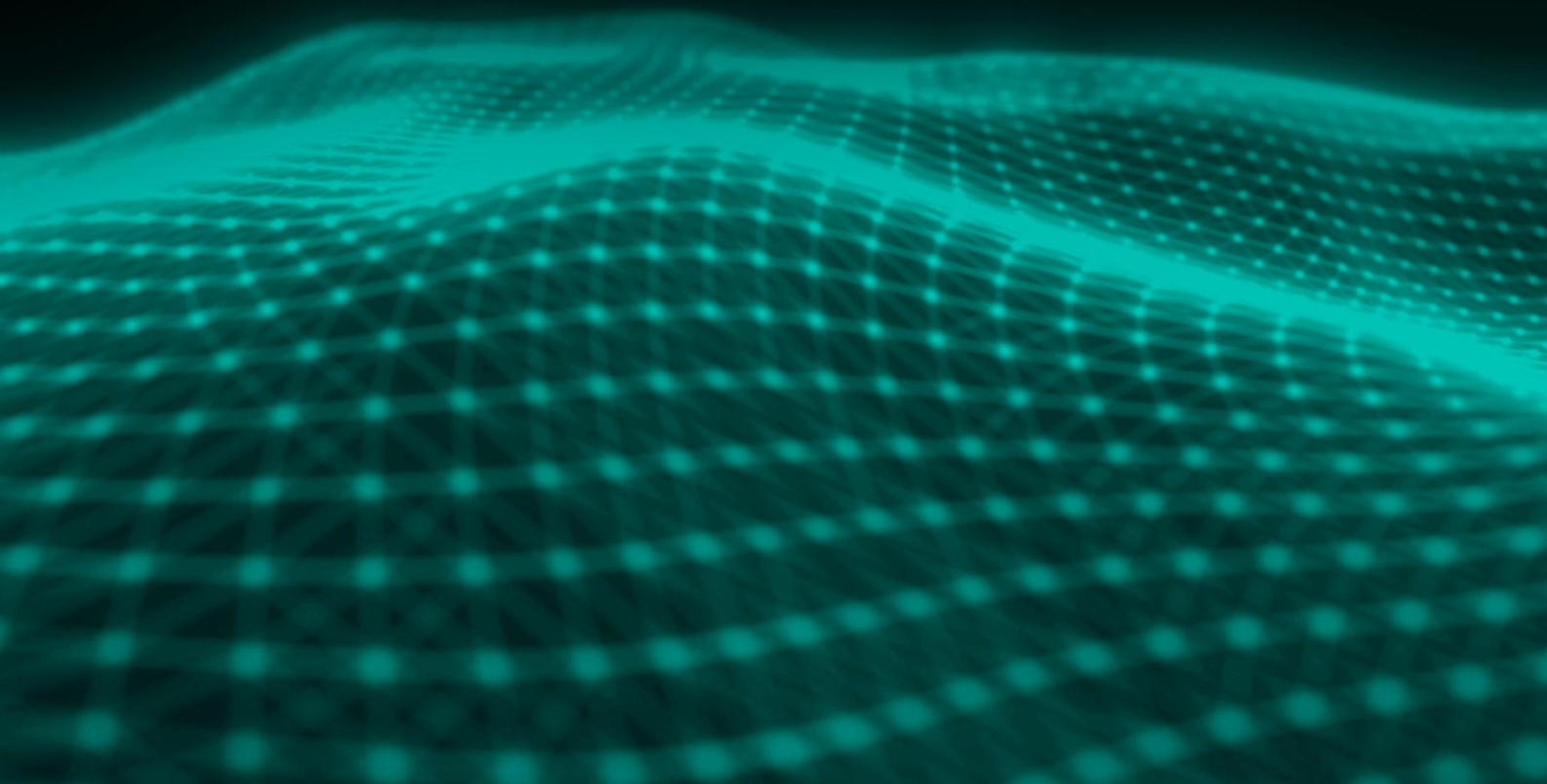




Code of Conduct and Professional Ethics



Datasheet

Classification	Public
Author	Responsible for Regulatory Compliance and Human Resources Management
Approval	Glantt Global Board of Directors

History and version control

Date	Version	Description
19/07/2023	1	Initial version
11/12/2024	2	Full review of the Glantt Global Brand

Index

1.	Introduction	5
2.	Subject Matter	6
3.	OUR CULTURE	7
	3.1 The principles we have adopted	8
	3.2 The leaders we want	8
4.	Professional behaviour	10
	4.1 Legal and regulatory compliance	10
	4.2 Prevention of corruption and related offences	10
	4.3 Intellectual and industrial property	11
	4.4 Information security	11
	4.5 Equal opportunities and non-discrimination	12
	4.6 Protection of personal data	12
	4.7 Compliance with financial regulations	12
	4.8 Compliance with competition regulations	12
	4.9 Occupational health and safety	13
	4.10 Environmental responsibility	13
	4.11 Proper utilisation of resources	13
	4.12 Real and honest communication	14
5.	Ongoing commitment	15
6.	Non-compliance	17
	6.1 Applicable Disciplinary Sanctions	17
7.	Approval and validity	19
8.	Dissemination and updating	20
9.	Annexes	21

1. Introduction

The Glantt Global Group has developed the present **Code of Conduct and Professional Ethics** to define and help its employees understand the principles and core values it upholds, as well as to identify and establish the standards and norms of action in terms of professional ethics.

We must be governed by the highest standards of behaviour towards our shareholders, customers, suppliers, partners, as well as other stakeholders.

This commitment is fully aligned with our **Culture, Mission, Core Values and Vision** and applies to all Glantt Global entities (hereinafter jointly referred to as "**Glantt Global**") and their governing body members, as well as all employees, regardless of the contractual relationship they have with Glantt Global and where they are based.

