
CODE OF ETHICAL CONDUCT

"MIMCORD XXI, S.L."

Introduction

This code of ethical conduct (henceforth, the "**Code**") is the guide that regulates our company's conduct and highlights the sense of corporate social responsibility which defines and governs it at all times. Our goal is to achieve our strategic objectives by constantly acting with integrity and ethics and, by all means, complying with all the current regulations. The main objective of the Code, along with the established work rules and procedures, is to guarantee that the correct standards are met and, consequently, no crime is committed in our company.

The Code constitutes a guide for all of us who are part of "**MIMCORD XXI, S.L.**" (henceforth, "**MIMCORD**" or the "**Company**") in our professional performance in relation to our daily work, the resources we use and the business context in which those occur. It offers the guidelines that formulate the basic principles of any operation and any interpersonal relationship with colleagues, collaborators, managers, suppliers, customers, partners, potential investors and generally any person with a direct or indirect interest in the activity carried out by the Company. Our actions are based on the respect for our corporate values, and the Management and employees of the organization will accommodate our actions to the principles of behaviour aligning with business ethics and professionalism, with the aim of earning the trust which our customers, suppliers and other stakeholders place in us; for MIMCORD to be a benchmark in these terms and to be thus recognized.

Area of application

This Code constitutes a protocol for all employees and companies collaborating with MIMCORD, regardless of the contractual modality that determines their relationship, the position of employment or the place in which their work is carried out. A copy of the Code is to be given to the above-mentioned and signed as proof of receipt and conformity. Similarly, the existence of this Code will be made known to the main customers and suppliers of the Company and other stakeholders, making it available on our website to anyone who might be interested: <https://mimcord.com>.

Values

Our values represent our identity as a corporation. We are different from other companies because the people who work at MIMCORD make it a unique and distinctive project. We are fast, we know how to listen, we seek innovation, we are helpful and we work rigorously and transparently as a team.

We care about working correctly

- We make quick decisions and act with speed and dynamism.



- We quickly focus on solving a problem by proposing realistic, quality and feasible alternatives.
- We swiftly adapt to the changes and demands of the professional environment.
- We actively seek opportunities to improve our products and services and create new business opportunities.
- We make the most of each opportunity or problem to be able to provide an innovative solution.
- We constantly update our technological knowledge to be pioneers in innovation.
- We know how to work in multidisciplinary teams, from different units, companies and countries, generating an atmosphere of trust and mutual respect.
- We cooperate with the rest of the organization making commitments which are aimed at achieving common objectives.
- We direct our efforts towards the same result, taking into account the contribution of each and every one of us, no matter how small it might seem.
- We respect each other's differences, opinions and diversity.

We care about our customers:

- We listen carefully to our internal and external customers to exactly get to know their needs and be able to propose applicable solutions accordingly.
- We bear our customers in mind during any operation that is carried out, constantly asking ourselves about their satisfaction.
- We listen actively, with an open attitude and respect for the opinion of all parties involved in a situation.
- We identify the needs and expectations of our customers to be able to develop and apply solutions that increase their contentment.
- We assist our customers efficiently, maintaining at all times an agile and decisive behaviour that enhances the credibility and reputation of the Company and its professionals.
- We help our customers with the utmost care and we push ourselves to understand their demands, this being the primary characteristic of all our professionals' attitude.

We care about our employees:

- We protect, train and invest in our staff.
- We promote a positive working environment based on personal and professional growth in different disciplines, equal opportunities and mutual respect.
- We are committed to health, safety and well-being in the workplace.



We care about the environment:

- Our products and services are eco-friendly by definition.
- We respect the environment and we care for sustainability policies.
- We are committed to the efficient and sustainable management of resources, the use of renewable energies and the mitigation and adaptation to climate change.
- We do not emit greenhouse gases or pollute in any way.

We care about our stakeholders:

- We make an effort to sustain a solid relationship with all our stakeholders: from customers and suppliers to workers, partners, potential investors and even the press.
- We take care of our partners, investors and financial institutions; we are transparent to keep them updated at all times. Financial transparency is one of our primary objectives.
- We have a good relationship with other companies and, should we partner with them, a balanced and competitive portfolio of products would be offered to enhance business growth, as strategic alliances cover the value chain.
- We cooperate and are transparent with the media who wish to get to know, understand and publish information about our business.
- Our suppliers must meet the standards in accordance with our social and quality commitments, prioritizing those holding quality, environmental, as well as occupational health and safety certifications.

Principles of ethical behaviour

The ethical behaviour that governs this Society is mainly based on the following principles:

Good faith

We constantly adapt our actions to the principles of loyalty and good faith toward the company, our supervisors, our colleagues and collaborators. We emphasize our eagerness for achievement and our spirit of self-improvement. Our concern to attain the settled goals must be constant and continuous. We support optimistic versus pessimistic attitudes. We subordinate our personal objectives to the Society's general ones. We ensure that there is no conflict between the two, and we act giving priority to the interests of the Company over personal interests or those of third parties. We do not engage in external interests that divert our time and attention from the responsibilities of the Company or require work during the time dedicated to social activity.

