirectly holds all or a majority of its share capital.

5. Scope

This Code of Ethics is applicable to and must be complied with by all employees and associates who act for and on behalf of SEIDOR, regardless of the territory in which they carry out their work and irrespective of whether the relationship that binds them is of an employment or commercial nature.

This Code of Ethics applies to all direct and indirect subsidiaries of SEIDOR TopCo, S.L., and its development is integrated into the Integrated Compliance Management System, which constitutes the common framework applicable to the entire organisation and its relations with third parties.

6. Rules of conduct

Employees and Associates must declare any Gifts, Hospitality and Business Courtesies they receive or offer in the appropriate register by completing the form attached as an annex. Promotional or merchandising items are exempt from this obligation, as are those of symbolic or immaterial value.

a) Legality and ethics in business

SEIDOR is committed to complying with the legislation in force that is applicable in all the countries in which it operates. SEIDOR employees and associates are obliged to adhere to the law and internal regulations, to act transparently and to reject any practice that is illegal, corrupt or contrary to the principles of fair competition, transparency and good faith. They must also fulfil their contractual commitments to clients, shareholders and suppliers, ensuring the highest level of professional integrity.

This commitment extends to international standards in the areas of corporate integrity, human rights, free competition and sustainability.

Any participation with third parties in actions that may violate the law or that, although legal, could undermine SEIDOR's reputation, values or image, is expressly prohibited.

Strict compliance with legislation and ethical business conduct are essential pillars of our corporate culture and the foundation on which the trust of our stakeholders is built.

b) Bribery and corruption

Employees and associates must maintain integrity, transparency and zero tolerance for any form of bribery or corruption, whether in the public or private sphere. It is expressly prohibited to promote, facilitate, participate in or conceal any practice involving the direct or indirect offer, promise, giving, solicitation or acceptance of improper gratuities, benefits or advantages for the purpose of influencing or rewarding business, contractual or administrative decisions.

This prohibition extends to any relationship with authorities, civil servants, representatives of international organisations or any person who, by virtue of their position, can influence public sector decisions. All interaction with these representatives must be conducted with the utmost transparency, in accordance with applicable law and the principles of impartiality and integrity.

SEIDOR employees or associates may not request, accept or offer payments, gifts, loans, favours, benefits or services that are not duly justified or that could be interpreted as an undue advantage, including those offered to civil servants or representatives of government entities.

These provisions are developed in greater detail in the Anti-Bribery and Anti-Corruption Policy (CMP-AB-PO-01) and in the Public Procurement Policy (CMP-AB-PO-03), both part of SEIDOR's Integrated Compliance Management System, which reinforce the Company's commitment to legality, transparency and integrity in all its operations and institutional relations and provide specific examples of prohibited actions.

c) Money laundering

SEIDOR reaffirms its firm commitment to the prevention and prosecution of money laundering and terrorist financing, and to acting in accordance with applicable national and international laws and the highest standards of integrity and financial transparency.

Those subject to this Code of Ethics must refrain from promoting, facilitating, participating in, concealing or consenting, directly or indirectly, to any type of operation that implies or may imply the illicit or unjustified origin of funds or assets, whether from national or international sources. They are also obliged to immediately report any reasonable indication or suspicion of money laundering or irregular financial transactions to the Global Compliance Committee or through the Ethics Channel, even if the transactions are not completed.

SEIDOR ensures strict compliance with anti-money laundering legislation through the application of internal verification and due diligence procedures, specifically the KYC and Third Party Due Diligence Procedure (CMP-DD-PR-01), financial controls and continuous training programmes.

Employees and associates must exercise the utmost prudence and diligence in identifying clients, suppliers, partners and third parties, ensuring that all business relationships are conducted within an ethical and traceable framework and in accordance with current legislation and corporate policies.

d) Gifts, hospitality and courtesies

Professional relations must be conducted with absolute transparency, impartiality and respect for the legislation in force, international ethical standards and the internal policies that make up SEIDOR's Compliance Management System. Accordingly, it is prohibited to offer, promise, solicit or accept gifts, entertainment, hospitality or other inducements that may influence, or appear to influence, independent judgement or business, contractual or administrative decisions.