Compliance with the regulations and principles set out in this Code is required of everyone and applies to all interactions carried out on behalf of Glantt Global, and is therefore a mandatory document whose main purpose is to provide clear guidance so that we can all adopt behaviours that comply with the highest ethical standards required, promoting integrity in all our professional actions.

Responsibility for updating and publicising this Code of Conduct lies with the Regulatory Compliance Officer and the Human Resources Department (People), who will ensure that all Glantt Global employees are fully informed and aligned with the principles set out here. However, **it is the responsibility of each employee to know and comply**

with the principles and standards set out in the present Code.

This document is very detailed, but it cannot anticipate everything and every circumstance. If doubts arise about any aspect of the Code of Conduct, employees should seek appropriate guidance to ensure proper understanding and compliance. For clarification of issues relating to conflicts of interest and the prevention of corruption, employees should contact Glantt Global's Regulatory Compliance Officer. For other questions, they can consult their line manager or the Human Resources Department.

Compliance with this Code of Conduct does not exempt anyone from reading and being acquainted with the other applicable internal regulations and policies, specifically the following ones:

- ✓ Regulation of the Internal Complaints and Whistleblowing Channels;
- ✓ Plan for Gender Equality;
- ✓ Anti-corruption policy;
- ✓ Code of Safe Conduct on information security.

In accordance with legal requirements, or in response to specific circumstances, it may be necessary to draw up additional policies, procedures or documents for the different organisational units of Glantt Global. In said cases, the principles set out in this Code must be strictly observed.






2. Subject Matter

This Code of Conduct strictly follows the principles of the United Nations Global Compact, encompassing social responsibilities, respect for human rights, fair labour practices and environmental protection, as well as the guidelines imposed by the General Framework for the Prevention of Corruption, identifying both the risks of exposure to this type of infraction and the potentially applicable sanctions in the event of non-compliance, actively promoting the fight against corruption and related infractions within the Organisation.

We follow a zero tolerance policy towards any form of discrimination, including but not limited to race, colour, nationality, social origin, age, gender, marital status, sexual orientation, ideology, political opinion, religion or any other personal, physical or social condition.

Promoting equal opportunities is therefore a priority, as is rejecting any form of harassment, abuse of authority, violence or conduct that could create an intimidating or offensive working environment.

The present document has been developed with the following key objectives:

-  **Disseminate Guiding Principles:** Share the fundamental principles that guide Glintt Global's activity, both internally and to society and citizens;
-  **Establish Regulations of Conduct:** Define and describe the guidelines for action and the regulations of conduct, of an ethical and deontological nature, which must be fully observed by all Glintt Global employees and entities;
-  **Promote the Adoption of Principles:** Encourage the consistent application of these principles and regulations in Glintt Global's internal and external relations;
-  **Strengthen the Institutional Image:** Consolidate Glintt Global's institutional reputation, emphasising its commitment to integrity and professional ethics;
-  **Comply with Legal Duties:** Comply with the duties established by the General Framework for the Prevention of Corruption, as set out in the annex to Decree-Law no. 109-E/2021, of 9 December.

3. OUR CULTURE

Our culture is what sets us apart. Our people are what make us unique.

We encourage a culture of innovation, where bold ideas are nurtured and creativity is valued. **We embrace** adaptability by promoting a growth mindset, allowing our team to evolve in a rapidly changing environment and encouraging each employee to embrace new challenges and opportunities. **We foster a culture of empathy** by encouraging our team members to understand and support each other, creating an inclusive, stimulating and collaborative working environment. **We provide** opportunities for continuous learning and knowledge sharing, ensuring that our collective expertise drives our success.

We share core **values** that guide our daily operation and determine how we make our decisions and who we are:

01 People

At the centre of our technological innovations is an unwavering commitment to improving the quality of life for all people. Every solution we develop is created with a human touch, thus ensuring that our technology brings positive, tangible change to everyone who uses it.

02 Experience

We have a deep and broad knowledge of technology. We explore every dimension, connecting all the pieces of information and know-how we have gathered. We make sure our customers get intelligent, well-informed solutions designed to meet not only today's challenges, but also those that may arise tomorrow.

03 Commitment

Our commitment to customers, partners and society is deep-rooted. We prioritise long-lasting, trusting relationships, staying close to them and understanding their needs. This helps us to provide technological solutions with precision and reliability. Working together, we make a positive difference, both in the world of technology and in the communities around us.

04 Ambition

We are never satisfied with the *status quo*. Our insatiable curiosity and progressive mindset lead us to constantly challenge the limits, aspire for more and question conventional thinking. We believe in the transformative power of technology and are constantly redefining the horizons of its potential, ensuring that we remain at the forefront of innovation.

3.1 The principles we have adopted

We are a group of more than 1,200 people dedicated to community pharmacy services, hospital pharmacies, hospitals, clinics, as well as application and infrastructure consultancy, with a complete range of services and a 360° vision of each of the markets in which we operate.

In our management, and in terms of professional ethics, we have adopted the following key principles:

Commitment and Responsibility

We have made a serious commitment to our shareholders, customers, employees, partners and our community;

Honesty and Integrity

We operate with honesty, integrity and mutual respect in all interactions;

Trust and Excellence

We promote trust, initiative, as well as excellence in the service we provide;

Transparency and accountability

We maintain transparency in our relationships, taking responsibility for the consequences of the decisions we make and the actions we take;

Awareness and Ethics

We raise awareness and demand individual ethical behaviour;

Risk minimisation

We work to minimise the risk of unethical or illegal practices;

Creating Sustainable Value

We focus on creating long-term sustainable value;

Quality of Life

We seek to improve people's quality of life;

Environmental Impact

We reduce the environmental impact of our activities;

Resource Management

We ensure proper and efficient management of our assets and resources;

Monitoring and recording

We monitor and record all our activities to ensure compliance and quality;

Teamwork and professionalism

We value teamwork and professionalism in all our endeavours;

The inspiration of leadership

We expect managers to set standards of ethical behaviour and responsibility and to become role models.