Honesty



All MIMCORD employees commit to disclosing any personal or professional relationships that could alter our behaviour as employees of the Company. In addition, as MIMCORD employees we do not accept any improper compensation or advantage. We instil honesty and professional ethics in the usual commercial and professional relationships while performing our work, both in the private sector and in our relations with the Public Administration. We do not offer gifts or promise inappropriate treatment to third parties, whether public or private, in order to obtain an advantage. We encourage the trust to disclose any gifts or advantages that we could obtain from third parties and make them available to the Company. Any personal or professional relationship that affects the interests of the Company is communicated to the immediate superior. We do not allow personal or family relationships in direct dependency or within the same organizational unit.

We avoid any conduct that is contrary to free competition or that involves an act of unfair competition. Advertising campaigns feature clear and truthful information.

Respect

Each and every one of us is responsible for creating an atmosphere of cordiality and kindness around us. We encourage an attitude of trust and respect among people. We embrace opinion, training and cultural diversity as a source of knowledge and view those as a competitive advantage. We are careful with the language we use when talking about third parties and we favour the non-existence of defamatory guidelines and comments inside and outside the organization. We promote respect for real equality of opportunities between men and women, transgender people and the LGBTI collective, avoiding any scenario of direct or indirect discrimination. No person employed at MIMCORD is discriminated in their professional environment by reason of their race, physical disability, religion, age, nationality, sexual orientation, gender, political opinion or social origin. Our working environment is free from any discrimination or conduct that implies a personal harassment. We cannot accept any form of physical, sexual, psychological or verbal abuse. We care for the environment and cooperate to support the sustainable development of the Company.

Confidentiality

We refrain from providing, internally or externally, confidential data about people and/or activities carried out in the Company. We provide, however, the data that is necessary for other MIMCORD employees to correctly carry out their function, with strict respect for this duty of confidentiality. We avoid any conduct that is contrary to free competition or that involves an act of unfair competition. In advertising campaigns we offer clear and truthful information. We apply principles of ethical behaviour, respect and confidentiality in the use of information. We comply with the legislation that regulates the protection of the personal data to which we have access owing to our job position. MIMCORD employees are characterized by a distinct proactive attitude in the treatment of confidential information. The information is the property of the Company and it must be shared whenever it is beneficial and necessary for it. Our conduct includes the following points:

- We provide our supervisors with truthful, necessary, complete and timely information about the progress of the activities carried out in our area; and we provide our colleagues with whatever information is necessary for the proper performance of their duties.

- We maintain the professional secrecy of the data, reports, accounts, balance sheets, strategic plans and other MIMCORD activities and their staff's; that is those which are not of a public nature, and whose publicity may affect the interests of the Company. We will not provide information about the above-mentioned, except when we are expressly authorized to do so.

- We obtain information from third parties in an ethical and legitimate manner, rejecting all information obtained improperly or that involves a violation of the company secrets or of its confidentiality.

- In the event of having doubts about the appropriate treatment of the information, we request the assessment of our supervisor about the correct handling of the same.

- We are not allowed to use any programs, computer systems, manuals, videos, courses, studies, reports, etc..., created, developed or perfected in MIMCORD, for our own purposes or for those of third parties, or for our own benefit or profit, since the Company invariably keeps the intellectual property of the same.

- In general terms, we maintain the strictest confidentiality in the use of internal knowledge outside the scope of MIMCORD, thus preserving our know-how.

- We will only use the computer systems, software, material, reports, etc... from which MIMCORD has acquired the corresponding license, respecting the intellectual and industrial property of those tools at all times.

- The use of computer equipment is subject to MIMCORD's information security policy in order to avoid any damage to third parties and/or to the company itself.

- We will not use our access to the systems to act fraudulently or for our own benefit.

10 Questions we should ask ourselves prior to making a decision in the workplace

Asking ourselves these questions will help us decide upon the behaviour to adopt.

1. Does it go against the work rules?
2. Does it look like it is the right thing to do?
3. Is it legal?
4. Will it have a negative impact on my reputation or on the company's?
5. Who else can be affected by this (other people in the entity, customers, suppliers...)?
6. Would I feel ashamed if others knew that I decided to act in this way?
7. Is there an alternative solution that may not raise an ethical conflict?
8. How would that make me look if it were published in the media?
9. What would a reasonable person think about it?
10. Will it be keeping me awake at night?

Principles of professional behaviour

Being passionate about customer service

All employees seek to offer our customers with a top quality product as well as provide exquisite service. Excellence and quality of service are constant action guidelines for us, promoting a healthy concern for continuous improvement. The resources provided by the company seek to enhance the innovation and the development of customer service, based on profitability criteria. All of us, regardless of the functional area in which we work, are committed to the satisfaction of our customers, encouraging honest attitudes towards them.