Only courtesies of a symbolic, reasonable and institutional nature are permitted, provided that they serve legitimate business purposes, are in accordance with reasonable business practice, and cannot be construed as an undue advantage.

The giving or acceptance of any gift, hospitality or hospitality must be in accordance with the principles and limits set out in the Anti-Bribery and Anti-Corruption Policy (CMP-AB-PO-01), in the Gifts, Hospitality and Hospitality Procedure (CMP-AB-PR-02) and in the Public Procurement Policy (CMP-AB-PO-03) when interacting with authorities, officials or representatives of the public sector. The details of the applicable terms, authorisations and internal controls, and the procedures for validating, recording and documenting these actions, are regulated in these corporate policies and in the internal control procedures that develop them, which form an integral part of SEIDOR's Integrated Compliance Management System.

SEIDOR promotes a culture of integrity and transparency in all its commercial and institutional interactions, always bearing in mind that business courtesy should never compromise the objectivity, reputation and trust that underpin the organisation's professional relationships and its good name.

e) Conflicts of interest

Anyone subject to this Code of Ethics who identifies a potential conflict of interest situation must

immediately report it to their line manager or to the Global Compliance Committee and refrain from intervening in any related decision or action until a resolution is adopted.

Some examples of conflict of interest include, without limitation:

- Intervening in procurement or award decisions affecting companies linked to family members or close associates.
- Engaging in a transaction that may benefit someone with whom the employee has relevant economic or personal links.

The management of conflicts of interest is governed by the principles and procedures set out in the Anti-Bribery and Anti-Corruption Policy (CMP-AB-PO-01) and in the Public Procurement Policy (CMP-AB-PO-03), which include practical examples of actual and potential conflict situations and the measures to be taken in each case.

f) Free competition

SEIDOR is prepared to compete successfully in today's commercial world and will always do so in full compliance with all applicable antitrust, competition and fair trading laws. SEIDOR rejects any anti-competitive practices, including collusion, abuse of dominant position and improper exchange of sensitive information between competitors. Employees and Associates must therefore adhere to the following rules at all times:

- The commercial policy and prices must be set independently and must never be agreed, formally or informally, with competitors or other unrelated parties, either directly or indirectly. Clients, territories or product markets may never be divided up by SEIDOR and its competitors but must always be the result of fair competition. Clients and suppliers must be treated fairly.
- All employees, but particularly those engaged in marketing, sales and purchasing activities, and those who are in frequent contact with competitors, should ensure that they are familiar with applicable competition laws.
- Competing fairly with other companies by cooperating to achieve a free market based on mutual respect among competitors.
- Not poaching clients from other competitors through unethical methods.

g) Relations with clients

SEIDOR's employees and associates must always strive for excellence in the company's goods and services, so that its clients and users obtain the satisfaction they expect from them. They must also ensure the confidentiality and protection of clients' personal and business data, in accordance with applicable law and internal privacy policies.

SEIDOR will promote a culture of quality at all levels, which implies having a quality management system and defined and implemented processes, which, based on the setting of objectives and the implementation of action and continuous improvement plans, seeks to increase the satisfaction of its clients and users.

In this way, all products and services must be guaranteed and client and user complaints must be dealt with quickly and efficiently, seeking their satisfaction beyond mere compliance with the legislation in force.

h) Relations with suppliers

All SEIDOR employees and associates must interact with suppliers of goods and services under the highest standards of integrity, transparency and legality, ensuring that all their interactions are carried out in an ethical, fair and responsible manner. SEIDOR will only select and maintain relationships with suppliers whose business practices respect human dignity, fundamental labour rights and applicable laws and regulations, and who share its commitment to integrity, sustainability and regulatory compliance.