The set of regulations, principles and core values included in this document constitute the ethical model of behaviour that should inspire and govern the operations of all Glantt Global employees at all times.

3.2 The leaders we want

It is expected that the members of the corporate and management bodies at Glantt Global will lead by example and act as role models.

As such, it is your responsibility to:

- ✓ **Ensure Understanding of Responsibilities:** Ensure that all employees under your supervision understand their responsibilities, internal regulations, as well as applicable legislation;
- ✓ **Disseminate the Guidelines for Action:** Discuss this Code of Conduct with employees, stressing the

importance of adopting upright, ethical and responsible behaviour;

- ✓ **Support and Listen to the Team:** Ensure that your team members know they can seek clarification and express concerns without fear of retaliation, and respond appropriately and attentively;
- ✓ **Never ignore misconduct:** Never overlook acts of misconduct or retaliation against employees;
- ✓ **Avoid Retaliation:** Do not retaliate against an employee who, in good faith, has reported offences or irregularities through the appropriate channels;
- ✓ **Never Encourage Unethical Conduct:** Never incite or instruct employees to achieve results or deals that violate ethical conduct, internal standards or applicable legislation;
- ✓ **Act Against Infringements:** Act promptly to stop any non-compliance with this Code of Conduct, other internal regulations or applicable legislation by the employees they are responsible for supervising;
- ✓ **Promote Guidance and Counselling:** Provide guidance and counselling on the provisions of this Code of Conduct and any other applicable internal regulations.

4. Professional behaviour

4.1 Legal and regulatory compliance

In all our actions we must operate in accordance with the applicable legislation and the internal regulations in force.

Said commitment includes, to the extent necessary, close co-operation with the competent authorities to ensure fully compliance with Glantt Global's legal and regulatory duties.

In addition, it is imperative to guarantee the accuracy and integrity of all internal documents, ensuring that the information circulating within the organisation, and which is eventually reported to external entities, is correct, complete and reliable. Such behaviour is crucial to maintaining Glantt Global's trust and credibility with its stakeholders and regulatory authorities.

4.2 Prevention of corruption and related offences

4.2.1 Corruption and related offences

Members of the governing bodies and employees of Glantt Global are strictly prohibited from offering, promising or granting undue benefits, financial or otherwise, which could jeopardise the principles and core values set out in this Code. Glantt Global adopts a zero tolerance policy towards corruption, fraud, bribery or any related offence, and employees who commit said offences may incur disciplinary, civil and criminal liability under the legally applicable terms detailed in **Annex I** of this Code of Conduct.

We are fully committed to strictly complying with the law, ensuring that all our operations are conducted with integrity and transparency.

To said end, Glantt Global appointed a Regulatory Compliance Officer and a Plan for the Prevention of Corruption Risks and Related Offences (PPRO) was drawn up, which describes the Regulatory Compliance Programme adopted by the Group, establishing the activities to be duly carried out by the bodies involved in its implementation and execution.

The PPRO, the main aim of which is to constantly update internal policies and procedures in order to prevent and mitigate the impact and likelihood of crimes being committed within the Organisation, will be continuously monitored and updated whenever necessary in the light of internal or legislative changes and, in any case, reviewed every three years.

4.2.2 Conflicts of interest

Glantt Global is fully committed to maintaining impartiality and impartiality in all decision-making processes and actions, which is particularly relevant in situations where potential conflicts of interest involving Glantt Global or its employees may arise. Employees are strictly prohibited from using information obtained as a result of their employment relationship with Glantt Global for their own benefit or that of third parties. Said prohibition is intended to guarantee integrity and fairness in Glantt Global's operations, avoiding any undue advantage that may result from the improper use of confidential information.

When situations arise in which there is a potential conflict between employees' personal interests and their duties of loyalty to Glantt Global, it is mandatory for the employee to immediately report the situation to their line manager or the Regulatory Compliance Officer. In addition, the employee must refrain from participating in any decision-making process related to the conflict in question, to ensure that the decision is taken objectively and impartially.

4.2.3 Gifts and invitations

In the performance of their duties, Glantt Global employees must not offer or accept gifts, favours, advantages or invitations (for themselves, family members or third parties), unless they are of irrelevant or symbolic economic value and correspond to customary gestures of courtesy, respect or invitation, in accordance with social customs, provided that they are within sensible and reasonable limits.

Under no circumstances will gifts, favours, advantages or invitations be accepted that are prohibited by applicable legislation, that could compromise the professionalism or independence of Glantt Global employees, or that could influence professional decision-making.

Glantt Global employees may not, directly or indirectly, through third parties:

- ✓ Promising, offering or granting unjustified advantages or benefits with the immediate or mediate aim of obtaining a present or future benefit for Glantt Global, themselves or third parties.
- ✓ Receiving, requesting or accepting benefits or advantages of any kind to unduly favour third parties in the contracting of goods or services or in business relations with Glantt Global.

4.2.4 Relations with public and government officials

Glantt Global employees must be aware of and strictly comply with the regulations governing business relations, negotiations and contractual terms with public and government entities, as well as with their employees. It is crucial to know and ensure compliance with the legal requirements applicable to doing business with public entities, both nationally and internationally.