Efficient management

MIMCORD employees work efficiently during the work day, making the most of the time and resources that the company makes available to us in a rigorous and rational manner. We all provide the dedication that the performance of our functions requires, seeking to achieve the results in the most optimal and productive way possible. The Company makes all the necessary resources available to carry out our tasks and thus improve our performance and optimize our time and the access to information necessary to fulfil our daily responsibilities. Therefore, we must make appropriate and reasonable use of the above according to the professional needs of each and every one of us. During work hours we do not engage in any personal activities that may interfere with or prevent us from fulfilling our job responsibilities.

We use e-mail, Internet access and the Company's computer systems in general exclusively for professional purposes. Their usage for personal goals is expressly forbidden. We purposely authorize the Company to control the use of the above. Unacceptable use of Company communications systems includes processing, sending, retrieving, accessing, viewing, storing, printing, or otherwise disseminating materials and information that is fraudulent, abusive, threatening, illegal, racially, sexist, obscene, threatening, defamatory or in any other way



inconsistent with professional conduct. In terms of safety at work and professional healthcare, we will comply with preventive measures, using the individual and collective means of protection that the company has made available. If the employee is in charge of a group of people, measures will be taken to ensure that the members of the team carry out their activity in a safe environment.

Team attitude

The employees of the Company will favour teamwork and acknowledge the contribution of others in obtaining general results. As members of a team we contribute with equal commitment both inside and outside our area. Teamwork attitude predominates and stands out over any individual performance. An outstanding person is also defined as such because of their capacity to work as part of a team, and therefore there is no conflict between this behaviour and that of being excellent individually. Personal interest does not prevail over the interest of the team. We avoid passive attitudes: we do not get carried away and we do not stand aside. We encourage enthusiasm and commitment to the group and therefore to the organization. We act in a spirit of cooperation, making the knowledge and resources that facilitate the achievement of the company's objectives available to the other areas and departments of the entity.

Taking care of our reputation

We consider the image and reputation of the Company as one of its most valuable assets to maintain the trust of our customers. All the people involved in the Company care for the respect and correct usage of the corporate image and its reputation. Our brand image is visually reflected onto our Company logo, which has its own rules protecting its usage and that we must respect. We are extremely careful in every public appearance that we make, and we must have the necessary authorization to appear before the media, take part in professional conferences or seminars and in any public means of communication, provided they appear as MIMCORD employees. We are all part of the corporate image and therefore we assume an ethical and responsible conduct that allows us to preserve the image and reputation of the Company. Never will we act adopting behaviours which may compromise or damage the corporate image. Our way of communicating, conducting ourselves as well as our own personal image will be in line with the professional context in which we operate.

Professional development

Our professional growth and that of our teams of employees is key to our being competitive. As members of the company we are responsible for our professional growth, and consequently it is our duty to constantly upgrade our knowledge and techniques necessary for an efficient performance of our work. Employees who are in charge of a team of people must pay attention to the motivation and professional development of their collaborators, and must be committed to providing them with development opportunities based on merit and professional contribution. For this purpose, they will encourage their continuous learning, they will expressly acknowledge their efforts and they will objectively assess their achievements, drawing up the necessary action plans and support for such development to occur.



Entry into force of the code of conduct, interpretation and monitoring

The present Code of Ethical Conduct entered into force after its approval on 11th February, 2022. The present Code of conduct was implemented and approved, and it was ratified and approved by the Company's Board of Directors on the aforementioned date.

The Code will be forwarded to all the members of the Society. It will be in force as long as its modification or cancellation is not approved, which will be duly communicated.

Each and every one of us takes on the task to go through and follow this Code, and thus comply with all applicable laws, policies and guidelines. While this Code seeks to cover many of the situations we face every day at work, it cannot cover all circumstances.

You should then try to get help from:

- Your supervisor.
- Your HR manager.
- Your service coordinator if you are an external collaborator.

All professionals must report our supervisor about any conduct that we believe, in good faith, to be a violation of the Code of Ethical Conduct.

If any of the three supervisors mentioned above are involved in the situation we wish to report or they cannot or have not addressed our concerns properly, we will report to a more senior manager or to an area HR manager or to the Company's Criminal Compliance Officer.

The Factorial platform has been designated as the **internal communication channel** for filing any criminal compliance complaint, as all employees are familiar with it. This channel allows for reporting criminal behaviour or acts which are contrary to ethics, the current legislation, the present Code of Ethical Conduct, or to the good corporate governance practices that rule our Company, in a completely confidential and anonymous manner, if necessary.

We also make this **reporting channel** available to any collaborating agent of our Company (MIMCORD staff, customers, suppliers, and any collaborating company) to express any grievance with our company. The reporting channel can be accessed through the website <https://mimcord.com/en/code-of-conduct/>

We do not discriminate or retaliate against the employees who have, in good faith, reported a real and proven abuse. The person responsible for Regulatory Compliance will ensure the conformity with the present Code, will resolve incidents or doubts about its interpretation and will adopt the appropriate measures to secure better compliance.

Failure to comply with this code may lead to the adoption of disciplinary measures, including the possibility of dismissal and, where appropriate, the exercise of pertinent legal action.