The choice of suppliers must be based on objective criteria of technical suitability, quality, price, delivery terms and ethical and environmental compliance, promoting sustainable, equitable and mutually beneficial business relationships.

Likewise, SEIDOR will encourage its suppliers to adopt standards similar to those of its own Code of Ethics and its Integrated Compliance Management System.

i) Public relations

SEIDOR employees and associates must undertake to respect human rights and democratic institutions and promote them wherever possible, maintaining the principle of political neutrality and not interfering politically in the communities the Company operates in, as a sign of respect for the various opinions and sensitivities of the people linked to it.

SEIDOR will deal with public authorities and institutions in a lawful and respectful manner, neither accepting nor offering gifts, fees or commissions, whether in cash or in kind. In the case of contributions to political parties and public institutions, this will be done only in accordance with the legislation in force and, in any case, with guaranteed transparency.

Lastly, SEIDOR will collaborate as far as possible with public administrations and with non-governmental entities and organisations dedicated to improving the levels of social care for the most disadvantaged.

7. Protection of SEIDOR's resources and assets

SEIDOR's management policies, and the actions of its Employees and Associates, must guarantee the correct state of its facilities and equipment, always in line with its activity, objectives and goals. The availability of the necessary resources to establish, implement, maintain and improve SEIDOR's integrated management system must also be ensured.

Those subject to this Code of Ethics are obliged to ensure the safekeeping and correct use of all the assets that SEIDOR places at their disposal for their work. "SEIDOR assets" refers not only to buildings, vehicles, machinery or furniture, but also to plans, designs, formulas, processes, systems, technologies, master plans, business strategies, product launch plans, promotional campaigns and of course SEIDOR's brands, among others.

SEIDOR assets must be used responsibly, seeking to keep them in perfect working order and usefulness, maximising their capacity and prolonging their useful life.

a) IT systems

SEIDOR has a policy for the use of IT systems with the aim of guaranteeing their responsible use and the security of the information they process. They must not be used in an abusive manner, for personal use, or for actions that could affect SEIDOR's reputation or image.

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

Any communications made through IT tools must not contain offensive or defamatory statements.

Users of any computer or communication media owned by SEIDOR may not disseminate or transmit illegal, sexist, abusive, defamatory, obscene, racist, offensive, pornographic or any other type of offensive information or information not authorised by law, whether through photographs, texts, advertising banners or links to external pages; nor may they publish, transmit, reproduce, distribute or exploit any information, pirated material or software that contains viruses or any other component harmful to the integrity of the computer systems or that may infringe intellectual property rights; nor may they publish or provide material or access to resources on hacking, cracking or any other information that SEIDOR considers susceptible, even potentially, of compromising the security or integrity of computer systems, and those who do will be solely liable for those actions and for any possible legal consequences.

b) Corporate policy on the use of information

Employees and associates must maintain the strictest professional secrecy and keep confidential all information they handle in the course of their professional work.

For these purposes, "confidential information" is defined as any information that may be disclosed orally, in writing or by any other tangible or intangible means or medium, and that they may access in the course of their employment.

This includes, without limitation, information related to business plans, products and services, financial forecasts, patents, trademarks, utility models and any other intellectual or industrial property rights or applications for them (whether registered or not), computer passwords, source codes, inventions, processes, designs, whether graphic or not, engineering, advertising, budgets, financial forecasts, characteristic elements of services of all kinds that SEIDOR offers on the market, business management techniques, related or accessory, including the hardware and software used in management.

Privileged or confidential information to which access has been gained as a result of a partnership, strategic alliance or collaboration with third parties, privileged or confidential information to which access has been gained as a result of interactions with competitors, and any other information that SEIDOR identifies or designates as confidential, is also considered confidential information.