In all interactions, behaviour that could be construed as attempts to influence public officials in the performance of their duties must be refrained from. This conduct includes strict compliance with the prohibition on offering or accepting gifts, favours, advantages or invitations prohibited under the terms of the previous point, to said officials.

4.2.5 Political neutrality

Glantt Global strives for political neutrality and strict non-partisanship. It therefore prohibits making any kind of contribution to political parties in its name and/or on its behalf.

Any political activity or participation by employees must be carried out exclusively in their personal name, without any association with Glantt Global.

4.2.6 Participation in events

For Glantt Global, scientific and professional meetings include all events involving health professionals, technology or related areas. Said meetings can influence decisions, especially in the health sectors and in the technological offerings that Glantt Global is active in.

The participation of employees in said events, whether as speakers, moderators, participants or in any other capacity, must be previously communicated to, and duly authorised by, their line manager. This approval must be express and be taken after a careful assessment of all the relevant criteria, as established by Glantt Global's internal guidelines.

4.3 Intellectual and industrial property

Glantt Global employees must protect the tangible and intangible assets entrusted to them, including computer systems, intellectual and industrial property, regardless of whether they were produced by them. Their use must be strictly limited to carrying out their duties and business processes, ensuring efficient use of available resources.

It is forbidden to use computer programmes or any other content that could cause damage to Glantt Global's assets or those of third parties. Employees must respect the intellectual and industrial property rights of third parties and not use third-party information acquired during previous professional activities without proper authorisation. In addition, any third-party content used in publications must be correctly cited.

Glantt Global owns the property and the rights to use and exploit all computer programmes and systems, manuals, studies, reports, opinions, legal documents, contracts and any other work produced by employees as part of their professional duties. This acknowledgement ensures that all products and documents generated in the course of their duties belong to Glantt Global, thus preserving its intellectual and industrial property rights.

4.4 Information security

Glantt Global employees must maintain absolute confidentiality with regard to all information to which they have access, regardless of its origin or format, unless otherwise stated.

All information is considered confidential and is subject to a permanent duty of secrecy. The use of information must be limited exclusively to the purpose for which it was obtained, respecting the security policies and standards for the use of computer devices and systems established by Glantt Global and legitimate third parties.

It is imperative to treat all information with due care, preserving its confidentiality and preventing its unauthorised dissemination. Disclosure of non-public information to third parties is strictly prohibited. Employees must strictly follow Glantt Global's internal regulations on the use of information and keep up to date with any changes in technical security measures to ensure the continued protection of information.

4.5 Equal opportunities and non-discrimination

Glantt Global employees must respect the dignity and diversity of people by complying with all applicable laws and standards relating to human rights and fair labour practices. This includes the prohibition of slavery, forced labour, child labour, human trafficking and sexual exploitation.

It is crucial not to condone any discriminatory behaviour, especially in interview and recruitment processes, access to training, career progression, performance evaluation and termination of employment.

Each employee must be treated fairly and with equal opportunities, promoting their professional and personal development through incentives for active participation and training programmes. Evaluations must be conducted in a fair, clear and rigorous manner, using methods that are previously disclosed to those being evaluated in order to guarantee transparency and fairness.

At Glantt Global we believe that a world of equality is not made up of equal people, but of people with equal rights to be different.

4.6 Protection of personal data

Glantt Global is fully committed to complying with legislation on the protection and processing of personal data. It has manuals, policies, as well as procedures for managing personal data processing activities, respecting the rights of data subjects, responding to requests and including specific clauses in agreements. Said documents are regularly updated to adapt to internal and legislative changes.

Glantt Global has appointed a Data Protection Officer (DPO) to manage and control the protection of personal data. Its duties include organising and managing processing

activities, designating those responsible, supervising compliance with the law, coordinating impact assessments and operating as a point of contact with the CNPD and interested parties. Data subjects can request access to information, rectification, restriction of processing, portability and forgetting/destruction of their data.

Glantt Global is fully committed to protecting any and all confidential information, in accordance with applicable laws and regulations, as well as to guaranteeing each employee's right to privacy. Confidentiality is ensured in the collection, processing, storage and transfer of personal data of employees, suppliers, customers or other interested parties, and access to said data is done in a legitimate manner, requesting authorisation whenever necessary.

4.7 Compliance with financial regulations

Glantt Global employees must strictly comply with the procedures established for the prevention and detection of illegal practices in financial and accounting matters, including money laundering.

It is paramount to ensure the reliability and accuracy of the accounting records of the Group's different entities, guaranteeing transparency and integrity in their accounting and in the financial operations they carry out.

4.8 Compliance with competition regulations

Glantt Global employees must ensure strict compliance with all competition legislation governing their operations, avoiding abusing any dominant position they may hold in the markets.

It is paramount not to induce customers or competitors to breach agreements with third parties and to refrain from obtaining illicit access to confidential information or using unfair means to gain competitive advantage.

In addition, it is crucial to avoid any anti-competitive behaviour, such as agreements or joint actions with competitors to fix prices, manipulate bid tenders, divide markets or customers, limit distribution or set minimum resale prices. Employees must avoid making false, misleading or derogatory statements about competitors, and

refrain from any other unacceptable activity or practice that could damage Glantt Global's reputation.

Compliance with applicable competition and antitrust laws is mandatory in all countries where the Group operates, ensuring fair and ethical competition.

4.9 Occupational health and safety

Glantt Global is firmly committed to complying with regulations on the prevention of occupational risks and to continuously improving its risk management systems. It has manuals, protocols, plans, as well as recommendations aimed at preventing occupational risks and promoting the well-being of its employees in the workplace, with a focus on risks related to physical load, environmental conditions and psychosocial aspects.

Glantt Global employees must strictly comply with occupational health and safety regulations, maintaining a firm commitment to occupational risk prevention standards and the continuous improvement of risk management systems. In addition, it is strictly forbidden to possess, distribute, use or trade illegal substances on Glantt Global premises, as well as to perform duties under the influence of drugs or alcohol.

The well-being of employees is of fundamental importance to Glantt Global, and it is key to create a positive and collaborative working environment, promoting the sharing of information, team spirit and mutual help to achieve common goals.

4.10 Environmental responsibility

Employees must integrate sustainable practices into all operations and activities, promoting a reduced environmental impact and fostering a culture of sustainability that involves all colleagues and partners. Commitment to environmental responsibility is an integral part of our long-term strategy, reflected in actions that contribute to the preservation of the environment and the well-being of the communities where we operate.

Employees must act to reduce the company's carbon footprint, adopting measures to reduce greenhouse gas emissions and promoting the use of renewable energy

sources whenever possible. Operational processes should follow efficiency criteria to minimise environmental impact, such as route optimisation or efficient travel, contributing to a significant reduction in emissions.

Natural resources must be managed consciously and rationally, implementing practices that guarantee the efficient use of water and energy, as well as promoting the recycling and reuse of materials.

Minimising waste and pollution is a priority, and policies of reduction, reuse and recycling are promoted in all activities. Strict guidelines are followed for the handling, storage and disposal of substances that are potentially harmful to the environment. Our company adopts measures to reduce the emission of pollutants in all media and promote the recycling of materials, particularly electronics, with the aim of minimising environmental impact and promoting responsible disposal practices.

Environmental responsibility also extends to our supply chain, where we carry out an ESG maturity survey of our suppliers, promoting responsible and transparent practices. We aim to encourage partners to comply with environmental regulations and adopt sustainability initiatives, in order to strengthen relationships based on trust and commitment to positive impact throughout the supply chain.

4.11 Proper utilisation of resources

Employees must fully respect copyright and strictly comply with the laws and policies relating to the use and copying of computer programmes used at Glantt Global. It is crucial to use corporate equipment and systems exclusively for professional purposes and in connection with the role performed.

Personal use should be minimised and only carried out when it does not interfere with the diligent and punctual fulfilment of work activities and duties, and whenever it does not disturb other employees. In addition, all personal emails must be clearly labelled as such.

It is forbidden to transmit any abusive, violent, discriminatory or illicit content through Glantt Global's systems and equipment. Employees must not use company resources to send, receive, retrieve or store abusive, aggressive, sexual, discriminatory or offensive information,

or content that involves the risk of spreading viruses or that could cause damage or lead to liability for Glantt Global.

4.12 Real and honest communication

Glantt Global employees have a responsibility to represent Glantt Global with integrity, protecting its reputation as an ethical and trustworthy organisation. It is key that all communications about products, services and prices are always truthful, accurate and not misleading, ensuring an honest and clear presentation to the public and customers.

In addition, when promoting the benefits of Glantt Global products or services, it is paramount to avoid statements that could disparage or falsely represent the competition. Comparative advertising must be conducted in a fair and transparent manner, without resorting to misleading or unfair information, and always with scientific support when necessary. Said practices help maintain Glantt Global's integrity and promote healthy competition in the market.

Glantt Global employees must also strictly respect internal guidelines regarding official publications on social networks and communication with the media. It is key to fulfil the duties of loyalty, confidentiality and urbanity, ensuring that all communications and publications are respectful and appropriate.

It is imperative to avoid behaviour that could be offensive, discriminatory, defamatory or inappropriate. In addition, employees must ensure that they do not breach the duty of confidentiality or damage the prestige and reputation of Glantt Global in any personal publications or statements made to the media. Maintaining a high standard of conduct is fundamental to preserving Glantt Global's image and integrity.

5. Ongoing commitment

Glantt Global's activity aims to provide customers with the highest quality solutions and added value in all the services offered, based on ethical principles and conduct, with the utmost commitment to the interests of all parties.

To said end, we committed ourselves:

5.1 With the community

- ✓ To promote and participate in initiatives that stimulate social awareness in everyone;
- ✓ To maintain a close relationship with the aim of understanding the needs of the community, respecting its cultural integrity and endeavouring to contribute to improving people's living conditions;
- ✓ To seek energy efficiency and helping to implement more sustainable lifestyles;
- ✓ To promote sustainable development, integrating environmental concerns into economic growth and the evolution of future generations;
- ✓ To ensure that any information disseminated through the media is informative and truthful, as well as that respects the cultural and ethical parameters of the community and the dignity of the human person.

5.2 With shareholders and partners

- ✓ To operate with the aim of generating shareholder value and promoting the interests of shareholders;
- ✓ To safeguard the interests of shareholders and partners;
- ✓ To share all necessary information in a clear, truthful and intelligible manner to all shareholders and partners, promoting free and informed decision-making;
- ✓ To adopt the best corporate governance standards.

5.3 With customers

- ✓ To treat customers with professionalism, respect and loyalty;
- ✓ To distribute goods and providing quality services;
- ✓ To provide the necessary, truthful and clear information, in good time, so that the customer's decision is free and informed;

- ✓ Scrupulously fulfil the conditions assumed and contracted.

5.4 With suppliers

- ✓ To adopt clear, transparent and impartial criteria when choosing suppliers;
- ✓ To treat all suppliers respectfully;
- ✓ To fulfil all commitments on time;
- ✓ To choose suppliers who adopt high standards of working conditions, health, safety and well-being of their employees, environmental management or who undertake to adopt such measures;
- ✓ To ensure compliance with the ethical and behavioural standards of this Code;
- ✓ To ensure that all agreements entered into are first reviewed by the Legal Department before they are signed, with a view to guaranteeing their legality and compliance with the principles set out in this Code of Conduct.