Employees and associates may not access, use or disclose confidential information unless they have been properly authorised by their line manager to do so in writing. In case of doubt, and

unless otherwise stated, employees must treat information to which they have access in the course of their professional activities as confidential.

All confidential information must be protected and maintained as such, so that it may only be disclosed and used by the person for the purposes assigned to them under their employment contract or relationship with SEIDOR.

In this regard, SEIDOR and all of its employees may only act or speak on behalf of third parties (including partners, strategic allies or associates) when there is express authorisation, in writing, issued by the relevant party. If the assistance of a third party is required and it is necessary to disclose confidential information to that third party, the employee must take the necessary measures to ensure that the information is duly protected by entering into a written and binding non-disclosure agreement with all the guarantees provided by law.

The person in possession of the confidential information must not directly or indirectly disclose it to third parties other than those referred to in the previous section; nor may it be copied, reproduced or duplicated, in whole or in part, without the written authorisation of SEIDOR.

The person in possession of the confidential information must report, as soon as possible, any incorrect treatment or use of confidential information, cooperating with SEIDOR to protect the information.

SEIDOR will ensure the protection of personal data stored and exchanged in the course of its day-to-day business activities, insofar as protecting it is a priority to achieve the highest level of quality in the performance of its corporate purpose.

All SEIDOR employees and associates must always follow personal data protection legislation when processing personal data of clients, suppliers, shareholders or employees.

SEIDOR will put training policies in place, periodically distributing didactic material to facilitate their understanding and thus avoid any non-compliance in their application.

With regard to inside information, those subject to this Code must never use information they have learned as a result of their dealings with SEIDOR to obtain a personal financial advantage and must not provide it to third parties so that they can obtain the same type of advantage.

c) Misuse, fraud or misappropriation of assets

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

8. Honest and respectful dealings with people

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

a) Human rights

SEIDOR will respect and promote human rights. SEIDOR recognises that human rights are

fundamental and universal rights and must be interpreted and recognised in accordance with international law and practice, in particular the United Nations Universal Declaration of Human Rights and the principles proclaimed by the International Labour Organisation.

SEIDOR is particularly interested in controlling and monitoring compliance with human rights in its relations with its personnel, paying special attention to rights linked to its business activity, such as the right of association (freedom of association and the right to collective bargaining), the rights of children and young people (eradication of child exploitation and forced labour) and the right to fair and satisfactory employment conditions.

SEIDOR is focused on prohibiting sexual exploitation and abuse and is committed to the United Nations. It takes all the necessary measures to prevent sexual exploitation and abuse of anyone by its employees or any other person engaged and directed by SEIDOR to perform any service under contract. For these purposes, sexual activity with any person under the age of eighteen, regardless of laws relating to consent, will be taken as sexual exploitation and abuse of that person. In addition, SEIDOR will refrain from, and take all reasonable and appropriate measures to prohibit its employees or other persons employed and controlled by it from, exchanging any money, goods, services or other items of value for sexual favours or activities, or from engaging in any sexual activity that could be exploitative or degrading to anyone.

b) Respectful treatment

Those subject to this code must always treat everyone with whom they come into contact, whether or not they subject to this code or aware of it, with due respect. Disrespectful verbal or written actions or statements against any person or group of persons, whether present or not, will not be permitted.

c) Violence and aggressive behaviour

SEIDOR categorically prohibits those subject to this code from performing any kind of violent conduct and aggressive behaviour, including assault, threat of physical assault or verbal violence, harassment or bullying. All employees and associates must act with respect, courtesy and professionalism in all their interactions, ensuring a safe and violence-free working environment.

d) Equality and non-discrimination

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

9. Behaviour towards our employees

SEIDOR recognises the human factor as the most valuable resource in our company and has as its primary objective that all SEIDOR personnel will be considered an important and integrated part of the company: "We want them to want to work with us". SEIDOR's social policy, which applies to all group companies, therefore makes it mandatory to:

- Treat employees with dignity, respect and fairness, taking into consideration their various cultural sensitivities.
- Not discriminate against employees on the grounds of race, religion, age, nationality, sex, pregnancy, or any other personal or social condition unrelated to their merit and ability.
- SEIDOR prohibits and will punish any type of workplace harassment, including sexual harassment. Those subject to this code of conduct must understand and apply the company's policies on preventing and punishing workplace harassment.
- Recognise employees' rights of association, unionisation and collective bargaining.
- Establish and communicate clear criteria and rules that balance the rights of the company and those of employees in the hiring and termination processes, including in the case of voluntary departures.
- Ensure health and safety at work, taking all reasonable measures to maximise the prevention of occupational hazards.
- Ensure that employees are able to balance their work in the company with their personal lives.
- Promote the integration of people with disabilities in the workplace, eliminating all kinds of barriers to their integration in the company's environment.
- Facilitate employee engagement in the company's social action programmes.

a) Protection of health and safety in the workplace

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

SEIDOR is clearly committed to informing all those subject to this code of conduct about the rules and procedures relating to the prevention of occupational hazards.

Those subject to the Code of Ethics must notify the company, through their superiors or occupational health officers, of the existence of any alleged violation of occupational safety rules and regulations or failure to participate in health and safety related activities.

b) Drugs and alcohol in the workplace

SEIDOR is committed to providing and maintaining a safe drug-free work environment that encourages optimum productivity and service to our clients. Abusing alcohol or any drug or other substance, whether legal or illegal, can interfere with employees' ability to fulfil their professional responsibilities and obligations, and can endanger their own health and safety and those of others, and can damage the company's reputation and business; in addition to posing a potential legal risk.

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

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

10. Sustainability

SEIDOR's sustainability strategy is articulated to respond to social and environmental protection challenges, both those that have already arisen and those that may arise in the future. Through its commitment to sustainability, SEIDOR aims to generate a positive impact on its social and business environment.

a) Sustainability policy

As part of its ongoing commitment to ethics and sustainable development, SEIDOR has a sustainability policy inspired by the United Nations Sustainable Development Goals, integrated into good corporate governance and aligned with international best practices and standards. The company promotes sustainability in all its decision-making processes, in the development of its products and services and in the relationship with its employees, associates, clients and suppliers.

b) Environmental protection

Environmental protection is one of the guiding principles of SEIDOR's business activities, which are always carried out in accordance with environmental protection laws and regulations, and in accordance with its Environmental Management System. As part of its Integrated Management System, SEIDOR has an adequate system of environmental management standards and procedures, in accordance with current legislation in each case, which makes it possible to identify and minimise the various environmental risks, especially when it comes to waste disposal, handling of hazardous materials and prevention of spills and leaks.

SEIDOR will provide those subject to this Code of Ethics with knowledge of all the company's internal rules and procedures on environmental protection that affect their activity and level of responsibility.

Those subject to this code must ensure that they comply with it and notify their superiors or environmental managers of any risks and breaches of these procedures that may come to their attention. In particular, they must observe the following rules:

- Comply with environmental legislation in all the territories in which SEIDOR operates, minimising the environmental impact of its facilities and operations, and of the products and services it offers its clients.
- Minimise greenhouse gas (GHG) emissions and promote the rational use of resources and responsible waste management.
- Promote the company's image as a company committed to the environment and provide information to society on environmental performance.

11. Controls

a) Risk-based approach to compliance

SEIDOR identifies and assesses the compliance risks arising from its activity and its relations with third parties. This assessment is carried out on a regular basis and is documented and updated in the event of any relevant changes in the legal or organisational environment. The results are reflected in the Global Compliance Risk Map.

The results of the risk analyses serve as a basis for defining preventive measures, specific controls and action plans, ensuring continuous improvement of the effectiveness of the Integrated Compliance Management System.

b) Compliance objectives

SEIDOR establishes and periodically reviews specific and measurable compliance objectives aimed at ensuring the effectiveness of the system and of this Code of Ethics.