5.5 With employees

- ✓ To respect and encourage a balance between personal, family and professional life;
- ✓ To adopt a cordial and respectful demeanour, based on cooperation and clear and truthful communication;
- ✓ Not tolerating any behaviour of moral or sexual harassment, physical or verbal abuse, with the aim or effect of disturbing or embarrassing, affecting dignity and which may contribute to a hostile or offensive, intimidating, degrading, humiliating or destabilising work environment;
- ✓ To operate with courtesy, dignity and respect, regardless of ethnicity, gender, age, physical status, marital status, sexual orientation or religious confession;
- ✓ To keep the privacy of employees private;
- ✓ To treat all employees fairly and with equal opportunities, guaranteeing an inclusive and respectful working environment, assuming continuous compliance with the Gender Equality Plan in force;
- ✓ To implement a comprehensive ongoing training plan, covering a variety of areas relevant to their professional and organisational development.

6. Non-compliance

It is the responsibility of each employee to know and fully comply with the regulations, principles and guidelines for action set out in this Code of Conduct.

Its fulfilment and the duties stipulated are, with the necessary adaptations, also applicable to proxies, as well as representatives and service providers who are in any way authorised to operate on behalf of Glantt Global entities, such as on business trips, meetings, conferences and training.

Any behaviour that breaches the regulations established in this document may result in serious and adverse consequences for Glantt Global, including reputational damage. Said behaviour will result in any and all corrective actions deemed appropriate, as well as the disciplinary actions applicable to infractions under the terms of the legislation in force, and as such must be promptly communicated by Employees who become aware of them.

The report must be made through **Glantt Global's Internal Whistleblowing and Whistleblowing Reporting Channels**, available on the corporate website via the following link <https://Glantt.Global.whistlelink.com>, guaranteeing protection against retaliation and that the process will be conducted confidentially.

For more information on this subject, readers can refer to Glantt Global's Internal Whistleblowing and Reporting Channels Regulations, available at the link above.

Employees who breach this Code of Conduct or other applicable internal or legal regulations may incur penalties:

- ✓ **Disciplinary responsibility**, and may even be subject to a penalty of dismissal with just cause, if the respective conditions are met;
- ✓ **Civil liability**, under the general terms legally applicable;
- ✓ **Criminal liability**, in general terms, if the conduct constitutes a typical offence provided for by law, namely the criminal sanctions listed in **Annex I** of this Code.

Suppliers and service providers to whom this Code of Conduct is applicable are subject to the measures or sanctions established in the contract or others that result from a decision by Glantt Global.

6.1 Applicable Disciplinary Sanctions

Whenever Glantt Global becomes aware of any behaviour that may constitute a violation of the regulations set out in this Code of Conduct, the appropriate disciplinary procedure will be initiated with a view to applying one of the sanctions provided for by law, or, if necessary, a prior investigation. Employees subject to disciplinary action have the right to be heard, under the terms of the law.

In accordance with current legislation, Glantt Global may apply the following sanctions to its employees when exercising its disciplinary powers:

- ✓ Reprimand;
- ✓ Recorded reprimand;
- ✓ Financial penalty;
- ✓ Loss of holiday days;
- ✓ Suspension from work with loss of pay and seniority;
- ✓ Dismissal with just cause (dismissal without the right to indemnity or compensation).

While complying with the rights and principles in force, the Glantt Global entities reserve the right to carry out any and all investigative measures they deem necessary or convenient to ascertain the facts. The information gathered as part of the investigation process will be processed and duly archived in accordance with the applicable legislation on the protection and processing of personal data.

7. Approval and validity

The Code of Conduct and Professional Ethics is duly approved by the Board of Directors of Glantt Global, S.A. and is applicable to all Glantt Global entities.

This document shall enter into force immediately after its approval.

8. Dissemination and updating

This document, as well as its successive amendments, revisions or updates, will be shared on the corporate intranet and website, and will be made available to all Employees in printed and/or digital format.

Employees must sign a declaration confirming that they have received, read, as well as understood this Code of Conduct, and that they undertake to comply with and enforce its provisions, in accordance with the model in **Appendix II** to this document.

This Code of Conduct **must be reviewed every 3 (three) years** from the last review or whenever there is a change in the duties or in the organisational or corporate structure of Glantt Global's entities that justifies a review of the principles, core values and regulations of action of all its managers and employees in terms of professional ethics.

9. Annexes

- **ANNEX I** - Criminal Sanctions Associated with Acts of Corruption and Related Offences;
- **ANNEX II** - Declaration of Knowledge and Commitment to Compliance.

Annex I

Criminal Sanctions Associated with Acts of Corruption and Related Offences

i. Active Corruption - Article 374 of the Penal Code

- ✓ Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or pledges an official, or a third party on their recommendation or with their knowledge, a pecuniary or non-pecuniary advantage, for the purpose of carrying out an act or omission contrary to the duties of office, even if prior to that acceptance, shall be punished with imprisonment of one to five years. Attempts are punishable if the offence is punishable by more than 3 years in prison, with the maximum sentence being reduced by one third and the minimum sentence by one fifth.

- ✓ If the act or omission is not contrary to the duties of office and the advantage is not due, the conduct is punishable by imprisonment for up to three years or a fine of up to 360 days. Attempts are punishable, with the maximum prison sentence being reduced by one third and the minimum legal limit being reduced to one month, and the maximum fine being reduced by one third and the minimum limit being reduced to a 10-day fine (each day of the fine corresponds to an amount between €5 and €500).

Examples:

A manager or employee of a legal person pays a certain amount of money to an official of a public body in order to award an agreement or obtain a licence in violation of the public procurement procedure or the applicable legal regulations.

A manager or employee of a legal person pledges to pay a public official a certain amount of money to speed up the examination of a certain claim.

ii. Undue Offer of Advantage - article 372, no. 2 of the Penal Code

- ✓ Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or pledges a public official, or a third party on their recommendation or knowledge, a pecuniary or non-pecuniary advantage that is not due to them, in the course of their duties or because of them, shall be punished with imprisonment of up to 3 years or a fine of up to 360 days.

- ✓ Behaviour that is socially appropriate and conforms to custom will not be punishable.

Example: At Christmas time, a manager or employee of a legal person gives a gift of high value to a civil servant who carries out relevant duties in the context of supervising the activity carried out by the company.

iii. Influence peddling - article 335 of the Penal Code

- ✓ Anyone who, by themselves or through an intermediary, with their consent or ratification, requests or accepts, for themselves or for a third party, a pecuniary or non-pecuniary advantage, or the pledge thereof, in order to abuse their control, real or supposed, over any public body, shall be punished:
 - With imprisonment of 1 to 5 years, if a more serious penalty does not apply by virtue of another legal provision, if the purpose is to obtain a favourable unlawful decision;
 - With imprisonment of up to 3 years or a fine, if a more serious penalty does not apply by virtue of another legal provision, if the aim is to obtain a favourable legal decision.

- ✓ Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or pledges a pecuniary or non-pecuniary advantage to the parties referred to in the previous paragraph for the purposes set out in point a) shall be punished with imprisonment of up to 3 years or a fine.

Example: A manager or employee of a legal person gives a sum of money to a friend of a civil servant so that the latter will intercede with the civil servant for the approval of a project submitted to a public body.

iv. Active Corruption to the detriment of International Trade - article 7 of Law no. 20/2008 of 21 April

- ✓ Anyone who, by themselves or with their consent or ratification, through an intermediary, gives or pledges a national, foreign or international organisation official, or a national or foreign political office-holder, or a third party with their knowledge, a pecuniary or non-pecuniary advantage which is not due to them, in order to obtain or retain a business deal, an agreement or any other undue advantage in international trade, shall be punished with imprisonment from 1 to 8 years.

Example: A manager or employee of a legal person, through the conclusion of a consultancy agreement with a third party, pays certain sums of money to a foreign official for the award of an agreement in that territory.

v. Passive Corruption in the Private Sector - Article 8 of Law no. 20/2008 of 21 April

- ✓ A private sector worker who, by itself or, with its consent or ratification, through an intermediary, requests or accepts, for itself or for a third party, without being owed, a pecuniary or non-pecuniary advantage, or the pledge thereof, for any act or omission that constitutes a violation of its functional

duties, shall be punished with imprisonment of up to 5 years or a fine of up to 600 days.

- ✓ If the act or omission is likely to cause a distortion of competition or damage to the property of a third party, the perpetrator shall be punished with imprisonment of between 1 and 8 years.

Examples:

A director of a private sector company accepts a sum of money to award an agreement to a supplier, without consulting the market and to the detriment of the company and its competitors.

An employee makes commercial information available to a competitor's representative, under confidentiality or professional reservation, in return for a pledge of payment.

vi. Active Corruption in the Private Sector - article 9 of Law no. 20/2008, of 21 April

- ✓ Anyone who, by themselves or with their consent or ratification, through an intermediary, gives or pledges a private sector worker, or a third party with their knowledge, a pecuniary or non-pecuniary advantage that is not due to them, for any act or omission that constitutes a breach of their functional duties, is punishable by imprisonment for up to three years or a fine. Attempts are punishable, with the maximum prison sentence reduced by one third and the minimum legal limit reduced to 1 month, and the minimum fine reduced by one third and the maximum legal limit reduced to 10 days' fine (each day's fine corresponds to an amount between €5 and €500).
- ✓ If the conduct is intended to obtain or is likely to cause a distortion of competition or damage to the property of third parties, the perpetrator shall be punished with imprisonment of up to 5 years or a fine of up to 600 days. Attempts are punishable and the penalty is reduced by a third at the maximum and a fifth at the minimum.

Examples:

A manager or employee of a legal person offers a sum of money to a director of a customer company to obtain the award of an agreement, without consulting the market and to the detriment of that company and its competitors.

A manager or employee of a legal person in the private sector pledges a payment to an employee of a competing company so that the latter makes commercial information available under cover of secrecy or professional secrecy in order to obtain an advantage over the competition.

vii. Undue Offer of Advantage - article 16, no. 2, of Law no. 34/87, of 16 July (Crimes against Political Office Holders)

- ✓ Anyone who, by itself or through an intermediary, with its consent or ratification, gives or pledges to a holder of political office or high public office, or to a third party on his/her recommendation or knowledge, a pecuniary or non-pecuniary advantage that is not due to it, in the exercise of its functions or because of them, shall be punished with imprisonment for up to 5 years or a fine of up to 600 days.
- ✓ Excluded from the previous paragraph is behaviour that is socially appropriate and conforms to custom.

Example: A manager or employee of a legal person gives a minister a gift worth €5,000.00, and no payment is due.

viii. Active Corruption - Article 18 of Law 34/87 of 16 July (Crimes against Political Office Holders)

- ✓ Anyone who, by themselves or through an intermediary, with their consent or ratification, gives or pledges a holder of political office or high public office, or a third party on their recommendation or with their knowledge, a pecuniary or non-pecuniary advantage for the performance of any act or omission contrary to the duties of office, even if prior to that

request or acceptance, shall be punished with imprisonment for 2 to 5 years.

- ✓ If the act or omission is not contrary to the duties of office and the advantage is not due, the agent will be punished with imprisonment for up to 5 years.