These include comprehensive employee training, timely resolution of complaints received, updating of the Global Compliance Risk Map and regular verification of the application of corporate policies. The Global Compliance Committee assesses the degree of achievement of these objectives and reports the results to the Board.

12. Objectives and planning

SEIDOR sets measurable annual compliance objectives, such as training 100% of its employees, resolving complaints and updating 100% of risk maps, the assessment of which is documented in the annual report by the Global Compliance Committee.

13. Training

SEIDOR ensures the knowledge and continuous training of all the people who make up the organisation, to help them understand their ethical and legal obligations.

Participation in the training actions is compulsory and the certifications from the courses are retained as proof of competence. The Global Compliance Committee will annually review the effectiveness of the training programmes.

In turn, the members of the Global Compliance Committee will receive training and continuous updating in corporate compliance, international legislation and ethical innovation, ensuring their technical competence.

14. Communication and engagement

SEIDOR encourages open communication on ethical and compliance issues. In addition to the Ethics Channel, anyone can direct queries or requests for guidance to the Global Compliance Committee via email.

In this way, the Global Compliance Committee offers preventive support to resolve interpretative doubts about this Code of Ethics, the Criminal Risk Prevention Manual and its version for international subsidiaries, corporate policies, specific procedures and protocols and any other documents that make up the Integrated Global Compliance System, and it also promotes responsible conduct before possible breaches occur.

15. Documented information and traceability

Any actions related to the implementation of the Code of Ethics, the Criminal Risk Prevention Manual and its version for international subsidiaries, corporate policies and specific procedures and protocols must be documented accurately and fully.

The records, reviews, training, investigations and disciplinary actions arising from the system must be kept in a secure and controlled manner, with their authenticity, integrity and confidentiality guaranteed.

This principle of documentation ensures the traceability of the decisions and enables verification of the functioning of the Integrated Compliance Management System.

16. Assessment and review of compliance

The Global Compliance Committee will conduct regular audits and reviews of the System and this Code of Ethics, using key performance indicators (KPIs) to measure their effectiveness.

The results will be reported to the Board, which, together with the Global Compliance Committee, reviews the suitability, adequacy and effectiveness of the System annually and approves any necessary improvement actions.

The findings of the audits and reviews will be incorporated as a basis for improvement for action plans and continuous improvement of the System, ensuring continuous feedback of the Integrated Compliance Management System.

17. Violations and corrective actions

Any violations of this Code will be subject to review and, where appropriate, proportionate corrective or disciplinary action.

The Global Compliance Committee will document the causes, the actions taken and the results, ensuring organisational learning and the prevention of recurrence.

18. Continuous improvement of the Global Integrated Compliance System

SEIDOR applies the principle of continuous improvement in accordance with the “Plan Do Check Act” cycle and undertakes to permanently review this Code of Ethics, the manuals, policies, procedures and processes that develop it.

19. Document control and approval

This Code of Ethics forms part of the official documentation of SEIDOR's Integrated Compliance Management System and is subject to the document control and management procedures established by the company.

The current version, its revisions and the records derived from its application are kept in a secure and accessible manner, guaranteeing their authenticity, integrity and traceability.

Any amendments and updates to the Code of Ethics must be approved by the Board, following a formal review process to ensure they are in line with current legislation, international best practices and compliance standards.

SEIDOR will make its Code of Ethics and its key compliance commitments available to the public, thus reinforcing its transparency to its stakeholders and society.

This Code of Ethics was approved by SEIDOR's Board on 28 November 2025.

Version control:

Version	Date	Description of change	Manager	Approved by:
1.0	28/11/2025	Overhaul of the Code of Ethics	Compliance Area Global Corporate	Board of Directors

On behalf of the Board
Sergi Biosca Arpa



The head of the Global Compliance
Committee
Ainhua Santamaría Benito





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