Example: A manager or employee of a legal person pays a certain amount to a minister for the award of an agreement.

ix. Money laundering - article 368-A of the Penal Code

- ✓ Advantages are considered to be assets derived from the practice, in any form of co-participation, of the typical illicit activities of:
 - Pimping, sexual abuse of children or dependent minors, or child pornography;
 - Computer and communications fraud, extortion, abuse of a guarantee card or payment card, device or data, counterfeiting of currency or similar securities, depreciation of the value of currency or similar securities, passing counterfeit currency in agreement with the counterfeiter or similar securities, passing counterfeit currency or similar securities, or acquiring counterfeit currency to be put into circulation or similar securities;
 - Computer forgery, counterfeiting of cards or other payment devices, use of counterfeit cards or other payment devices, purchase of counterfeit cards or other payment devices, preparatory steps for counterfeiting, purchase of cards or other payment devices obtained through computer crime, damage to computer programmes or other data, computer sabotage, illegitimate access, illegitimate interception or illegitimate reproduction of a protected programme;
 - Criminal association;
 - Terrorist offences, offences related to a terrorist group, offences related to terrorist activities and terrorist financing;
 - Trafficking in narcotics and psychotropic substances;
 - Arms trafficking;

- Human trafficking, aiding illegal immigration or trafficking in human organs or tissues;
- Damage to nature, pollution, activities dangerous to the environment, or danger to animals or plants;
- Smuggling, smuggling for circulation, smuggling of goods with restricted circulation on vessels, tax fraud or fraud against social security;
- Traffic in influence, undue receipt of an advantage, corruption, embezzlement, economic participation in a business, harmful administration in a public sector economic unit, fraud in obtaining or diverting a subsidy, grant or credit, or corruption to the detriment of international trade or in the private sector;
- Insider dealing or market manipulation;
- And other offences referred to in Article 1(1) of Law 36/94, of 29 September, and Article 324 of the Industrial Property Code, and typical illicit acts punishable by imprisonment for a minimum term of more than 6 months or a maximum term of more than 5 years, as well as the property obtained therefrom.

- ✓ Anyone who converts, transfers, assists or facilitates any operation of conversion or transfer of advantages, obtained by themselves or a third party, directly or indirectly, with the aim of concealing their illicit origin, or of preventing the perpetrator or participant in such offences from being criminally prosecuted or subjected to a criminal reaction, shall be punished with imprisonment of up to 12 years.
- ✓ The same penalty applies to anyone who conceals or disguises the true nature, origin, location, disposition, movement or ownership of advantages, or the rights relating thereto.

Example: Transferring or converting a sum of money or property obtained by you or a third party in order to conceal its illicit origin or to avoid criminal liability. For example, entering into an agreement to justify a payment that is not due.

x. Fraud in Obtaining a Subsidy or Grant - article 36 of Decree-Law no. 28/84, of 20th January

- ✓ Whoever obtains a subsidy or grant:
 - Providing the competent authorities or bodies with inaccurate or incomplete information about themselves or third parties and concerning facts that are important for the award of the subsidy or grant;
 - Omitting, contrary to the provisions of the legal framework of the grant or subsidy, information on facts that are important for its award;
 - Using a document justifying entitlement to the grant or subsidy or facts important to its award, obtained through inaccurate or incomplete information;

It will be punishable by imprisonment of 1 to 5 years and a fine of 50 to 150 days.

- ✓ In particularly serious cases, the penalty is imprisonment for 2 to 8 years.
- ✓ If said acts are carried out on behalf of and in the interests of a legal person or company, exclusively or predominantly set up to carry them out, the court will order its dissolution in addition to the financial penalty.

xi. Diversion of Subsidy, Grant or Subsidised Credit - article 37 of Decree-Law no. 28/84 of 20 January

- ✓ Anyone who uses benefits obtained by way of a subsidy or grant for purposes other than those for which they were legally intended will be punished with imprisonment of up to 2 years or a fine of not less than 100 days.
- ✓ The same penalty shall apply to anyone who uses a benefit obtained under a subsidised credit for a

purpose other than that provided for in the credit line determined by the legally competent authority.

- ✓ The penalty is imprisonment for 6 months to 6 years and a fine of up to 200 days when the amount or damage caused is greater than €20,400.00.
- ✓ If the acts in question are repeatedly committed in the name and interest of a legal person or company and the damage has not been spontaneously repaired, the court will order its dissolution.

- ✓ If the agent, operating in the manner described, obtains credit worth more than €20,400.00, the penalty could rise to 5 years in prison and a fine of up to 200 days.

xii. Fraud in obtaining credit - article 38 of Decree-Law no. 28/84 of 20th January

- ✓ Whoever submits a proposal to grant, maintain or modify the terms and conditions of a credit intended for an establishment or company:
 - Providing inaccurate or incomplete written information intended to be believed or important for the decision on the application;
 - Using inaccurate or incomplete documents relating to the economic situation, such as balance sheets, profit and loss accounts, general descriptions of assets or expert reports;
 - Conceal deteriorations in the economic situation that have occurred in the meantime in relation to the situation described at the time of the credit application and that are important for the decision on the application;

Will be punished with imprisonment of up to 3 years and a fine of up to 150 days.

Annex II

Declaration of Knowledge and Commitment to Compliance

_____ **[name]**, as _____ **[position/role]** of Glantt Global, I hereby declare that I have taken full and complete cognisance of **Glantt Global's Code of Conduct and Professional Ethics**, and that I undertake, in a free and informed manner, to perform my duties in accordance with the regulations, principles and core values set out therein, to fulfil the duties arising from said standards and to strictly observe all the measures and procedures implemented for their development.

Place, Date

Signature